

ENFORCEMENT





NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

DIL CONSERVATION DIVISION DISTRICTI HOBBS PO BOX 1980, Hobbs, NM 88241 (505) 393-6161 FAX (505) 393-0720

Jennifer A. Salisbury CABINET SECRETARY

Certified Mail: P 209 878 099

July 13, 1998

Mr: Rodney Childress R & S Service (R&S) P.O. Box 1141 Denver City, Texas 79323

Re:Unauthorized Release & Disposal of Oilfield Waste Without A Permit.Location:Dunham St between Birch & Coleman Hobbs, NM

Dear Mr. Childress:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 "Initial Report" and analytical results concerning the above referenced incident. Please note this satisfies NMOCD requirements listed as functions # 1 & 3 in correspondence to you dated May 28, 1998.

Please note after reviewing the analytical results of the waste material, it appears that drums # 1,4,5,7,8,9,10,12,13,14,15,16, 17 and the two oilfield common trash drums (3&6) are RCRA non-hazardous and may be disposed of at an approved NMOCD facility. Therefore you are hereby ordered to dispose of these drums within 30 days of receipt of this letter at an approved NMOCD facility.

Please note it appeared that drums #2,11,18, & 19 were high in Benzene. Please contact the New Mexico Hazardous & Radioactive Materials Bureau concerning proper handling and disposal.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor Roger Anderson-Environmental Bureau Chief, Santa Fe, NM Benito Garcia- NMED-HRMB SF CRI- Halfway NM

attachments- analyticals, C-141 Release report

P. O. Box 1980 Energy Minerals and N. Hobbs, NM 88241-1980 Energy Minerals and N. District II - (505) 748-1283 Oil Conser 811 South First 2040 South Artesia, NM 88210 Santa Fe, N. District III - (505) 334-6178 Santa Fe, N. 1000 Rio Brazos Road (505) Aztec, NM 87410 (505) District IV - (505) 827-7131 Santa Fe, N.	New Mexico atural Resources Department vation Division h Pacheco Street ew Mexico 87505 9 827-7131
	PERATOR Initial Report Final Report
Narije ,	Contact of
KES SERVICE	Kodney G CHILDRESS
Address BOX 1141 DENNERCITY TX 793 Facility Name	Telephone No.
Surface Owner Mineral Owner Mineral Owner	Lease No.
Unit Letter Section Township Range Feet from the North/South L	NOF RELEASE Ine Feet from the East/West Line County
	4 COLEMAN) LEA COUNTY
	OF RELEASE
Type of Release <u> <u> <u> </u> <u> </u></u></u>	Date and Hour of Occurrence Date and Hour of Discovery
Was Immediate Notice Given? Yes No Not Required	JJ198 APPROX 10:0000 JJ2198 APPROX 10:30A. If YES, TO Whom? LODNEY G CHILDRESS
By Whom?	Date and Hour
BETTY STRANSER	5/22/98 10:BO AND CST
Was a Watercourse Reached? Yes No	If YES, Volume Impacting the Watercourse.
If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessa	ry)
Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets IF FOUND 19 BARRELS ON TRAILER W THE TRAILER WAS FICKED UP. UNCEL SENT ACREW OF 3 MEN TO CLEAN UP	Necessary) COLLECTED TRAILER FOR DEBTOWED HICH WE UNLOADED AT THE LOCATION UE WERE NOTIFIED OF THE PROBLEM WE THE SPILL TRAME AND ADDRESS
Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Nece	MILL CAME AND SUFERVISED
APPROX 600' FROM THE NEAREST RESIDE FICKED UP ANY SPILLAGE LOADED BAI	BE TESTED.
TO CRI TO STORE TILL THEY COULD	BE TESTED.
I hereby certify that the information given above is true and complete to the best of my kn are required to report and/or file certain release notifications and perform corrective action a C-141 report by the NMOCD market as "Final Report" does not relieve the operator of contamination that pose a threat to ground water, surface water, human health or the envir operator of responsibility for compliance with any other federal, state, or local laws and	s for releases which may endanger public health or the environment. The acceptance of liability should their operations have failed to adequately investigate and remediate ronment. In addition, NMOCD acceptance of a C-141 report does not relieve the
Signanur: Aller Chieffer	OIL CONSERVATION DIVISION
Printed Name: Co DALEN Co CHILDESS	Approved by District Supervisor:
Tide: OLDAER	Approval Date: Expiration Date:
Date: 6/9/98 (806) 572-3473	Conditions of Approval: Attached
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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR R & S SERVICES ATTN: JEAN MANN P.O. BOX 1141 DENVER CITY, TX 79323 FAX TO: (806) 592-8659

Receiving Date: 06/10/98 Reporting Date: 06/24/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Sampling Date: 06/10/98 Sample Type: SLUDGE, SAND Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: GP

