

# Minor Permit Modification Request

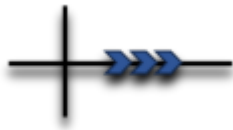
**TNT Landfarm, Permit NM1-8  
Surface Waste Management Facility  
Facility ID fEEM0112335451  
Rio Arriba County, New Mexico**

**SW/4 SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of  
Section 8, Township 25 North, Range 3 West**

October 7, 2025

Prepared by Ancell Environmental Consulting Services  
on behalf of TNT Environmental





Ansell Environmental Consulting Services, LLC

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## TABLE

Table 1            New Mexico Environment Department Soil Screening Levels

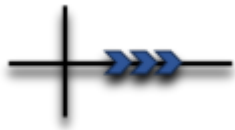
## FIGURE

Figure 1           Site Location Map

## ATTACHMENT

C-137A Form    Application for Minor Modification to Surface Waste Management Facility

180 E. 12<sup>th</sup> St.  
Durango, CO 81301  
970-749-0124  
[theresa@ansellconsulting.com](mailto:theresa@ansellconsulting.com)



Ancestry Environmental Consulting Services, LLC

## 1. Introduction

On behalf of TNT Environmental (TNT), Ancestry Environmental Consulting Services (AECS) has prepared the following Minor Permit Modification Request for the TNT Landfarm Commercial Surface Waste Management Facility (SWMF) located in Rio Arriba County, New Mexico.

The landfarm portion of the SWMF was originally permitted in 1992 and has been operating under the requirements of permit NM1-8, the 2002 permit modification, 19.15.36.20 NMAC transitional provisions, and 2025 permit modification. The purpose of this Minor Permit Modification is to review language in place to address the 19.15.36.20.A Transitional Provisions, in which *'existing surface waste management facilities shall comply with the financial assurance, operational, monitoring, waste acceptance and closure and post closure requirements provided in 19.15.36 NMAC, except as otherwise specifically provided in the applicable permit or order, or in a specific waiver, exception or agreement that the division has granted in writing to the particular surface waste management facility'* in order to address treatment and vadose zone sampling and reporting requirements by adopting the Specific Requirements Applicable to Landfarms per 19.15.36.15 NMAC, commonly referred to as Rule 36.

The proposed alternatives are in accordance with 19.15.36.19 NMAC and will provide equivalent protection of fresh water, public health and the environment at the surface waste management facility.

### 1.1. Site Description

The TNT Landfarm (the Site) is located in Section 5 and 8, Township 25 North, Range 3 West in the Lindrith district in the San Juan Basin Oil and Gas field (Figure 1). The Site is a commercial surface waste management facility in which hydrocarbon impacted soils are placed into bermed cells for remediation purposes. The Site has not received any new soils since 2016 but has continued plowing, disking, and monitoring the treatment and vadose zone. The Site has well maintained fencing and protective barriers in place to restrict any unauthorized access to the landfarm.

## 2. Current Landfarm Operations

### 2.1. Cell size

Per Rule 711, Treatment Zone Monitoring Condition 2, 'a minimum of one random soil sample must be taken from each individual cell, with no cell being larger than five (5) acres...'

### 2.2. Background Testing

Background testing per Rule 711 Treatment Zone Monitoring Conditions states that *'one (1) background soil sample must be taken from the center portion of the landfarm two (2) feet below the native ground surface prior to operation. The sample must be analyzed for total petroleum*

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hydrocarbons (TPH), major cations/anions, volatile aromatic organics (BTEX), and eight (8) RCRA heavy metals using Environmental Protection Agency (EPA)-approved methods.'

The Transitional Provisions of Rule 36.20.A for background testing per 19.15.36.15.B NMAC indicate that 'prior to beginning operation of a new landfarm or to opening a new cell at an existing landfarm at which the operator has not already established background, the operator shall take, at a minimum, 12 composite background soil samples, with each consisting of 16 discrete samples from areas that previous operations have not impacted at least six inches below the original ground surface, to establish background soil concentrations for the entire surface waste management facility. The operator shall analyze the background soil samples for TPH, as determined by EPA method 418.1 or other EPA method approved by the division; BTEX, as determined by EPA SW-846 method 8021B or 8260B; chlorides; and other constituents listed in Subsections A and B of 20.6.2.3103 NMAC, using approved EPA methods.'

