

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAPP2111336915
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party JFJ Landfarm, LLC operated by Industrial Ecosystems, Inc.	OGRID 374111
Contact Name Marcella Marquez	Contact Telephone 505-632-1782
Contact email marcella@industrialecosystems.com	Incident # (assigned by OCD) NAPP2111336915
Contact mailing address 49 Road 3150 Aztec, NM 87410	

Location of Release Source

Latitude -108.054° Longitude 36.751°
(NAD 83 in decimal degrees to 5 decimal places)

Site Name JFJ Landfarm, LLC	Site Type Surface Waste Management Facility (NM01-0010B)
Date Release Discovered 04/20/2021	API# (if applicable)

Unit Letter	Section	Township	Range	County
J	2	29N	12W	San Juan

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: JFJ Landfarm, LLC)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input checked="" type="checkbox"/> Other (describe)	Volume/Weight Released (provide units) <1 BBL	Volume/Weight Recovered (provide units) < 1 BBL

Cause of Release

The cause of the release is undetermined. On the morning of 04/20/21 an adjacent landowner contacted NMOCD District 3 office to complain about dirt/oily specks on his vehicles/RVs/outbuildings. He stated a large dirt devil had went through his property between 5 & 7 p.m. on the evening of 04/19/21 and he thought that is what caused the dirt/oil specks. Cory Smith, District 3 personnel called to notify us of the complaint. Jonathan Kelly, District 3 personnel arrived shortly thereafter to perform inspection on our facility and also inspected a well site located on our property. I informed Mr. Kelly that we had no known releases from our facility and there was no evidence indicating a release had occurred. Mr. Kelly stated he would be visiting the landowners property to try and determine the material and source of the release. The landowner's property is located approximately 300 yards east of our facility east fence line. County Road 3150 runs between our fence line and the landowner's property. This road is a high traffic area for county, waste management, and oilfield vehicles due to the proximity of the county gravel pit, county landfill, oilfield truck facilities, and our facility. It is my understanding that local District 3 personnel could not determine the source of the release (our facility, well site near landowner, or from a vehicle traveling on the road), but due to the nature of our business OCD is assuming our facility would be a probable cause and have instructed us to follow the release reporting regulations as described in 19.15.29 NMAC.

Incident ID	NAPP2111336915
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The NM EMNRD Bureau Chief considers it to be a major release as adjacent landowner's property was impacted.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? There was no on-site overflow, puddling, pooling or over spray of materials to evidence there had been any type of release from our facility. On the morning of 04/20/21 we were notified by Cory Smith, NMOCD District 3 personnel that an adjacent landowner had complained of dirt/oil specks on his vehicles/RVs/outbuildings.	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: The source of the release remains undetermined and there is no evidence to indicate it came from our facility. NMOCD is assuming that due to the nature of our business that we are a probable source. There was no puddling or pooling of oily liquids on-site or at the adjacent landowner's property, therefore there were no "free liquids" or recoverable materials to contain and remove. The adjacent landowner complained of specks of dirt/oil on some of his vehicles/RVs/outbuildings.	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Marcella Marquez</u> Signature: <u>Marcella Marquez</u> Digitally signed by Marcella Marquez Date: 2021.05.03 16:21:05 -06'00' email: <u>marcella@industrialecosystems.com</u>	Title: <u>Regulatory/Compliance/HR</u> Date: <u>05/03/2021</u> Telephone: <u>505-632-1782</u>
<u>OCD Only</u> Received by: <u>Ramona Marcus</u> Date: <u>5/11/2021</u>	

Incident ID	NAPP2111336915
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>100'</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	NAPP2111336915
District RP	
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Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Marcella Marquez Title: Regulatory/Compliance/HR
Signature: Marcella Marquez Digitally signed by Marcella Marquez
Date: 2021.05.03 16:21:29 -06'00' Date: 05/03/2021
email: marcella@industrialecosystems.com Telephone: 505-632-1782

OCD Only

Received by: Ramona Marcus Date: 5/11/2021

Incident ID	NAPP2111336915
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Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Marcella Marquez Title: Regulatory/Compliance/HR
Signature: Marcella Marquez Digitally signed by Marcella Marquez
Date: 2021.05.03 16:21:45 -06'00'
Date: 05/03/2021
email: marcella@industrialecosystems.com Telephone: 505-632-1782

OCD Only

Received by: Ramona Marcus Date: 5/11/2021

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Nelson Velez Date: 05/18/2022 **Final Closure Report Approved on 02/22/2022**

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Cabinet Secretary

Adrienne Sandoval Director
Oil Conservation Division



BY ELECTRONIC MAIL ONLY

April 22, 2021

Ms. Marcella Marquez
Industrial Ecosystems Inc.
49 Road 3450
Aztec, NM 87410
(505) 632-1782
marcella@industrialecosystems.com

RE: Release - Industrial Ecosystems Inc. Crouch Mesa Landfarm Facility, San Juan County, New Mexico

Dear Ms. Marquez:

The Oil Conservation Division (OCD) received information indicating that a release from the Industrial Ecosystems Inc. (IEI) Crouch Mesa Landfarm Facility in San Juan County occurred on April 20, 2021. Because the release impacted adjacent landowners and their property, it is considered to be a major release under 19.15.29.7 (2) NMAC, and IEI must take the following immediate actions:

As per 19.15.29.8 NMAC, IEI must take the following immediate actions:

1. Stop the source of release and limit access to the site as necessary to protect human health and the environment;
2. Contain the materials released and prevent a threat to public health and the environment as well as monitor the release to ensure the material is effectively contained; and
3. Commence remediation immediately.

