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## APPROVALS

YEAR(S):

1994-1993



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

September 20, 1994

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SANTA FE, NEW MEXICO 87504  
(505) 827-5800

ANITA LOCKWOOD  
CABINET SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-111-334-172**

Mr. James H. Dunavant  
Trico Industries, Inc.  
P.O. Box 2909  
3040 East Slauson Ave  
Huntington Park, CA 90255

**RE: SITE REMEDIATION  
OLD ARTESIA TRICO SITE  
ARTESIA, NEW MEXICO**

Dear Mr. Dunavant:

The New Mexico Oil Conservation Division (OCD) has completed a review of Trico Industries, Inc. July 22, 1994 correspondence, January 31, 1994 REMEDIATION AND CLOSURE REPORT, TRICO INDUSTRIES, OLD ARTESIA SITE, ARTESIA, NEW MEXICO" and October 8, 1993 "REVISED PROPOSAL AND COST ESTIMATE FOR REMEDIATION AND CLOSURE OF THE OLD ARTESIA SITE, ARTESIA, NEW MEXICO". These documents, which were submitted to the OCD on July 26, 1994, contain the results of recent remedial actions taken by Trico during closure of Trico's former Artesia service company facility.

The soil remediation and closure actions as contained in the above referenced documents are approved as meeting the standards in effect at the time of closure. Please be advised that OCD approval does not relieve Trico of liability if, in the future, remaining contaminants are found to pose a threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve Trico of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: OCD Artesia Office

P 111 334 172



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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
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August 27, 1993

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SANTA FE, NEW MEXICO 87504  
(505) 827-5800

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-242-381**

Mr. Jim Dunavant  
Trico Industries, Inc.  
P.O. Box 2909  
3040 East Slauson Ave  
Huntington Park, CA 90255

**RE: SITE INVESTIGATION  
OLD ARTESIA SITE  
ARTESIA, NEW MEXICO**

Dear Mr. Dunavant:

The New Mexico Oil Conservation Division (OCD) is in the process of reviewing Trico Industries, Inc. July 1, 1993 "PRELIMINARY SITE INVESTIGATION OF THE OLD ARTESIA SITE, ARTESIA, NEW MEXICO" and Trico's accompanying August 16, 1993 correspondence.

The remedial concept for the facility is acceptable. However, the OCD has the following comments and requests for information regarding the above referenced report which must be addressed prior to approval:

1. The samples obtained during the investigation were not analyzed for all hazardous waste characteristics. Oil field service company wastes are not exempt from federal RCRA Subtitle C hazardous waste provisions. Therefore, all wastes at the facility must be sampled and analyzed for hazardous waste characteristics. Please provide OCD with analytic results of facility wastes for all hazardous waste characteristics.
2. Soils were sampled at only three of the areas identified as containing contaminated soils. All areas with differing sources, including the cesspool, must be analyzed for hazardous waste characteristics. Please submit analyses of these areas to OCD.