An established background data set is required for the comparison of Rule 711 tri-annual and Part 36 semi-annual vadose zone results in order to determine if a release has occurred at the Site. An established background data set is also required for consideration of Part 36 treatment zone closure performance standards.

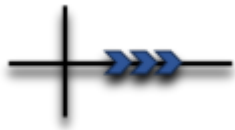
Although several background samples were collected and submitted to the NMOCD, for various reasons, the Site does not currently have an established, comprehensive background data set on file.

### 2.3. Treatment Zone Monitoring

Per Rule 711 Landfarm Operation Condition 7, successive lifts of contaminated soils or drilling mud may not be spread until the following are demonstrated to the OCD:

- TPH as determined by EPA method 418.1 or by EPA method 8015 extended (sum of GRO, DRO, and MRO/ORO) is less than 100 parts per million (ppm).
- BTEX as determined by EPA SW-846 method 8021B and 8260B is less than 50 ppm.
- Benzene is less than 10 ppm.
- Soils will be spread on the surface in six-inch lifts or less and require authorization from the OCD prior to application of successive lifts and/or removal of remediated soils.

In addition to the above permit conditions, per the transitional provisions in 19.15.36.20 NMAC, chloride concentrations as determined by EPA method 300.0 shall not exceed 1,000 mg/kg where ground water is 100 feet or more below the lowest elevation at which the operator will place oil field waste.



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## 2.4. Treatment Zone Closure Performance Standards

Under the transitional provisions of 19.15.36.19 NMAC, the treatment zone closure performance standards listed in 19.15.36.15.F(5) NMAC states that *'if the concentration of those constituents exceed the PQL or background concentration, the operator shall either perform a site-specific risk assessment using EPA approved methods...'*

## 2.5. Vadose Zone Monitoring and Reporting Requirements

Per Rule 711 Treatment Zone Monitoring (Vadose Zone) Condition 3, *'soil samples must be analyzed using EPA approved methods for TPH and volatile aromatic organics (BTEX) **quarterly** and for major cations/anions and eight (8) RCRA heavy metals **annually**.'*

Per Rule 711 Reporting and Record Keeping Condition 5, *'analytical results from the quarterly treatment zone monitoring (vadose zone) must be submitted to the OCD Santa Fe office within thirty (30) days of receipt from the laboratory.'*

Based on the existing permit condition of Permit NM1-8, the June 17, 2005, modification approval, and the transitional provision of 19.15.36.20.A NMAC, as outlined in the July 15, 2022, communication from the NMOCD,

*'TNT is required to perform the following **Tri-annual** vadose zone sampling:*

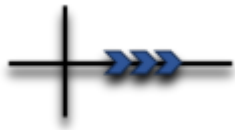
*A minimum of one random vadose zone soil sample will be taken from each individual cell.*

*Samples will be taken between two (2) to (3) feet below the native ground surface (as required by permit).*

- *1<sup>st</sup> VZ Sampling event (April 30<sup>th</sup> of each year): TPH as determined by EPA method 418.1 or by EPA method extended (sum of GRO, DRO, and MRO); BTEX as determined by EPA SW-846 method 8021B or 8260B; and chlorides as determined by EPA method 300.0. The sampling report for this event shall be submitted to the OCD Santa Fe office no later than May 31<sup>st</sup> of each year.*
- *2<sup>nd</sup> VZ Sampling event (July 31<sup>st</sup> of each year): TPH as determined by 418.1 or by EPA Method 8015 extended (sum of GRO, DRO, and MRO); and BTEX as determined by EPA SW-846 method 8021B or 8260B. The sampling report for this event shall be submitted to the OCD Santa Fe office no later than August 31<sup>st</sup> of each year.*
- *3<sup>rd</sup> VZ sampling event (October 31<sup>st</sup> of each year): TPH as determined by EPA method 418.1 or by EPA method 8015 extended (sum of GRO, DRO, and MRO); BTEX as determined by EPA SW-846 method 8021B or 8260B, major cations/anions (which includes chlorides) and eight (8) RCRA heavy metals. The sampling report for this shall be submitted to the OCD Santa Fe office no later than November 30<sup>th</sup> of each year.'*

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## 2.6. Five Year Monitoring Program

The Operator shall collect and analyze a minimum of four randomly selected, independent samples from the vadose zone, using the methods specified below for the constituents listed in Subsections A and B of 20.6.2.3103 NMAC at least every five years and shall compare each result to the higher of the PQL or background soil concentrations to determine if a release has occurred.

