

**GW – 375**

**PERMITS,  
RENEWALS,  
& MODS  
Application**



RECEIVED

June 11, 2008

2008 JUN 16 PM 2 02

CERTIFIED MAIL NO. 7007 0710 0003 8375 2581  
RETURN RECEIPT REQUESTED

New Mexico Environmental Department  
Oil Conservation Division  
Attn: Leonard Lowe  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

RE: GW-375 Discharge Permit  
Special Condition 16 Follow-up Report  
BJ Services Company, U.S.A.  
11211 FM 2920  
Tomball, TX 77375

Dear Mr. Lowe:

The BJ Services Company, U.S.A. (BJ Services) 3111 Bloomfield Highway District was inspected on April 23, 2008, as a part of New Mexico Oil Conservation Division's (NMOCD) Discharge Permitting process. The final permit was issued on May 8, 2008 and a signed copy was sent to the NMOCD via UPS on May 29, 2008. As required by Special Condition 16 BJ Services is submitting this follow-up report to confirm that the following items have been addressed:

1. Identify history and purpose of PVC tubing on the south side of the main building;
  2. Verify the presence or absence of an underground fuel tank; and
  3. Repair and declare how BJ Services will ensure the integrity of the secondary containment area.
1. The PVC tubing listed in item one is pictured in Photo 1 of the NMOCD's inspection report; this pipe is the clean out for the sanitary septic tank.
  2. The due diligence report completed for BJ Services by a third party contractor identified a former leaking underground storage tank (LUST) that was used to store used oil. This tank is listed in the database as being removed and the associated 1995 release report has a No Further Action Required determination granted the same year. This was the only underground storage tank identified. The tanks associated with the former fueling operations were all aboveground tanks.
  3. As shown in the enclosed photographs the deformed southwest corner of the secondary containment has been repaired. This containment is made of a heavy-duty



June 11, 2008

plastic and is designed to withstand truck and forklift traffic. In order to protect the containment floor from small rocks puncturing through either the bottom or the top plywood sheets have been placed underneath and on top of it.

BJ Services HSE Base inspections are conducted on a monthly basis. A copy of this inspection sheet was provided with the district's discharge plan in Attachment 2. In the Environmental Section of this inspection sheet the spill containment area will be evaluated for integrity problems and any concerns identified here will be corrected.

BJ Services appreciates your time and if there are any questions or comments, please contact me at (281) 357-2573.

Thank You.