Please immediately provide confirmation of these requirements and the information required per 19.15.29.10(A)(1) NMAC. In addition, IEI must comply with all requirements in 19.15.29.9 through 13 NMAC.

In addition to the C-141 requirements for reporting a major release, and before taking any further actions, the OCD requires the following information by close of business on April 23rd, if not sooner:

1. Detailed composition analysis of the material on site;

April 22, 2021

Page 2

2. Verification that the weather station has been repaired and is in proper working condition;
3. Delineation of the affected area, including persons and property;
4. Remedial action plan; and
5. IEI internal response plan for human contact with landfarm materials.

For questions, please contact Emily Hernandez, Environmental Bureau Chief at emily.hernandez@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'ASandoval', with a stylized, cursive script.

Adrienne Sandoval
Director



Main Address: 49 Road 3150 * Aztec, NM 87410
Remit to Address: P.O. Box 1202 * Flora Vista, NM 87415
P.O. Box: P.O. Box 2043 * Farmington, NM 87499
Phone: (505) 632-1782
Fax: (505) 632-1876 or (505) 334-1003

April 23, 2021

Ms. Emily Hernandez
Environmental Bureau Chief
NM EMNRD
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Release – Industrial Ecosystems, Inc. Crouch Mesa Landfarm Facility, San Juan County, NM

Dear. Ms. Hernandez:

This reply is being sent to your letter dated 04/22/21. I have been in communication with Jonathan Kelly and Cory Smith from the local District 3 office and Incident Supervisor Mike Bratcher regarding this matter.

On 04/20/21 we were notified by Cory Smith, District 3 NMOCD, that an adjacent landowner had complained of specks of dirt/oil on some of his vehicles, RVs, and a car port on his property. Mr. Smith indicated the landowner stated a strong “dust devil” had crossed his property and that may have been what caused the dirt/oil specks.

On 04/20/21 Mr. Kelly, District 3 NMOCD, visited our facility to investigate for the potential source of the release. A well location on the East side of our property near the adjacent landowner was also inspected. Mr. Kelly indicated he would be visiting the landowner(s) to look at the areas of complaint.

The landowner(s) property is located approximately 300-500 yards to the East of our facility fence line. County Road 3150 runs between our facility fence line and the affected properties. This road is a high traffic area for county, waste management, and oilfield vehicles due to the proximity of the landfill, oilfield truck facilities, county gravel pit and our facility.

It is my understanding that Mr. Kelly could not determine the source of the release (our facility, wellsite or from a vehicle traveling on the road), but due to the nature of our business it is assumed that our facility would be a probable source.



Main Address: 49 Road 3150 * Aztec, NM 87410
Remit to Address: P.O. Box 1202 * Flora Vista, NM 87415
P.O. Box: P.O. Box 2043 * Farmington, NM 87499
Phone: (505) 632-1782
Fax: (505) 632-1876 or (505) 334-1003

In addition to the C-141 reporting requirements, the following actions have been taken:

1. **Composition of Materials on-site include:**
 - a. RCRA Exempt E&P liquid waste, i.e., tank bottoms, BS&W, produced water & drilling fluids stored in tanks until processed through the centrifuge to be sufficiently solidified and placed into a biopile to begin the remediation process.
 - b. Biopiles in varying stages of the remediation process.
2. **Weather Station Repair** - Parts to repair the weather station have been ordered and are scheduled to arrive by Tuesday, April 27 (see attached order receipt).
3. **Affected Areas**- There have been 2 landowners identified as having property affected by the dust/oil specks:
 - a. Mr. Moody - indicated he has 12 vehicles, 2 campers & 1 carport which have dirt/oil specks on them.
 - b. Mr. Archuleta - indicated he had 3 vehicles which were affected, but that he has already cleaned the vehicles by taking them to a local car wash and having them washed and hand dried.
4. **Remedial Action Plan** – Industrial Ecosystems, Inc. has reached out to the identified landowners and has offered the following:
 - a. To pay for a professional pressure cleaning service to wash the exterior of all the affected vehicles, RVs, and buildings. I notified the landowners that we have contacted a professional pressure washing service who will plan to assess the job and discuss the details of the cleaning service with them.
 - b. To reimburse the landowner for car wash fees already paid *or*
 - c. To provide coupons to a local professional car wash to have the exterior of the vehicles cleaned.

We are committed to taking prudent actions related to this matter. We will continue to be “good neighbors” by working with the adjacent landowners and we will also continue to work closely with NMOCD personnel.