The Site does not have a comprehensive background data set in place at this time in order to perform an evaluation of vadose zone monitoring for the constituents listed in Subsection A and B of 20.6.2.3103 NMAC.

## 3. Proposed Permit Modifications

### 3.1. Cell size

TNT would like to request an exception and adopt the Landfarm cell definition listed in 19.15.36.7.B(6) where it is defined as a bermed area of 10 acres or less within a landfarm.

### 3.2. Background Testing

TNT would like to request an exception to 19.15.36.15.B for conducting background sampling in which contaminants of concern are compared to the permissible quantitation limit or background concentrations. Although TNT collected and submitted several background samples, based on QA/QC data, errors in testing, and incomplete analyte testing, the facility does not have an established, comprehensive set of background concentrations on file to compare the annual or five-year vadose zone results and evaluate whether a release has occurred.

THE NMED Risk Assessment Guidance for Investigations and Remediation, Volume I (November 2022), commonly referred to as the Soil Screening Guidance (SSG), was created using various EPA risk assessment guidance documents and determines SSLs for various exposure pathways. In lieu of conducting a new background sampling event, TNT proposes to use the most stringent residential, industrial/occupation or construction soil screening limits presented in Table A-1: New Mexico Environment Department (NMED) Soil Screening Levels (SSLs) (NMED Risk Assessment Guidance for Site Investigations and Remediation, Volume I Soil Screening guidance for Human Health Risk Assessments) for the applicable constituents listed in Subsections A and B of 20.6.2.3103 NMAC. The constituents of concerns analyzed per EPA 6010B or 6020 or other division approved methods include the following: antimony, arsenic, beryllium, barium, cadmium, chromium, copper, iron, lead, manganese, selenium, silver, thallium, and zinc per EPA method 6010B; and mercury (per USEPA 7471) (Table 1).

### 3.3. Treatment Zone Monitoring

TNT would like to adopt 19.15.36.15.D NMAC standards for adding a lift such that,

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fEEM0112335451  
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- TPH concentration as determined by EPA SW-846 method 8015M does not exceed 2,500 mg/kg.
- Chloride concentration (where groundwater is 100 feet or more below the lowest elevation at which the operator will place oil field waste) as determined by EPA 300.1 does not exceed 1,000 mg/kg.

TNT would also like to request an exception to analyze chlorides per EPA 300.0 in lieu of 300.1.

TNT would like to continue adding successive lifts in six-inch increments until the maximum thickness of treated soils is reached (two feet or approximately 3,000 cubic yards per acre).

### 3.4. Treatment Zone Closure Performance Standards

TNT would like to request an exception to 19.15.36.15.F(3) NMAC to utilize EPA Method 8015M to determine TPH in place of EPA Method 418.1.

The Site does not have a comprehensive background data set in place at this time in order to perform an evaluation of performance standards for the constituents listed in Subsection A and B of 20.6.2.3103 NMAC. TNT would like to propose an exception request to apply the pending approval for NMED SSLs as the facility background concentrations requested in Section 3.2 of this report for treatment zone closure performance standards listed in 19.15.36.15.F(5) NMAC in lieu of PQL or background concentrations (Table 1).

### 3.5. Vadose Zone Monitoring and Reporting Requirements

TNT would like to request to conduct vadose zone monitoring per 19.15.36.15.E NMAC in which the operator shall collect and analyze a minimum of four randomly selected, independent samples from the vadose zone between three (3) and four (4) feet below ground surface (bgs) on a **semi-annual** basis using the methods specified for TPH, BTEX, and chlorides and shall be compared to 19.15.29 NMAC Table I Closure Criteria, per the C-137A Minor Permit Modification approved by the NMOCD on July 2, 2025.

