GW - 214

GENERAL CORRESPONDENCE

YEAR(S):

2000 - 1994

GW - 214
Pool Company
Hobbs Service Facility

MEMO TO FILE

On August 23, 2000, I attempted to visit and inspect the above facility and found out that Pool Co. had sold the property to Vulcan Enterprises. The property is now being operated as a trucking company yard. This trucking company hauls no liquids, only gravel, dirt, etc.

On August 29, 2000, in a telephone conversation with Benny Baldwin of Pool Company, I asked him to contact his Houston office and get them to mail me a copy of the sales agreement. He said he would do this and have them call me if they had any questions.

Pending questions:

1. What happened to all of the tanks? According to their discharge plan they had:
   2 - 500-gal above ground steel tanks, storing methanol and hydraulic fluid
   1 - 300-gal above ground steel tank, storing engine oil
   5 - 55-gal drums storing Varsol, kerosene, methanol, antifreeze and a corrosion inhibitor.

2. Does Pool Company currently operate such a facility in some other location in New Mexico?

3. Will Pool Company need a discharge plan at their (apparently) only remaining location south of the Carlsbad highway adjacent to the airport? This is the location where the SWD well is located. There was a spill at this location and remediation is complete. There are several tanks on the property, but according to Mr. Baldwin, these will not remain. Are they empty? Where will they go?

Ed Martin

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

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

March 28, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9481

Mr. Trip Ellison
Pool Company
515 West Greens Road, Suite 1000
Houston, Texas 77067

RE: Discharge Plan Renewal Notice for Pool Company Facility

Dear Mr. Ellison:

Pool Company has the following discharge plan which expires during the current calendar year.

GW-214 expires 9/25/2000 – Hobbs Service Facility

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

The discharge plan renewal application for each of the above facilities 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.

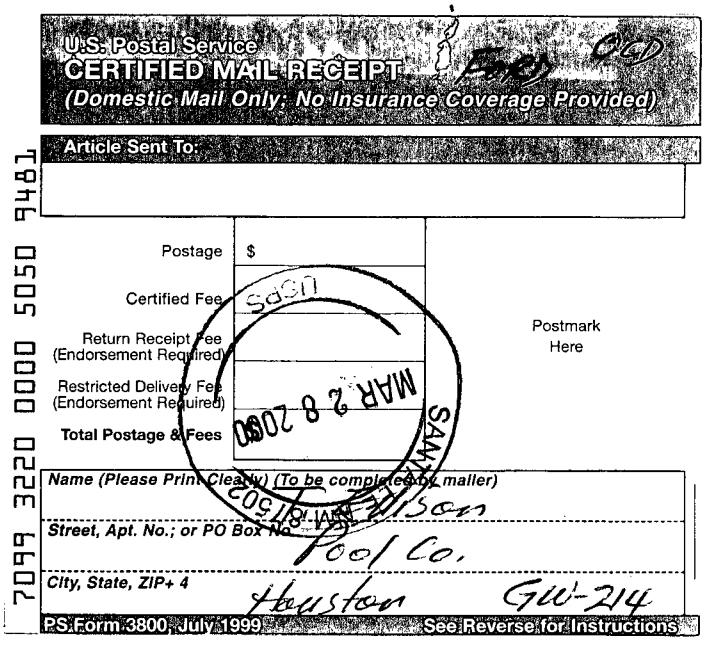
Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application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

If the above sited facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Pool Company has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 827-7156 as he has been assigned the responsibility for reviewing this discharge plan.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

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

March 14, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9344

Mr. Tim Parker
Pool Company
P.O. Box 1198
Hobbs, New Mexico 88240-1198

RE: Discharge Plan Renewal Notice for Pool Company Facility

Dear Mr. Parker:

Pool Company has the following discharge plan which expires during the current calendar year.

GW-214 expires 9/25/2000 – Hobbs Service Facility

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

The discharge plan renewal application for each of the above facilities 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.

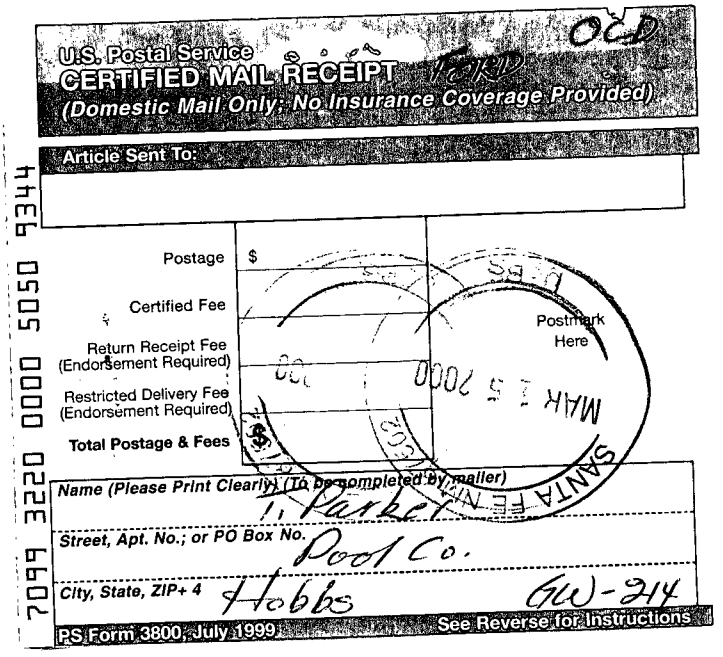
Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application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

If the above sited facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Pool Company has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

March 27, 1997

CERTIFIED MAIL
RETURN RECEIPT NO.P-288-258-795

Mr. Dick Bellis
POOL COMPANY
P.O. Box 1198
Hobbs, NM 88240-1198

RE: Bioremediation Plan Approval
"Stockpiled Soil"
Lea County, New Mexico

Dear Mr. Bellis:

The New Mexico Oil Conservation Division (OCD) has received the Pool Company bioremediation report dated March 25, 1997 submitted by "COMBEST GEOscience" representing Pool Company. The plan is approved for the Pool Company facility located at SW/4 SW/4, Section 36, Township 18 South, and Range 37 East, NMPM, Lea County, New Mexico. **The conditions of approval continue to be those as stated in the August 28, 1995 letter from OCD:**

1. The stockpiled soil will be remediated based on a groundwater depth of less than fifty (50') feet. **This is a category of greater than 20 according to the NMOCD guide--lines, and TPH must be less than 100 ppm, BTEX less than 50 ppm, and Benzene less than 10 ppm.**

2. The final approval for the remediation or offsite disposal will be obtained from the Santa Fe, NM OCD office. Upon completion of the bioremediation a final "Closure Report" will be submitted to the Santa Fe, NM OCD office for approval, with a copy sent to Mr. Wayne Price in the Hobbs District. The final report will include the final sampling data for confirmation of remediation activities.

NOTE: POOL has committed to sample the soil in April 1998, the results will be submitted to the OCD Santa Fe Office for approval with a copy to OCD Hobbs.

Be advised, that OCD approval does not relieve Pool Company of liability should it later be found that contamination exists which is beyond the scope of this work plan. In addition, OCD approval does not relieve POOL COMPANY of responsibility for compliance with any other federal, state, or other local laws and/or regulations.

If POOL has any questions regarding this matter feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - OCD

c: Hobbs- District office: Mr. Wayne Price.

P 288 258 795

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Pool Company -	
Street & Number BIREM plus	
Post Office, State, & ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

COMBEST GEOscience
Geotechnical / Hydrological Consulting and Testing

706 Austin
San Angelo, Texas 76903
(915) 655-4302

25 March 1997

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPT.
Oil Conservation Division
P.O. Box 6429
Santa Fe, New Mexico 87505
Attn: Mr. Patricio W. Sanchez, Petroleum Engineer

Subject: POOL COMPANY - HOBBS, NM
Bioremediation of Soil

Dear Mr. Sanchez:

As previously described in reports to the New Mexico OCD, soil at the subject facility is being bioremediated in a bermed and lined cell. To review the effectiveness of the bioremediation process, the soil was sampled by COMBEST GEOscience on 06 March 1997. Sampling was conducted by gridding the cell into 4 quadrants then collecting 9-part composite samples from each quadrant (total of 4 samples). For your review, current and previous results are summarized in Appendix A and individual laboratory data sheets along with QA/QC data are included in Appendix B.

According to all laboratory tests that have been performed, the soil in the cell contains TPH but is non-hazardous (Appendix A). TPH has decreased from 9750 mg/kg on 08 February 1995 to a range of 1650 mg/kg to 5438 mg/kg on 06 March 1997 (Appendix A).

POOL COMPANY would like to continue the bioremediation process and sample again during mid-April 1998. If you need any additional information, please call us. Thank you.

Sincerely,

Kyle B. Combest

Kyle B. Combest, CPG
Geologist/Project Manager

xc w/attachments:
Mr. Dick Bellis, POOL COMPANY - Hobbs, NM
Mr. Trip Ellison, POOL COMPANY - Houston, TX
Mr. Wayne Price, OCD Hobbs Office

APPENDIX A

LABORATORY DATA SUMMARY

PROJECT: POOL CO.
LOCATION: Hobbs, New Mexico
EST RESULTS: TPH, BTEX, MTBE

SPL NO.	DATE COLLECTED	DESCRIPTION	MATRIX	TPH	BTEX	BENZENE	TOLUENE	E-BENZ	XYLENE m&p	XYLENE o	MTBE	UNITS
1	19-Jul-93	Excavated Pile-N	Soil	3255	NA	<0.001	<0.001	<0.001	0.005	0.018	<0.001	mg/kg
2	19-Jul-93	Excavated Pile-SE	Soil	1652	NA	<0.001	<0.001	<0.001	0.002	0.008	<0.001	mg/kg
3	19-Jul-93	Excavated Pile-SW	Soil	2202	NA	<0.001	0.028	0.035	0.007	0.025	<0.001	mg/kg
4	19-Jul-93	South Wall-Floor Level	Soil	79.4	NA	<0.001	<0.001	0.012	0.009	0.004	<0.001	mg/kg
5	19-Jul-93	East Wall-Floor Level	Soil	661.4	NA	<0.001	<0.001	0.007	0.005	0.017	<0.001	mg/kg
6	19-Jul-93	West Wall-Floor Level	Soil	6972	NA	0.032	0.048	0.352	0.135	0.100	0.027	mg/kg
7	08-Feb-95	North Pit Wall	Soil	630	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
8	08-Feb-95	South Pit Wall	Soil	830	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
9	08-Feb-95	East Pit Wall	Soil	740	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
10	08-Feb-95	West Pit Wall	Soil	233	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
11	08-Feb-95	Floor (before overexcavation)	Soil	680	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
12	08-Feb-95	Stockpile	Soil	9750	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
13	23-Feb-95	Floor - Final (after overexcavation)	Soil	93	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
14	23-Feb-95	4' Below Floor - Final (after overexcavation)	Soil	<10	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01	NT	mg/kg
15	06-Mar-97	Stockpile-NW Section	Soil	2200	NT	NT	NT	NT	NT	NT	NT	mg/kg
16	06-Mar-97	Stockpile-SW Section	Soil	1650	NT	NT	NT	NT	NT	NT	NT	mg/kg
17	06-Mar-97	Stockpile-NE Section	Soil	2300	NT	NT	NT	NT	NT	NT	NT	mg/kg
18	06-Mar-97	Stockpile-SE Section	Soil	5438	NT	NT	NT	NT	NT	NT	NT	mg/kg
END												

Reference Methods: BTEX (EPA 602, 8020); MTBE (EPA 8020); TPH (EPA 418.1)

COMBEST GEOscience
San Angelo, Texas

PROJECT: POOL CO.
LOCATION: Hobbs, New Mexico

TEST: TCLP VOLATILES
SAMPLE: Stockpiled Soil
DATE COLLECTED: 08-Feb-95

COMPOUND	CONCENTRATION (mg/L)
BENZENE	<0.10
CARBON	<0.10
TETRACHLORIDE	<0.10
CHLOROBENZENE	<0.10
CHLOROFORM	<0.10
1,4-DICHLOROBENZENE	<0.10
1,2-DICHLOROETHANE	<0.10
1,1-DICHLOROETHENE	<0.10
METHYL ETHYL KETONE	<1.00
TETRACHLOROETHENE	<0.10
TRICHLOROETHENE	<0.10
VINYL CHLORIDE	<0.20

Reference Methods: EPA 1311/8240/1

TEST: TCLP METALS
SAMPLE: Stockpiled Soil
DATE COLLECTED: 08-Feb-95

METAL	CONCENTRATION (mg/L)
SILVER	<0.01
ARSENIC	0.1
BARIUM	1.0
CADMIUM	0.017
CHROMIUM	<0.010
MERCURY	<0.001
LEAD	0.071
SELENIUM	<0.250

Reference Methods: Silver, Arsenic, Barium, Cadmium, Chromium, Lead, and Selenium (EPA 1311/3015, 6010A);
Mercury (EPA 1311/7470, 7470)

TEST: MISCELLANEOUS
SAMPLE: Stockpiled Soil
DATE COLLECTED: 08-Feb-95

ANALYSIS	RESULT
CYANIDE, REACTIVE	<0.10 mg/Kg
CORROSIVITY (pH)	Non-corrosive
pH	8.5 std.units
IGNITABILITY (by definition)	Not Ignitable
REACTIVITY	Non-Reactive
TOTAL SOLIDS	93.2 %
SULFIDE, REACTIVE	<10.0 mg/Kg

Reference Methods: Cyanide, Reactive (EPA 9010); Corrosivity (pH) (EPA 9040/45); pH (EPA 9045);
Ignitability (40 CFR 261.21 /1); Reactivity (EPA 9010/9030); Total Solids (ASTM D2216);
Sulfide, Reactive (EPA 9030)

COMBEST GEOscience
San Angelo, Texas

APPENDIX B

LABORATORY DATA SHEETS

CHAIN-OF-CUSTODYS

QA/QC DATA

Attachment 4

Chain of Custody Record

ARD NAL LABORATORIES
PHONE: (505) 393-5326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

BEST AVAILABLE COPY

Project I.D. _____
Project Location Teal Yard, Carlsbad Hwy, Hobbs, N.M.
Sampled By J. A. Parker
Client Name Teal Company
Address P.O. Box 1198, Hobbs, N.M., 88240
Telephone 505-393-5161

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required: TPH	Analysis Required: BTEX	Remarks (Type sample, preservation, etc.)
1	2/19/03	11:20 A.M.			Abandoned Pile - North side of pit	1	✓	✓	Sample From Abandoned Leach Field at Washbay.
2		11:48 A.M.			" - South side of Pit - East	1	✓	✓	
3		11:55 A.M.			" - " " " - West	1	✓	✓	
4		12:02 P.M.			P.F - South Wall @ Floor level	1	✓	✓	
5		12:12 P.M.			" - East wall @ Floor level	1	✓	✓	
6					P.F - West wall @ Floor level	1	✓	✓	

Relinquished by: (Signature)	Date - Time	Received by: (Signature)	Remarks:	Shipped/Delivered
J. A. Parker	2/19/03 1:37 P.M.	Mike Taylor	EAST	
Relinquished by: (Signature)	Date - Time	Received by: (Signature)		

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TEXAS 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

BEST AVAILABLE COPY

FINAL ANALYSIS REPORT

Company: Pool Company
Address: P.O. Box 1198
City, State: Hobbs, NM 88241-1198

Date: 7/21/93
Lab#: H1294

Project Name: Pool Yard
Project Location: Hobbs
Sampled by: TP Date: 7/19/93 Time: 11:20
Analyzed by: SS/HM Date: 7/19/93 Time: 4:30
Type of Samples: Soil Sample Condition: GIST Units: ug/kg, ug/l

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE	MTBE
1	Exc.Pile-N.	3,255	<0.001	<0.001	<0.001	<0.001	0.005	0.018	<0.001
2	Exc.Pile-S.E.	1,652	<0.001	<0.001	<0.001	<0.001	0.002	0.008	<0.001
3	Exc.Pile-S.W.	2,202	<0.001	0.028	0.035	<0.001	0.007	0.025	<0.001
4	S.Wall-Floor L.	79.4	<0.001	<0.001	0.012	<0.001	0.009	0.004	<0.001
5	E.Wall-Floor L.	661.4	<0.001	<0.001	0.007	<0.001	0.005	0.017	<0.001
6	W.Wall-Floor L.	6,972	0.032	0.048	0.352	0.060	0.075	0.100	0.057
	QC Recovery	466.4	2.019	2.062	2.086	2.034	1.984	2.007	1.148
	QC Spike	405.9	2.147	2.103	2.162	2.110	2.128	2.083	1.329
	Accuracy	114.9%	94.0%	98.1%	96.5%	96.5%	93.2%	96.3%	86.4
	Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - AUTOMATED HEADSPACE GC; INFRARED SPECTROSCOPY
- EPA SW-846; EPA METHODS 8020, 418.1, 3540 OR 3510

Michael R. Fowler

Date 7/21/93

Attachment 5

CHAIN OF CUSTODY RECORD

Enviro-Tech *Laboratories, Inc.*

117 S. A&M Ave., San Angelo, Texas 76901
Phone: (915) 944-1302 / Fax: (915) 942-9693

Submitted By	Bill To
Company: COMBEST GEOSCIENCE	Company:
Address: 706 AUSTIN	Address:
SAN ANGELO TX 76903	
Contact:	Contact:
Phone: 915-655-4302	Phone:
Fax:	Fax:

Collected By (signature): R. RENEAU

Project Description: POOL CO - HOBBS, NM

REQUESTED ANALYSES

BTEX / TPH
TCLP VOLATILES
8 RCRA METALS (TCLP)
RCI

Page ___ of ___

Comment: 1 container collected from stockpile. ANALYZE ONLY 1. THE OTHER IS EXTRA IF NEEDED.

Laboratory Number (Lab Use Only)	COLLECTED Date	COLLECTED Time	TYPE Grab	TYPE Comp	Sample Identification	Number of Containers	Sample Matrix	BTEX / TPH	TCLP VOLATILES	8 RCRA METALS (TCLP)	RCI
95-2629-01	2/6/95	3:08	✓		N. WALL	1	S	✓			
-02	2/6/95	3:00	✓		S. WALL	1	S	✓			
-03	2/6/95	2:56	✓		E. WALL	1	S	✓			
-04	2/6/95	3:02	✓		W. WALL	1	S	✓			
-05	2/6/95	2:55		✓	FLOOR (3 PART COMP)	1	S	✓			
-06	2/6/95	3:08		✓	STOCKPILE	1	S	✓	✓	✓	✓

Preservatives added:

REQUESTED TURNAROUND TIME:
[✓] Standard [ ] 50% Rush [ ] 100% Emergency [ ] Other _____

LABORATORY TRANSFER
[ ] YES

Relinquished By (signature)	Date	Time	Received By (signature)	Date	Time
R. Reneau	2/9/95			2/10/95	11:30A
Relinquished By (signature)	Date	Time	Received By (signature)	Date	Time
Relinquished By (signature)	Date	Time	Received By (signature)	Date	Time

For Laboratory Use Only

Sample Temp. On Receipt:	[ ] Cool < 4° C	[ ] Other _____
Preservative Added By Lab:	[ ] None	[ ] Other _____
Sample Container Condition:	[ ] Acceptable	[ ] Unacceptable
Sample Holding Times:	[ ] Acceptable	[ ] Unacceptable

Comments:

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: N. Wall
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-01

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	630 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	92.0	Matrix Spike	94.0
tetrachloroethylene	86.0		
isopropylbenzene	82.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dirks
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: S. Wall
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-02

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	830 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	104.0	Matrix Spike	94.0
tetrachloroethylene	102.0		
isopropylbenzene	102.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Davis
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*
117 South A&M Avenue
San Angelo, Texas 76901
Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: E. Wall
MATRIX: Solid
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-03

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	740 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	104.0	Matrix Spike	94.0
tetrachloroethylene	106.0		
isopropylbenzene	104.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dirks
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: W. Wall
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-04

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	233 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	104.0	Matrix Spike	94.0
tetrachloroethylene	102.0		
isopropylbenzene	104.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dyer
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: Floor (3 Part Comp)
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-05

BEFORE OVEREXCAVATION

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	680 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	98.0	Matrix Spike	94.0
tetrachloroethylene	100.0		
isopropylbenzene	100.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dixon
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

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REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: Stockpile
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-06

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	9,750 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	74.0	Matrix Spike	94.0
tetrachloroethylene	72.0		
isopropylbenzene	52.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dirks
Enviro-Tech Laboratories, Inc.