If you should have any questions or if any additional information is needed, please feel free to contact me at the above listed telephone number or by email at: marcella@industrialecosystems.com

Respectfully,

Marcella Marquez
 Regulatory/Compliance/HR

Attachment: Weather Station Parts Order Form

4/23/2021

Amazon.com - Order 114-1978676-4516209



Details for Order #114-1978676-4516209

[Print this page for your records.](#)

Order Placed: April 23, 2021

Amazon.com order number: 114-1978676-4516209

Order Total: \$127.82

Not Yet Shipped

Items Ordered

1 of: *Davis Instruments Anemometer for Vantage Pro2 and Vantage Pro*

Sold by: VirVentures ([seller profile](#)) | Product question? [Ask Seller](#)

Price

\$121.59

Condition: New

Shipping Address:

Marcella Marquez c/o Industrial Ecosystems, Inc.

49 ROAD 3150

AZTEC, NM 87410-4809

United States

Shipping Speed:

FREE Prime Delivery

Payment information

Payment Method:

Visa | Last digits: 5401

Item(s) Subtotal: \$121.59

Shipping & Handling: \$0.00

Billing address

Marcella Marquez c/o Industrial Ecosystems, Inc.

49 ROAD 3150

AZTEC, NM 87410-4809

United States

Total before tax: \$121.59

Estimated tax to be collected: \$6.23

Grand Total: \$127.82

To view the status of your order, return to [Order Summary](#).

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	Revision Date:	11/10/2020
	Management:	Management
	Issuing Authority:	Management
Process and Safety Management Program		Pages: 1 of 4

PURPOSE

This Program has been developed for Industrial Ecosystems Facility for the requirements of the Process and Safety Management (PSM) of Hazardous Substances

RESPONSIBILITIES

Facility Management

- Assign sufficient resources and qualified operators to ensure safe operating and material conditions are maintained.
- Assign a qualified supervisor to oversee and direct Landfarm Operations, maintenance, and training.
- Involve employee and operators in the various elements of this program.
- Request, as necessary, assistance from Company Engineering to execute the PSM Program and conduct effective audits.

Safety Department

- Train all employees and operators in hazards of the land farm process, safe operating procedures, and good engineering practices.
- Assign tasks based on operator's level of knowledge.
- Monitor maintenance and operations activities to ensure they comply with good engineering practice.
- Ensure contractors are provided the information required by this program.
- Document the information, activities, inspections, etc. required by this program.
- Provide PSM overview indoctrination training for all new employees as part of the New Hire Safety Orientation training.
- Certify compliance with the provisions of the PSM Program at least every three years to verify that the procedures and practices developed under the program are adequate and are being followed.
- Audit shall be conducted by at least one person knowledgeable in the program.
- A report of the findings of the audit shall be developed and documented along with a response to each of the findings of the audit have been corrected.

IEI Employees

- Actively participate in the PSM program.
- Exercise good engineering practices in the operation and maintenance of the land farm operations.
- Comply with all safety procedures.

PSM ELEMENTS

The PSM Program contains the elements listed that must be addressed in this program.

1. Employee Participation
2. Process Safety Information (PSI)
3. Process Hazard Analysis (PHA)
4. Operating Procedures
5. Training
6. Contractor Safety
7. Management of Change (MOC)
8. Incident Investigation
9. Emergency Planning and Response

	Revision Date:	11/10/2020
	Management:	Management
	Issuing Authority:	Management
Process and Safety Management Program		Pages: 2 of 4

EMPLOYEE PARTICIPATION

Requirements

The standard requires employers to:

- Develop a Plan of Action for implementation of Employee Involvement.
- Consult with employees on the conduct of the development of PSM Elements.
- Provide access to PSM information.

PROCESS SAFETY INFORMATION (PSI)

Requirements

The standard requires compiling information on the process and equipment in the land farm process. This requirement is to allow for PHA-Process Hazard Analysis and maintaining information on the operations for operator training and reference.

Specifically

- Hazards of operations pertaining to the Land farm operations.
- Information pertaining to the operations in the process.
- Documentation that operations and equipment complies with recognized and generally accepted good engineering practices.

PROCESS HAZARD ANALYSIS

Requirements

An initial process hazard analysis must be conducted by a safety process, including at least one employee who has experience and knowledge on the land farm operations.

After Initial PHA

- Establish a system to promptly address the team's findings and recommendations.
- Assure that the recommendations are resolved in a timely manner.
- Document resolutions.
- Document what actions are to be taken.
- Complete actions as soon as possible.
- Develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance.
- Engineering and administrative controls.
- Detection methods for providing early warning of releases.
- Consequences of failure of engineering and administrative controls.
- Human factors.
- Qualitative evaluation of a range of the possible safety and health effects of failure of controls on employees.

	Revision Date:	11/10/2020
	Management:	Management
	Issuing Authority:	Management
Process and Safety Management Program		Pages: 3 of 4

OPERATING PROCEDURES

Requirements

Develop and implement written operating procedures that provide clear instructions for safely conducting operations and maintenance. Operating procedures shall be readily accessible to employees. The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice. The employer shall certify annually an assessment that these operating procedures are current and accurate.

Develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; H2S; confined space entry; opening process equipment or piping; and control over entrance into a facility by contractor or other support personnel. These safe work practices shall apply to employees and contractor employees.

Procedures Shall Include:

- Initial operations.
- Normal, temporary, and emergency operations.
- Startup following an emergency shutdown.
- Operating limits.
- Safety and health considerations.
- Precautions necessary to prevent exposure, including engineering controls.
- Administrative controls and personal protective equipment.
- Control measures to be taken if physical contact or airborne exposure occurs.
- Quality control for raw materials and control of hazardous chemical inventory levels.
- Safety systems and their functions.

TRAINING

Requirements

Initial training

Each operator must be trained in an overview of the process and in the operating procedures. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.

For those employees already involved in operating a process, an employer may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures.

Refresher training

Shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The employer, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.

Training documentation

The employer shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The employer shall prepare a record that contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

	Revision Date:	11/10/2020
	Management:	Management
	Issuing Authority:	Management
Process and Safety Management Program		Pages: 4 of 4

CONTRACTORS

Requirements

- Obtain and evaluate information regarding the contract employer's safety performance and programs.
- Contract employers of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process to contract employers the applicable provisions of the emergency action plan.
- Develop and implement safe work practices to control the entrance, presence and exit of contract personnel.
- Evaluate the performance of contract employers in fulfilling their obligations.
- A contract employee injury and illness log related to the contractor's work in process areas if required.

MANAGEMENT OF CHANGE (MOC)

Requirements

Establish and implement written procedures to manage changes to process chemicals, technology, equipment, and procedures; and changes to facilities that affect a covered process. Prior to the change, address the following considerations:

- The technical basis for the proposed change.
- Impact of change on safety and health.
- Modifications to operating procedures.
- Necessary time for the change.
- Authorization requirements for the proposed change.
- Train affected employees and contract employees in the change prior to start-up of the process or affected part of the process.

INCIDENT INVESTIGATION

Requirements

- Investigate each incident that resulted in or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace. An incident investigation shall be initiated as promptly as possible, but no later than 48 hours following the incident.
- Establish an incident investigation team which consists of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.
- Incident Reports - A report shall be prepared at the conclusion of the investigation that includes at a minimum:
 - Date of incident.
 - Date investigation began.
 - Description of the incident.
 - Factors that contributed to the incident.
 - Recommendations resulting from the investigation.
- Corrective Actions - Establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented.
- Report Review - The report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable. Incident investigation reports shall be retained for five years.

	Revision Date:	11/10/2020
	Management:	Management
	Issuing Authority:	Management
Process and Safety Management Program		Pages: 5 of 4

EMERGENCY PLANNING AND RESPONSE

Requirements

Establish and implement an emergency action plan for the entire plant in accordance with the provisions of 29 CFR 1910.38(a), 29 CFR 1910.120(a), (p) and (q). In addition, the emergency action plan shall include procedures for handling small releases to reduce the potential for mistakes which might threaten human health or the environment by ensuring that facility personnel working in jobs where they handle hazardous waste will be thoroughly familiar with their duties and responsibilities. There are specific training requirements for individuals who work with hazardous waste. These requirements are found in federal code and specify minimum training levels. Personnel who may be exposed to hazardous waste must be properly trained.

Training

Facility personnel working in jobs where they handle hazardous waste will be thoroughly familiar with their duties and responsibilities. There are specific training requirements for individuals who work with hazardous waste. These requirements are found in federal code and specify minimum training levels. Personnel who may be exposed to hazardous waste must be properly trained.

Personal Protection Equipment (PPE)

Whenever hazardous materials, including hazardous wastes, are used, or handled, the use of proper personal protection equipment should be considered to protect all potentially exposed personnel. The degree of PPE used should be equivalent with the hazard potential. PPE includes, but is not limited to, safety glasses, chemical gloves, face shields, aprons, lab coats designed to offer splash protection, and respiratory equipment. PPE that has been contaminated by a hazardous material needs to be characterized as to whether it becomes a hazardous waste.

Medical Surveillance

IEI will provide, at least annually and at the end of employment, medical surveillance to all employees exposed to any hazardous substance at or above established exposure levels and/or those who wear approved respirators for 30 days or more on site. Such surveillance also will be conducted if a worker is exposed to unexpected or emergency releases.

Air Monitoring

Must be completed to identify and quantify hazardous substance levels with periodic monitoring to assure that proper protective equipment is being used.

Decontamination Procedures

Potentially hazardous exposure, employees must minimize exposure through contact with equipment, other employees, or used clothing. Decontamination will be completed in areas that will minimize the exposure to:

- Uncontaminated employees and equipment.
- All contaminated work surfaces, tools, objects, etc. will be decontaminated immediately or as soon as feasible after encountering any hazardous waste materials.
- Equipment that may become contaminated with hazardous or other potentially infectious materials will be examined and decontaminated before servicing or use.
- Employees will remove PPE and all garments that become contaminated with hazardous or other potentially infectious materials and place in containers that are closable, constructed to contain all contents and prevent leakage of fluids during handling, storage, transportation, or shipping.
- Employees will utilize showers and changing areas as needed.
- Unauthorized employees will be restricted from having access to the contaminated clothing and changing rooms.