Josh Morrissette  
HSE Specialist

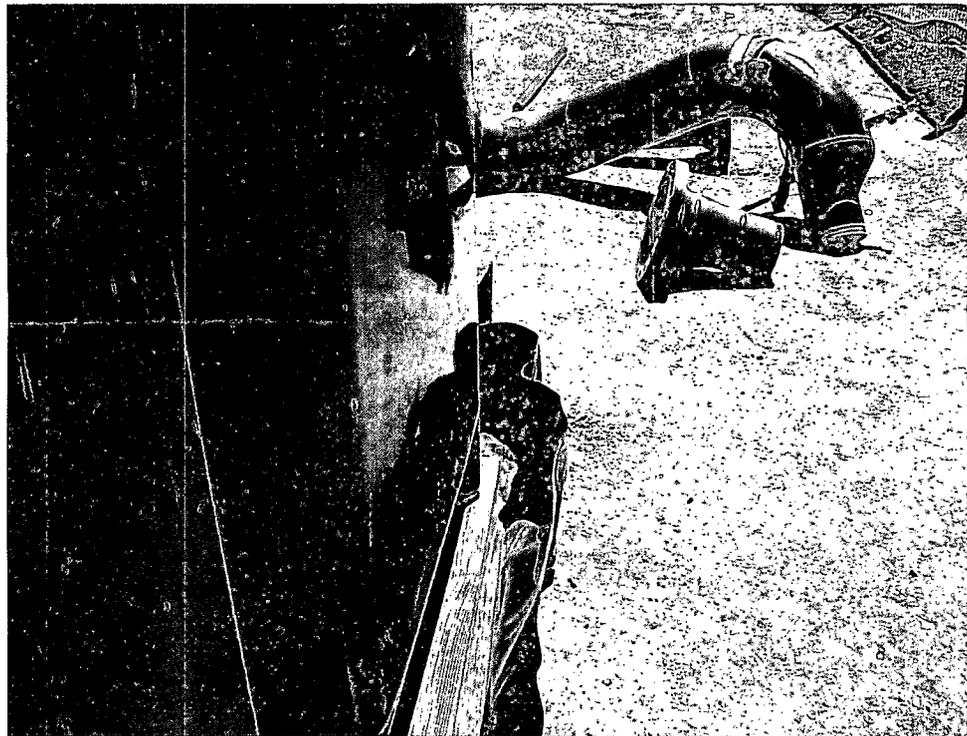
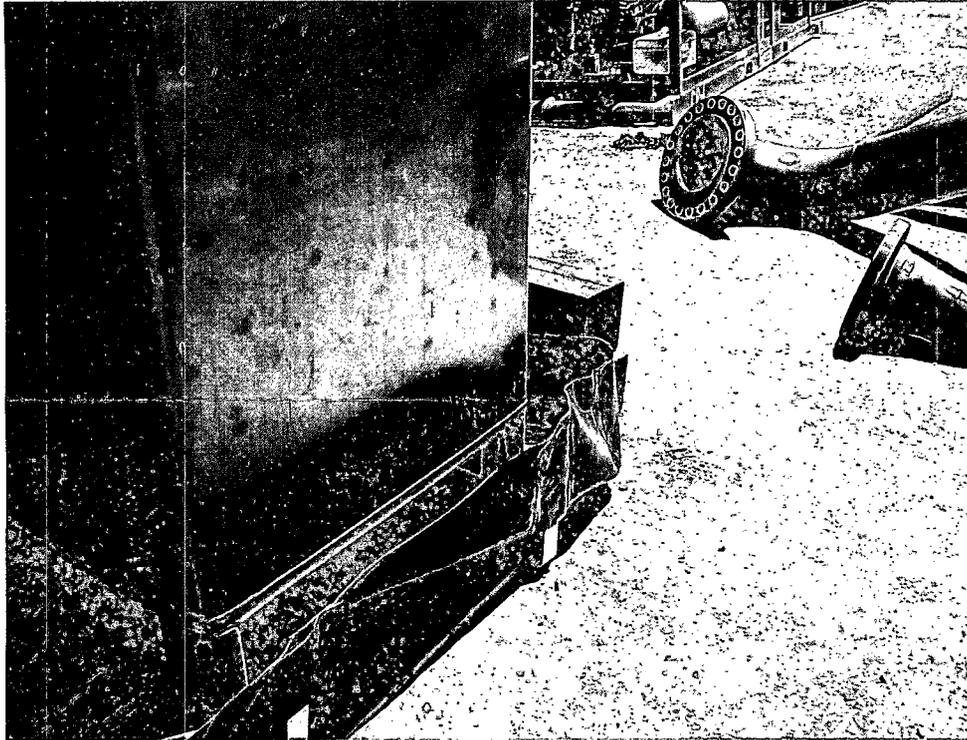
Cc: Ralph Williams – BJ Process & Pipeline Services, Farmington  
Steve Crawford – BJ Chemical Services, Farmington  
Jerry McAlpin – BJ Process & Pipeline Services, Houston  
Jason Goodwin – BJ Chemical Services, Houston  
Jim Britton – BJ Chemical Services, Hobbs  
File – BJ Services, Tomball

Enclosure



June 6, 2008

Repaired South West Corner Photos





RECEIVED

May 29, 2008

2008 MAY 30 PM 1 38

UPS Overnight

New Mexico Environmental Department  
Oil Conservation Division  
Attn: Leonard Lowe  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

RE: Discharge Permit  
GW-375  
BJ Services Company, USA  
11211 FM 2920  
Tomball, TX 77375

Dear Mr. Lowe:

Enclosed is the signed Discharge Permit for a new BJ Services Company, USA Facility located at 3111 Bloomfield Highway, Farmington, NM.