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995
PREPARATION METHOD : EPA 1311/5030
PREPARED BY : GWG
PREPARED ON : 16-FEB-1995
ANALYSIS METHOD : EPA 1311/8240 /1
ANALYZED BY : RDG
ANALYZED ON : 20-FEB-1995
DILUTION FACTOR : 20
QC BATCH NO : ITS6-363

TCLP VOLATILE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Benzene	0.10 mg/L	< 0.10 mg/L
Carbon tetrachloride	0.10 mg/L	< 0.10 mg/L
Chlorobenzene	0.10 mg/L	< 0.10 mg/L
Chloroform	0.10 mg/L	< 0.10 mg/L
1,4-Dichlorobenzene	0.10 mg/L	< 0.10 mg/L
1,2-Dichloroethane	0.10 mg/L	< 0.10 mg/L
1,1-Dichloroethene	0.10 mg/L	< 0.10 mg/L
Methyl ethyl ketone	1.00 mg/L	< 1.00 mg/L
Tetrachloroethene	0.10 mg/L	< 0.10 mg/L
Trichloroethene	0.10 mg/L	< 0.10 mg/L
Vinyl chloride	0.20 mg/L	< 0.20 mg/L

Inchcape Testing Services
NDRC Laboratories

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Richardson, TX 75081
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REPORT NUMBER : D95-1304-1
ANALYSIS METHOD : EPA 1311/8240 /1

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
1,2-Dichloroethane-d4 (SS)	50.0 µg/L	98.9 %
Toluene-d8 (SS)	50.0 µg/L	95.0 %
Bromofluorobenzene (SS)	50.0 µg/L	90.5 %

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
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Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995

TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Silver	/1	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			
Arsenic	/1	0.1 mg/L	0.1 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 20-FEB-1995 by MDB QC Batch No : 10311			
Barium	/1	0.5 mg/L	1.0 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			
Cadmium	/1	0.010 mg/L	0.017 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 19-FEB-1995 by MES QC Batch No : 10311			
Chromium	/1	0.010 mg/L	< 0.010 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			

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TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Mercury	/1	0.001 mg/L	< 0.001 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 16-FEB-1995 by T_L Analyzed using EPA 7470 on 20-FEB-1995 by CGJ QC Batch No : HG-1248			
Lead	/1	0.050 mg/L	0.071 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			
Selenium	/1	0.250 mg/L	< 0.250 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 20-FEB-1995 by MDB QC Batch No : 10311			

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

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Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995

MISCELLANEOUS ANALYSES			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Cyanide, Reactive	/1	0.10 mg/Kg	< 0.10 mg/Kg
Analyzed using EPA 9010 on 14-FEB-1995 by GGD QC Batch No : 200053A/336024A			
Corrosivity(pH)	/1		Non-corrosive
Analyzed using EPA 9040/45 on 16-FEB-1995 by RLR QC Batch No : AB319032A			
pH	/1		8.5
Analyzed using EPA 9045 on 16-FEB-1995 by RLR QC Batch No : AB319032A			
Reactivity	/1		Non-reactive
Analyzed using EPA 9010/9030 on 14-FEB-1995 by GGD QC Batch No : 200053A/336024A			
Total Solids	/1	0.01 %	93.2 %
Analyzed using ASTM D2216 mod. on 16-FEB-1995 by PSS QC Batch No : 362062C			
Sulfide, Reactive	/1	10.0 mg/Kg	< 10.0 mg/Kg
Dilution Factor : 1 Analyzed using EPA 9030 on 14-FEB-1995 by GGD QC Batch No : 200053A/336024A			

Martin Jeffus
General Manager

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DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995
ANALYSIS METHOD : 40 CFR 261.21 /1
ANALYZED BY : KPP
ANALYZED ON : 18-FEB-1995
QC BATCH NO : 219057A

IGNITABILITY		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Ignitability (by Definition)		Not Ignitable *

* This sample does not meet the definition of ignitability according to 40 CFR 261.21

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

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Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Benzene	Carbon tetrachloride	Chlorobenzene	Chloroform	1,4-Dichlorobenzene
BATCH NO.	ITS6-363	ITS6-363	ITS6-363	ITS6-363	ITS6-363
LCS LOT NO.	F-0698	F-0698	F-0698	F-0698	F-0698
PREP METHOD	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	RDG	RDG	RDG	RDG	RDG
ANALYSIS METHOD	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	RDG	RDG	RDG	RDG	RDG
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500
MS RECOVERY %	129	103	93.7	86.3	82.7
MSD RECOVERY %	125	98.5	89.8	84.0	82.5
MS/MSD RPD %	3.15	4.47	4.25	2.70	0.24
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NA	NA	NA	NA	NA
LCS RECOVERY %	85.4	79.0	85.0	81.2	73.8
SPIKE SAMPLE ID	1371-4	1371-4	1371-4	1371-4	1371-4
DUP SAMPLE ID	---	---	---	---	---

NA Not applicable

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	1,2-Dichloroethane	1,1-Dichloroethene	Methyl ethyl ketone	Tetrachloroethene	Trichloroethene
BATCH NO.	ITS6-363	ITS6-363	ITS6-363	ITS6-363	ITS6-363
LCS LOT NO.	F-0698	F-0698	F-0698	F-0698	F-0698
PREP METHOD	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	RDG	RDG	RDG	RDG	RDG
ANALYSIS METHOD	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	RDG	RDG	RDG	RDG	RDG
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.00500	< 0.00500	< 0.05000	< 0.00500	< 0.00500
MS RECOVERY %	89.1	77.1	70.8	83.6	81.7
MSD RECOVERY %	87.5	75.9	69.9	78.1	78.9
MS/MSD RPD %	1.81	1.57	1.28	6.80	3.49
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NA	NA	NA	NA	NA
LCS RECOVERY %	80.6	74.2	61.8	76.6	77.2
SPIKE SAMPLE ID	1371-4	1371-4	1371-4	1371-4	1371-4
DUP SAMPLE ID	---	---	---	---	---

NA Not applicable

Inchcape Testing Services
NDRC Laboratories

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Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Vinyl chloride	Silver	Arsenic	Barium	Cadmium
BATCH NO.	ITS6-363	10311	10311	10311	10311
LCS LOT NO.	F-0698	491229	491229	491229	491229
PREP METHOD	EPA 1311/5030	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015
PREPARED BY	RDG	T_L	T_L	T_L	T_L
ANALYSIS METHOD	EPA 1311/8240	EPA 6010A	EPA 6010A	EPA 6010A	EPA 6010A
ANALYZED BY	RDG	JLW	MDB	JLW	MES
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.01000	<0.010000	<.100	<0.500	<.01
MS RECOVERY %	65.1	98.0	115	107	105
MSD RECOVERY %	63.6	100	113	108	106
MS/MSD RPD %	2.33	2.02	2.58	0.44	0.19
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NA	NC	NC	NC	NC
LCS RECOVERY %	60.6	103	116	106	107
SPIKE SAMPLE ID	1371-4	1345-1	1345-1	1345-1	1345-1
DUP SAMPLE ID	---	1345-1	1345-1	1345-1	1345-1

NA Not applicable
NC Not calculable

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 28-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Chromium	Mercury	Lead	Selenium	Cyanide, Reactive
BATCH NO.	10311	HG-1248	10311	10311	200053A/336024A
LCS LOT NO.	491229	AB300-6	491229	491229	AB-106-25-J
PREP METHOD	EPA 1311/3015	EPA 1311/7470	EPA 1311/3015	EPA 1311/3015	---
PREPARED BY	T_L	T_L	T_L	T_L	---
ANALYSIS METHOD	EPA 6010A	EPA 7470	EPA 6010A	EPA 6010A	EPA 9010
ANALYZED BY	JLW	CGJ	JLW	MDB	GGD
UNITS	mg/L	mg/L	mg/L	mg/L	mg/Kg
METHOD BLANK	<0.010	<.001	<0.050	<.25	< 0.10000
MS RECOVERY %	103	107	96.9	115	NA
MSD RECOVERY %	103	99.0	104	118	NA
MS/MSD RPD %	0.19	7.77	6.78	2.04	NA
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NC	NC	NC	NC	NA
LCS RECOVERY %	102	106	107	117	23.8
SPIKE SAMPLE ID	1345-1	1299-3	1345-1	1345-1	---
DUP SAMPLE ID	1345-1	1299-3	1345-1	1345-1	---

NA Not applicable
NC Not calculable

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Sulfide, Reactive	pH
BATCH NO.	200053A/336024A	AB319032A
LCS LOT NO.	AB-002-90-H	ERA 9963
PREP METHOD	---	---
PREPARED BY	---	---
ANALYSIS METHOD	EPA 9010	EPA 9040/45
ANALYZED BY	GGD	RLR
UNITS	mg/Kg	---
METHOD BLANK	< 10.0	NA
MS RECOVERY %	NA	NA
MSD RECOVERY %	NA	NA
MS/MSD RPD %	NA	NA
BS RECOVERY %	NA	NA
BSD RECOVERY %	NA	NA
BS/BSD RPD %	NA	NA
DUPLICATE RPD %	NA	3.87
LCS RECOVERY %	10.0	98.9
SPIKE SAMPLE ID	---	---
DUP SAMPLE ID	---	1308-1

NA Not applicable

Environmental Analytical Services

[redacted]

[redacted]Ave.
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[redacted]
[redacted]

[redacted]
[redacted]
[redacted]
[redacted]6

Chain of Custody Record

Project I.D. Pool Company P.O. Bx. 1198 Hobbs, N.M. 88240

Project Location 5730 W. Carlsbad Hwy Hobbs, N.M. 88240

Sampled By

Client Name Combest GEO Science

Address

Telephone 505-393-5161

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required: TPH/BTEX							Remarks (Type sample, preservation, etc.)
1	2/23/95	11:30 A.M.	✓		Excavated leech Field - Bottom of pit	1	X							95-2686-01
2	2/23/95	12:30 A.M.	✓		Samplehole dug to approx. 4' below GL.	1	X							-02

Released by: (Signature)	Date	Time	Received by: (Signature)
T.G. Parker	2/23/95	5:00 P.M.	U.P.S.
Released by: (Signature)	Date	Time	Received by: (Signature)

Enviro-Tech *Laboratories, Inc.*
117 South A&M Avenue
San Angelo, Texas 76901
Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED: 28 February,1995
REPORTED: 02 March,1995

PROJECT: Pool Company - Hobbs, NM
SAMPLE ID: Excavated leech Field-Bottom of Pit
MATRIX: Soil
COLLECTED: 23 February,1995
BTEX ANALYZED: 28 February,1995 by CWD
TPH ANALYZED: 01 March,1995 by CWD

REPORT NUMBER
95-2686-01

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH)	10	93 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2215	TPH QC	T2219
Method Blank	< 0.01	Method Blank	< 10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	0.0
a,a,a -trifluorotoluene	94.0	Matrix Spike	100.0
tetrachloroethylene	96.0		
isopropylbenzene	106.0		
Matrix Spike	99.3		

Comment:

Reviewed By: T Wayne Davis
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED: 28 February,1995
REPORTED: 02 March,1995

PROJECT: Pool Company - Hobbs, NM
SAMPLE ID: Sample hole dug to approx. 4' below G.L.
MATRIX: Soil
COLLECTED: 23 February,1995
BTEX ANALYZED: 28 February,1995 by CWD
TPH ANALYZED: 01 March,1995 by CWD

REPORT NUMBER
95-2686-02

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH)	10	< 10 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2215	TPH QC	T2219
Method Blank	< 0.01	Method Blank	< 10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	0.0
a,a,a -trifluorotoluene	92.0	Matrix Spike	100.0
tetrachloroethylene	92.0		
isopropylbenzene	102.0		
Matrix Spike	99.3		

Comment:

Reviewed By: Wayne D Duff

Enviro-Tech Laboratories, Inc.

CHAIN OF CUSTODY RECORD

Enviro-Tech *Laboratories, Inc.*

117 S. A&M Ave., San Angelo, Texas
Phone: (915) 944-1302 / Fax: (915)

Submitted By	Bill To
Company: Context Consulting	Company:
Address:	Address:
Contact:	Contact:
Phone:	Phone:
Fax:	Fax:

Collected By (signature):

Project Description: Pool Co. Hobbs N.M.

REQUESTED ANALYS: TPH

Page 1 of 1

Comment:

Laboratory Number (Lab Use Only)	COLLECTED Date	COLLECTED Time	TYPE Grab	TYPE Comp	Sample Identification	Number of Containers	Sample Matrix	Preservatives added:
97-226601	3/6/97	12:00p		X	Stock pile NW section	1	S	X
-02	↓	↓		X	Stock pile SW section	1	↓	X
-03	↓	↓		X	Stock pile NE section	1	↓	X
-04	↓	↓		X	stock pile SE section	1	↓	X

REQUESTED TURNAROUND TIME:
[ ] Standard [ ] 50% Rush [ ] 100% Emergency [ ] Other _____

LABORATORY TRANSFER
[ ] YES

Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:
	3/7/97	10:00A		3/7/97	10:00A
Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:
Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:

For Laboratory Use Only

Sample Temp. On Receipt:	[ ] Cool < 4° C	[ ] Other
Preservative Added By Lab:	[ ] None	
Sample Container Condition:	[ ] Acceptable	[ ] Other
Sample Holding Times:	[ ] Acceptable	

Comments:

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
706 Austin
San Angelo, TX 76903
Mr Kyle Combest

RECEIVED: 7 March 1997
REPORTED: 17 March 1997

REPORT NUMBER
97-2266 -01

PROJECT ID: Pool Co., Hobbs N.M.
SAMPLE ID: Stockpile NW section
MATRIX: Soil
COLLECTED: 6 March 1997

Requested Analyses	Reference Method	Date Prepared	Prep. By	Date Tested	Tested By	Det. Limits	Test Result	Units
Total Petroleum Hydrocarbons (TPH)	EPA 3550/418.1	03-07-97	CWD	03-07-97	CWD	10	2200	mg/Kg

Reviewed by: _____

Enviro-Tech *Laboratories, Inc.*

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
706 Austin
San Angelo, TX 76903
Mr Kyle Combest

RECEIVED: 7 March 1997
REPORTED: 17 March 1997

REPORT NUMBER
97-2266 -02

PROJECT ID: Pool Co., Hobbs N.M.
SAMPLE ID: Stockpile SW section
MATRIX: Soil
COLLECTED: 6 March 1997

Requested Analyses	Reference Method	Date Prepared	Prep. By	Date Tested	Tested By	Det. Limits	Test Result	Units
Total Petroleum Hydrocarbons (TPH)	EPA 3550/418.1	03-07-97	CWD	03-07-97	CWD	10	1650	mg/Kg

Reviewed by: _____

Enviro-Tech *Laboratories, Inc.*

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
706 Austin
San Angelo, TX 76903
Mr Kyle Combest

RECEIVED: 7 March 1997
REPORTED: 17 March 1997

REPORT NUMBER
97-2266 -03

PROJECT ID: Pool Co., Hobbs N.M.
SAMPLE ID: Stockpile NE Section
MATRIX: Soil
COLLECTED: 6 March 1997

Requested Analyses	Reference Method	Date Prepared	Prep. By	Date Tested	Tested By	Det. Limits	Test Result	Units
Total Petroleum Hydrocarbons (TPH)	EPA 3550/418.1	03-07-97	CWD	03-07-97	CWD	10	2300	mg/Kg

Reviewed by: _____

Enviro-Tech *Laboratories, Inc.*

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
706 Austin
San Angelo, TX 76903
Mr Kyle Combest

RECEIVED: 7 March 1997
REPORTED: 17 March 1997

REPORT NUMBER
97-2266 -04

PROJECT ID: Pool Co., Hobbs N.M.
SAMPLE ID: Stockpile SE section
MATRIX: Soil
COLLECTED: 6 March 1997

Requested Analyses	Reference Method	Date Prepared	Prep. By	Date Tested	Tested By	Det. Limits	Test Result	Units
Total Petroleum Hydrocarbons (TPH)	EPA 3550/418.1	03-07-97	CWD	03-07-97	CWD	10	5438	mg/Kg

Reviewed by: _____

Enviro-Tech *Laboratories, Inc.*

Quality Assurance / Quality Control Report

For Batch Number: 97-2266 -01

Analyte	Quality Control Number	Units	Method Blank	LCS Lot Number	LCS % Rec.	MS % Rec.	MSD % Rec.	MS/MSD RPD %	BS % Rec.	BSD % Rec.	BS/BSD RPD %	Dupe RPD %	Spike ID	Duplicate ID
Total Petroleum Hydrocarbons (TPH)	TPHS030797A	mg/Kg	< 10	97-S081	100.0	0.0	N/A	N/A	104.0	104.00	0.0	3.3		97-2270-01

LCS - Laboratory Control Sample
MS - Matrix Spike
MSD - Matrix Spike Duplicate
BS - Blank Spike
BSD - Blank Spike Duplicate
RPD - Relative Percent Difference
DUP - Duplicate Analyses

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 9:45 AM	Date 3-24-97

Originating Party	Other Parties
Kyle Combest - Consultant for Paal Co. Hobbs GW-214.	Pat Sanchez - OCD

Subject: TPH contaminated Soil at the GW-214 facility. (Bermed on a synthetic liner.)

Discussion: (1.) Mr. Combest will address the August 28, 1995 letter from OCD. (condition No. 1 & 2) - He said the only constituent was TPH, He will send OCD an update letter with the most recent analysis and a statement regarding their desire to continue to Bioremediate the Soil at the facility. I said Okay, but that they also need to committ to sampling the soil again Next April 1998 to see if TPH levels can be obtained and final approval to be considered by the OCD.

Conclusions or Agreements:

Mr. Combest agreed - said He would send the OCD a letter in the next few days to address the above. (Mail to OCD Santa Fe and cc Wayne in Hobbs.)

Distribution: File, Wayne Price.

Signed: Robert V. Sanchez

Pat Sanchez

From: Wayne Price
Sent: Wednesday, March 12, 1997 1:35 PM
To: Pat Sanchez
Subject: FW: Pool Co.-Hobbs GW-214

Correction 1000-5400 ppm not 100-5400 ppm.

From: Wayne Price
To: Pat Sanchez
Cc: Jerry Sexton
Subject: Pool Co.-Hobbs GW-214
Date: Wednesday, March 12, 1997 1:28PM

Received call from Kyle Combest (Pool's consultant), TPH values of bio-area is 100-5400 ppm 418.1.

Mr. Combest has requested list of NMOCD disposal facilities. These have been faxed to him.

Mr. Combest will be sending you a letter requesting permission to dispose of soils, he will CC district.

Pat Sanchez

From: Wayne Price
Sent: Wednesday, March 12, 1997 1:28 PM
To: Pat Sanchez
Cc: Jerry Sexton
Subject: Pool Co.-Hobbs GW-214
Importance: High

Received call from Kyle Combest (Pool's consultant), TPH values of bio-area is 100-5400 ppm 418.1.

Mr. Combest has requested list of NMOCD disposal facilities. These have been faxed to him.

Mr. Combest will be sending you a letter requesting permission to dispose of soils, he will CC district.

Pat Sanchez

From: Wayne Price
Sent: Thursday, February 13, 1997 7:19 AM
To: Pat Sanchez
Cc: Jerry Sexton
Subject: Pool Co. GW-214 Progress report of Bio-area.
Importance: High

Dear Mr. Sanchez,

Dick Bellis Pool's Mrg. called and indicated they are going to continue to remediated the soils. When the action levels are low enough then they will notify us for the ultimate disposition. They did not indicate a time frame.

Recommendation: Ask Pool for time schedule.

Please let me know if you require additional info.

Thanks You.

Mr. Bellis w/Pool Co. - Hobbs
Phone No. (505) - 393 - 5161

Spoke w/ Mr. Bellis, he will get with his Midland office and follow-up, He will also set w/Wayne price to look into a time schedule.

DMG
2-14-97

Pat Sanchez

From: Wayne Price
Sent: Monday, February 10, 1997 2:18 PM
To: Pat Sanchez
Cc: Jerry Sexton
Subject: Pool CO.-Hobbs
Importance: High

Per your request I met with Pool's yard Mgr. Mr. Dick Bellis.

The leech field and excavated area has been covered. The Bio-area is still active.

Mr. Bellis will give us a progress report in one week.

Pat Sanchez

From: Jerry Sexton
Sent: Friday, January 31, 1997 9:59 AM
To: Pat Sanchez
Subject: Registered: *Jerry Sexton*

Your message

To: Jerry Sexton
Subject: POOL COMPANY HOBBS FACILITY GW-214 - LEACH AREA CLOSURE STATUS
Sent: 1/31/97 8:55:00 AM

was read on 1/31/97 9:59:00 AM

Pat Sanchez

From: Wayne Price
Sent: Friday, January 31, 1997 9:10 AM
To: Pat Sanchez
Subject: Registered: Wayne Price

Your message

To: Wayne Price
Subject: POOL COMPANY HOBBS FACILITY GW-214 - LEACH AREA CLOSURE STATUS
Sent: 1/31/97 8:55:00 AM

was read on 1/31/97 9:10:00 AM

Pat Sanchez

From: System Administrator
Sent: Friday, January 31, 1997 8:55 AM
To: Wayne Price
Subject: Delivered: POOL COMPANY HOBBS FACILITY GW-214 - LEACH AREA CLOSURE STATUS
Importance: High

Your message

To: Wayne Price
Cc: Jerry Sexton
Subject: POOL COMPANY HOBBS FACILITY GW-214 - LEACH AREA CLOSURE STATUS
Sent: 1/31/97 8:55:57 AM

was delivered to the following recipient(s):

Wayne Price on 1/31/97 8:55:59 AM

Pat Sanchez

From: Pat Sanchez
Sent: Friday, January 31, 1997 8:55 AM
To: Wayne Price
Cc: Jerry Sexton
Subject: POOL COMPANY HOBBS FACILITY GW-214 - LEACH AREA CLOSURE STATUS
Importance: High

Mr. Price upon a review of the Pool company file, it appears as though (according to a letter dated August 28, 1995 from OCD) that they have not yet finalized the closure of the leach area. As your schedule allows I would like to request that you visit with Mr. Parker of Pool to determine the status of the closure.