In adopting Part 36 vadose zone sampling requirements, TNT would like to request an exception to discontinue tri-annual monitoring events and reporting per Rule 711 and the associated 2005 permit modification and conduct semi-annual vadose monitoring as discussed above. As such, reporting requirements will include a single **annual** report for the semi-annual vadose zone and semi-annual treatment zone compliance monitoring events.

TNT would like to request an exception to discontinue Rule 711 annual vadose zone sampling for major cations/anions and eight (8) RCRA heavy metals annually.





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### 3.6. Five Year Monitoring Program

TNT would like an exception request to compare the laboratory analytical results per EPA method 6010B or 6020 or other division approved method for the constituents listed in 20.6.2.3103 NMAC to the most stringent NMED SSL's to determine if a release has occurred (Table 1). The constituents of concern listed in Subsections A and B of 20.6.2.3103 NMAC analyzed per EPA 6010B include the following: antimony, arsenic, barium, beryllium, cadmium, chromium, iron, copper, iron, lead, manganese, mercury, selenium, silver, thallium, and zinc. Mercury will be analyzed per EPA Method 7471 in lieu of EPA Methods 6010B or 6020.

## 4. Exception Request Discussion

TNT believes that the requested exceptions listed in this Minor Permit Modification Request provide equal or better protection of fresh water, public health and the environment for the following reasons:

- By adopting Part 36 vadose zone semi-annual and five-year monitoring in lieu of Rule 711 conditions, the sample number per sampling event will increase, providing a more comprehensive evaluation of vadose zone conditions over time in turn providing better protection of fresh water, public health and the environment to determine if a release has occurred at the Site.
- There has been significant land disturbance at the landfarm and in the vicinity of the landfarm. Collecting a representative background sample for the comparison of vadose zone results may not yield a reliable background concentration to determine if a release has occurred in the vadose zone. The NMED SSL values were determined through various EPA risk assessment guidance documents and when used for comparison, in lieu of background or PQL's, will identify any areas of concern that may need to be addressed at the Site for both vadose and treatment zone sampling events.
- The landfarm has received soil from across the San Juan Basin, and as such TNT believes that the NMED SSLs will be more applicable to assess treatment zone closure performance standards while remaining equally protective of fresh water, human health and the environment.



TABLE

**Table 1. New Mexico Environment Department (NMED) Soil Screening Levels (SSLs)  
for constituents of concern per USEPA Method 6010B or 6020 listed in Subsection A and B of 20.6.2.3103 NMAC**

Chemical	Residential Soil, Cancer (mg/kg)	Residential Soil, Noncancer (mg/kg)	Industrial/ Occupational Soil, Cancer (mg/kg)	Industrial/ Occupational Soil, Noncancer (mg/kg)	Construction Worker Soil, Cancer (mg/kg)	Construction Worker Soil, Noncancer (mg/kg)	Most Stringent Soil Screening Level (mg/kg)
Antimony	NE	31.3	NE	519	NE	142	31.3
Arsenic	7.07	13.03	35.9	208	216	41.2	7.07
Barium	NE	15,600	NE	25,500	NE	4,390	4,390
Beryllium	64,411	156	313,000	2,580	2,710	148	148
Cadmium	85,900	70.5	417,000	1,110	3,610	72.1	70.5
Chromium	96.6	45,200	505	314,000	468	134	96.6
Copper	NE	3,130	NE	51,900	NE	14,200	3,130
Iron	NE	54,800	NE	908,000	NE	248,000	54,800
Lead*	NE	200	NE	800	NE	800	200
Manganese	NE	10,500	NE	160,000	NE	464	464
Mercury	NE	NE	NE	112	NE	20.7	20.7
Selenium	NE	391	NE	6,490	NE	1,750	391
Silver	NE	391	NE	6,490	NE	1,770	391
Thallium	NE	0.78	NE	13.0	NE	3.54	0.78
Zinc	NE	23,500	NE	389,000	NE	106,000	23,500

## NOTES:

USEPA - United States Environmental Protection Agency

NMAC - New Mexico Administrative Code

mg/kg - milligram per kilogram

NE - not established



\* - lead soil screening level based on Section 5.2 of the EPA Regional Screening Levels (RSLs) - User's Guide dated November 2024