If there are any questions or comments, please contact me at (281) 357-2573.

Thank You.

Josh Morrissette  
HSE Specialist

Cc: Ralph Williams – BJ Services, Farmington  
File – BJ Services, Tomball

Enclosures

## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division (“OCD”) has received the required \$100.00 filing fee. The fee for a Oil and gas service company is \$1700.00 was received and processed on February 2008.
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on May 8, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its January 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

**B. Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

**7. Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

**8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

**9. Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

**10. Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

**11. Below-Grade Tanks/Sumps and Pits/Ponds.**

**A.** All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

**B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all

pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

## 12. **Underground Process/Wastewater Lines:**

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. **Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

**14. Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD performed an inspection on April 23, 2008. Below are findings of this facility. Reference all photos in attachment:

1. Photo 1: PVC tubing south of main building is unidentified. Identify history and purpose of tubing.
2. Photo 2 & 3: Concrete slab might have been a fueling station. If so there might be an underground storage tank on this premise. BJ Services shall verify.
3. Photo 4 – 7: Chemical storage holding area has questionable secondary containment. (1) Ply boards separating the chemical totes and the liner may compromise the integrity of the liner. (2) The actual “berm” function does not seem to be engineered enough to sustain itself. At time of inspection the southwest corner of entire containment was manipulated. OCD rules state, by definition, “Berm shall mean an embankment or ridge constructed to prevent the movement of liquids, sludge, solids or other materials.” BJ Services shall re-engineer their secondary containment to reduce their possibility of an unauthorized discharging on to the ground.
4. Photo 8: It appears that the previous vendor adjacent to the facility located on the east side has left questionable containers that could cause a concern for BJ Services. As a suggestion, BJ Services should reduce this potential concern.

BJ Services has 120 days to resolve issues 1 – 3 and submit a report of these issues. This report shall contain photographs where applicable.

**17. Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22. Closure Plan and Financial Assurance:** Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

Mr. Josh Morrissette  
BJ Services Company USA  
GW-375  
May 8, 2008  
Page 7

**23. Certification: (Owner/Operator)**, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

BJ Services Company, U.S.A.  
Company Name-print name above

Jo Ann Cobb  
Company Representative- print name

Jo Ann Cobb  
Company Representative- Signature

Title Mgr. Env. Services

Date: 5-29-08

OCD Inspection BJ Services, 3111 Bloomfield Hwy., GW - 375

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Mr. Josh Morrissette and Facility representatives

Date: 04.23.08

Time: 8:00 – 8:40

Page 1



Photo 1: Identify purpose of extruding PVC pipe. UST?

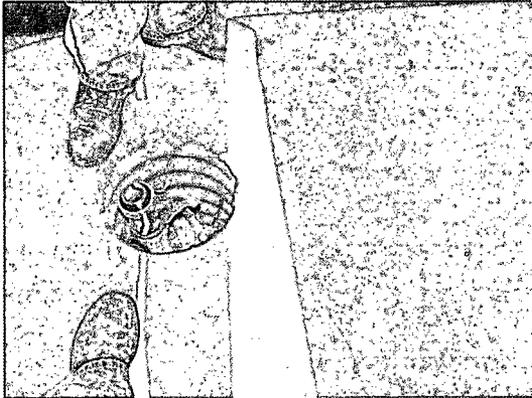


Photo 2: Unknown reason for slab of concrete. UST?