TCLP METALS

LAB NO.	SAMPLE ID	As	Ag	Ba	Cd	Cr	Pb	Hg	Se
		ppm							
ANALYSIS D	DATE:	06/23/98	06/24/98	06/24/98	06/24/98	06/24/98	06/24/98	06/24/98	06/23/98
EPA LIMITS:	•	5	5	100	1	5	5	0.2	1
H3686-1 CO	MP. OF BLS. #2,#11	<1	<1	<5	<0.1	<1	<1	<0.050	<0.1
H3686-2 CO	MP. OF BLS. #1,#4,#5	<1	<1	<5	>0.1	<1	<1	<0.050	<0.1
	#7-#10, #12-#17								
H3686-3 CO	MP. OF BLS. #18,#19	<1	<1	<20	<0.1	<1	<1	<0.050	<0.1
Quality Cont	trol	0.058	2.955	5.78	1.976	4.995	5.120	0.055	0.044
True Value C	20	0.050	3.000	5.00	2.000	5.000	5.000	0.050	0.050
% Recovery		116	98.5	115	98.8	99.9	102	110	89
Relative Star	ndard Deviation	3.2	0.6	13.1	0.5	1.6	1.0	5.0	4.2
METHODS:	EPA 1311, 600/4-91/010	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Barrels numbered 3, and 6, are trash, and were not analyzed.

Gayle A. Potter, Chemis



06/24/98 Date

H3686M.XLS

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 analyses. All clarms, 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 incirced to y Cardinal, its subsidiaries, affliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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ANALYTICAL RESULTS FOR R&S SERVICES ATTN: JEAN MANN P.O. BOX 1141 DENVER CITY, TX 79323 FAX TO: 806-592-8659

Receiving Date: 06/10/98 Reporting Date: 06/16/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Lab Number: H3686-1 Sample ID: COMPOSITE OF BARRELS #2 & #11 Analysis Date: 06/15/98 Sampling Date: 06/10/98 Sample Type: SLUDGE Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

	EPA	Sample Result	Method			True Value
TCLP SEMIVOLATILES (ppm)	LIMIT	H3686-1	Blank	QC	% Recov.	QC
Pyridine	5.00	<0.050	<0.005	0.022	44	0.050
1,4-Dichlorobenzene	7.50	<0.050	<0.005	0.041	82	0.050
o-Cresol	200	0.143	<0.005	0.035	70	0.050
m, p-Cresol	200	0.158	<0.005	0.037	74	0.050
Hexachloroethane	3.00	<0.050	<0.005	0.039	78	0.050
Nitrobenzene	2.00	<0.050	<0.005	0.056	112	0.050
Hexachloro-1,3-butadiene	0.500	<0.050	<0.005	0.043	86	0.050
2,4,6-Trichlorophenol	2.00	< 0.050	<0.005	0.044	88	0.050
2,4,5-Trichlorophenol	400	<0.050	<0.005	0.049	98	0.050
2,4-Dinitrotoluene	0.130	<0.050	<0.005	0.053	106	0.050
Hexachlorobenzene	0.130	<0.050	<0.005	0.048	96	0.050
Pentachlorophenol	100	<0.050	<0.005	0.043	86	0.050

	% RECOVERY
Fluorophenol	26
Phenol-d5	37
Nitrobenzene-d5	89
2-Fluorobiphenyl	75
2,4,6-Tribromophenol	72
Terphenyl-d14	118

METHODS: EPA SW 846-8270, 1311

Barrels numbered 3, and 6, were trash, and were not analyzed.

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	EPA	Sample Result	Method			True Value
TCLP VOLATILES (ppm)	LIMIT	H3686-1	Blank	QC	%Recov.	QC
Vinyl Chloride	0.20	<0.005	<0.005	0.099	99	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.088	88	0.100
Methyl Ethyl Ketone	200	< 0.050	<0.050	0.095	95	0.100
Chloroform	6.0	< 0.005	<0.005	0.103	103	0.100
1,2-Dichloroethane	0.5	< 0.005	<0.005	0.100	100	0.100
Benzene	0.5	3.860	<0.005	0.100	100	0.100
Carbon Tetrachloride	0.5	< 0.005	<0.005	0.095	95	0.100
Trichloroethylene	0.5	< 0.005	<0.005	0.101	101	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.096	96	0.100
Chlorobenzene	100	< 0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.105	105	0.100

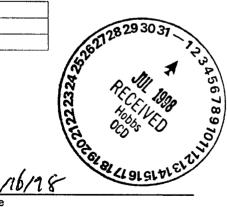
% RECOVERY

Dibromofluoromethane	95	_
Toluene-d8	104	
Bromofluorobenzene	100	

METHODS: EPA SW 846-8260, 1311

NOTE: Matrix interference observed; dilution required. Barrels numbered 3, and 6, were trash, and were not analyzed.