Thanks!!!!!!

COMBEST GEOscience
Geotechnical / Hydrological Consulting and Testing
706 Austin
San Angelo, Texas 76903
(915) 655-4302

OIL CONSERV... DIVISION
RECEIVED
'95 SEP 21 AM 8 52

18 September 1995

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPT.
Oil Conservation Division
P.O. Box 6429
Santa Fe, New Mexico 87505
Attn: Mr. Patricio W. Sanchez, Petroleum Engineer

Subject: Discharge Plan GW-214
POOL COMPANY, Hobbs Facility
Lea County, New Mexico

Dear Mr. Sanchez:

In response to the NMOCD 28 Aug 1995 letter to POOL COMPANY, the following information is being added to the POOL COMPANY Discharge Plan.

- Covers will be constructed over secondary containment areas to prevent storm water accumulation;
- Hydrocarbon contaminated soils resulting from leaking rigs and/or trucks will be removed and placed in barrels. The barrels will be covered and stored on concrete. For determining disposal options, barrel contents will be characterized by using EPA sampling and laboratory methods. If the contents are non-hazardous, a NMOCD approved facility will be used for disposal. If the contents are hazardous, an approved hazardous waste facility will be used for disposal; and
- Waste paint cans that are disposed in the Waste Management dumpster will be empty and dry. Liquid wastes shall not be placed in the dumpster.

If you need additional information, please call. Thank you.

Sincerely,

Kyle B. Combest
Project Manager/Geologist

RECEIVED
SEP 21 1995
Environmental Bureau
Oil Conservation Division

xc: Mr. Tim Parker, POOL COMPANY - Hobbs, NM
Mr. Trip Ellison, POOL COMPANY - Houston, TX

Pool Company
Trip Ellison - Contact Person
515 West Greens Rd, Ste. 1000
Houston, TX 77067
281-874-0035

OIL CONSERVATION DIVISION

August 28, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.Z-765-963-037

Mr. Tim Parker
Area Manager
POOL Company
P.O. Box 1198
Hobbs, NM 88240-1198

RE: Bioremediation Plan Approval
"Stockpiled Soil"
Lea County, New Mexico

Dear Mr. Parker:

The New Mexico Oil Conservation Division (OCD) has received the Pool Company bioremediation plan dated August 1, 1995 submitted by "COMBEST GEOscience" representing Pool Company. The plan is approved for the Pool Company facility located at SW/4 SW/4, Section 36, Township 18 South, and Range 37 East, NMPM, Lea County, New Mexico. **The conditions outlined below shall serve as basis for the approval:**

1. The stockpiled soil will be remediated based on a groundwater depth of less than fifty (50') feet. **This is a category of greater than 20 according to the NMOCD guidelines, and TPH must be less than 100 ppm, BTEX less than 50 ppm, and Benzene less than 10 ppm.**

2. The final approval for the remediation or offsite disposal will be obtained from the Santa Fe, NM OCD office. Upon completion of the bioremediation a final "Closure Report" will be submitted to the Santa Fe, NM OCD office for approval, with a copy sent to Mr. Wayne Price in the Hobbs District. The final report will include the final sampling data for confirmation of remmediation activities.

Note, that OCD approval does not relieve Pool Company of liability should it later be found that contamination exists which is beyond the scope of this work plan. In addition , OCD approval

does not relieve POOL COMPANY of responsibility for compliance with any other Federal, State , or other local laws and/or regulations. If you have any questions regarding this matter feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer, Environmental Bureau OCD

XC: Hobbs- District office: Mr. Jerry Sexton and Mr. Wayne Price.

Z 765 963 037

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

Sent to Tim Parker - Bio Rem.	
Street and No.	
P.O., State and ZIP Code	
Postage	$
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
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PS Form 3800, March 1993

COMBEST GEOscience
Geotechnical / Hydrological Consulting and Testing

706 Austin
San Angelo, Texas 76903
(915) 655-4302

1 August 1995

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPT.
Energy, Minerals, and Natural Resources
P.O. Box 6429
Santa Fe, New Mexico 87505
Attn: Mr. Patricio W. Sanchez, Petroleum Engineer

Subject: Bioremediation of soil at POOL COMPANY - Hobbs, NM

Dear Mr. Sanchez:

POOL COMPANY in Hobbs, New Mexico would like to begin a bioremediation project for the stockpiled soil described in the 08 March 1995 report entitled, "Closure of Unlined Surface Impoundment at Pool Company, Hobbs, New Mexico".

The attached information describes the proposed bioremediation project. Please call if you have any questions or comments. Thank you.

Sincerely,

Kyle B. Combest
Project Manager/Geologist

enclosure

xc with enclosures:
Mr. Tim Parker, POOL COMPANY, Hobbs, New Mexico
Mr. Wayne Price, New Mexico OCD, Hobbs, New Mexico

PROPOSED BIOREMEDIATION PROJECT

AT POOL COMPANY

HOBBS, NEW MEXICO

01 August 1995

Prepared by:

Kyle B. Combest
COMBEST GEOscience
San Angelo, Texas

PROPOSED BIOREMEDIATION PROJECT AT POOL COMPANY HOBBS, NEW MEXICO

1.0 INTRODUCTION

POOL COMPANY at Hobbs, New Mexico would like to begin a bioremediation project for the stockpiled soil described in the 08 March 1995 report entitled, "Closure of Unlined Surface Impoundment at Pool Company, Hobbs, New Mexico" (Reneau and Combest, 1995). The following information briefly discusses the proposed bioremediation project.

Previous projects have shown that bioremediation processes are capable of remediating soils contaminated with petroleum hydrocarbons such as gasoline, diesel fuel, crude oil, and creosote (Kamnikar, 1992; Kabrick et al., 1989). Other bioremediation projects have included the remediation of soils contaminated with pesticides, chlorinated solvents such as methylene chloride, and aromatic hydrocarbons such as pentachlorophenol, naphthalene, anthracene, and benzopyrene (Moore, 1992; U.S. EPA, 1988). Bioremediation treatments for petroleum hydrocarbons have been particularly successful through land treatment and composting (Kamnikar, 1992; Williams and Myler, 1990).

To summarize the process, indigenous bacterial populations at any given location are capable of metabolizing organic compounds (such as hydrocarbons) to obtain energy. During the metabolic process, organic carbon is transformed to an inorganic carbon form. If the process is aerobic, the transformation is accomplished through enzymatic oxidation with molecular oxygen functioning as the electron acceptor. If the process is

anaerobic, a compound other than molecular oxygen such as sulfate (SO_4) or nitrate (NO_3) functions as the terminal electron acceptor. The final products of anaerobic degradation are usually methane (CH_4), carbon dioxide (CO_2), water, and biomass. The final products of aerobic degradation are usually carbon dioxide (CO_2), water, and biomass. Because of the faster rate of degradation and lack of obnoxious odors, aerobic degradation is typically the preferred process and is the process that will be used at the Hobbs POOL COMPANY facility.

The efficiency of the process is significantly influenced by the physical conditions supporting the bacteria cultures. To provide suitable conditions, the following items shall be considered in the Hobbs bioremediation project:

- Microorganisms (natural indigenous organisms can function after a brief acclimation to the physical conditions);
- Oxygen (greater than 0.2 mg/l dissolved oxygen, minimum air-filled pore space of 10%);
- Nutrients (Nitrogen, Phosphorous, and other nutrients);
- Proper moisture (25-85% of holding capacity); and
- Maintaining proper pH (5.5-8.5).

Efforts will be principally aimed at optimizing oxygen and nutrients. Rainfall events should also provided additional nutrients along with maintaining moisture requirements. Bacterial degradation tends to make the pH more acidic and lime is often added to offset this process. However, with the caliche soil ($CaCO_3$) at the Hobbs facility, maintaining proper pH is not considered a problem in this particular case.

2.0 METHODS

The following activities will be conducted to enhance the bioremediation process:

- The soil will be thoroughly tilled and fertilized with a 35-9-3 fertilizer. The fertilization rate will follow the manufacturer's recommendation for lawn starter;

- High protein hay will also be tilled into the soil to form a compost, thus increasing nutrients and pore space;

- Clean well-water will be sprayed over the soil to increase the moisture content to approximately 50% of holding capacity;

- The soil will be tilled monthly to maintain aerobic conditions; and

- Moisture conditions and the overall integrity of the cell will be monitored weekly.

For documentation of the above listed activities, records will be updated with each activity and maintained onsite. The records will be available at anytime for New Mexico OCD inspection.

To evaluate the effectiveness of the treatment, quarterly field sampling will be conducted. Sampling will be accomplished by dividing the cell into 4 quadrants from which 9-part composite samples will be collected from each quadrant. After sampling, the 4 samples will be kept in a cooler and transported to the laboratory for analysis of total petroleum hydrocarbons (TPH). The analytical method for TPH requires a fluorocarbon 113 soil digestion followed by infra-red spectroscopy (EPA 418.1).

Previous analytical results have demonstrated that BTEX compounds and TCLP volatile organics are below detection limits in the stockpiled soil (Reneau and Combest, 1995). Additionally, the stockpiled soil displays no RCI and TCLP metals are below TCLP concentrations listed in Table 1 of 40 CFR 261.24 (Reneau and Combest, 1995).

Local ground-water levels will be measured to determine appropriate TPH target concentrations and disposal options as follows:

- If the depth to the uppermost ground-water bearing formation is less than 50-ft and TPH concentrations are less than 100 mg/kg, the soil may be placed in the excavation;

- If the depth to the uppermost ground-water bearing formation is less than 50-ft and TPH concentrations are greater than 100 mg/kg, the soil will be transported with a waste manifest to an approved RCRA disposal facility;

- If the depth to the uppermost ground-water bearing formation is greater than 50-ft and TPH concentrations are less than 1000 mg/kg, the soil may be placed in the excavation; or

- If the depth to the uppermost ground-water bearing formation is greater than 50-ft and TPH concentrations are greater than 1000 mg/kg, the soil will be transported with a waste manifest to an approved RCRA disposal facility.

3.0 CONCLUSIONS

POOL COMPANY is prepared to initiate the bioremediation project immediately after receiving verbal or written approval by the New

Mexico OCD. Mr. Tim Parker can be reached by telephone at 505-393-5161 in Hobbs, New Mexico.

4.0 REFERENCES

Kabrick, R., D. Sherman, M. Coover, and R. Loehr, 1989, Biological Treatment of Petroleum Refinery Sludges. Presented at the Third International Conference on New Frontiers for Hazardous Waste Management, Remediation Technologies, Inc. Pittsburgh, PA.

Kamnikar, B., 1992, Bioremediation of Contaminated Soil. Pollution Engineering, November 1992.

Moore, R.E., Jr., 1992, Enhanced Bioactivity Treats Hydrocarbon Contaminated Soil. The National Environmental Journal, January 1992.

Reneau, R.R. and K.B. Combest, 1995, Closure of Unlined Surface Impoundment at Pool Company, Hobbs, New Mexico. Report prepared by Combest Geoscience, San Angelo, Texas for Pool Company.

U.S. Environmental Protection Agency (EPA), 1988, Technology Screening Guide for Treatment of CERCLA Soils and Sludges. EPA/540/2-88/004. U.S. Environmental Protection Agency.

Williams, R.T. and C.A. Myler, 1990, Bioremediation Using Composting. BioCycle, November 1990.

MEMORANDUM OF MEETING OR CONVERSATION

___TELEPHONE X PERSONAL TIME 8:30 (AM)/PM DATE 7/26/95

ORIGINATING PARTY: Pat Sanchez - OCD
OTHER PARTIES: Bill Olsen - OCD

SUBJECT: Pool Co. Remmediation.

DISCUSSION: Pool used a groundwater depth of 65' - they should of used a depth of 43'. Risk factor changes from 10 to 20. TPH changes to 100 PPM. This will effect their remmediation level for the soil if they desire to place it back in the hole. TPH will have to be less 100 PPM instead of 1,000 ppm.

The bottom of the Pit shows 93 ppm per the Pool Co. report dated. March 8, 1995

CONCLUSIONS/AGREEMENTS: Pool needs to submit quarterly samples according to their 11/8/94 Submittal. Also they have not responded to the April 28, 1995 letter from Bill Olsen and need to do so. If pool wants to place remmiated dirt back in the hole they need to have a TPH of 100ppm for the remmiated dirt.

PATRICIO W. SANCHEZ: Patricio W. Sanchez

xc: FILE, Bill Olson, Wayne Price.

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

April 28, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-251

Mr. Tim Parker
Area Manager
Pool Company (Texas) Inc.
Carlsbad Highway
P.O. Box 1198
Hobbs, New Mexico 88240

RE: PIT CLOSURE
POOL CO. HOBBS SERVICE FACILITY

Dear Mr. Parker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Pool Company (Texas) Inc. (PCI) March 8, 1995 "CLOSURE OF UNLINED SURFACE IMPOUNDMENT AT POOL COMPANY, HOBBS, NEW MEXICO" which was submitted on behalf of PCI by their consultant COMBEST GEOscience. This document contains the results of PCI's closure of an unlined pit at PCI's service company yard in Hobbs, New Mexico.

The closure actions taken to date are satisfactory. However, the OCD cannot issue final closure approval for the pit until remediation of the stockpiled soils is complete. Therefore, the OCD requests that PCI provide the OCD with:

1 The proposed bioremediation method for the stockpiled soils including the composition of the materials proposed to be used for enhancing bioremediation.

2. The proposed final disposition of the stockpiled soils upon completion of bioremediation.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price , OCD Hobbs Office
Kyle B. Combest, COMBEST GEOscience

P 667 242 251

Certified Mail Receipt

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Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, June 1990

Fold at line over top of envelope to the right of the return address.

Bill Olson

From: Bill Olson
To: Jerry Sexton
Cc: Wayne Price
Subject: Pool Company Pit Closure
Date: Wednesday, April 26, 1995 3:59PM
Priority: High

Attached is a draft letter approving of the pit closure work at the Pool Co. Please provide me with any comments in writing by 4:00 pm on4/28/95. Thanks!

<<File Attachment: PITCLOS2.APR>>

Bill Olson

From: POSTOFFICE
To: Bill Olson
Subject: Registered: Wayne Price
Date: Thursday, April 27, 1995 7:09AM

[013] ***** CONFIRMATION OF REGISTERED MAIL *****
Your message:

TO: Wayne Price DATE: 04-26-95
SUBJECT: Pool Company Pit Closure TIME: 15:54

Was accessed on 04-27-95 07:09

Bill Olson

From: Wayne Price
To: Bill Olson
Cc: Wayne Price; Jerry Sexton
Subject: Pool Company Pit Closure-Response
Date: Thursday, April 27, 1995 8:13AM
Priority: High

Dear Bill,

For your information, the depth to ground water in this area is 45 to 50 feet from surface to top of water. Nowsco (Ritter Envir.) just drilled two MW's and this was their findings. Nowsco is located east of Pool Co. approximately 300 yards.

Thanks!

Ps: Let me know if you need any more info.

Bill Olson

From: Jerry Sexton
Date sent: Thursday, April 27, 1995 9:58AM
To: Bill Olson
Subject: Registered: Jerry Sexton

Your message
To: Jerry Sexton
Subject: Pool Company Pit Closure
Date: Wednesday, April 26, 1995 3:59PM
was accessed on
Date: Thursday, April 27, 1995 9:58AM

COMBEST GEOscience
Environmental Consulting and Testing

706 Austin
San Angelo, Texas 76903
(915)655-4302

8 March 1995

Mr. William C. Olson
NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPT.
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: POOL COMPANY surface impoundment closure.

Dear Mr. Olson:

At POOL COMPANY in Hobbs, New Mexico, surface impoundment closure has been completed according to the 08 November 1994 closure plan and your 05 January 1995 response letter. Enclosed please find a report describing the closure methods and results. A copy of the report has also been forwarded to the Hobbs OCD office. Thank you.

Sincerely,

Kyle B. Combest
Environmental Geologist

Enclosure

xc: Wayne Price - Hobbs OCD
Tim Parker - POOL COMPANY Hobbs, NM
Nick Petronio - POOL COMPANY Houston, TX

COMBEST GEOscience

Environmental Consulting and Testing

7122 Wood Hollow #7
Austin, Texas 78731
(512) 345-1063

CLOSURE OF UNLINED

SURFACE IMPOUNDMENT

AT POOL COMPANY

HOBBS, NEW MEXICO

08 March 1995

Prepared by:
Randall R. Reneau and Kyle B. Combest
COMBEST GEOscience
Austin and San Angelo, Texas

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CLOSURE OF UNLINED SURFACE IMPOUNDMENT AT POOL COMPANY HOBBS, NEW MEXICO

1.0 INTRODUCTION

Closure of an unlined surface impoundment has been completed at the POOL COMPANY facility in Hobbs, New Mexico (Figure 1; Figure 2). Closure activities followed the requirements listed in the following documents:

- Report prepared for POOL COMPANY and entitled "Unlined surface impoundment closure plan for POOL COMPANY Hobbs, New Mexico" (Combest Geoscience, 1995); and

- Letter dated 05 January 1995 from the New Mexico Oil Conservation Division (Appendix A) stating conditional approval for the above referenced closure plan.

The facility is located west of Hobbs along the north side of U.S. Highway 180 (Figure 1). A further detailed description of the facility and facility history can be found in the closure plan (Combest Geoscience, 1995).

Closure activities most importantly required overexcavation of the impoundment and placing the excavated soil in a bermed and lined bioremediation cell. The following report describes the project methods and results.

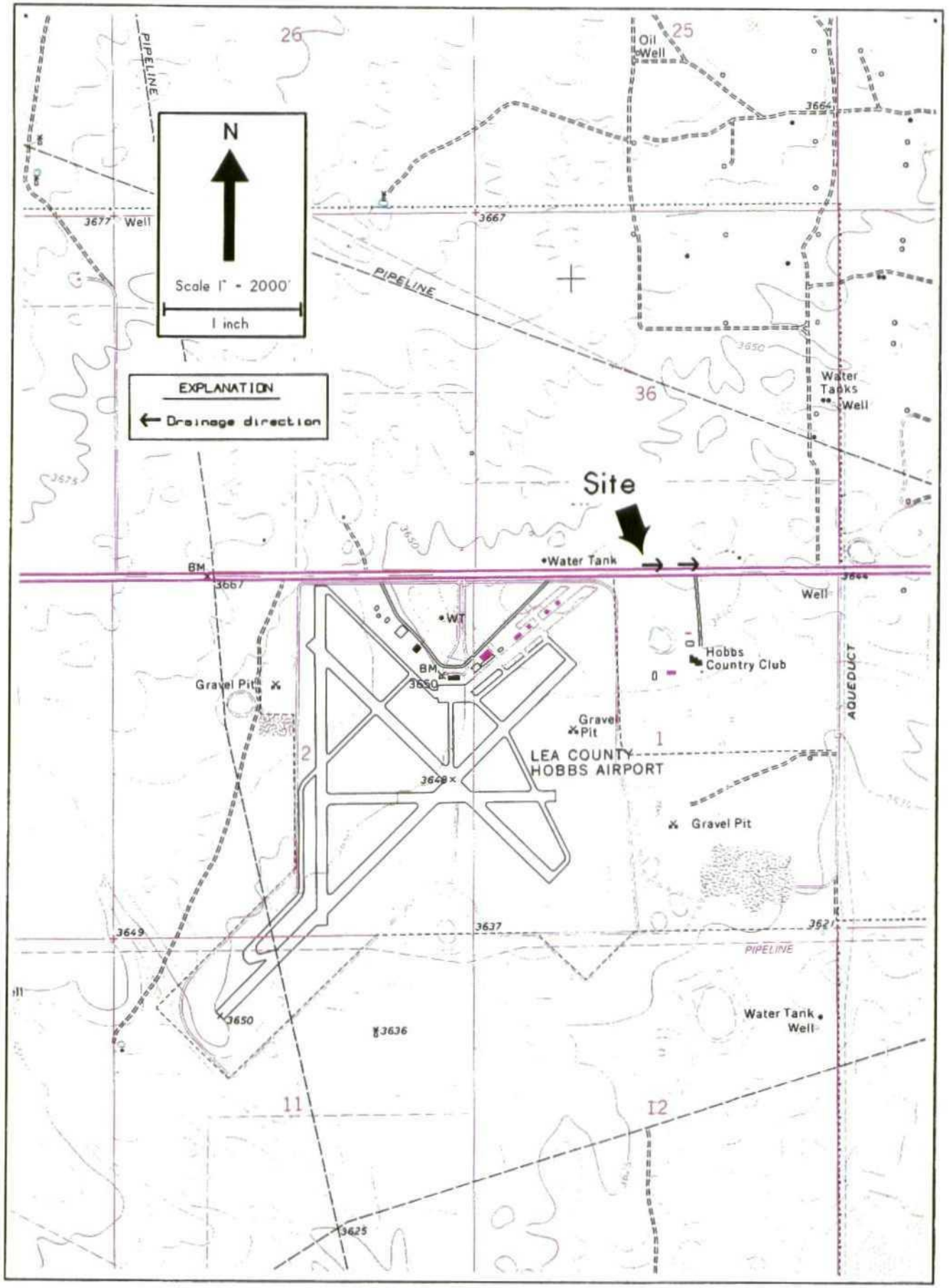
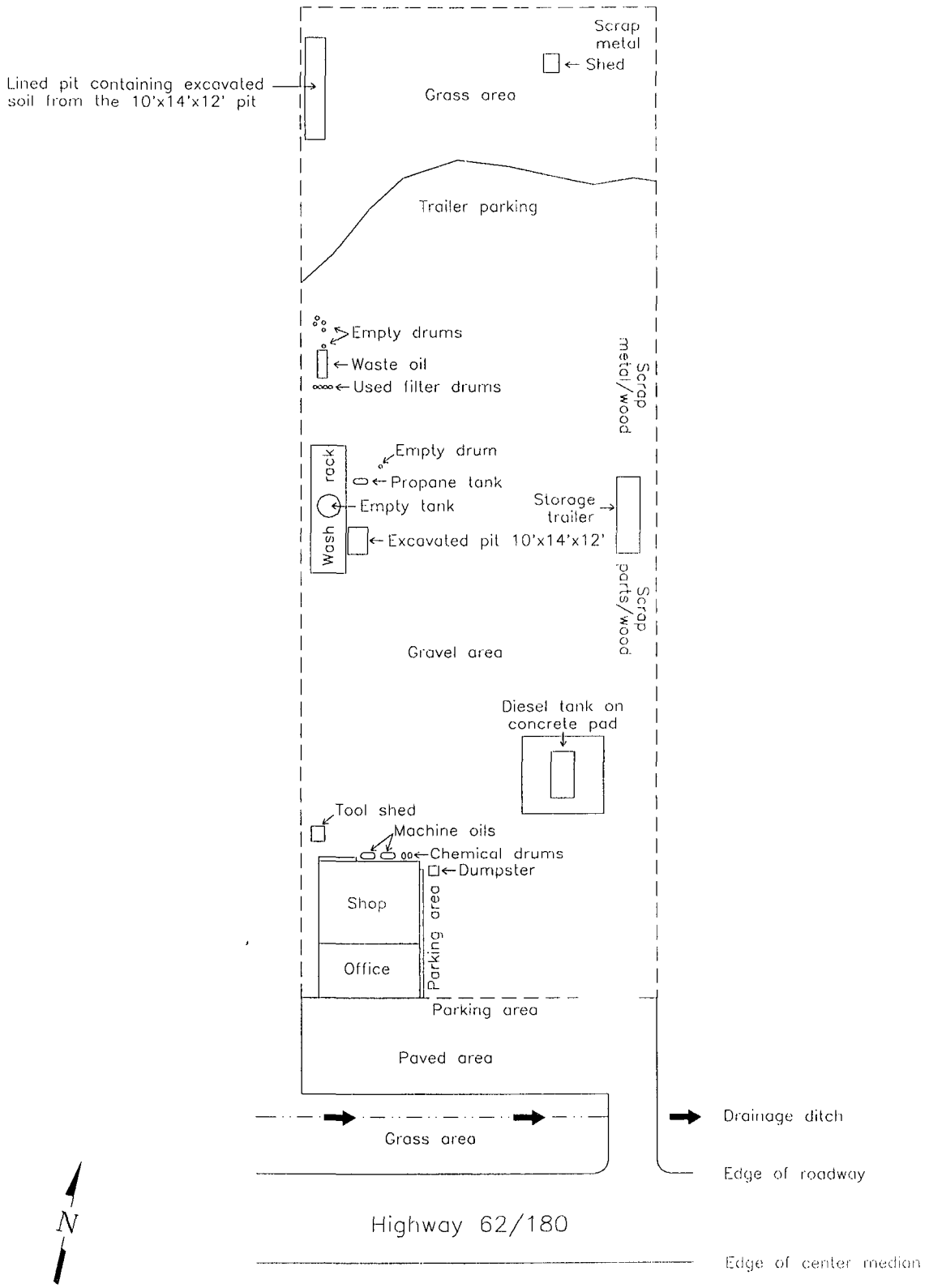