FIGURE





**TNT Landfarm Permit NM1-8  
C137-A Minor Permit Modification  
Request  
facility ID fEEM0112335451**

-  Facility Boundary
-  Cell Boundary



**Figure 1  
Project Location**



UTM NAD 83: Zone 13N; 305480mE, 4032719mN | Longitude -107.16968°W, Latitude 36.41998°N  
SW/4 SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of Section 8, Township 25 North, Range 3 West; NMPM  
Rio Arriba County, New Mexico

Map Created by Gage Norris  
on Behalf of Ancell Consulting LLC  
Prepared for: TNT Environmental  
Date Exported: 10/8/2025 3:49 PM



ATTACHMENT



Santa Fe Main Office  
Phone: (505) 476-3441  
General Information  
Phone: (505) 629-6116

Online Phone Directory Visit:  
<https://www.emnrd.nm.gov/oed/contact-us/>

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

For State Use Only:

Form C-137A  
Revised October 11, 2022

File via OCD Permitting with any  
associated permit fee

## APPLICATION FOR MINOR MODIFICATION TO SURFACE WASTE MANAGEMENT FACILITY

1. Operator: TNT Environmental, Inc  
Address: PO Box 2530, Farmington, NM 87499  
Contact Person: Carl Merilatt Phone: 505-320-1404
2. Location: 0 /4 0 /4 Section 5 and 8 Township 25N Range 3W
3. Provide permit number NM1-8
4. Attach a description of the proposed minor modification(s) to the surface waste management facility.
5. If the Minor Modification involves changes to a treatment, remediation, or disposal method, attach engineering designs, certified by a registered professional engineer, including technical data on the design elements of each applicable treatment, remediation, and disposal method and detailed designs of surface impoundments.
6. If the Minor Modification will affect the closure and post-closure plan, attach an updated closure and post closure plan, including a responsible third party contractor's cost estimate, sufficient to close the surface waste management facility in a manner that will protect fresh water, public health, and the environment (the closure and post closure plan shall comply with the requirements contained in 19.15.36.18 NMAC).
7. If the Minor Modification will affect the contingency plan, attach an updated contingency plan that complies with the requirements of Subsection N of 19.15.36.13 NMAC and with NMSA 1978, Sections 12-12-1 through 12-12-30, as amended (the Emergency Management Act).
8. If the Minor Modification will affect the control of run-on or run-off water at the site, attach an updated plan to control run-on water onto the site and run-off water from the site that complies with the requirements of Subsection M of 19.15.36.13 NMAC.
9. If the Minor Modification will affect the best management practice plan, attach a best management practice plan to ensure protection of fresh water, public health, and the environment.
10. The division may require additional information to demonstrate that the surface waste management facility's operation will not adversely impact fresh water, public health, or the environment and that the surface waste management facility will comply with division rules and orders.

### 11. CERTIFICATION

I hereby certify that the information submitted with this application is true, accurate, and complete to the best of my knowledge and belief.

Name: Carl Merilatt

Title: COO

Signature: 

Date: 10-8-25

E-mail Address: cmerilatt@laplataofs.biz

State of New Mexico  
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham  
Governor

Melanie A. Kenderdine  
Cabinet Secretary

Ben Shelton  
Deputy Secretary

Erin Taylor  
Deputy Secretary

Albert Chang  
Division Director  
Oil Conservation Division



Electronic Mail Only

October 30, 2025

Carl Merilatt  
TNT Environmental, Inc.  
PO Box 2530  
Farmington, New Mexico 87499  
[cmerilatt@laplataofs.biz](mailto:cmerilatt@laplataofs.biz)

**RE: Review of Minor Modification Application from TNT Environmental, Inc., Permit NM1-8**

Dear Mr. Merilatt:

The Oil Conservation Division (OCD) has completed a review of the minor modification application submitted on October 9, 2025, by TNT Environmental, Inc. (TNT) for Permit NM1-8. The minor modification application requested alternatives/exceptions in accordance with 19.15.36.19 NMAC.