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Receiving Date: 06/10/98 Reporting Date: 06/16/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Lab Number: H3686-2 Sample ID: COMPOSITE OF BARRELS #1, #4, #5, #7-10, #12-17 Analysis Date: 06/15/98 Sampling Date: 06/10/98 Sample Type: SAND Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3686-2	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.050	<0.005	0.022	44	0.050
1,4-Dichlorobenzene	7.50	<0.050	<0.005	0.041	82	0.050
o-Cresol	200	<0.050	<0.005	0.035	70	0.050
m, p-Cresol	200	<0.050	<0.005	0.037	74	0.050
Hexachloroethane	3.00	<0.050	<0.005	0.039	78	0.050
Nitrobenzene	2.00	<0.050	<0.005	0.056	112	0.050
Hexachloro-1,3-butadiene	0.500	<0.050	<0.005	0.043	86	0.050
2,4,6-Trichlorophenol	2.00	< 0.050	<0.005	0.044	88	0.050
2,4,5-Trichlorophenol	400	<0.050	<0.005	0.049	98	0.050
2,4-Dinitrotoluene	0.130	<0.050	<0.005	0.053	106	0.050
Hexachlorobenzene	0.130	<0.050	<0.005	0.048	96	0.050
Pentachlorophenol	100	<0.050	<0.005	0.043	86	0.050

	% RECOVERY
Fluorophenol	31
Phenol-d5	32
Nitrobenzene-d5	84
2-Fluorobiphenyl	84
2,4,6-Tribromophenol	80
Terphenyl-d14	118

METHODS: EPA SW 846-8270, 1311 .

Barrels numbered 3, and 6, were trash, and were not analyzed.

Burgess

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ANALYTICAL RESULTS FOR Re3 SERVICES ATTN: JEAN MANN P.O. BOX 1141 DENVER CITY, TX 79323 FAX TO: 806-592-8659

Receiving Date: 06/10/98 Reporting Date: 06/16/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Lab Number: H3686-2 Sample ID: COMPOSITE OF BARRELS #1, #4, #5, #7-10, #12-17 Analysis Date: 06/15/98 Sampling Date: 06/10/98 Sample Type: SAND Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

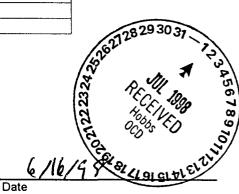
TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3686-2	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.099	99	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.088	. 88	0.100
Methyl Ethyl Ketone	200	<0.050	<0.050	0.095	95	0.100
Chloroform	6.0	<0.005	<0.005	0.103	103	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.100	100	0.100
Benzene	0.5	0.109	<0.005	0.100	100	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.095	95	0.100
Trichloroethylene	0.5	. <0.005	<0.005	0.101	101	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.096	96	0.100
Chlorobenzene	100	<0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.105	105	0.100

	% RECOVERY		
Dibromofluoromethane	95		
Toluene-d8	106		
Bromofluorobenzene	92		

METHODS: EPA SW 846-8260, 1311

Barrels numbered 3, and 6, were trash, and were not analyzed.

f.R. Cooke Burge



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ANALYTICAL RESULTS FOR R&S SERVICES ATTN: JEAN MANN P.O. BOX 1141 DENVER CITY, TX 79323 FAX TO: 806-592-8659

Receiving Date: 06/10/98 Reporting Date: 06/16/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Lab Number: H3686-3 Sample ID: COMPOSITE OF BARRELS #18 & #19 Analysis Date: 06/15/98 Sampling Date: 06/10/98 Sample Type: SULDGE Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

	EPA	Sample Result	Method			True Value
TCLP SEMIVOLATILES (ppm)	LIMIT	H3686-3	Blank	QC	% Recov.	QC
Pyridine	5.00	<0.050	<0.005	0.022	44	0.050
1,4-Dichlorobenzene	7.50	<0.050	<0.005	0.041	82	0.050
o-Cresol	200	<0.050	<0.005	0.035	70	0.050
m, p-Cresol	200	<0.050	<0.005	0.037	74	0.050
Hexachloroethane	3.00	<0.050	<0.005	0.039	78	0.050
Nitrobenzene	2.00	<0.050	<0.005	0.056	112	0.050
Hexachloro-1,3-butadiene	0.500	< 0.050	<0.005	0.043	86	0.050
2,4,6-Trichlorophenol	2.00	. <0.050	<0.005	0.044	88	0.050
2,4,5-Trichlorophenol	400	<0.050	<0.005	0.049	98	0.050
2,4-Dinitrotoluene	0.130	<0.050	<0.005	0.053	106	0.050
Hexachlorobenzene	0.130	<0.050	<0.005	0.048	96	0.050
Pentachlorophenol	100	<0.050	<0.005	0.043	86	0.050

	% RECOVERY
Fluorophenol	34
Phenol-d5	34
Nitrobenzene-d5	86
2-Fluorobiphenyl	70
2,4,6-Tribromophenol	61
Terphenyl-d14	108

METHODS: EPA SW 846-8270, 1311

Barrels numbered 3, and 6, were trash, and were not analyzed.