Figure 1. U.S.G.S. topographic map (1:24,000).



COMBEST GEOSCIENCE Austin, Texas Prepared by: L & L DRAFTING Date: 19 FEBRUARY 1995	SCALE 1" = 80' 1 inch	LEGEND Fence Drainage Direction	POOL COMPANY HOBBS, NEW MEXICO SITE MAP FIGURE 2

2.0 METHODS

The following sections describe field methods and laboratory methods.

2.1 Field Methods

Mr. Wayne Price, environmental engineer with the State of New Mexico Oil Conservation Division (District One) was notified on 07 February 1995 of closure activities that were planned for 08 February 1995. Mr. Price visited the facility on 08 February 1995 as closure activities were being conducted.

A bermed, lined bioremediation cell was first constructed by using a backhoe (Figure 2; Appendix B, Photograph No. 2). The finished size of the lined cell was approximately 12-ft wide, 75-ft long, and approximately 2-ft deep. The finished heights of the containment berms were approximately 3-ft (Appendix B, Photograph No. 2).

As the impoundment was being excavated, all excavated soil was placed in the lined bioremediation cell (Appendix B, Photograph No. 2).

Excavation activities revealed that the impoundment had originally been infilled with sand and gravel. From periodic use, the sand and gravel had acquired hydrocarbon staining and a noticeable hydrocarbon odor.

After completely removing all of the sand and gravel, the original impoundment dimensions were found to be 10-ft X 14-ft and approximately 10-ft deep (Appendix B, Photographs No. 4-6). An examination of the impoundment after removing the sand and gravel found that the walls and floor were composed of hard,

indurated caliche. A further examination of the caliche walls and floor revealed localized hydrocarbon staining. The backhoe was then used to overexcavate the stained caliche as determined by visual and olfactory examinations. In the floor, some stains had penetrated 6-in to 10-in into the caliche below the original impoundment floor. To reasonably assure that the floor had been sufficiently excavated, a 24-in layer of caliche was ultimately excavated from the floor. After overexcavation activities were complete, the final dimensions were 10-ft X 14-ft and 12-ft deep (Appendix B, Photographs 7-8).

To verify the success of clean-up activities, soil samples were collected from the base of the north, south, east, and west walls. From the floor, three-part composite samples were collected at the following times: (1) during the intermediate stage of overexcavation and (2) after final completion of overexcavation. From the stockpiled soil in the lined bioremediation cell, a three-part composite sample was also collected.

To establish background TPH values, a clean soil sample was collected at a depth of 4-ft from a location 10-ft inside the north fence line. All samples were stored on ice and transported to Enviro-Tech Laboratories in San Angelo, Texas for analyses (Chain of Custody in Appendix C).

2.2 Laboratory Methods

All samples were analyzed for BTEX (EPA method 8020) and TPH (EPA method 418.8).

The BTEX analysis measures light fuel concentrations by separating aromatic organics with a purge-and-trap followed by gas chromatograph (GC) analysis. In the GC, the various organic

compounds move through the chromatography column at specific rates for each compound. Each compound is then quantified as it eludes off the chromatography column through a photo ionization detector (PID).

The TPH analysis determines amounts of weathered gasoline and heavy fuels such as diesel. The procedure first requires separation of the fuel from the soil with fluorocarbon 113 followed with infra-red spectroscopy analysis. The infra-red absorption peaks for the fuel constituents are compared with an oil standard for quantification.

In addition to the above analyses, the soil sample collected from the stockpile was analyzed at Inchscape Laboratories in Richardson, Texas for RCRA hazardous waste characteristics (TCLP volatiles, 8 TCLP metals, and RCI).

3.0 RESULTS

For documentation purposes, a New Mexico OCD closure form was completed and is attached in Appendix D. Results from the hydrocarbon analyses are summarized in Table 3.1.

Additional analytical results for the stockpile sample are summarized in Tables 3.2, 3.3, 3.4 and, 3.5.

Table 3.1 Laboratory results summary (hydrocarbons).

SAMPLE LOCATION	TPH	BTEX	BENZENE	TOLUENE	ETHYL-BENZENE	XYLENE (m,p)	XYLENE (o)
N. WALL	630	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01
S. WALL	830	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01
E. WALL	740	<0.01	<0.01	<0.01	<0.01	<0.02	<0.1
W. WALL	233	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01
FLOOR - Intermediate	680	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01
FLOOR - Final	93	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01
BACKGROUND	<10	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01
STOCKPILE	9750	<0.01	<0.01	<0.01	<0.01	<0.02	<0.01

All concentrations in mg/kg

Copies of laboratory data sheets are included in Appendix C.

Samples collected on 8 February 1995

Table 3.2 Stockpiled Soil: TCLP Volatile Organics.

COMPOUND	**CONCENTRATION (mg/L)**
BENZENE	<0.10
CARBON TETRACHLORIDE	<0.10
CHLOROBENZENE	<0.10
CHLOROFORM	<0.10
1,4-DICHLOROBENZENE	<0.10
1,2-DICHLOROETHANE	<0.10
1,1-DICHLOROETHENE	<0.10
METHYL ETHYL KETONE	<1.00
TETRACHLOROETHENE	<0.10
TRICHLOROETHENE	<0.10
VINYL CHLORIDE	<0.20

All concentrations in mg/l.

Copies of laboratory data sheets are included in Appendix C.

Sample collected on 8 February 1995.

Table 3.3 Stockpiled Soil: TCLP Metals.

METAL	CONCENTRATION (mg/L)
ARSENIC	0.1
BARIUM	1.0
CADMIUM	0.017
CHROMIUM	<.010
LEAD	0.071
MERCURY	<0.001
SELENIUM	<0.250
SILVER	<0.01

All concentrations in mg/l.

Copies of laboratory data sheets are included in Appendix C.

Sample collected on 8 February 1995.

Table 3.4 Stockpiled Soil: Miscellaneous Analyses.

ANALYSIS	RESULT
CORROSIVITY (pH)	NON-CORROSIVE
CYANIDE, REACTIVE	<0.10
REACTIVITY	NON-REACTIVE
SULFIDE, REACTIVE	<10.0
TOTAL SOLIDS	93.2%
pH	8.5

Copies of laboratory data sheets are included in Appendix C.

Sample collected on 8 February 1995.

Table 3.5 Stockpiled Soil: Ignitability.

ANALYSIS	RESULT
IGNITABILITY (by definition)	NOT IGNITABLE

Copies of laboratory data sheets are included in Appendix C.

Samples collected on 8 February 1995.

4.0 CONCLUSIONS

Analytical results verified that the impoundment walls and floor had been cleaned to New Mexico OCD target levels (<1000 mg/l TPH, <10 mg/l Benzene, <50 mg/l BTEX) based on the Remediation and Closure Report ranking score of 10 (Appendix D). Upon receipt of closure approval from the New Mexico OCD, the overexcavated impoundment will be backfilled with clean fill and leveled to grade.

Stockpiled soil in the lined bioremediation cell will be treated with conventional bioremediation methods. However, before any bioremediation method is initiated, a proposal shall first be submitted to the New Mexico OCD for review and approval. Once the proposal is approved and the bioremediation method established, sampling shall be conducted on a quarterly basis. Disposal options will be evaluated as TPH concentrations decrease during the bioremediation program. Any disposal option that is selected will be in full compliance with New Mexico regulations.

5.0 REFERENCES

Combest Geoscience, 1995, Unlined surface impoundment closure plan for POOL COMPANY Hobbs, New Mexico. Report prepared by Combest Geoscience, Austin, Texas for Pool Company.

New Mexico Oil Conservation Division, 1993, Unlined Surface Impoundment Closure Guidelines.

New Mexico Oil Conservation Division letter dated 05 January 1995 to POOL COMPANY.

APPENDIX A

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

January 5, 1995

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-193

Mr. Tim Parker
Area Manager
Pool Company (Texas) Inc.
Carlsbad Highway
P.O. Box 1198
Hobbs, New Mexico 88240

RE: UNLINED PIT CLOSURE PLAN

Dear Mr. Parker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Pool Company (Texas) Inc. (PCI) November 8, 1994 "UNLINED SURFACE IMPOUNDMENT CLOSURE PLAN FOR POOL COMPANY, HOBBS, NM". This document contains PCI's plan for closure of an unlined pit at PCI's service company yard in Hobbs, New Mexico.

The above referenced pit closure plan **is approved with the following conditions:**

1. All soil samples for verification of closure or completion of remedial activities will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene (BTEX) and total petroleum hydrocarbons in accordance with the OCD's "SURFACE IMPOUNDMENT CLOSURE GUIDELINES".

   NOTE: A field headspace measurement of 100 parts per million (mg/l) of total organic vapor, if determined in accordance with OCD guidelines, may be substituted for a laboratory analysis of the concentrations of BTEX.

2. Since wastes generated at oilfield service companies are not exempt from federal RCRA hazardous waste regulations, the OCD requires that PCI analyze the stockpiled soils for RCRA Subtitle C Hazardous Characteristics. The results of these analyses will be submitted to the OCD for approval prior to either onsite remediation or offsite disposal.

3. PCI will submit the composition of any materials to be used for enhancing bioremediation of soils to the OCD for approval prior to application.

4. PCI will submit the location and sampling plan of any proposed soil borings to the OCD for approval prior to implementation.

5. PCI will notify the Environmental Bureau Chief of the OCD Santa Fe Office and the OCD Aztec District Office within 24 hours of the discovery of ground water contamination related to any pit closure activity.

6. The final report, submitted to the OCD upon completion of closure actions, will include a completed OCD "Pit Remediation and Closure Report" form (attached) which will contain the final results of all pit closure activities. The report will also include the concentrations and application rates of all materials or additives used to enhance bioremediation of contaminants.

7. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not relieve PCI of liability should closure activities determine that contamination exists which is beyond the scope of the work plan or if the closure activities fail to adequately remediate contamination related to their activities. In addition, OCD approval does not relieve PCI of responsibility for compliance with any other federal, state or local laws and/or regulations.

The OCD commends PCI for their initiative in the closure of this unlined pit and looks forward to working with you as the work plan is implemented.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

Attachment

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price , OCD Hobbs Office
Lynne Fahlquist, COMBEST GEOscience

APPENDIX B

Photo No. 1. Excavation of leach field pit.

Photo No. 2. Stockpiled excavated soil from leach field pit.

Photo No. 3. Excavation of leach field pit. Note hydrocarbon stained gravels.

Photo No. 4. Hydrocarbon contaminated gravels (black) in leach field collection pit.

Photo No. 5. Excavation of hydrocarbon stained gravels (black) from leach field collection pit.

Photo No. 6. Excavation of Hydrocarbon contaminated gravels (black) from leach field collection pit.

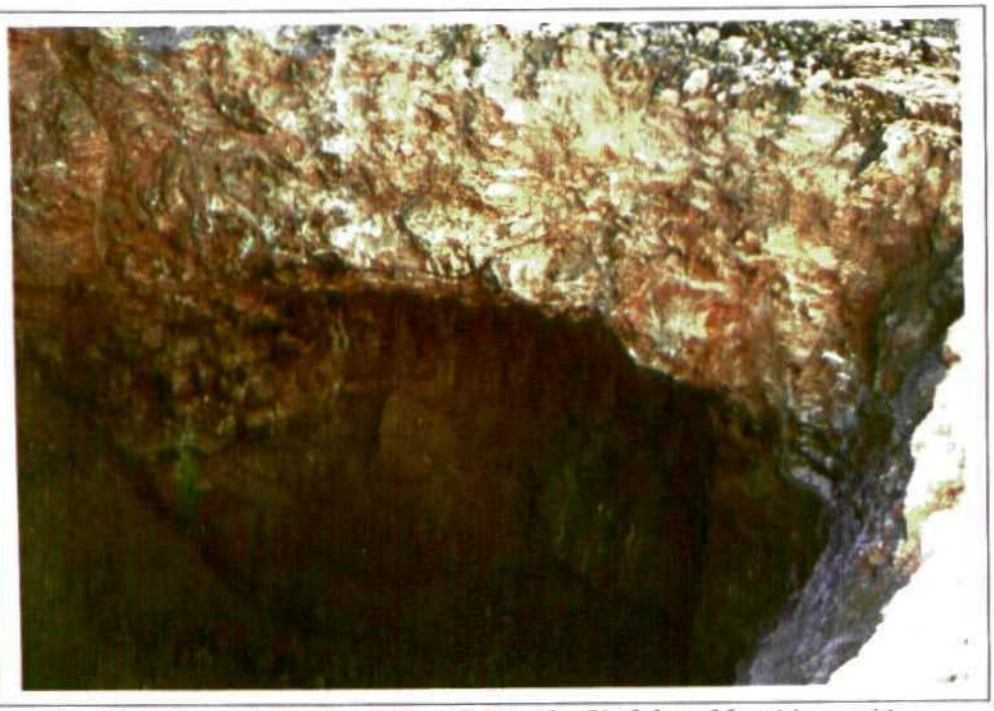


Photo No. 7. View (south) of leach field collection pit during excavation.

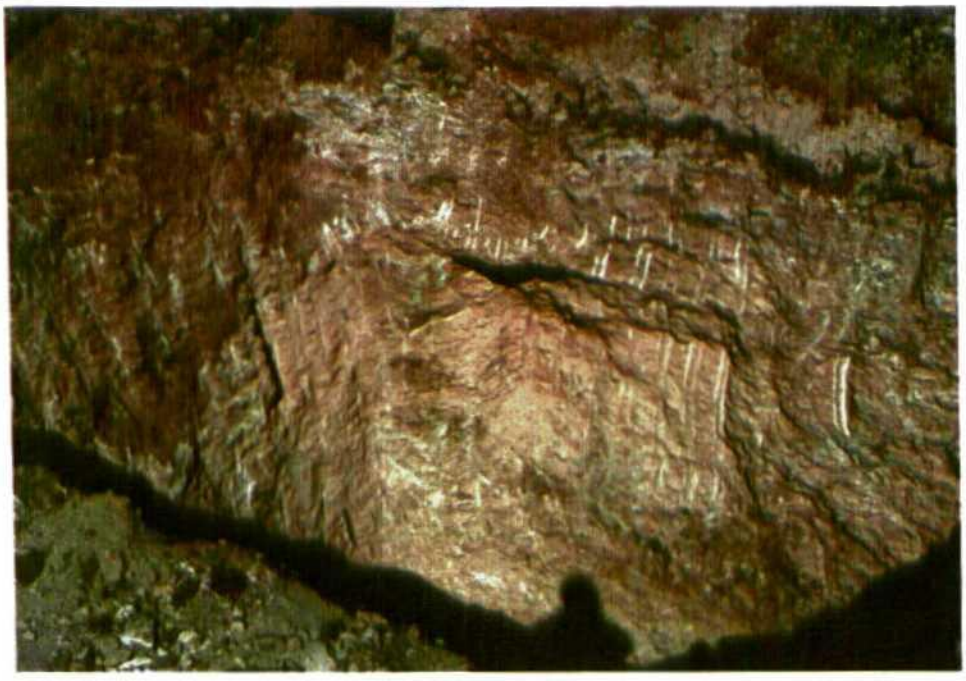


Photo No. 8. View (north) of leach field collection pit following excavation.

APPENDIX C

CHAIN OF CUSTODY RECORD

Enviro-Tech *Laboratories, Inc.*
117 S. A&M Ave., San Angelo, Texas 76901
Phone: (915) 944-1302 / Fax: (915) 942-9693

Submitted By	Bill To
Company: COMBEST GEOSCIENCES	Company:
Address: 706 AUSTIN	Address:
SAN ANGELO, TX 76903	
Contact:	Contact:
Phone: 915-655-4302	Phone:
Fax:	Fax:

Collected By (signature): R. RENEAU

Project Description: POOL CO - Hobbs, NM

REQUESTED ANALYSES

Laboratory Number (Lab Use Only)	COLLECTED Date	Time	TYPE Grab	Comp	Sample Identification	Number of Containers	Sample Matrix	BTEX / TPH	TCLP VOLATILES	8 RCRA METALS (TCLP)	RCI
95-2629-01	2/6/95	3:06p	✓		N. WALL	1	S	✓			
-02	2/6/95	3:00	✓		S. WALL	1	S	✓			
-03	2/6/95	2:58	✓		E. WALL	1	S	✓			
-04	2/6/95	3:02	✓		W. WALL	1	S	✓			
-05	2/6/95	2:55		✓	FLOOR (3 PART COMP)	1	S	✓			
-06	2/6/95	3:08		✓	STOCKPILE	2	S	✓	✓	✓	✓

Page ___ of ___

Comment: 2 containers collected from stockpile. ANALYZE ONLY 1. THE OTHER IS EXTRA IF NEEDED.

Preservatives added:

REQUESTED TURNAROUND TIME:
[✓] Standard [ ] 50% Rush [ ] 100% Emergency [ ] Other _____

LABORATORY TRANSFER
[ ] YES

Relinquished By (signature)	Date	Time	Received By (signature)	Date	Time
R. Reneau	2/9/95			2/10/95	10:30A
Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:
Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:

For Laboratory Use Only

Sample Temp. On Receipt: [ ] Cool < 4° C [ ] Other _____
Preservative Added By Lab: [✓] None [ ] Other _____
Sample Container Condition: [✓] Acceptable [ ] Unacceptable
Sample Holding Times: [✓] Acceptable [ ] Unacceptable

Comments:

CHAIN OF CUSTODY RECORD

Enviro-Tech *Laboratories, Inc.*
117 S. A&M Ave., San Angelo, Texas 76901
Phone: (915) 944-1302 / Fax: (915) 942-9693

Submitted By	Bill To
Company: Enviro-Tech	Company: Same
Address:	Address:
Contact:	Contact:
Phone:	Phone:
Fax:	Fax:

Collected By (signature): R.R.