The following alternatives/exceptions were requested by TNT; the OCD's response to the alternative/exception request is shown in bold:

- Permit NM1-8 requires that no landfarm cell be larger than five (5) acres. TNT is requesting that their acre size limit meet the definition of 19.15.36.7(B)(6) NMAC which defines a landfarm cell as a bermed area of ten (10) acres or less within a landfarm.

**The OCD will allow TNT to meet 19.15.36 NMAC's definition of landfarm cell only if the increased size of the landfarm cell meets all siting criteria and does not exceed the permitted landfarm area of 20.5 acres.**

- 19.15.36.15.B NMAC requires background testing for other constituents listed in Subsections A and B of 20.6.2.3103 NMAC, using approved EPA methods. TNT is requesting to utilize the most stringent residential, industrial/occupation or construction soil screening limits presented in Table A-1: New Mexico Environment Department (NMED) Soil Screening Levels (SSLs) (NMED Risk Assessment Guidance for Site Investigations and Remediation, Volume I Soil Screening Guidance for Human Health Risk Assessments, November 2022) for the applicable constituents listed in Subsections A and B of 20.6.2.3103 NMAC in lieu of conducting background sampling.



**The OCD approves this request. Therefore, the most stringent residential, industrial/occupation or construction soil screening limits presented in Table A-1 must be used in comparing the sampling data required by 19.15.36.15(E)(3) NMAC, 19.15.36.15(E)(5) NMAC, and 19.15.36.15(F)(5) NMAC. Note, 19.15.36.15(E)(5) NMAC requires sampling of all the constituents listed in Subsections A and B of 20.6.2.3103 NMAC.**

- Permit NM1-8 stipulates that successive lifts of contaminated soils or drilling mud may not be spread until a laboratory measurement of total petroleum hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. TNT is requesting to meet the successive lift requirements of 19.15.36.15.D NMAC; in this section of the rule, the following monitoring and verification must be conducted prior to adding an additional lift: TPH concentration must not exceed 2,500 mg/kg and chloride concentration must not exceed 500 mg/kg if the landfarm is located where ground water is less than 100 feet but at least 50 feet below the lowest elevation at which the operator will place oil field waste or 1000 mg/kg if the landfarm is located where ground water is 100 feet or more below the lowest elevation at which the operator will place oil field waste.

**The OCD approves TNT's request to meet the successive lift requirements of 19.15.36.15.D NMAC in lieu of the specified permit condition of NM1-8.**

- TNT has requested to utilize EPA SW-846 method 8015M in place of EPA Method 418.1 to determine TPH concentration. TNT has also requested to utilize EPA method 300.0 in place of EPA method 300.1 to determine chloride concentration.

**The OCD approves this request.**

- In lieu of specific permit conditions, TNT has requested the frequency of all vadose zone monitoring to be conducted in accordance with 19.15.36.15.E NMAC. Furthermore, TNT has requested to only sample/analyze the constituents listed in 19.15.36.15.E NMAC for the vadose zone.

**The OCD approves this request. TNT must follow all conditions of 19.15.36.15.E NMAC for vadose zone monitoring. All vadose zone samples must be taken from soils between three and four feet below the cell's original ground surface.**

- TNT has requested to report landfarm analytical sampling results to the OCD on an annual basis versus quarterly basis.

**The OCD approves this request. 19.15.36.18(C)(4)(g) NMAC requires the operator to submit annual reports of the vadose zone and treatment zone sampling until the OCD has approved the surface waste management facility's final closure.**

If there are any questions regarding this approval with conditions, please do not hesitate to contact me at (505) 795-1722 or via email at [LeighP.Barr@emnrd.nm.gov](mailto:LeighP.Barr@emnrd.nm.gov).

Respectfully,

*Leigh Barr*

**Leigh Barr**

Environmental Permitting Supervisor

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

CONDITIONS

Action 513673

CONDITIONS

Operator: T-N-T ENVIRONMENTAL INC PO Box 2530 Farmington, NM 87499	OGRID: 22099
	Action Number: 513673
	Action Type: [C-137] SWMF Minor Modification (C-137A)

CONDITIONS

Created By	Condition	Condition Date
lbarr	See attached approval letter with conditions.	10/30/2025