Field supervisors will be responsible for ensuring that decontamination procedures are followed by all employees prior to leaving a potentially hazardous exposure area.



Main Address: 49 Road 3150 * Aztec, NM 87410
Remit to Address: P.O. Box 1202 * Flora Vista, NM 87415
P.O. Box: P.O. Box 2043 * Farmington, NM 87499
Phone: (505) 632-1782
Fax: (505) 632-1876 or (505) 334-1003

Remediation Plan

RELEASE INFORMATION					
JFJ Landfarm LLC Operated by Industrial Ecosystems, Inc.					
FACILITY LOCATION	INCIDENT #	Section, Township, Range			
49 Road 3150 Aztec, NM 87410	NAPP2111336915	Unit J	Section 2	Township 29N	Range 12W
Date Reported to OCD	04/20/2021				
Reported By	Adjacent Property Owner – Mr. Jerry Moody Road 3148 # 4 Aztec, NM 87410				
Source of Release	Undetermined – Due to nature of business OCD is assuming JFJ Landfarm is a probable cause and has requested we follow the release reporting regulation as described in 19.15.29 NMAC				
Released Material	Undetermined – dirt/oil specks				
Released Volume	Estimated to be < 1 BBL				
Recovered Volume	Estimated to be < 1 BBL				
Nearest Waterway	3 miles North of the Location and 4.5 miles South of the Location				
Depth to Groundwater	Estimated to be greater than 100 feet				

REMEDIATION SPECIFICATIONS	
Remediation Parameters:	As per the recommendations of Mike Bratcher, NMOCD Incident Supervisor, and with prior landowner approval, Industrial Ecosystems hired Donny's Power Wash (professional pressure wash company) to clean all vehicles/RVs/outbuildings identified as being impacted with dirt/oil specks.
Remediation Activities:	05/03/2021

The source of the release remains undetermined, but due to the nature of our facility OCD is assuming that we are a probable cause and has instructed us to follow the release reporting regulations as described in 19.15.29 NMAC.

The JFJ Landfarm (NM01-0010B) is a NMOCD permitted Surface Waste Management facility located at 49 Road 3150 Aztec, NM 87410. The adjacent landowner's impacted property is located at Road 3148 # 4, Aztec, NM 87410 which is approximately 300 foot east of the JFJ Landfarm east facility fence line. County Road 3150 Aztec, NM runs between the JFJ Facility fence line and the adjacent landowner's property line. Figure 1 – Site Map.



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IEI utilized the NM Office of the State Engineer's Water Rights Reporting System (NMWRRS) to determine the facility and adjacent landowner's impacted property are located approximately 3 miles south of the Animas River and 4 ½ miles north of the San Juan River with an elevation of approximately 5,890 feet above sea level. Figure 2 – Significant Watercourses & Figure 3 – TOPO.

IEI utilized the NMWRRS to determine depth to groundwater is estimated to be greater than 100 feet below ground surface (bgs). This determination is based on surrounding water wells depth of well, depth to water, elevation, distance from site, direction from site and PLSS information. Table 1 – NMWRRS Well Data.

IEI utilized the NMWRRS to determine there are no known domestic/livestock water wells within 500 foot of the facility and adjacent landowner's property. Table 1 – NMWRRS Well Data and Figure 4 – PODs in Excess of 500' from impacted area.

IEI utilized the US Fish & Wildlife National Wetlands Inventory mapping system to determine that we do NOT fall within any wetlands. Figure 5 – Wetlands.

IEI utilized the FEMA National Flood Hazard mapping system to determine that the facility/adjacent landowner's property are located in areas of "minimal flood hazard", NOT located within 100-year floodplain. Figure 6 – National Flood Hazard Layer Firmette.

The area is not typical for karst geology and has no subsurface mines.


Remediation Activities: As per the recommendation of Mike Bratcher, NMOCD Incident Supervisor, IEI spoke to the landowner about having a professional pressure washing service travel to the landowner's property and professionally clean all vehicles/RVs/outbuildings affected with the dirt/oil specks. The landowner was agreeable to the remediation proposal. IEI contracted Donny's Power Wash to perform the clean-up as he has completed similar jobs for local oilfield companies.

As discussed with Mr. Bratcher, there was no puddling or pooling of the contaminate, therefore IEI was unable to gather a large enough sample from the dirt/oil specks to provide to the laboratory for testing. Mr. Bratcher stated that he understands this "release" is different in nature than typical releases and that it is understood that we may not be able to provide all the customary required information.