Project Description: Pool Co. – Hobbs, NM

REQUESTED ANALYSES: TCLP Volatiles; TCLP Metals (8); RCI Pkg.

Page 1 of 1

Comment: Due 2/24/95

Laboratory Number (Lab Use Only)	COLLECTED Date	COLLECTED Time	TYPE Grab	TYPE Comp	Sample Identification	Number of Containers	Sample Matrix	TCLP Volatiles	TCLP Metals (8)	RCI Pkg.	Preservatives added
	2/8/95				Stockpile 802-1	8	S	X	X	X	1304 - 1

REQUESTED TURNAROUND TIME:
[X] Standard [ ] 50% Rush [ ] 100% Emergency [ ] Other _____

LABORATORY TRANSFER [X] YES

Relinquished By (signature)	Date	Time	Received By (signature)	Date	Time
Wayne Dirk	2/13/95	4:30P	K.W. Morgan	2/14/95	1045
Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:
Relinquished By (signature):	Date:	Time:	Received By (signature):	Date:	Time:

For Laboratory Use Only

Sample Temp. On Receipt:	[ ] Cool < 4° C	[ ] Other
Preservative Added By Lab:	[ ] None	[ ] Other
Sample Container Condition:	[ ] Acceptable	[ ] Unacceptable
Sample Holding Times:	[ ] Acceptable	[ ] Unacceptable

Comments: COOLER TEMPERATURE WHEN RECEIVED 4 °C

ORIGINAL

SCREENED FOR RADIOACTIVITY Kum 2/14/95

Environmental Analytical Services

[redacted] LABORATORIES

[redacted] Ave. 101 E. Marland

Fax [redacted] 01 [redacted]

[redacted] [redacted] 6

[redacted] [redacted] 76

Chain of Custody Record

Project I.D. Pool Company P.O. Bx. 1198 Hobbs, N.M. 88240

Project Location 5730 W. Carlsbad Hwy Hobbs, N.M. 88240

Sampled By

Client Name Combest GEO Science

Address

Telephone 505-393-5161

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required: TPH / BTEX	Remarks (Type sample, preservation, etc.)
1	2/23/95	11:30 a.m.	✓		Excavated leech field - Bottom of pit	1	X	95-2686-01
2	2/23/95	12:30 p.m.	✓		Sample hole dug to approx. 4' below Gl.	1	X	-02

Released by: (Signature)	Date	Time	Received by: (Signature)
J.G. Parker	2/23/95	5:00 p.m.	U.P.S.
Released by: (Signature)	Date	Time	Received by: (Signature)

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for 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

Enviro-Tech *Laboratories, Inc.*
117 South A&M Avenue
San Angelo, Texas 76901
Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: N. Wall
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-01

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	630 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	92.0	Matrix Spike	94.0
tetrachloroethylene	86.0		
isopropylbenzene	82.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dirks
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: S. Wall
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-02

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	830 mg/Kg
Total BTEX		< 0.01 mg/Kg

Individual BTEX Constituents

Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	104.0	Matrix Spike	94.0
tetrachloroethylene	102.0		
isopropylbenzene	102.0		
Matrix Spike	99.0		

Comment:

Reviewed By: [signature]
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: E. Wall
MATRIX: Solid
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-03

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	740 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	104.0	Matrix Spike	94.0
tetrachloroethylene	106.0		
isopropylbenzene	104.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dirks
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*
117 South A&M Avenue
San Angelo, Texas 76901
Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: W. Wall
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-04

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	233 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	104.0	Matrix Spike	94.0
tetrachloroethylene	102.0		
isopropylbenzene	104.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dunn
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: Floor (3 Part Comp)
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-05

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	680 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	98.0	Matrix Spike	94.0
tetrachloroethylene	100.0		
isopropylbenzene	100.0		
Matrix Spike	99.0		

Comment:

Reviewed By: T Wayne Dixon
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*
117 South A&M Avenue
San Angelo, Texas 76901
Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED 10 February,1995
REPORTED: 15 February,1995

PROJECT: Pool Co. - Hobbs, NM
SAMPLE ID: Stockpile
MATRIX: Soil
COLLECTED: 08 February,1995
BTEX ANALYZED: 10 February,1995 by CWD
TPH ANALYZED: 14 February,1995 by CWD

REPORT NUMBER
95-2629-06

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH))	10	9,750 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2208	TPH QC	T2210
Method Blank	< 0.01	Method Blank	<10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	5.9
a,a,a -trifluorotoluene	74.0	Matrix Spike	94.0
tetrachloroethylene	72.0		
isopropylbenzene	52.0		
Matrix Spike	99.0		

Comment:

Reviewed By: Wayne Dirks
Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*

117 South A&M Avenue
San Angelo, Texas 76901

Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED: 28 February,1995
REPORTED: 02 March,1995

PROJECT: Pool Company - Hobbs, NM
SAMPLE ID: Excavated leech Field-Bottom of Pit
MATRIX: Soil
COLLECTED: 23 February,1995
BTEX ANALYZED: 28 February,1995 by CWD
TPH ANALYZED: 01 March,1995 by CWD

REPORT NUMBER
95-2686-01

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH)	10	93 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2215	TPH QC	T2219
Method Blank	< 0.01	Method Blank	< 10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	0.0
a,a,a -trifluorotoluene	94.0	Matrix Spike	100.0
tetrachloroethylene	96.0		
isopropylbenzene	106.0		
Matrix Spike	99.3		

Comment:

Reviewed By: Wayne Dick

Enviro-Tech Laboratories, Inc.

Enviro-Tech *Laboratories, Inc.*
117 South A&M Avenue
San Angelo, Texas 76901
Phone: (915) 944-1302
Fax: (915) 942-9693

REPORT TO: COMBEST GEOscience
7122 Wood Hollow, #7
Austin, Texas 78731

RECEIVED: 28 February,1995
REPORTED: 02 March,1995

PROJECT: Pool Company - Hobbs, NM
SAMPLE ID: Sample hole dug to approx. 4' below G.L.
MATRIX: Soil
COLLECTED: 23 February,1995
BTEX ANALYZED: 28 February,1995 by CWD
TPH ANALYZED: 01 March,1995 by CWD

REPORT NUMBER
95-2686-02

REQUESTED ANALYSES	DETECTION LIMIT	RESULT
Total Petroleum Hydrocarbons (TPH)	10	< 10 mg/Kg
Total BTEX		< 0.01 mg/Kg
Individual BTEX Constituents		
Benzene	0.01	< 0.01 mg/Kg
Toluene	0.01	< 0.01 mg/Kg
Ethylbenzene	0.01	< 0.01 mg/Kg
Xylenes - meta and para	0.02	< 0.02 mg/Kg
Xylenes - ortho	0.01	< 0.01 mg/Kg

Quality Control Data

BTEX QC	B2215	TPH QC	T2219
Method Blank	< 0.01	Method Blank	< 10
Duplicate Analyses %RPD	0.0	Duplicate Analyses %RPD	0.0
a,a,a -trifluorotoluene	92.0	Matrix Spike	100.0
tetrachloroethylene	92.0		
isopropylbenzene	102.0		
Matrix Spike	99.3		

Comment:

Reviewed By: Wayne D Duff
Enviro-Tech Laboratories, Inc.

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995
ANALYSIS METHOD : 40 CFR 261.21 /1
ANALYZED BY : KPP
ANALYZED ON : 18-FEB-1995
QC BATCH NO : 219057A

IGNITABILITY		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Ignitability (by Definition)		Not Ignitable *

* This sample does not meet the definition of ignitability according to 40 CFR 261.21

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995
PREPARATION METHOD : EPA 1311/5030
PREPARED BY : GWG
PREPARED ON : 16-FEB-1995
ANALYSIS METHOD : EPA 1311/8240 /1
ANALYZED BY : RDG
ANALYZED ON : 20-FEB-1995
DILUTION FACTOR : 20
QC BATCH NO : ITS6-363

TCLP VOLATILE ORGANICS		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Benzene	0.10 mg/L	< 0.10 mg/L
Carbon tetrachloride	0.10 mg/L	< 0.10 mg/L
Chlorobenzene	0.10 mg/L	< 0.10 mg/L
Chloroform	0.10 mg/L	< 0.10 mg/L
1,4-Dichlorobenzene	0.10 mg/L	< 0.10 mg/L
1,2-Dichloroethane	0.10 mg/L	< 0.10 mg/L
1,1-Dichloroethene	0.10 mg/L	< 0.10 mg/L
Methyl ethyl ketone	1.00 mg/L	< 1.00 mg/L
Tetrachloroethene	0.10 mg/L	< 0.10 mg/L
Trichloroethene	0.10 mg/L	< 0.10 mg/L
Vinyl chloride	0.20 mg/L	< 0.20 mg/L

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REPORT NUMBER : D95-1304-1 PAGE 2
ANALYSIS METHOD : EPA 1311/8240 /1

QUALITY CONTROL DATA		
SURROGATE COMPOUND	SPIKE LEVEL	SPIKE RECOVERED
1,2-Dichloroethane-d4 (SS)	50.0 µg/L	98.9 %
Toluene-d8 (SS)	50.0 µg/L	95.0 %
Bromofluorobenzene (SS)	50.0 µg/L	90.5 %

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

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Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995

TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Silver	/1	0.01 mg/L	< 0.01 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			
Arsenic	/1	0.1 mg/L	0.1 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 20-FEB-1995 by MDB QC Batch No : 10311			
Barium	/1	0.5 mg/L	1.0 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			
Cadmium	/1	0.010 mg/L	0.017 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 19-FEB-1995 by MES QC Batch No : 10311			
Chromium	/1	0.010 mg/L	< 0.010 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			

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TCLP METALS			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Mercury	/1	0.001 mg/L	< 0.001 mg/L
Dilution Factor : 1 Prepared using EPA 1311/7470 on 16-FEB-1995 by T_L Analyzed using EPA 7470 on 20-FEB-1995 by CGJ QC Batch No : HG-1248			
Lead	/1	0.050 mg/L	0.071 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 17-FEB-1995 by JLW QC Batch No : 10311			
Selenium	/1	0.250 mg/L	< 0.250 mg/L
Dilution Factor : 1 Prepared using EPA 1311/3015 on 16-FEB-1995 by T_L Analyzed using EPA 6010A on 20-FEB-1995 by MDB QC Batch No : 10311			

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

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Fax. 214-238-5592

DATE RECEIVED : 14-FEB-1995

REPORT NUMBER : D95-1304-1
REPORT DATE : 24-FEB-1995

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ADDRESS : 117 S. A & M Ave.
: San Angelo, TX 76901
ATTENTION : Mr. Waymond Dixon

SAMPLE MATRIX : Soil
ID MARKS : Stockpile
PROJECT : Pool Co.-Hobbs,NM
DATE SAMPLED : 8-FEB-1995

MISCELLANEOUS ANALYSES			
TEST REQUESTED		DETECTION LIMIT	RESULTS
Cyanide, Reactive	/1	0.10 mg/Kg	< 0.10 mg/Kg
Analyzed using EPA 9010 on 14-FEB-1995 by GGD QC Batch No : 200053A/336024A			
Corrosivity(pH)	/1		Non-corrosive
Analyzed using EPA 9040/45 on 16-FEB-1995 by RLR QC Batch No : AB319032A			
pH	/1		8.5
Analyzed using EPA 9045 on 16-FEB-1995 by RLR QC Batch No : AB319032A			
Reactivity	/1		Non-reactive
Analyzed using EPA 9010/9030 on 14-FEB-1995 by GGD QC Batch No : 200053A/336024A			
Total Solids	/1	0.01 %	93.2 %
Analyzed using ASTM D2216 mod. on 16-FEB-1995 by PSS QC Batch No : 362062C			
Sulfide, Reactive	/1	10.0 mg/Kg	< 10.0 mg/Kg
Dilution Factor : 1 Analyzed using EPA 9030 on 14-FEB-1995 by GGD QC Batch No : 200053A/336024A			

Martin Jeffus
General Manager

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Benzene	Carbon tetrachloride	Chlorobenzene	Chloroform	1,4-Dichlorobenzene
BATCH NO.	ITS6-363	ITS6-363	ITS6-363	ITS6-363	ITS6-363
LCS LOT NO.	F-0698	F-0698	F-0698	F-0698	F-0698
PREP METHOD	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	RDG	RDG	RDG	RDG	RDG
ANALYSIS METHOD	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	RDG	RDG	RDG	RDG	RDG
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.00500	< 0.00500	< 0.00500	< 0.00500	< 0.00500
MS RECOVERY %	129	103	93.7	86.3	82.7
MSD RECOVERY %	125	98.5	89.8	84.0	82.5
MS/MSD RPD %	3.15	4.47	4.25	2.70	0.24
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NA	NA	NA	NA	NA
LCS RECOVERY %	85.4	79.0	85.0	81.2	73.8
SPIKE SAMPLE ID	1371-4	1371-4	1371-4	1371-4	1371-4
DUP SAMPLE ID	---	---	---	---	---

NA Not applicable

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	1,2-Dichloroethane	1,1-Dichloroethene	Methyl ethyl ketone	Tetrachloroethene	Trichloroethene
BATCH NO.	ITS6-363	ITS6-363	ITS6-363	ITS6-363	ITS6-363
LCS LOT NO.	F-0698	F-0698	F-0698	F-0698	F-0698
PREP METHOD	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030	EPA 1311/5030
PREPARED BY	RDG	RDG	RDG	RDG	RDG
ANALYSIS METHOD	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240	EPA 1311/8240
ANALYZED BY	RDG	RDG	RDG	RDG	RDG
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.00500	< 0.00500	< 0.05000	< 0.00500	< 0.00500
MS RECOVERY %	89.1	77.1	70.8	83.6	81.7
MSD RECOVERY %	87.5	75.9	69.9	78.1	78.9
MS/MSD RPD %	1.81	1.57	1.28	6.80	3.49
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NA	NA	NA	NA	NA
LCS RECOVERY %	80.6	74.2	61.8	76.6	77.2
SPIKE SAMPLE ID	1371-4	1371-4	1371-4	1371-4	1371-4
DUP SAMPLE ID	---	---	---	---	---

NA Not applicable

Inchcape Testing Services
NDRC Laboratories

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Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Vinyl chloride	Silver	Arsenic	Barium	Cadmium
BATCH NO.	ITS6-363	10311	10311	10311	10311
LCS LOT NO.	F-0698	491229	491229	491229	491229
PREP METHOD	EPA 1311/5030	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015	EPA 1311/3015
PREPARED BY	RDG	T_L	T_L	T_L	T_L
ANALYSIS METHOD	EPA 1311/8240	EPA 6010A	EPA 6010A	EPA 6010A	EPA 6010A
ANALYZED BY	RDG	JLW	MDB	JLW	MES
UNITS	mg/L	mg/L	mg/L	mg/L	mg/L
METHOD BLANK	< 0.01000	<0.010000	<.100	<0.500	<.01
MS RECOVERY %	65.1	98.0	115	107	105
MSD RECOVERY %	63.6	100	113	108	106
MS/MSD RPD %	2.33	2.02	2.58	0.44	0.19
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NA	NC	NC	NC	NC
LCS RECOVERY %	60.6	103	116	106	107
SPIKE SAMPLE ID	1371-4	1345-1	1345-1	1345-1	1345-1
DUP SAMPLE ID	---	1345-1	1345-1	1345-1	1345-1

NA Not applicable
NC Not calculable

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 28-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Chromium	Mercury	Lead	Selenium	Cyanide, Reactive
BATCH NO.	10311	HG-1248	10311	10311	200053A/336024A
LCS LOT NO.	491229	AB300-6	491229	491229	AB-106-25-J
PREP METHOD	EPA 1311/3015	EPA 1311/7470	EPA 1311/3015	EPA 1311/3015	---
PREPARED BY	T_L	T_L	T_L	T_L	---
ANALYSIS METHOD	EPA 6010A	EPA 7470	EPA 6010A	EPA 6010A	EPA 9010
ANALYZED BY	JLW	CGJ	JLW	MDB	GGD
UNITS	mg/L	mg/L	mg/L	mg/L	mg/Kg
METHOD BLANK	<0.010	<.001	<0.050	<.25	< 0.10000
MS RECOVERY %	103	107	96.9	115	NA
MSD RECOVERY %	103	99.0	104	118	NA
MS/MSD RPD %	0.19	7.77	6.78	2.04	NA
BS RECOVERY %	NA	NA	NA	NA	NA
BSD RECOVERY %	NA	NA	NA	NA	NA
BS/BSD RPD %	NA	NA	NA	NA	NA
DUPLICATE RPD %	NC	NC	NC	NC	NA
LCS RECOVERY %	102	106	107	117	23.8
SPIKE SAMPLE ID	1345-1	1299-3	1345-1	1345-1	---
DUP SAMPLE ID	1345-1	1299-3	1345-1	1345-1	---

NA Not applicable
NC Not calculable

Inchcape Testing Services
NDRC Laboratories

1089 E. Collins Blvd.
Richardson, TX 75081
Tel. 214-238-5591
Fax. 214-238-5592

REPORT DATE : 24-FEB-1995 REPORT NUMBER : D95-1304

SAMPLE SUBMITTED BY : Enviro-Tech Laboratories
ATTENTION : Mr. Waymond Dixon
PROJECT : Pool Co.-Hobbs,NM

LABORATORY QUALITY CONTROL REPORT

ANALYTE	Sulfide, Reactive	pH
BATCH NO.	200053A/336024A	AB319032A
LCS LOT NO.	AB-002-90-H	ERA 9963
PREP METHOD	---	---
PREPARED BY	---	---
ANALYSIS METHOD	EPA 9010	EPA 9040/45
ANALYZED BY	GGD	RLR
UNITS	mg/Kg	---
METHOD BLANK	< 10.0	NA
MS RECOVERY %	NA	NA
MSD RECOVERY %	NA	NA
MS/MSD RPD %	NA	NA
BS RECOVERY %	NA	NA
BSD RECOVERY %	NA	NA
BS/BSD RPD %	NA	NA
DUPLICATE RPD %	NA	3.87
LCS RECOVERY %	10.0	98.9
SPIKE SAMPLE ID	---	---
DUP SAMPLE ID	---	1308-1

NA Not applicable

APPENDIX D

District I
P.O. Box 1980, Hobbs, NM
District II
P.O. Drawer DD, Artesia, NM 88211
Distric 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 1 COPY TO APPROPRIATE DISTRICT OFFICE AND 1 COPY TO SANTA FE OFFICE

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

Operator: Pool Company Telephone: (505) 393-5161

Address: CARLSBAD Hwy. ; P.O. Box 1148 ; Hobbs, NM. 88240

Facility Or: Pool Company - Hobbs
Well Name

Location: Unit or Qtr/Qtr Sec _____ Sec _____ T _____ R _____ County _____

Pit Type: Separator _____ Dehydrator _____ Other _____

Land Type: BLM ____, State ____, Fed ____, Other _____

Pit Location: (Attach diagram)

Pit dimensions: length 15', width 10', depth 12'

Reference: wellhead ____, other Shop

Footage from reference: 160 FT

Direction from reference: 0 Degrees ___ East North X
of
__ West South ___

Depth to Ground Water: (Vertical distance from contaminants to seasonal high water elevation of ground water)	Less than 50 feet	(20 points)
	50 feet to 99 feet	(10 points)
	Greater than 100 feet	(0 points) 10
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources)	Yes	(20 points)
	No	(0 points) 0
Distance to Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)	Less than 200 feet	(20 points)
	200 feet to 1000 feet	(10 points)
	Greater than 1000 feet	(0 points) 0

RANKING SCORE (TOTAL POINTS): 10

Date Remediation Started: 8 FEB. 1995 Date Completed: 9 FEB. 1995

Remediation Method: Excavation X Approx. cubic yards 42.2

Landfarmed X In situ Bioremediation ____

Other ____

Remediation Location: Onsite X Offsite ____

(i.e. landfarmed onsite, name and location of offsite facility)

General Description of Remedial Action: OVEREXCAVATION OF PIT WITH SOIL SAMPLES COLLECTED AT BASE OF EACH WALL AND FROM FLOOR OF PIT. EXCAVATED SOIL STOCKPILED IN LINED (PLASTIC) BERMED CELL. STOCKPILED SOIL TO BE NATURALLY BIOREMEDIATED AND SAMPLED ON QUARTERLY BASIS (FOLLOWING OCD APPROVAL).

Ground Water Encountered: No X Yes ____ Depth ____

Final Pit: Sample location BASE OF PIT WALLS & PIT FLOOR

Closure Sampling: STOCKPILED SOIL, PIT FLOOR & BASE OF EACH WALL

(if multiple samples, attach sample results and diagram of sample locations and depths)

Sample depth 12-FT

Sample date 8 FEB. 1995 Sample time 5:00 PM

Sample Results

Benzene (ppm) <0.01

Total BTEX (ppm) <0.01

Field headspace (ppm) N.T.