Burges

CCC 100 189

Date

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Receiving Date: 06/10/98 Reporting Date: 06/16/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Lab Number: H3686-3 Sample ID: COMPOSITE OF BARRELS #18 & #19 Analysis Date: 06/15/98 Sampling Date: 06/10/98 Sample Type: SLUDGE Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

	EPA	Sample Result	Method			True Value
TCLP VOLATILES (ppm)	LIMIT	H3686-3	Blank	QC	%Recov.	QC
Vinyl Chloride	0.20	<0.005	<0.005	0.099	99	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.088	88	0.100
Methyl Ethyl Ketone	200	<0.050	<0.050	0.095	95	0.100
Chloroform	6.0	<0.005	<0.005	0.103	103	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.100	100	0.100
Benzene	0.5	1.120	<0.005	0.100	100	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.095	95	0.100
Trichloroethylene	0.5	· <0.005	<0.005	0.101	101	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.096	96	0.100
Chlorobenzene	100	<0.005	<0.005	0.101	101	0.100
1,4-Dichlorobenzene	7.5	< 0.005	<0.005	0.105	105	0.100

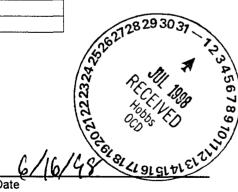
% RECOVERY

Dibromofluoromethane	99
Toluene-d8	106 ·
Bromofluorobenzene	94

METHODS: EPA SW 846-8260, 1311

NOTE: Matrix interference observed; dilution required. Barrels numbered 3, and 6, are trash and were not analyzed.

La Cooke Burdess J. A Cooke.



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Receiving Date: 06/10/98 Reporting Date: 06/25/98 Project Number: NOT GIVEN Project Name: NINETEEN BARRELS Project Location: CRI FACILITY Lab Number: H3686-3 Sample ID: COMPOSITE OF BARRELS #18 & #19 Analysis Date: 06/17/98 Sampling Date: 06/10/98 Sample Type: SLUDGE Sample Condition: COOL AND INTACT Sample Received By: GP

Natrual Occuring Radioactive Material

Analysis	Analysis	Analysis	Detection	Analysis	Analysis	Analysis
Description	Result	Error	Limit	Units	Test Method	Date & Time
Ra-226	24.75	4.81	1.65	pÇi/gm	EPA 901.1 M	06/17/98
Ra-228	BDL	N/A	<0.37	pCi/gm	EPA 901.1 M	06/17/98
Pb-210	7.77	5.47	2.17	pCi/gm	EPA 901.1 M	06/17/98
Total Activity	72.5	N/A	N/A	pCi/gm	EPA 901.1 M	06/17/98
BDL: Below Dete	ection Limit					
N/A: Not applicat	ble					



6 April Chemist

06/25/98 Date

H3686-3.XLS

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ANALYTICAL RESULTS FOR R & S SERVICES ATTN: JEAN MANN P.O. BOX 1141 DENVER CITY, TX 79323 FAX TO: (806) 592-8659

Receiving Date: 06/10/98 Reporting Date: 06/17/98 Project Number: NOT GIVEN Project Name: NOT GIVEN Project Location: NOT GIVEN Sampling Date: 06/10/98 · Sample Type: SLUDGE Sample Condition: COOL AND INTACT Sample Received By: GP Analyzed By: BC

LAB NUMBER SAMPLE ID	Sulfide	Cyanide	CORROSIVITY	IGNITABILITY
	(ppm)	(ppm)	(pH)	(Burn Rate)
ANALYSIS DATE:	06/16/98	06/16/98	06/13/98	06/12/98
H3686-1 COMP. OF BLS. #2 #11	Not reactive	Not reactive	7.26	Nonflammable
H3686-2 COMP. OF BLS. #1,#4,#5	Not reactive	Not reactive	7.50	Nonflammable
#7-#10, #12-#17				
H3686-3 COMP. OF BLS. #18, #19	Not reactive	Not reactive	7.47	<2.2 mm/sec
-			· · ·	
Quality Control	NR	NR	6.69	NR
True Value QC	NR	NR	7.00	NR
% Accuracy	NR	NR	99.4	NR
Relative Percent Difference	NR	NR	0.7	NR

METHOD: EPA SW 846-7.3, 7.2, 1030 (PROPOSED)

Barrels numbered 3, and 6, contained trash, and were not analyzed.

ay (Alte Chemist



H3686-2.XLS

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