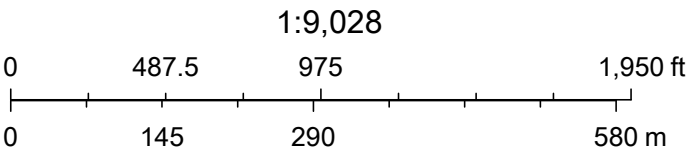
FIGURE 1 - Site Map



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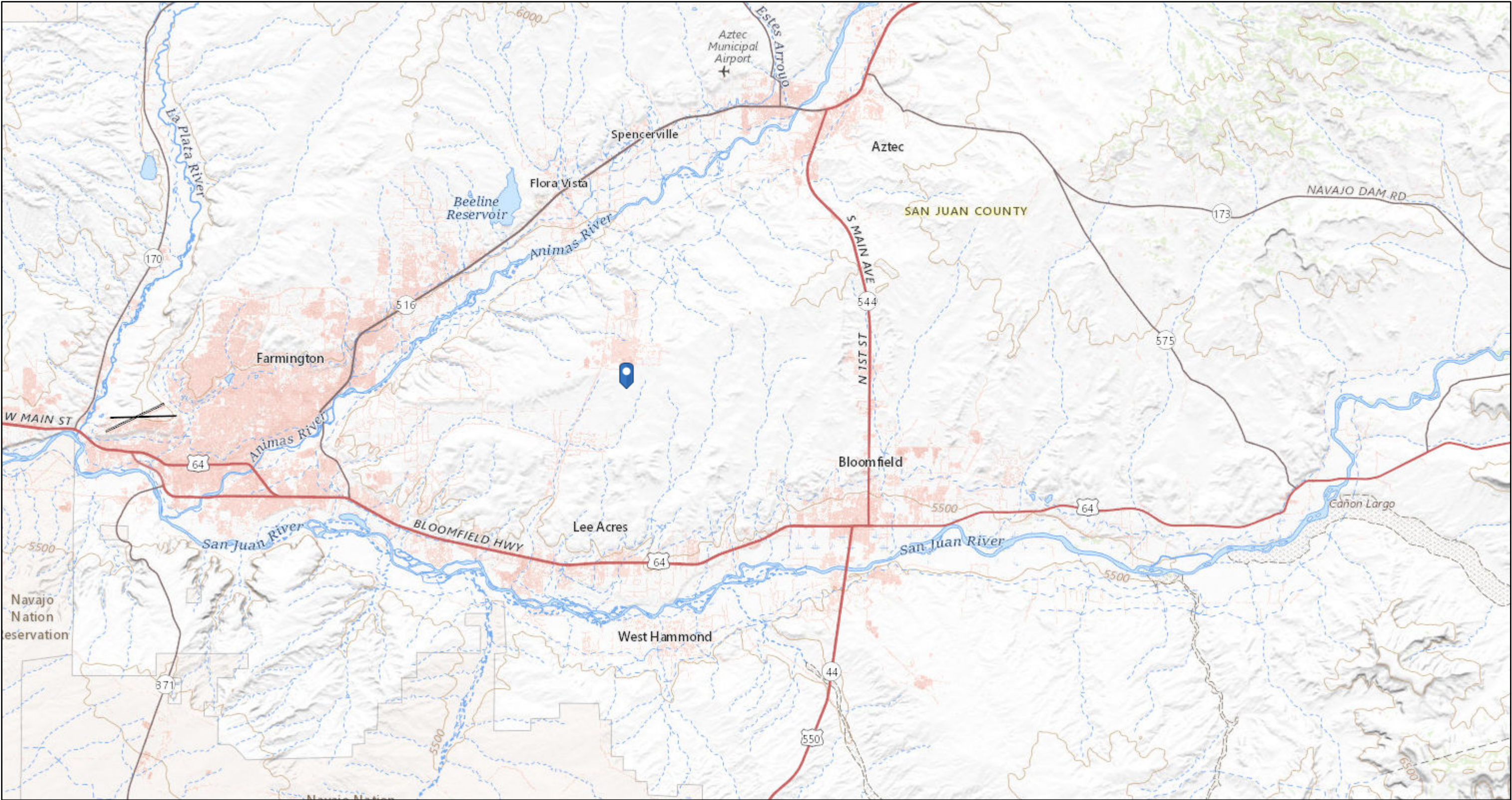
 Adjacent Landowner's property