TPH SEE TABLE 3.1

Ground Water Sample: Yes ___ No X (If yes, attach sample results)

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

DATE 19 FEBRUARY 1995

SIGNATURE R. Reneau PRINTED NAME AND TITLE RANDALL RENEAU GEOLOGIST

OIL CONSERVATION DIVISION

August 28, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-038

Mr. Tim Parker
Area Manager
Pool Company
P.O. Box 1198
Hobbs, NM 88240-1198

RE: Discharge Plan GW-214
Pool Company, Hobbs facility
Lea County, New Mexico

Dear Mr. Parker:

The NMOCD has received the additional information dated August 4, 1995 from Terra Dynamics Inc. representing Pool Company for the facility located in SW/4 SW/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. Upon review of the Additional information the following comments and request for additional information are based on the review of the Pool Company 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. The information will be submitted by September 28, 1995 to the Santa Fe OCD office for approval.**

Refer to the additional information package as submitted by Terra Dynamics Inc. representing Pool Company dated August 4, 1995.

A. Address storm water that will gather in secondary containments - and provide an option(s) for disposal or use. An example of a use could be blending with glycol for rig hydrostatic drawwork braking fluid.

B. Address how contaminated soils in the yard that are due to leaking rigs/and or trucks will be addressed. Note: Do not consider with current bioremmediation over the long term.

C. With regard to paint waste - Pool needs to clarify that only RCRA empty and dry paint cans will be disposed of in the Waste Management Dumpster. Liquid wastes will not be allowed to be disposed of in this manner.

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, Mr. Jerry Sexton - Hobbs Supervisor

Z 765 963 038

Receipt for Certified Mail

No Insurance Coverage Provided
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PS Form **3800**, March 1993

OIL CONSERVATION DIVISION-ENVIRONMENTAL BUREAU

TO: Mr. Mike Eide - Terra Dynamics

FROM: PATRICIO W. SANCHEZ , PETROLEUM ENGINEER 505-827-7156

NUMBER OF PAGES INCLUDING THIS ONE: 3

MESSAGE:

Additional information required for Pool company discharge Plan - Any Questions give me a call. Thanks!

IF YOU HAVE ANY TROUBLE RECEIVING THIS FAX PLEASE CALL (505)-827-7133.

OCD FAX NUMBER: (505)-827-8177

Note: Sent Mike Eide a Fax. letter Dated 8/28/95

Pat Sanchez

From: Wayne Price
To: Pat Sanchez
Cc: Roger Anderson; Wayne Price; Jerry Sexton
Subject: Pool Co. Discharge Plan Review
Date: Tuesday, August 15, 1995 9:18AM
Priority: High

Dear Pat,

I have the following recommendations:

1. They need to address what they plan to do with rainwater that collects inside of the curbs and berms.

2. Appendix E: Storm Water Pollution Plan page 17 & 18 discuss picking up oil/grease and fuel stains with a shovel and placing in a bioremediation area for treatment.

   Recommend that Pool add this waste stream and bio-area in the NMOCD discharge plan or clearify this issue.

3. Add waste stream for contaminated soils as a result of trucks, pulling units, and any other equipment that leak hydrocarbon fluids onto the yard.

4. Ref: Pool Response #1. to Modification #2: Pool should clearify that only RCRA empty containers are placed in the dumpster and delete the statement "dispose of the painting waste in the dumpster." ; or obtain a written statement from Waste Management that indicates this material would not be classified as a "special waste" and permission to do so would not violate their landfill permit conditions.

Note: Items 2 & 3 are probably the same issue.

Pat, thanks for letting me comment on this DP, also I suggest that you add you standard condition of any waste stream that is not included in the DP be required to have NMOCD approval before disposal.

Also the stantard disclaimer, for you protection!

OFFICE OF THE SECRETARY - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5950
ADMINISTRATIVE SERVICES DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5925
ENERGY CONSERVATION AND MANAGEMENT DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5900
FORESTRY AND RESOURCES CONSERVATION DIVISION - P. O. BOX 1948 - SANTA FE, NM 87504-1948 - (505) 827-5830
MINING AND MINERALS DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5970
OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-7131
PARK AND RECREATION DIVISION - P. O. BOX 1147 - SANTA FE, NM 87504-1147 - (505) 827-7465

TERRA
DYNAMICS INC
ENVIRONMENTAL SERVICES

August 4, 1995

95-172

Mr. Patricio Sanchez
New Mexico Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Re: OCD Comments and Request for Additional Information pertaining to Discharge Plan GW-214 for Pool Company Hobbs Facility.

Dear Mr. Sanchez,

Please find enclosed the additional information requested by the Oil Consevation Division (OCD) concerning the Pool Company Hobbs Facility Discharge Plan (GW-214) submitted on July 19, 1995. The structure of the responses (Attachment A) follows the format of your letter to Pool dated July 26, 1995 (Attachment B). Should you require additional information or have any additional questions or comments please feel free to contact either Tim Parker or myself.

Sincerely,

Michael G. Eide, REP
Geologist

Attachments

cc. Tim Parker - Area Manager Pool Company (Texas) Inc.
Kyle Combest - COMBEST GEOscience

ATTACHMENT A

A. UNDER ITEM 8.0 Summary of Waste Collection, Storage, and Disposal Procedures:

OCD Question #1:

1. Referring to Table 8-1 Painting Waste. Are paint cans air dried before they are tossed in the Waste Management Dumpster?

Pool Response:

1. Yes, after the paint has been completely used the paint cans are allowed to air dry before they are disposed of in the Waste Management Dumpster. According to Waste Management, small quantities of paint cans are considered accepted incidental waste (See Attachment C for Record of Communication).

OCD Question #2:

2. Referring to Table 8-1 Painting Waste. What is the volume and type of solvent that is evaporated? Provide the regulatory citation under RCRA that allows for this type of treatment?

Pool Response:

2. The solvent referred to in this question is paint thinner and a MSDS for the product is located in Appendix C of the application document. The thinner is used to clean painting equipment (spray guns and brushes) and the volumes used are very small (typically less than 32 oz. at a time) As mentioned in the referenced table (Table 8-1), the majority of the rig painting is performed on oil and gas well locations (not in the yard) as necessary to repair normal wear and tear resulting from rig operations.

   Pool does not believe that there is a specific regulatory citation under RCRA which allows for this type of waste treatment however, it should be noted that Pool has never intended the resulting evaporation to be a "waste treatment" method. Pool uses the small quantities of thinner with the intention of reusing them, therefore the paint thinner is actually a reusable product, not a waste, that is inadvertently lost through evaporation during use. Due to the paucity of painting performed at the facility, the evaporation of the product typically results from simple lack of use. Based on the lack of <u>waste</u> thinner generated, it does not seem economically feasible to incorporate a recovery system for the thinner at the Pool facility.

OCD Question #3:

3. Referring to Table 8-1 Other Wastes Solids. Does Waste Management know about and approve of spill absorbent being tossed in their dumpster?

Pool Response:

3. Waste Management of Hobbs, New Mexico is aware that spill absorbent is being placed in the dumpster. Mr. Lee Coffman of Waste Management was contacted pertaining to spill absorbent being disposed of in the dumpster at the Pool Facility in Hobbs. Mr. Coffman stated that "spill absorbent in small quantities is considered incidental material and is permitted to be disposed of in the Waste Management container" (See Attachment C for Record of Communication).

OCD Question #4:

4. Referring to Page 8-4 concerning the capacity of the secondary containment systems. "Clarify what is meant by in excess of a 1/3 volume, does this mean 1 and 1/3 times the total volume of the largest tank or interconnected tanks as required by the NMOCD"?

Pool Response:

4. In excess of a 1/3 volume of the largest tank is meant to suggest 133% the volume of the largest tank since none of the tanks are interconnected. The exact capacity of the secondary containment tubs is not known however the estimated volume based on measured dimension is 4.5 times the volume of the largest tank (500 gallons) in the bulk chemical storage area and 1.75 times the volume of the largest tank (300 gallons) in the waste chemical storage area (calculations included as Attachment D).

OCD Question #5:

5. Note all items listed in Section 8.0 shall be properly labeled as to their contents at the facility.

Pool Response:

5. The Pool Hobbs Facility is in the process of implementing this action as directed in the above noted comment.

B. UNDER ITEM 9.0 Proposed Modifications:

OCD Question #1:

1. Part A-Proposed Modifications to Fulfill the Requirements of the Regulations: Modifications #2 through #4 need to commit in a more specific response than "the material will be disposed of in a proper manner as the need arises."

Pool Response:

1. As to Modification #2, Pool generates very small quantities of painting waste and based on conversations with Waste Management, small numbers of empty containers with paint residue are considered "incidental to the load" and permissible within the container located on the site. Based on this information Pool wishes to withdraw Modification #2 in the original Discharge Plan Application Document submitted by Terra Dynamics Inc., on behalf of Pool, and dispose of the painting waste in the dumpster.

   As to Modification #3, Pool generates very small quantities of spent oil absorbent and based on conversations with Waste Management, small quantities of spent oil absorbent are considered "incidental to the load" and permissible within the container located on the site. Based on this information Pool wishes to withdraw Modification #3 in the original Discharge Plan Application Document submitted by Terra Dynamics Inc., on behalf of Pool, and dispose of the spent absorbent in the dumpster.

   As to Modification #4, Pool generates small quantities of spent welding rods during its normal operations. Based on information provided by persons involved in the Texas Natural Resource Conservation Commission (TNRCC) Recycle Texas Program, spent welding rods are characterized as iron/steel waste and can be recycled (See Attachment C for Record of Commication). Pool proposes to collect the spent welding rods in a drum along with other miscellaneous iron/steel waste generated at the yard and periodically truck the material to Hobbs Iron and Metal for recycling (see Table 8-4 of Discharge Plan Application).

OCD Question #2:

2. Part B- Proposed Closure of Ponds, Pits, Leach Fields, Etc...Upon review of Closure file for the Pool Company, Hobbs facility it was noted that Pool has not responded to Mr. Bill Olson's letter dated April 28, 1995 - this letter needs to be addressed by Pool so that the items requested in the above mentioned letter can be addresses and final closure can be approved.

Pool Response:

2. See correspondence from COMBEST GEOscience dated August 1, 1995 for this information.

C. UNDER ITEM 11.0 Spill and Leak Prevention Reporting:

OCD Directive:

Part A-Proposed Procedures for Containment, Cleanup and Reporting: Attach the enclosed OCD Rule 116 and WQCC 1-203 spill reporting requirements to the discharge plan.

Pool Response:

As directed the regulatory sections, OCD Rule 116 and WQCC Section 1-203, pertaining to spill reporting requirements have been attached to the Discharge Plan at the Pool Company Hobbs Facility.

D. UNDER ITEM 13.0 Compliance Information:

OCD Directive:

Refers to Section B, Item #2.

Pool Response:

See correspondence from COMBEST GEOscience dated August 1, 1995 for this information.

ATTACHMENT B

July 26, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-097

Mr. Tim Parker
Area Manager
Pool Company
P.O. Box 1198
Hobbs, NM 88240-1198

RE: Discharge Plan GW-214
Pool Company, Hobbs facility
Lea County, New Mexico

Dear Mr. Parker:

The NMOCD has received the proposed Pool Company discharge plan application for the facility located in SW/4 SW/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The NMOCD has prepared and sent out the public notice for the Pool Company 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 July 19, 1995.

The following comments and request for additional information are based on the review of the Pool Company 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 Pool Company signed by Mr. Timothy A. Parker on July 18, 1995.

A. UNDER ITEM 8.0 Summary of Waste Collection, Storage, and Disposal Procedures:
   1. Table 8-1 Painting Waste. Are the paint cans air dried before they are tossed in the Waste Management Dumpster?
   2. Table 8-1 Painting Waste. What is the volume and type of solvent that is evaporated? Provide the regulatory citation under RCRA that allows for this type of waste treatment.
   3. Table 8-1 Other Waste Solids. Does Waste Management know about and approve spill absorbent being tossed in their dumpster?
   4. Page 8-4. Clarify what is meant by " in excess of a 1/3 volume", does this mean 1 and 1/3 times the total volume of the largest tank or interconnected tanks as required by the NMOCD?

5. Note: All the items listed in the section 8.0 shall be properly labelled as to their contents at the facility.

B. UNDER ITEM 9.0 Proposed Modifications.

1. Part A-Proposed Modifications to Fulfill the Requirements of the Regulations: Modifications #2 through #4 need to commit to a more specific response than the" material will be disposed of in proper manner as the need arises."

Note: Few if any of the wastes generated this facility would fall under the RCRA exemption for E&P wastes, provide a more detailed statement that will address waste characterization, sampling for hazardous characteristics, storage, disposal, and regulatory agency notification-i.e. NMOCD for exempt and non-exempt nonhazardous wastes and NMED HRMB for non-exempt hazardous wastes.

2. Part B-Proposed Closure of Ponds, Pits, Leach Fields, Etc....
Upon review of Closure file for the Pool Company, Hobbs facility it was noted that Pool has not responded to Mr. Bill Olson's letter dated April 28, 1995 - this letter needs to be addressed by Pool Company so that the items requested in the above mentioned letter can be addressed and final closure can be approved.

Note: Upon review of the closure plan it was noted that a groundwater depth of 65' (feet) was used - upon checking data from a nearby facility and State Engineer information, the actual depth to groundwater is 45' to 43' (feet). This changes the required TPH of the remmediated soil to 100 ppm rather than 1,000 ppm if this soil is to be placed back into the excavation.

C. UNDER ITEM 11.0 Spill and Leak Prevention and Reporting.
Part A - Proposed Procedures for Containment, Cleanup and Reporting: Attach the enclosed OCD rule 116 and WQCC 1-203 spill reporting requirements to the discharge plan. NOTE: In the event of a reportable spill notify the Hobbs District first at 393-6161.

D. UNDER ITEM 13.0 Compliance Information.
- see B. 2. above -

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

ATTACHMENT C

TERRA DYNAMICS INC
ENVIRONMENTAL SERVICES

Record of Communication

Job Name:
Pool Hobbs - Discharge Plan NOD's

Job Number:
95-172

Topic: NOD # 8-3 - Does Waste Management Approve of Spill absorbant being thrown in their dumpster.

Time: 930 am

Mike Eide
Call From:

Lee Coffman
Call To:

1-800-634-8760
Phone Number:

Waste Management of SE New Mexico
Company:

2608 Lovington Hwy.
Address:

Hobbs
City:

N.M.
State:

Comments:
Spoke to Lee Coffman at Waste Management concerning the disposal of spill absorbant in the container on the Pool facility. Mr. Coffman stated that small quantities of spill absorbant are permitted and fall into an "Incidental to the load" classification. Small quantities of containers with paint residue would also fall into this classification.

Signature: Mike Eide

TERRA
DYNAMICS INC
ENVIRONMENTAL SERVICES

Record of Communication

Job Name: Pool Hobbs - Discharge Plan

Job Number: 95-172

Topic: Spent Welding Rods

Time: 11:00

Mike Eide

Call From:

Brian Noble

Call To:

(512) 239-6750

Phone Number:

Texas Natural Resource Conservation Commission

Company:

Address: Austin

City: TX

State:

Comments:

Spoke to Mr. Noble concerning the classification of spent welding rods as a waste type. Mr. Noble said that welding rods that are used are considered a steel/iron waste and can be recycled by a scrap metal handler. No special handling is required for spent welding rods.

Signature: Mike Eide

ATTACHMENT D

TERRA DYNAMICS INC ENVIRONMENTAL SERVICES

PROJECT 95-172 PREPARED BY WE

DETAIL Volume Calculations for Secondary Containment Units. DATE 8/3/95

CHECKED BY [signature] 8-3-95 PAGE NO. 1/1

(1) CONTAINMENT UNIT #1 - Bulk chemical Storage Area

Physical Dimensions (measured)

L = Length in inches
W = Width in inches
D = Depth in inches

L = 190"
W = 95"
D = 29"

(L)x(W)x(D) = Volume in cubic inches

190" x 95" x 29" = 523,450 inches^3

Volume in Gallons = (Volume in (inches^3)) · (4.329 x 10^{-3}) so

2,266 gallons = (523,450 inches^3) · 4.329 x 10^{-3}

The estimated volume of the bulk chemical secondary containment unit is approximately 4.5 times the volume of the largest tank (500 gallon).

(2) CONTAINMENT UNIT #2 - Waste Chemical Storage Area

Physical Dimensions (measured)

L = 168"
W = 60"
D = 12"

(L) x (W) x (D) = Volume in cubic inches

168" x 60" x 12" = 120,960 inches^3

Volume in Gallons = (Volume in inches^3) x (4.329 x 10^{-3}) so

(120,960 inches^3) x (4.329 x 10^{-3}) = 523.6 gallons.

The estimated volume of the Waste Chemical Secondary containment unit is approximately 1.75 times the volume (300-gallons) of the waste oil tank.

July 26, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-097

Mr. Tim Parker
Area Manager
Pool Company
P.O. Box 1198
Hobbs, NM 88240-1198

RE: Discharge Plan GW-214
Pool Company, Hobbs facility
Lea County, New Mexico

Dear Mr. Parker:

The NMOCD has received the proposed Pool Company discharge plan application for the facility located in SW/4 SW/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The NMOCD has prepared and sent out the public notice for the Pool Company facility as stated in WQCC section 3-108 and has performed a preliminary review of the discharge plan as proposed by ~~Cobra Industries~~ Pool Company as received by the OCD on July 19, 1995.

The following comments and request for additional information are based on the review of the Pool Company 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 Pool Company signed by Mr. Timothy A. Parker on July 18, 1995.

A. UNDER ITEM 8.0 Summary of Waste Collection, Storage, and Disposal Procedures:
   1. Table 8-1 Painting Waste. Are the paint cans air dried before they are tossed in the Waste Management Dumpster?
   2. Table 8-1 Painting Waste. What is the volume and type of solvent that is evaporated? Provide the regulatory citation under RCRA that allows for this type of waste treatment.
   3. Table 8-1 Other Waste Solids. Does Waste Management know about and approve spill absorbent being tossed in their dumpster?
   4. Page 8-4. Clarify what is meant by " in excess of a 1/3 volume", does this mean 1 and 1/3 times the total volume of the largest tank or interconnected tanks as required by the NMOCD?

5. Note: All the items listed in the section 8.0 shall be properly labelled as to their contents at the facility.

B. UNDER ITEM 9.0 Proposed Modifications.

1. Part A-Proposed Modifications to Fulfill the Requirements of the Regulations: Modifications #2 through #4 need to commit to a more specific response than the" material will be disposed of in proper manner as the need arises."

Note: Few if any of the wastes generated this facility would fall under the RCRA exemption for E&P wastes, provide a more detailed statement that will address waste characterization, sampling for hazardous characteristics, storage, disposal, and regulatory agency notification-i.e. NMOCD for exempt and non-exempt nonhazardous wastes and NMED HRMB for non-exempt hazardous wastes.

2. Part B-Proposed Closure of Ponds, Pits, Leach Fields, Etc....
Upon review of Closure file for the Pool Company, Hobbs facility it was noted that Pool has not responded to Mr. Bill Olson's letter dated April 28, 1995 - this letter needs to be addressed by Pool Company so that the items requested in the above mentioned letter can be addressed and final closure can be approved.

Note: Upon review of the closure plan it was noted that a groundwater depth of 65' (feet) was used - upon checking data from a nearby facility and State Engineer information, the actual depth to groundwater is 45' to 43' (feet). This changes the required TPH of the remmediated soil to 100 ppm rather than 1,000 ppm if this soil is to be placed back into the excavation.

C. UNDER ITEM 11.0 Spill and Leak Prevention and Reporting.
Part A - Proposed Procedures for Containment, Cleanup and Reporting: Attach the enclosed OCD rule 116 and WQCC 1-203 spill reporting requirements to the discharge plan. NOTE: In the event of a reportable spill notify the Hobbs District first at 393-6161.

D. UNDER ITEM 13.0 Compliance Information.
- see B. 2. above -

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

MEMORANDUM OF MEETING OR CONVERSATION

___TELEPHONE X PERSONAL TIME 8:30 (AM)/PM DATE 7/26/95

ORIGINATING PARTY: Pat Sanchez - OCD
OTHER PARTIES: Bill Olsen - OCD

SUBJECT: Pool Co. Remmediation.

DISCUSSION: Pool used a groundwater depth of 65'- they should of used a depth of 43'. Risk factor changes from 10 to 20. TPH changes to 100 PPM. This will effect their remmediation level for the soil if they desire to place it back in the hole. TPH will have to be less 100 PPM instead of 1,000 ppm.

* The bottom of the Pit shows 93 ppm per the Pool Co. report dated. March 8, 1995

CONCLUSIONS/AGREEMENTS: Pool needs to submit quarterly samples according to their 11/8/94 Submittal. Also they have not responded to the April 28, 1995 letter from Bill Olsen and need to do so. If pool wants to Place remmiated dirt back in the hole they need to have a TPH of 100ppm for the remmiated dirt.

PATRICIO W. SANCHEZ: Patricio W. Sanchez

xc: FILE, Bill Olson, Wayne Price.

MEMORANDUM OF MEETING OR CONVERSATION

X TELEPHONE ___ PERSONAL TIME 3:15 AM/(PM) DATE 7/25/95

ORIGINATING PARTY: WAYNE PRICE - Hobbs OCD
OTHER PARTIES: PAT SANCHEZ - Santa Fe OCD

SUBJECT: Review of GW-214, Pool Company Hobbs.

