

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Heather Riley, Division Director
Oil Conservation Division



February 9, 2018

Mr. John Volkerding
Basin Disposal, Inc.
200 Montana
Bloomfield, New Mexico 87413

RE: Determination Request of Non-Domestic Waste Status
Recycling Containment and Recycling Facility Permit: 3RF-002
Facility Location: SE/2 NW/4 and N/2 SE/4 of Section 13, Township 23 North, Range 7
West, NMPM, Rio Arriba County, New Mexico

Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated February 1, 2018, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill (Permit SWM 052426/ SWM 052433 SP). The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC (based upon the review of the Corrosivity results) and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec



30 Years of Environmental Health and Safety Excellence

200 Montana, Bloomfield, NM 87413

505-632-8936 or 505-334-3013

OPEN 24 Hours per Day

FEB 06 2018 PM 02:32

1 February 2018

Brad Jones
EMNRD/OCD/Environmental Bureau
1220 South St. Francis Dr.,
Santa Fe, New Mexico 87505

RE: Non-Domestic Waste, Subsection (D), Paragraph 2 of Section 19.15.35.8.B(2) NMAC.

Dear Mr. Jones;

Paragraph B of 19.15.35.8 NMAC states:

"A person may dispose of oil field waste listed in Paragraph (2) of Subsection C of 19.15.35.8 NMAC at a solid waste facility after testing and the division's prior written authorization. Before the division grants authorization, the applicant for the authorization shall provide copies of test results to the division and to the solid waste facility where the applicant will dispose of the oil field waste. In appropriate cases and so long as a representative sample is tested, the division may authorize disposal of a waste stream listed in Paragraph (2) of Subsection C of 19.15.35.8 NMAC without individual testing of each delivery"

Subsection C, Paragraph 2 (m) lists : *produced water filters, which the facility operator drains and then air-dries for at least 48 hours before testing, for corrosivity*

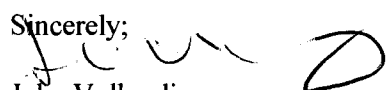
Subsection D, *The person applying for division approval to dispose of oil field waste in a solid waste facility shall conduct testing required by 19.15.35.8 NMAC according to the Test Methods for Evaluating Solid Waste, EPA No. SW-846 and shall direct questions concerning the standards or a particular testing facility to the division. The testing facility shall conduct testing according to the test method listed: (e) corrosivity EPA Method 1110;*

Prior to storage in the recycling containment in Lybrook, NM under permit OCD Permit 3RF-2 the treated produced water is filtered through a set of 20um and 5um filters. Basin Disposal requests permission to dispose of these filters at the San Juan County Regional Landfill operated by Waste Management.

The Corrosivity analysis is attached for the OCD's review and approval.

I thank you for your help and if you have any questions, please feel free to phone me at 334-3013 or 320-2840 or via email at jvolkerding@basindisposalinc.com

Sincerely;


John Volkerding
General Manager

Encl:

1. Envirotech Analysis

Cc:

1. Brandon Powell, OCD/Aztec, 1000 Rio Brazos, Aztec, NM 87410



Analytical Report

Report Summary

Client: Basin Disposal Inc.
Chain Of Custody Number:
Samples Received: 1/25/2018 2:50:00PM
Job Number: 03058-0003
Work Order: P801030
Project Name/Location: Filter

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', with a small flourish at the end.

Date: 1/31/18

Walter Hinchman, Laboratory Director

A handwritten signature in black ink, appearing to read 'Tim Cain', with a small flourish at the end.

Date: 1/31/18

Tim Cain, Quality Assurance Officer

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filter
Project Number: 03058-0003
Project Manager: Paul Gurule

Reported:
31-Jan-18 15:47

Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Filter 20	P801030-01A	Filter	01/25/18	01/25/18	Glass Jar, 4 oz.
Filter 5	P801030-02A	Filter	01/25/18	01/25/18	Glass Jar, 4 oz.

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5796 US Highway 64, Farmington, NM 87401

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Ph (970) 259-0615 Fr (800) 362-1879

envirotech-inc.com
laboratory - envirotech-inc.com



Basin Disposal Inc.	Project Name:	Filter	
PO Box 100	Project Number:	03058-0003	Reported:
Aztec NM, 87410	Project Manager:	Paul Gurule	31-Jan-18 15:47

Filter 20
P801030-01 (Solid)

Reporting									
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes

Corrosivity

pH @ 25°C	7.93		pH Units	1	1805017	01/31/18	01/31/18	9045D-9040 C	
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Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filter
Project Number: 03058-0003
Project Manager: Paul Gurule

Reported:
31-Jan-18 15:47

Filter 5
P801030-02 (Solid)

Reporting

Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Corrosivity

pH @25°C	7.77		pH Units	1	1805017	01/31/18	01/31/18	9045D-9040 C	
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Basin Disposal Inc.	Project Name:	Filter	Reported: 31-Jan-18 15:47
PO Box 100	Project Number:	03058-0003	
Aztec NM, 87410	Project Manager:	Paul Gurule	

Corrosivity - Quality Control
Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1805017 - Wet Chemistry Preparation

LCS (1805017-BS1)		Prepared & Analyzed: 31-Jan-18								
pH	7.95		pH Units	8.00		99.4	98.75-101.25			
Duplicate (1805017-DUP1)		Source: P801026-01		Prepared & Analyzed: 31-Jan-18						
pH	8.28		pH Units	8.27		0.121	20			

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Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filter
Project Number: 03058-0003
Project Manager: Paul Gurule

Reported:
31-Jan-18 15:47

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
RPD Relative Percent Difference

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Project Information

Chain of Custody

Page 7 of 7

Client: <u>Desw Disposal</u> Project: <u>Filter</u> Project Manager: <u>Paul Conde</u> Address: <u>4000 Alameda</u> City, State, Zip: <u>Albuquerque NM 87113</u> Phone: <u>505 320 7499</u> Email: <u>Paul Conde@DeswDisposal.com</u>				Report due by: Attention: Address: City, State, Zip: Phone: Email:				Lab Use Only Lab WO# <u>P001030</u> Job Number <u>03058-0003</u> Analysis and Method VOC by 8260 BTEX by 8021 GRO/DRO by 8015 DRO/DRO by 8015 TPH 418.1 Chloride 300.0 Metals 6010				EPA Program TAT 1D 3D RCRA CWA SDWA			
Sample ID												State NM CO UT AZ			
Time Sampled												Remarks			
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