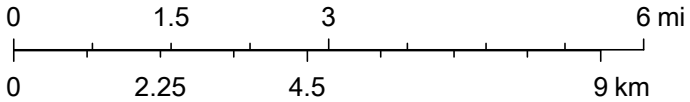
Esri, HERE, Garmin, iPC, Maxar

FIGURE 2 - Significant Watercourses



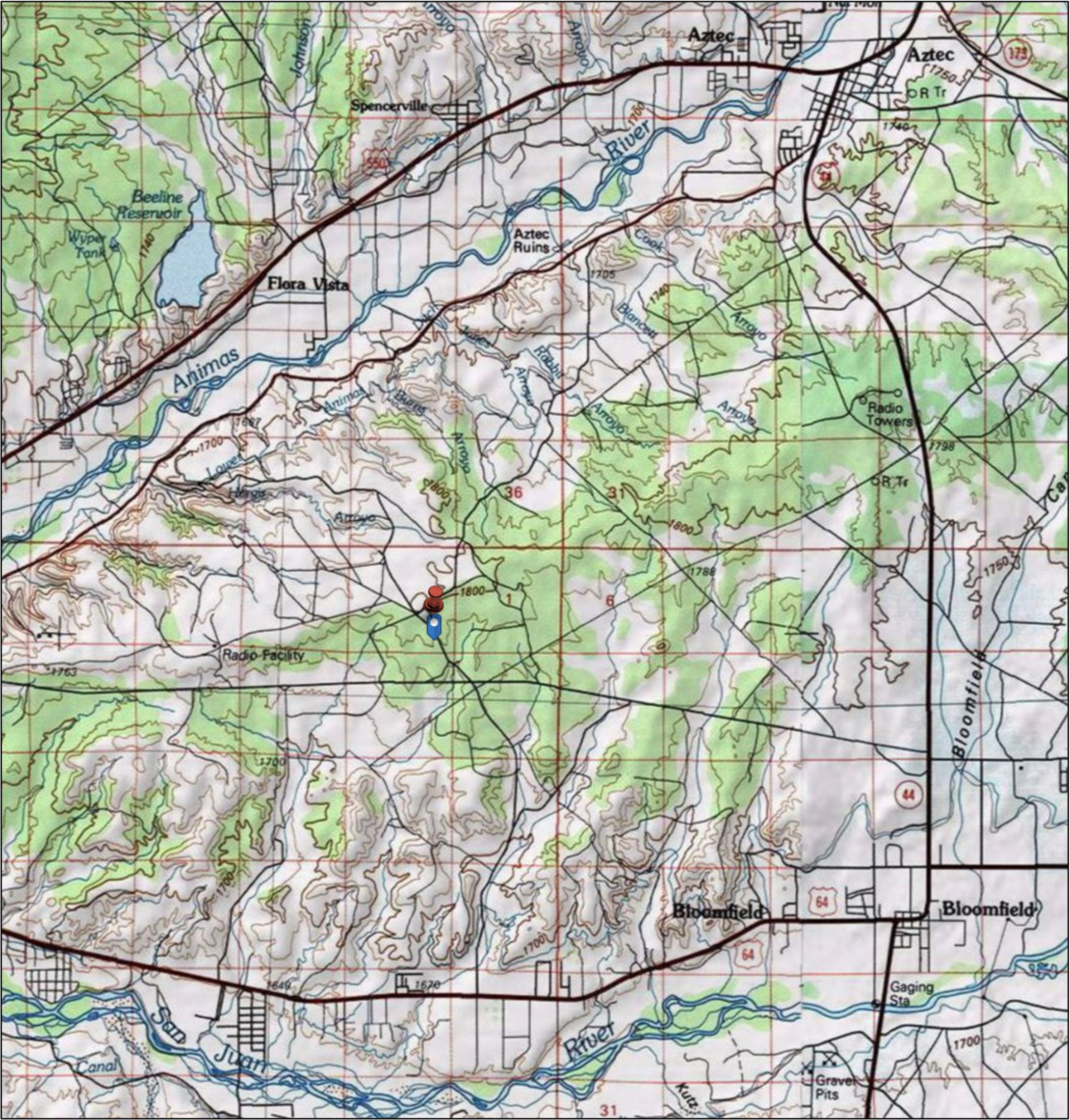
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1:144,448



USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS

FIGURE 3 - TOPO



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Adjacent Landowner

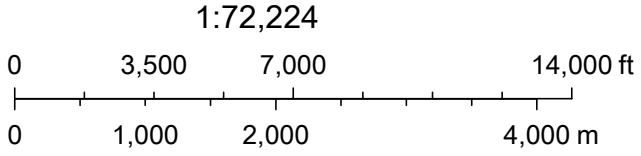
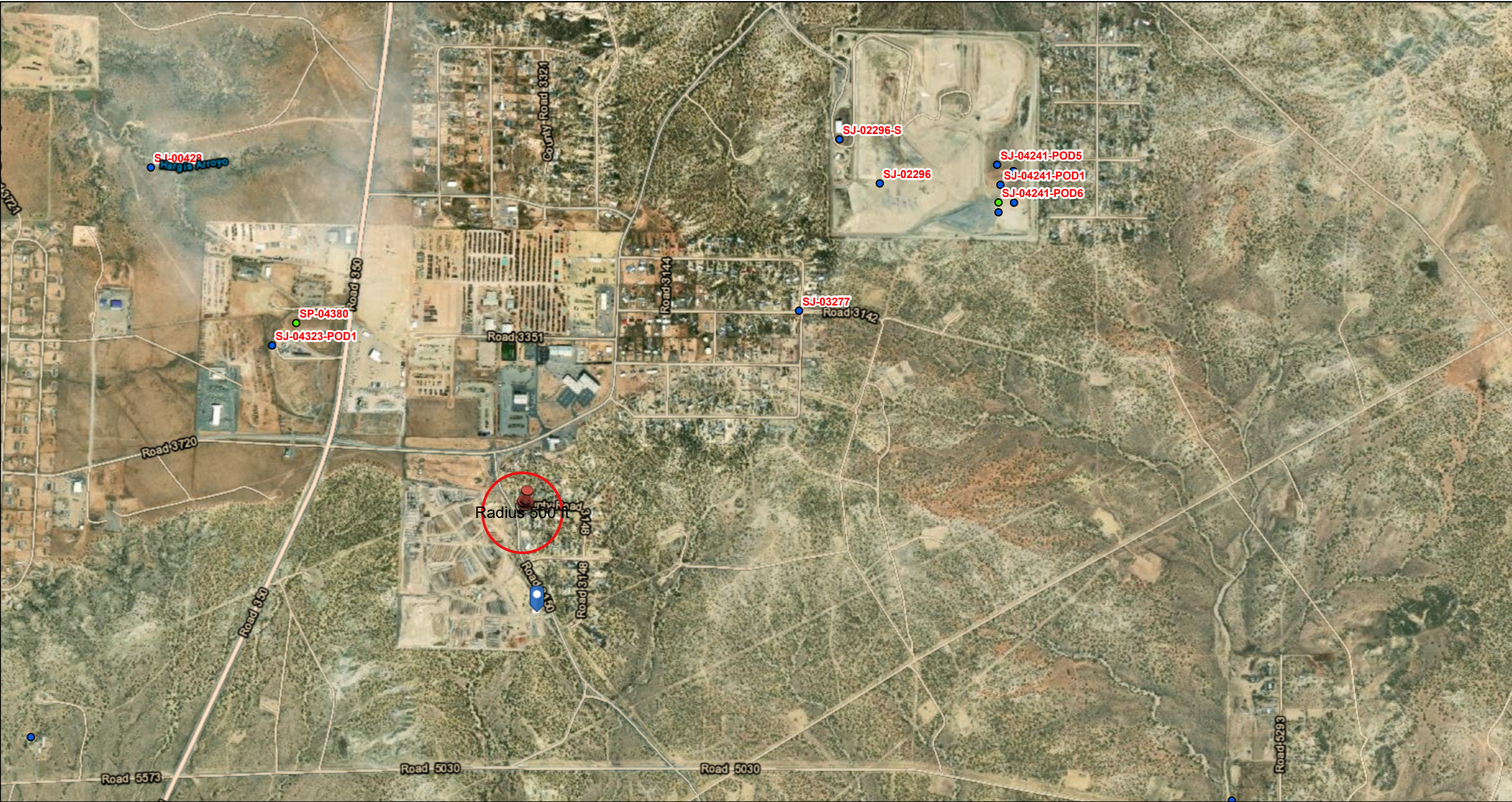


TABLE 1 - NMWRRS Well Data

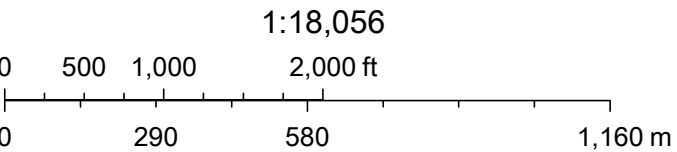
Well Designation	Depth of Well (ft)	Depth to Water	Estimated Surface Elevation	Approximate Distance from Site (ft)	Direction From Site	PLSS Information
SJ 01170	200	-	5,760	9,508	NW	S34, T30N, R12W
SJ 00428	107	90	5,790	4,821	NW	S34, T30N, R12W
SJ 02296 (S)	300	100	5,790	6,077	NW	S36, T30N, R12W
SJ 02296	400	89	5,805	6,112	NW	S36, T30N, R12W
SJ 03277	180	120	5,910	4,422	NE	S1, T29N, R12W
SJ 01839	212	175	5,675	6,273	SW	S10, T29N, R12W
SJ 00503	-	-	5,650	4,510	S	S11, T29N, R12W
SJ 03410	75	-	5,620	5,053	S	S11, T29N, R12W
NOTES:						
No Domestic/Livestock Wells Found in S35, T30N, R12W or S12, T29N, R12W						
IEI Elevation approximately 5,890 ft above sea level						
(-) Indicates no Available Information						

FIGURE 4 - POD's in Excess of 500' from impacted area



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- Override 1 GIS WATERS PODs
- Pending
- Active
- Adjacent Landowner



Esri, HERE, iPC, Esri, HERE, Garmin, iPC, Maxar



Wetlands - FIGURE 5



May 4, 2021

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

COMMENTS

Action 26670

COMMENTS

Operator: JFJ LANDFARM LLC 49 Road 3150 Aztec, NM 87410	OGRID: 374111
	Action Number: 26670
	Action Type: [C-141] Release Corrective Action (C-141)

COMMENTS

Created By	Comment	Comment Date
nvelez	Final Closure Report already approved on 02/22/2022. This Remediation Plan approval handled for the administrative record.	5/18/2022

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CONDITIONS

Created By	Condition	Condition Date
nvelez	None	5/18/2022