DISCUSSION: (1) Address Empty drum storage - Pad/curb.
(2) solvent Evaporation - concerns - RCRA treatment of HAZ. WASTES Also Air Quality.
(3) USED Paint Needs addressed - Air Empty cans air dryed.
(4) section 8.0 and 9.0 clarify volume and disposal of paint wastes.
(5) 10-1 check spill reporting - wayne concerned about definition of Major/Minor. * See comment in review book.
(6) 11-1 1-203 WQCC - make sure it matches - also Rule 116.
(7) Any Hazardous wastes - refer to HRMB (NMED coby).
(8) Groundwater Level - wayne says about 40'-50', their report says 65'. Note: I checked state Engineer levels. - Feb 1981 shows 43'. This affects TPH level of remmediated soils - from 1,000 ppm to 100 ppm.

CONCLUSIONS/AGREEMENTS: Will draft additional information request letter and address the above concerns as well as those I have marked with Red INK on review copy of GW-214.

PATRICIO W. SANCHEZ: Patricio W. Sanchez

xc: FILE, WAYNE Price

MEMORANDUM OF MEETING OR CONVERSATION

X TELEPHONE ___ PERSONAL TIME 11:15 (AM)/PM DATE 7/25/95

ORIGINATING PARTY: Pat Sanchez - NMOCD
OTHER PARTIES: Tim Parker - Pool company in Hobbs, NM 393-5161

SUBJECT: Discharge Plan GW-214 Application.

DISCUSSION: (1) I told Tim that I was reviewing his discharge Plan application and had submitted the Public notice.

(2) Told him that overall plan looking good but that I recommended to him to use the word "USED" rather than waste and to label Gycol/water mixture as "Rig Hydromatic Brake Fluid".

(3) Also, asked him to check in to the status of the wash pit closure and to check into updating the remmediations progress. Also suggested that he look into Placing the remmediated soil back into the existing hole - would be more cost effective than hauling offsite and buying new soil to fill the existing hole - of course this would be done once the soil is below our pit closure guideline levels.

CONCLUSIONS/AGREEMENTS: Tim will follow up on (2) and (3) Above - I told him I would send him a letter evaluating the discharge plan.

PATRICIO W. SANCHEZ: Patricio W. Sanchez

xc: FILE, WAYNE PRICE

Affidavit of Publication

STATE OF NEW MEXICO)

) ss.

COUNTY OF LEA)

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

That the notice which is hereto attached, entitled

Notice Of Publication

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, for one (1) day consecutive weeks, beginning with the issue of

July 27, 19 95

and ending with the issue of

July 27, 19 95

And that the cost of publishing said notice is the sum of $ 75.20

which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 22nd day of August, 19 95

Jean Ferrier

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 98

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

Notice is hereby given that pursuant to the 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)827-8177:

(GW-211) - El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Largo Plant Compressor Station located in Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 115 gallons per day of process wastewater with total dissolved solids concentration of approximately 3500 mg/l is stored in an above grade, closed top steel tank prior to offsite disposal at an OCD approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 255 feet with a total dissolved solids concentration of approximately 542 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-212) - El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Ballard Plant Compressor Station located in the SE/4 NE/4 and the NE/4 SE/4 of Section 26, Township 26 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 2 gallons per day of process wastewater with total dissolved solids concentration of approximately 3500 mg/l is stored in an above grade, closed top steel tank prior to offsite disposal at an OCD approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 440 feet with a total dissolved solids concentration of approximately 920 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-213) - Llano, Inc., Ed Sloman, 921 West Sanger, Hobbs, New Mexico 88240, has submitted a discharge plan application for their Strata Compressor Station located in the NE/4 NE/4 of Section 22, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 236 feet with a total dissolved solids concentration of approximately 1253 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-214) - POOL Company, Mr. Timothy Parker, (505) 393-5161, P.O. Box 1198, Hobbs, NM 88240-1198 has submitted a Discharge plan application for their Hobbs facility located in the SW/4 SW/4 Section 36, Township 18 South, Range 37 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 65 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 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 Oil Conservation Division at Santa Fe, New Mexico, on this 20th day of July, 1995.

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

SEAL

Published in the Lovington Daily Leader July 27, 1995.

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 Regulation, 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) 827-8177.

(GW-211) - El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Largo Plant Compressor Station located in Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 115 gallons per day of process wastewater with total dissolved solids concentration of approximately 3500 mg/l is stored in an above grade, closed top steel tank prior to offsite disposal at an OCD approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 255 feet with a total dissolved solids concentration of approximately 542 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-212) - El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Ballard Plant Compressor Station located in the SE/4 NE/4 and the NE/4 SE/4 of Section 26, Township 26 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 2 gallons per day of process wastewater with total dissolved solids concentration of approximately 3500 mg/l is stored in an above grade, closed top steel tank prior to offsite disposal at an OCD approved facility. Groundwater most likely to be affected is at a depth of approximately 440 feet with a total dissolved solids concentration of approximately [illegible] mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-213) - [illegible] Llano, Inc., [illegible] Sloman, [illegible] West, [illegible] Hobbs, New Mexico 882[illegible] has submitted a discharge plan application for the Strata Compressor Station located in the NE/4 NE/4 of Section 24, Township [illegible] South, Range 34 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 230 feet with a total dissolved solids concentration of approximately 1253 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-214) - POOL Company, Mr. Timothy Parker, (505)-393-6161, P.O. BOX 1198, Hobbs, NM, 88240-1198 has submitted a Discharge plan application for their Hobbs facility located in the SW/4 SW/4, Section 36, Township 18 South, Range 37 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 to 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 55 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 20th day of July, 1995.

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

Journal: July 27, 1995.

STATE OF NEW MEXICO
County of Bernalillo SS

RECEIVED
AUG - 7 1995
OIL CONSERVATION DIVISION

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 27 day of July, 1995, and the subsequent consecutive publications on ______, 1995

Bill Tafoya

OFFICIAL SEAL
Corina Duncan
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires 10-9-98

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 27 day of July 1995

[signature]

PRICE 77.30

Statement to come at end of month.

OK to pay

CLA-22-A (R-1/93) ACCOUNT NUMBER C 80932

AFFIDAVIT OF PUBLICATION

No. 35086

STATE OF NEW MEXICO
County of San Juan:

ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Thursday, July 27, 1995

and the cost of publication was: $102.97

Robert Lovett

On 7/28/95 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Mary L. Saad

My Commission Expires March 21, 1998

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, 20th day of July, 1995.

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 20th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

POOL COMPANY
a subsidiary of
Pool Energy Services Co.

Carlsbad Highway
P.O. Box 1198
Hobbs, New Mexico 88240

Tel: 505-393-5161
Fax: 505-393-8712

GW-214

Pat Sanchez
Energy Minerals and Natural Resource Dept.
Oil Conservation Division

July 18, 1995

Mr. Sanchez;

Please accept this Discharge Plan for Pool Company's Hobbs, New Mexico facility.

I apologize for our failure to meet the original submission date and hope that this plan will meet the State's requirement.

Thank you for the extension of time you allowed us to complete this Discharge Plan.

I will deliver a copy of this plan to Mr. Wayne Price's office in Hobbs, N.M. personally.

Attached to this letter you will find our check for $50.00 as required for filing this plan.
Thank you.

Sincerely,

RECEIVED
JUN 14 1995
Environmental Bureau
Oil Conservation Division

July 19, '95
pws

Timothy A. Parker
Area Manager
Pool Company
Hobbs, N.M.
505-393-5161

RECEIVED
JUL 19 1995
Environmental Bureau
Oil Conservation Division

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 20, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-712

Mr. Mike Eide
Terra Dynamics
9011 Mountain Ridge, Suite 100
Austin, Texas 78759

RE: DISCHARGE PLAN
POOL CO.(TX) Inc.
LEA COUNTY, NEW MEXICO

Dear Mr. Eide:

Enlosed you will find the information outlined below, It should be noted that POOL CO. (TX) Inc. had received all the information needed to prepare a discharge plan with the requirement letter that was sent to them dated February 7, 1995.

1. Requirement letter dated February 7, 1995.
2. Notice of Violation letter dated June 7, 1995.
3. Discharge plan application form.
4. Discharge plan guidelines.
5. WQCC rule book.

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

Sincerely,

Patricio W. Sanchez
Petroleum Engineer
XC: Wayne Price

OIL CONSERVATION DIVISION-ENVIRONMENTAL BUREAU

TO: Mr. Mike Eide - FAX NO. 512-795-8602

FROM: PATRICIO W. SANCHEZ , PETROLEUM ENGINEER 505-827-7156

NUMBER OF PAGES INCLUDING THIS ONE: 20

MESSAGE:

Mike, here are the guidelines and an application Form. I will also mail you this information as well as WQCC rule.
Note: Pool Co. was sent all this information.

IF YOU HAVE ANY TROUBLE RECEIVING THIS FAX PLEASE CALL (505)-827-7133.

OCD FAX NUMBER: (505)-827-8177

P. 01

TRANSACTION REPORT

JUN-20-95 TUE 8:14 AM

FOR: OIL CONSERVATION DIV. SIO 5058278177

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE
JUN-20	8:02 AM	915127958602	12'22"	20	SEND	OK

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 14, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-706

Mr. Tim Parker
POOL CO.(TX) Inc.
P.O. Box 1198
Hobbs, New Mexico 88240

RE: NOTICE OF VIOLATION
POOL CO.(TX) Inc.
LEA COUNTY, NEW MEXICO

Dear Mr. Parker:

Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, you were notified by a certified letter dated February 7, 1995 from the Oil Conservation Division (OCD) that the filing of a discharge plan is required for your existing facility at 5730 Carlsbad HWY Hobbs , New Mexico. The letter required a submittal of the discharge plan within 120 days (by June 12, 1995) of receipt of the above mentioned notification.

As of the date of this letter, the OCD has not received any response from POOL CO.(TX) Inc. to the request from the OCD for the filing of a discharge plan. This is in violation of the New Mexico Water Quality Act (Chapter 74, Article 6 NMSA 1978). Continued violation could subject you to the penalty provisions provided in Section 74-6-10 NMSA 1978 of the Water Quality Act and you may be assessed civil penalties up to the amount of fifteen thousand ($15,000) dollars per day.

The discharge plan requirement and notification thereof are set forth in sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in 1-101.Q. of the WQCC Regulations, should cover all discharges of effluent or leachate at the facility or adjacent to the facility site.

POOL CO. (TX) Inc. must submit the required discharge plan to the OCD Santa Fe Office no later than July 19, 1995. Failure to respond by that date may subject POOL CO.(TX) Inc. to the violation action referenced above from the date the discharge plan was originally due in this office, June 12, 1995.

Contact Patricio W. Sanchez at (505) 827-7156 if you have any questions as he is assigned responsibility for review of this service facility discharge plan.

Sincerely,

by Ron Mercer - Deputy Director

William J. LeMay
Director

xc: Wayne Price

CONSERVATION DIVISION
RECEIVED

15 MAY 8 AM 8 52

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 8:37 AM	Date 5/24/95

Originating Party	Other Parties
TIM PARKER - Pool Co	

Subject: INFO ON WASH OUT PIT

Discussion: REQUESTED PROCEDURE FOR INSTALLING WASH OUT PIT

Conclusions or Agreements

SUBMIT PLANS WITH DISCHARGE PLAN

Distribution cc: PAT SANCHEZ
MARK ASHLEY
JERRY SEXTON

Signed: Wayne Price

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

New Mexico DRUG FREE It's a State of Mind!

February 7, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.Z-765-962-640

Mr. Tim Parker
POOL CO.(TX) Inc.
P.O. Box 1198
Hobbs, NM 88240

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

Dear Mr. Parker:

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 POOL CO. (TX) facility located at 5730 Carlsbad HWY 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 facilty 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

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 765 962 640

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

UNITED STATES POSTAL SERVICE

Sent to Pool Co. (TX)	
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

COMBEST GEOscience
Environmental Consulting and Testing

7122 Wood Hollow #7
Austin, Texas 78731
(512) 345-1063

November 9, 1994

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Pox 2088
Santa Fe, NM 87304-2088

Mr. Anderson:

Enclosed, you will find the report entitled "Unlined Surface Impoundment Closure Plan for Pool Company, Hobbs, NM." Mr. Wayne Price, District I Engineer in Hobbs, NM requested that Pool Company (Texas) Inc. meet requirements for closure of an excavated leach field at their facility in Hobbs. This report describes procedures to be followed.

If you would like to discuss this plan or have any questions, please contact myself or Kyle Combest.

Sincerely,

Lynne Fahlquist

Lynne Fahlquist

xc: Wayne Price, District I, Hobbs

COMBEST GEOscience

Environmental Consulting and Testing

7122 Wood Hollow #7
Austin, Texas 78731
(512) 345-1063

UNLINED SURFACE IMPOUNDMENT
CLOSURE PLAN
FOR POOL COMPANY
HOBBS, NEW MEXICO

November 8, 1994

Prepared by:
Lynne Fahlquist, Environmental Geologist
Kyle Combest, Environmental Geologist
COMBEST GEOscience
Austin, Texas

TABLE OF CONTENTS

CLOSURE PLAN
FOR
POOL COMPANY
HOBBS, NEW MEXICO

INTRODUCTION

The Pool Company (Texas) Inc. Hobbs facility is located on the north side of Highway 62/180 between the Hobbs Country Club and Lea County Hobbs Airport (Figure 1). The facility is west of the town of Hobbs in Lea County, New Mexico (Township 18S and Range 37E, south-central part of Section 36). The mailing address is Carlsbad Highway, P.O. Box 1198, Hobbs, NM 88240-1198. The Pool Company contact is Mr. Tim Parker, Area Manager (Telephone: 505-393-5161).

Pool Company is an oilfield service company and the Hobbs facility is used for activities related to drilling and well service. On-site activities include vehicle maintenance, rig washing, and industrial vehicle washing on a concrete washpad. The washpad has walls on two sides and a sump in the floor (Figure 2). The sump was used to collect wash water that was then discharged into a swell leach field adjacent to the washpad. After learning that leach fields, common at well service sites, were no longer acceptable, the site manager excavated contaminated soil in the spring of 1993. The resulting pit is approximately 14-ft. in length, 8-ft. in width, and 5-ft. in depth. The excavated soil was laboratory analyzed and placed adjacent to the pit. Mr. Wayne Price, New Mexico Oil Conservation Division (District I, Hobbs) Engineer, visited the site and noticed the pit in the summer of 1994. Mr. Price requested that a Closure Plan be prepared and subsequent closure activities initiated (Attachments 1 and 2).

Although the pit lacked physical evidence of contamination from the wastewater discharge (no discoloration of soil, no odor), chemical analyses of the excavated material indicated the presence of TPH and minor amounts of BTEX (Table 1 and Attachments 3 and 4).

I. SITE ASSESSMENT

According to a geologic map of the area (Figure 3) and drilling information, the site is located on Quaternary gravel and caliche alluvium which is underlain by the sedimentary Ogallala formation. Depth to ground water in the Ogallala aquifer is approximately 65 feet below ground surface and total depth of the aquifer is about 200 feet in the general area (Eades Water Well Drilling Co., Hobbs, NM, pers. comm.). Ground water from the Ogallala is used as a domestic water source for the golf course and country club, located approximately 2000 feet to the SSE (Figure 1).

Soil samples collected from the pit and spoil pile were analyzed for TPH and BTEX. Sample #6, collected from the pit floor, indicated that TPH may still be present in the soil in this area (Table 1).

A. GENERAL SITE CHARACTERISTICS

1. Depth to Ground Water

   Depth to Ogallala ground water in the general area is approximately 65 feet. Nearest water wells are 3400 feet to the northeast (water tank and aqueduct), 2800 feet to the east, 1500 feet to the west (water tank), and 1500 feet to the northwest (water tank). Driller information indicates that the soil and rock type is caliche beginning at the surface and continuing to the ground-water zone (Eades Water Well Drilling Co., pers. comm.). In some areas, crystallized sandstone is encountered near the ground-water zone.

2. Wellhead Protection Area

   The leach field received washrack waste water. The pit has the dimensions of 8-ft. width, 14-ft. length, and 5-ft. depth. The excavated soil has been placed on the ground adjacent to the pit.

3. Distance to Nearest Surface Water Body

   The nearest surface water body is an aqueduct and is located about 3700 feet to the east of the site (Figure 1).

B. SOIL/WASTE CHARACTERISTICS

The soil in the pit is classified as gravel and caliche. The soil is not highly contaminated/saturated as defined in "Unlined Surface Impoundment Closure Guidelines (Feb. 1993)". Rather, the soil is defined as unsaturated/contaminated because the soil contains measurable concentrations of BTEX and TPH. These soils are oilfield contaminated soils which are not exempt from federal RCRA Subtitle C hazardous waste rules. However, because of process knowledge, NM OCD Closure Guidelines can be used for this closure plan.

C. GROUND WATER QUALITY

Ground water quality will be characterized if data from initial remediation activities indicate that constituents have migrated through the soil to the ground-water zone at roughly 65 feet depth.

II. SOIL AND WATER REMEDIATION

A. SOILS

Using the Ranking Criteria established by NM OCD to determine the remediation level required for unsaturated contaminated soils, the total ranking score for this facility is 10. Using the value of 10 as determined in part 1, the required remediation levels for TPH, BTEX and benzene are listed below in part 2. A Closure Report Form containing this information is included as Attachment 5.

1. Ranking Criteria

Ranking Criteria	Ranking Score
Depth to Ground Water (50-99 feet)	10
Wellhead Protection Area (No)	0
Distance to Surface Water Body (>1000 horizontal feet)	0
TOTAL RANKING SCORE	10

2. Required remediation level for constituents:

Benzene (ppm)	10
BTEX (ppm)	50
TPH (ppm)	1000 (above background level)

3. Other

A total concentration of lead will be determined by laboratory analysis. If the total concentration of lead is 20 times greater than its TCLP value (1.5 mg/L), then a TCLP analysis will be conducted.

B. GROUND WATER

Remediation levels for ground water will later be determined if the initial remediation activities are unsuccessful.

III. SOIL AND WATER SAMPLING

Soil sampling procedures for unsaturated/contaminated soils will follow procedures outlined in the NM OCD Closure Plan guidelines. At this time it is presumed that ground-water sampling will not be required. If ground-water sampling becomes necessary, a later proposal will describe the ground-water sampling procedures.

IV. REMEDIATION

Proposed remediation activites and verification sampling include the following:

- Continue excavation with a backhoe until either the soil is determined to be clean or an impractical limit of excavation is reached.
- During excavation, field screening using a PID and NM OCD procedures outlined in closure plan guidelines will be followed.
- Upon completion of excavation, soil samples from the pit will be collected for laboratory analyses (TPH, BTEX, lead). If the concentration of the constituents analyzed are greater than their required remediation levels, then a soil boring will be drilled at a later date.
- Excavated contaminated soil will be placed in a bermed and lined bioremediation cell on site. This soil will be treated with conventional bioremediation methods (nutrients, oxygen, moisture).
- The bioremediation progress will be monitored by quarterly sampling.

V. TERMINATION OF REMEDIAL ACTIVITY

Termination of remedial activity will occur when concentrations in the soil are at levels acceptable for transportation and disposal at an approved disposal facility. A manifest will accompany the waste.

VI. FINAL CLOSURE

The site will be deemed closed after the soil is removed from the facility and verification sampling indicates that no contaminants remain beneath the bioremediation cell.

VII. CLOSURE REPORTS

A final closure report and accompanying forms will be completed upon termination of remedial action.

FIGURES

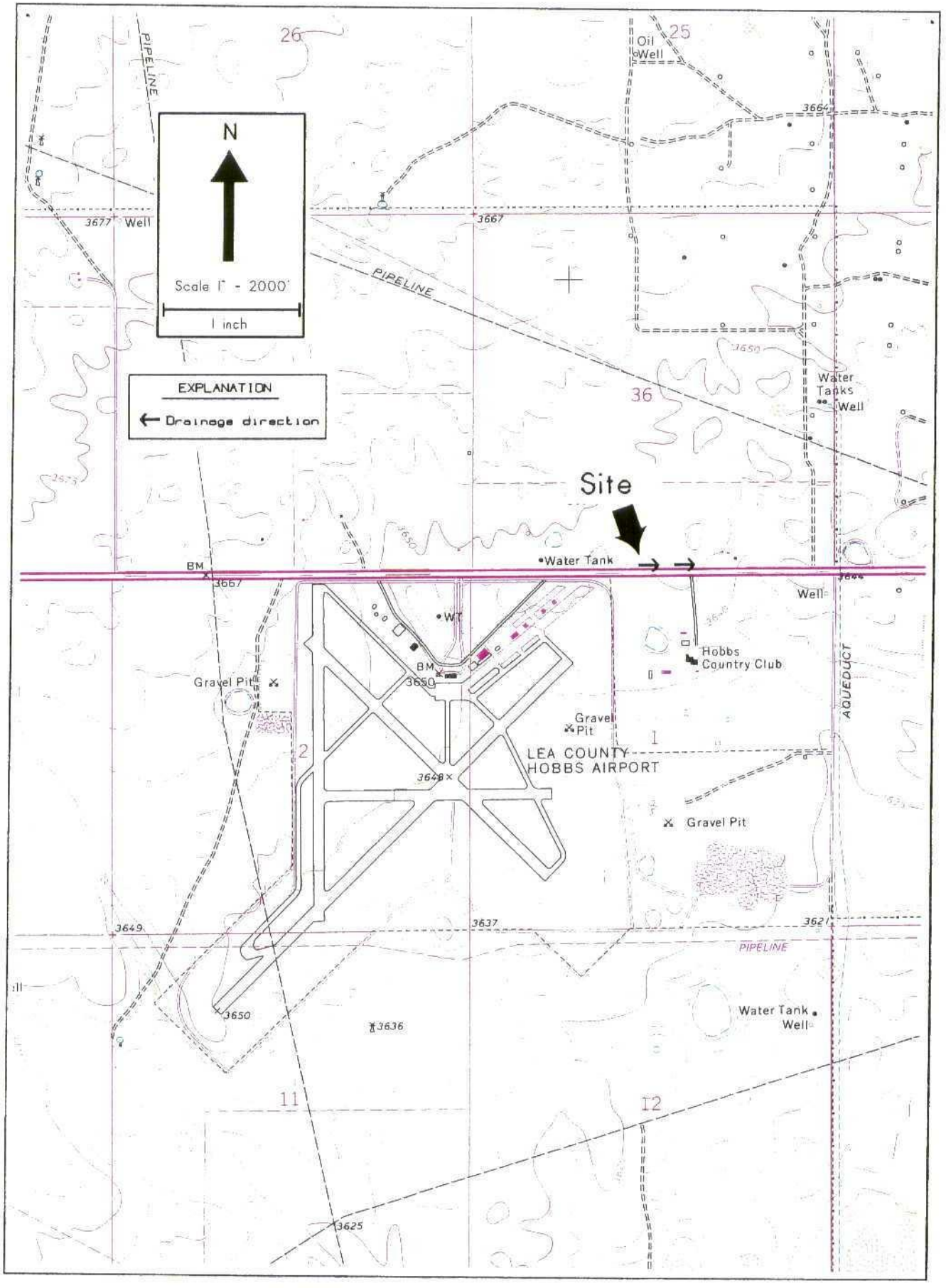
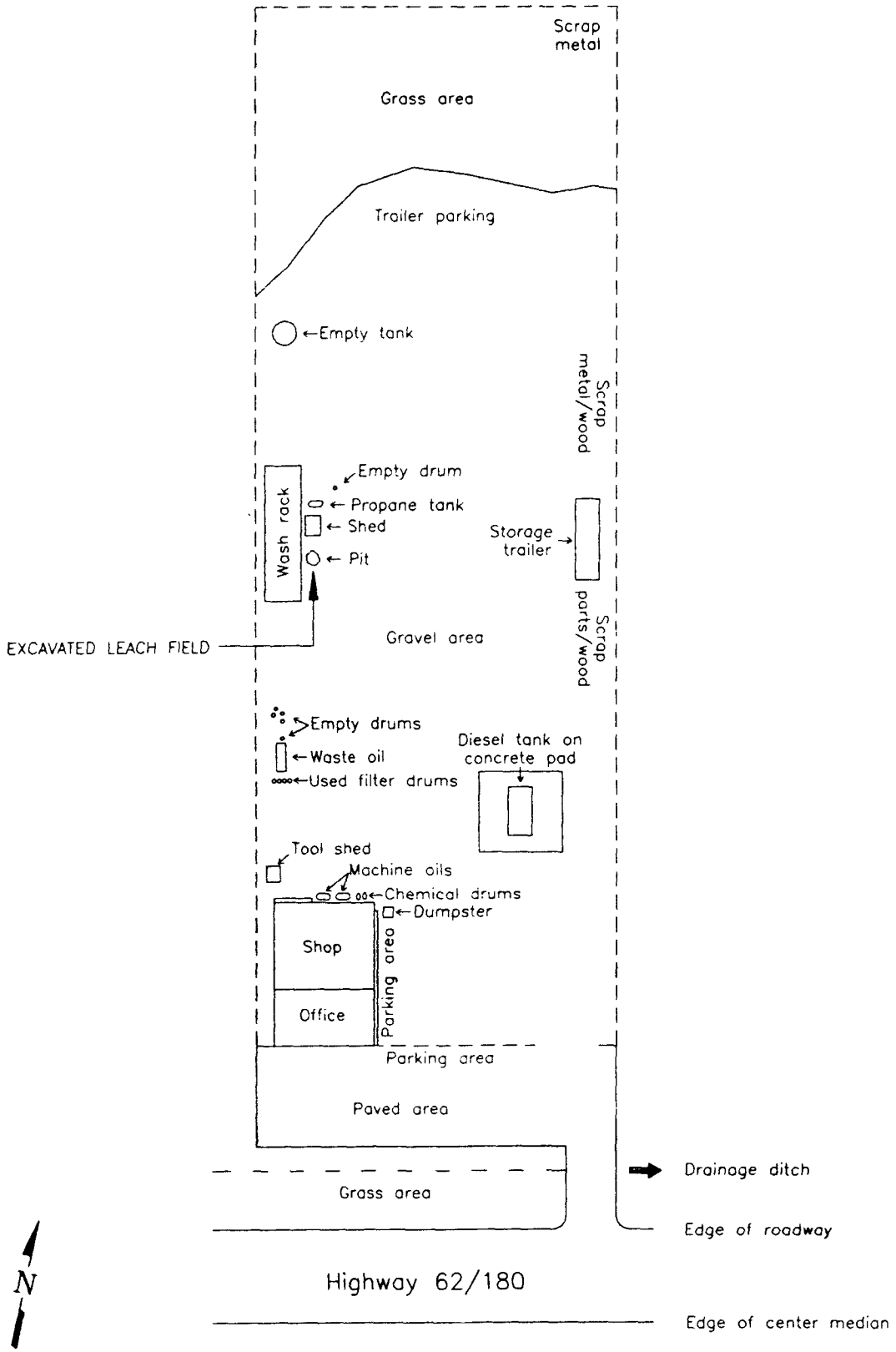
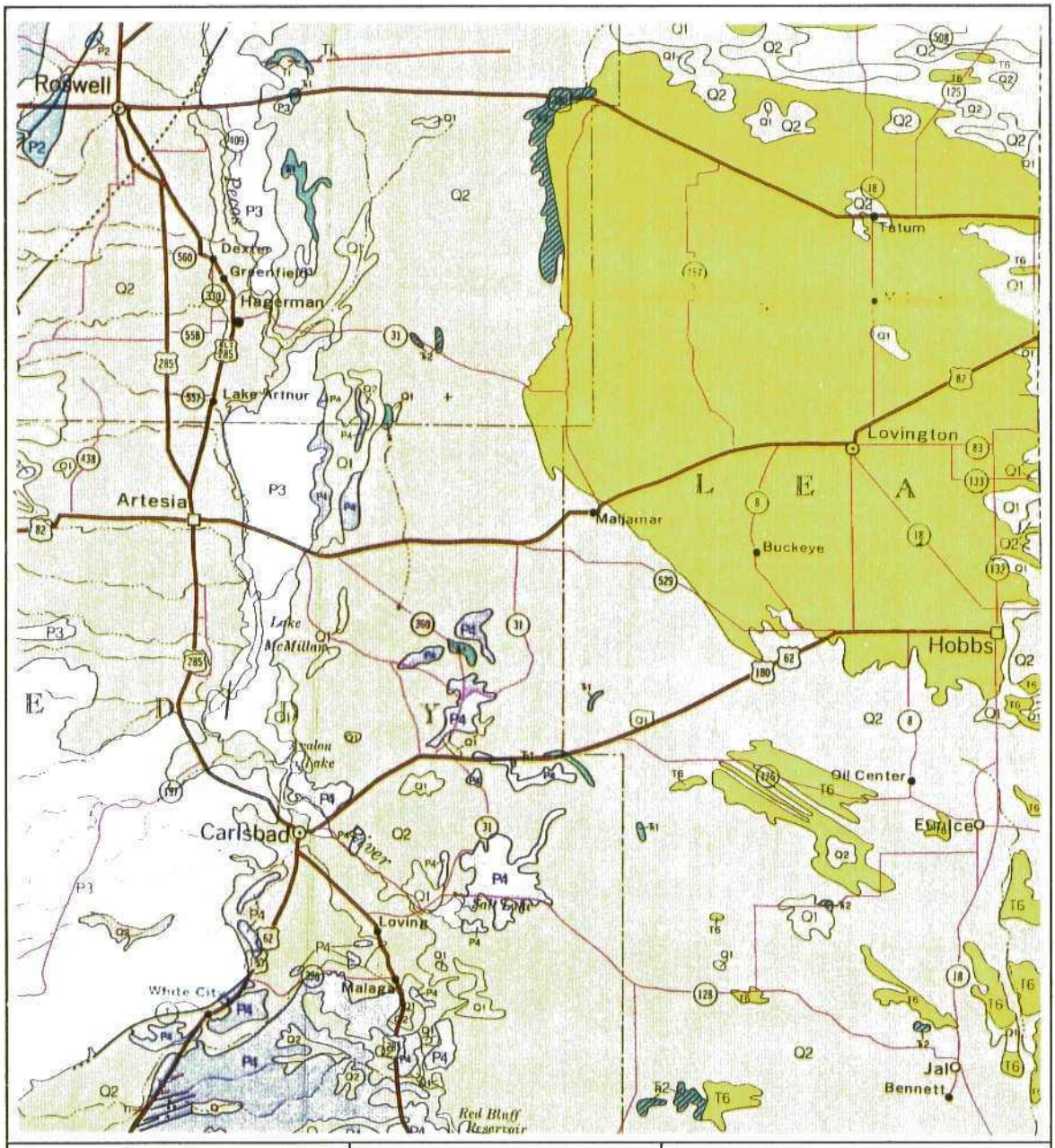


Figure 1. U.S.G.S. topographic map (1:24,000).



COMBEST GEOSCIENCE Austin, Texas Prepared by: L. Dowell Date: 28 Sept. 1993	SCALE 1" = 80' 1 inch	LEGEND Fence Drainage Direction	POOL COMPANY HOBBS, NEW MEXICO SITE MAP

Figure 2



COMBEST GEOscience Austin, TX Prepared by: Lynne Fahlquist Date: 1 November 1994	LEGEND Q2-Quat. alluvium Q1-Quat. colluvium T6-Tert. Ogallala Fm. SCALE 1:1,000,000	**Generalized Geologic Map of the Hobbs Area** from: New Mexico Highway Geologic Map, New Mexico Geological Society, 1982

Figure 3

TABLES

Table 1. Soil Sample Analytical Results

FINAL ANALYSIS REPORT
(see also Attachments 4 and 5)

Date: 7/21/93
Lab#: H1294

Project Name: Pool Yard
Project Location: Hobbs
Sampled by: TP Date: 7/19/93 Time: 11:20
Analyzed by: SS/HM Date: 7/19/93 Time: 4:30
Type of Sample: Soil Sample Condition: GIST Units: mg/kg, mg/L

Sample #	Field Code	TRPHC	Benzene	Toluene	Ethyl Benzene	Para-Xylene	Meta-Xylene	Ortho-Xylene	MTBE
1	Exc.Pile-N	3255	<0.001	<0.001	<0.001	<0.001	0.005	0.018	<0.001
2	Exc.Pile-SE	1652	<0.001	<0.001	<0.001	<0.001	0.002	0.008	<0.001
3	Exc.Pile-SW	2202	<0.001	0.028	0.035	<0.001	0.007	0.025	<0.001
4	S.Wall-FloorL.	79.4	<0.001	<0.001	0.012	<0.001	0.009	0.004	<0.001
5	E.Wall-FloorL.	661.4	<0.001	<0.001	0.007	<0.001	0.005	0.017	<0.001
6	W.Wall-FloorL.	6972	0.032	0.048	0.352	0.060	0.075	0.100	0.027
	QC Recovery	466.4	2.019	2.062	2.086	2.034	1.984	2.007	1.148
	QC Spike	405.9	2.147	2.103	2.162	2.110	2.128	2.083	1.328
	Accuracy	114.9%	94.0%	98.1%	96.5%	96.5%	93.2%	96.3%	86.4%
	Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - Automated Headspace GC; Infrared Spectroscopy
- EPA SW-846; EPA Methods 8020, 418.1, 3540 or 3510

Analyzed By:
Cardinal Laboratories
101 E. Marland
Hobbs, NM 88240
505-393-2326

Approved by:
Michael R. Fowler

ATTACHMENTS

INTEROFFICE MEMORANDUM

Post-it™ Fax Note 7671	Date 5/31	# of pages ▶2
To Kyle - FYI	From Leslie	
Co./Dept.	Co. Pool Co	
Phone #	Phone #	
Fax #	Fax #	

TO: Tim Parker

DATE: May 31, 1994

FROM: Gil Gayaut

RE: Hobbs, NM

I spoke to Wayne Price, New Mexico Environmental Engineer, (505)393-6161 or (505)369-6233 regarding the Hobbs location.

1. All water in berms around oil, fuel & used oil tanks needs to be treated as a non-exempt waste. Need to produce waste characterization for each fluid.

2. Leach field that was dug up last year. Need to take samples for TPH & BTEX. Wayne wants to be present when samples are drawn.

3. Need to clean up oil stains and diesel stains in yard. Test to determine if material is hazardous or non-hazardous. If hazardous we must dispose of properly - if non-hazardous then we should submit a plan to them on how we want to treat the soil, or dispose of it.

4. You should consider <u>all</u> wastes on your site as industrial non-exempt wastes. <u>Nothing</u> from the Hobbs yard should be pumped down a disposal well.

5. The New Mexico DEQ is working with us on an informal basis to improve our knowledge of environmental issues. Wayne indicated our yard would not now pass a cursory overview inspection due to obvious housekeeping problems. In short, we must keep up with the housekeeping to avoid further regulatory problems.

The single most effective way to achieve this is by <u>preventing</u> any releases of oil, fuel or grease. You need to advise how this can be done. Also, we need to come up with a disposal solution for <u>each</u> waste generated at the site. Records of all of your disposal activities will have to be kept on site.

I have contacted Combest GeoScience to assist you with competing the environmental requirements. Kyle Combest is the contact and may be reached at (512)345-1063.

Attachment 1

Tim: For your info. - Any costs related to cleanup of the old washbay or leach field will be borne by the Reserve Fund as an old problem. Waste characterization, sampling, and disposal of accumulated wastes will hit your bottom line.

Please call me if you have any questions.

Regards,

Gil Gaynart

Gil

GG:lak

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

FAX To Oil

BRUCE KING
GOVERNOR

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

August 12, 1994

Mr. Tim Parker-Area Manager
Pool Company (Texas) Inc.
Carlsbad Highway
P.O. Box 1198
Hobbs, NM 88240

Dear Mr. Parker,

Please note your plans to close the previous leech field and now open pit located at your Hobbs, New Mexico facility is regulated pursuant to State of New Mexico Water Quality Control Commission Regulations.

These regulations require certain reporting and notification requirements for the above mentioned activity. Therefore, please submit notification of your closure plans to:

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088
Tele: 505-827-5812

This notification shall be accomplished within sixty days of receipt of this document, with one copy distributed to the NMOCD District I office.

If you have any questions or if you require more time please don't hesitate to call or write this office.

Sincerely yours,

Wayne Price

Wayne Price-Environmental Engineer District I

cc: Jerry Sexton-District I Supervisor
Bill Olson-Hydrogeologist

DRUG FREE

Attachment 2

AUG 23 '94 9:45 FROM POOL HOBBS PAGE.002

** TOTAL PAGE.002 **

POOL COMPANY
Hobbs, NM 88240
505/393-3101

P. O. Box 1198
Carlsbad Hwy.

October 10, 1994

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, N.M. 87504-2088

Re: Hobbs POOL COMPANY facility

Dear Mr. Anderson:

A closure plan for the Hobbs POOL COMPANY facility is currently being prepared. The closure plan is being prepared by COMBEST GEOSCIENCE and will be submitted within 30 days. Thank You.

Sincerely,

Tim Parker

Tim Parker

xc:
Wayne Price, Environmental Engineer
Energy Minerals and Nat. Resources Dept - Oil Conservation Div.
Hobbs District

Attachment 4

ARD NAL LABORATORIES
PHONE: (505) 393-2326 - 101 E. MARLAND - HOBBS, NEW MEXICO 88240

Chain of Custody Record

Project I.D. _____
Project Location Teal Yard, Carlsbad Hwy, Hobbs, N.M.
Sampled By T. A. Parker
Client Name Teal Company
Address P.O. Box 1198, Hobbs, N.M., 88240
Telephone 505-393-5161

Sample Number	Date	Time	Composite	Grab	Sample Location	Number of Containers	Analysis Required: TPH	Analysis Required: BTEX	Remarks (Type sample, preservation, etc.)
1	7/9/03	11:20 A.M.			Buried File - North side of pit	1	✓	✓	Sample From abandoned leach
2		11:40 A.M.			" - South side of Pit - East	1	✓	✓	Field at workbay.
3		11:55			" " - " " " - West	1	✓	✓	
4		12:10 P.M.			Pit - South Wall @ Floor level	1	✓	✓	
5		12:12 P.M.			" - East wall @ Floor level	1	✓	✓	
6					Pit - West wall @ Floor level	1	✓	✓	

Relinquished by: (Signature) T. A. Parker — Date/Time 7/9/03 1:37 P.M. — Received by: (Signature) Mike Taylor
Relinquished by: (Signature) — Date/Time — Received by: (Signature)

Remarks: EAST

Shipped/Delivered

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TEXAS 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

FINAL ANALYSIS REPORT

Company: Pool Company
Address: P.O. Box 1198
City, State: Hobbs, NM 88241-1198

Date: 7/21/93
Lab#: H1294

Project Name: Pool Yard
Project Location: Hobbs
Sampled by: TP Date: 7/19/93 Time: 11:20
Analyzed by: SS/HM Date: 7/19/93 Time: 4:30
Type of Samples: Soil Sample Condition: GIST Units: mg/kg, mg/l

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE	MTBE
1	Exc.Pile-N.	3,255	<0.001	<0.001	<0.001	<0.001	0.005	0.018	<0.001
2	Exc.Pile-S.E.	1,652	<0.001	<0.001	<0.001	<0.001	0.002	0.008	<0.001
3	Exc.Pile-S.W.	2,202	<0.001	0.028	0.035	<0.001	0.007	0.025	<0.001
4	S.Wall-Floor L.	79.4	<0.001	<0.001	0.012	<0.001	0.009	0.004	<0.001
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6	W.Wall-Floor L.	6,972	0.032	0.048	0.352	0.060	0.075	0.100	0.027
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	QC Spike	485.9	2.147	2.103	2.162	2.110	2.128	2.083	1.328
	Accuracy	114.9%	94.0%	98.1%	96.5%	96.5%	93.2%	96.3%	86.4%
	Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - AUTOMATED HEADSPACE GC; INFRARED SPECTROSCOPY
- EPA SW-846; EPA METHODS 8020, 418.1, 3540 OR 3510

Michael R. Fowler

Date 7/21/93

Attachment 5

POOL COMPANY
Hobbs, NM 88240
505/393-5161

P. O. Box 1198
Carlsbad Hwy.

October 10, 1994

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, N.M. 87504-2088

Re: Hobbs POOL COMPANY facility

Dear Mr. Anderson:

A closure plan for the Hobbs POOL COMPANY facility is currently being prepared. The closure plan is being prepared by COMBEST GEOSCIENCE and will be submitted within 30 days. Thank You.

Sincerely,

Tim Parker

Tim Parker

xc:
Wayne Price, Envir9nmental Engineer
Energy Minerals and Nat. Resources Dept - Oil Conservation Div.
Hobbs District

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

BRUCE KING
GOVERNOR

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

August 12, 1994

Mr. Tim Parker-Area Manager
Pool Company (Texas) Inc.
Carlsbad Highway
P.O. Box 1198
Hobbs, NM 88240

Dear Mr. Parker,

Please note your plans to close the previous leech field and now open pit located at your Hobbs, New Mexico facility is regulated pursuant to State of New Mexico Water Quality Control Commission Regulations.

These regulations require certain reporting and notification requirements for the above mentioned activity. **Therefore, please submit notification of your closure plans to:**

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088
Tele: 505-827-5812

This notification shall be accomplished **within sixty days** of receipt of this document, with one copy distributed to the NMOCD District I office.

If you have any questions or if you require more time please don't hesitate to call or write this office.

Sincerely yours,

Wayne Price

Wayne Price-Environmental Engineer District I

cc: Jerry Sexton-District I Supervisor
Bill Olson-Hydrogeologist

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

OIL CONSERVATION DIVISION
RECEIVED
'94 JUN 8 AM 8 50

BRUCE KING
GOVERNOR

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

June 2, 1994

Mr. Tim Parker-Area Manager
Pool Company (Texas) Inc.
Carlsbad Highway
P.O. Box 1198
Hobbs, NM 88240

Dear Mr. Parker,

Please find enclosed a copy of the NMOCD guidelines for "Unlined Surface Impoundments" and a "Pit Remediation and Closure Report" form. These guidelines and form may be used in the closing of your wash bay leech field.

The following items are some recommendations to enhance your future operations.

1. Remove or remediate all of the oil contaminated soil on site.

2. Classify and segregate your RCRA exempt and non-exempt waste streams. Make arrangements to sample and test all of your non-exempt waste in order to determine if these waste exhibit any characteristics of hazardous waste.

3. Make arrangements to close the leech field that was used in the past operations on site.

If you have any questions please don't hesitate to call or write. Also, would you please pass this information along to Mr. Gill Gayaut, your Environmental Affairs person.

Sincerely yours,

Wayne Price

Wayne Price-Environmental Engineer District I

cc: Jerry Sexton-District I Supervisor
Roger Anderson-Environmental Bureau Chief