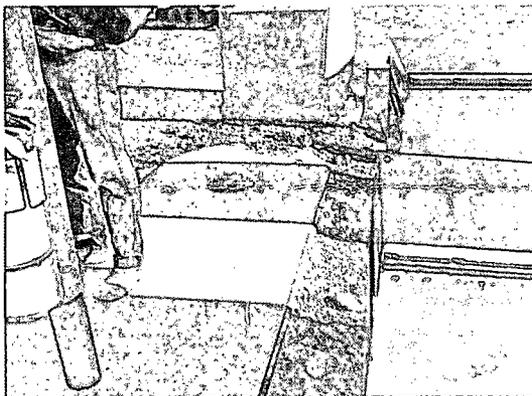


Photo 3: Assumed old tanking station. UST?

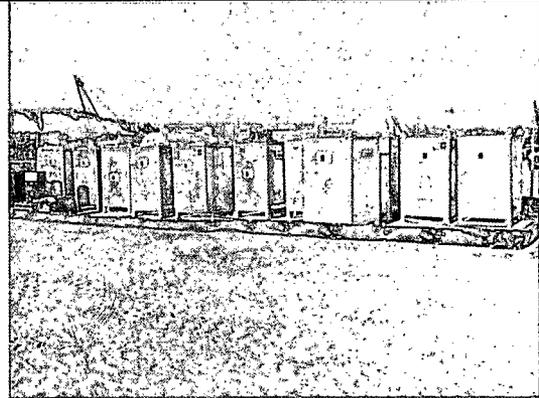


Photo 4: Chemical storage within secondary containment.

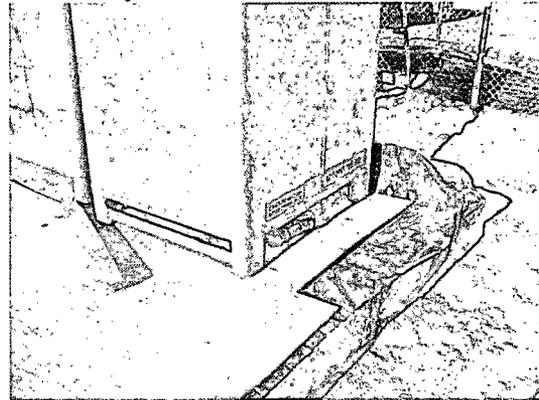


Photo 5: Close up of lined only secondary containment.

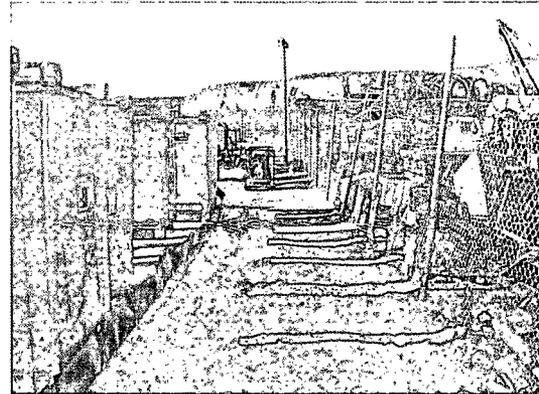


Photo 6: Chemical location near edge of facility.

OCD Inspection BJ Services, 3111 Bloomfield Hwy., GW - 375

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Mr. Josh Morrissette and Facility representatives

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Page 2

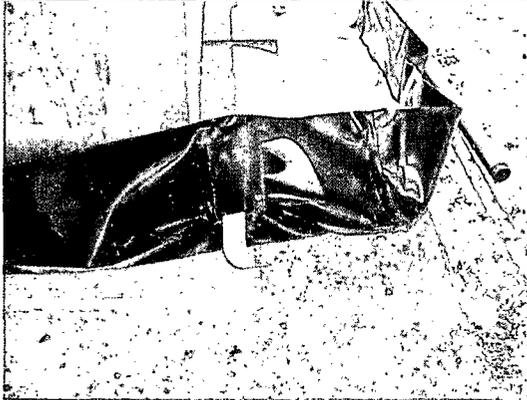


Photo 7: Corner of secondary containment deformed.

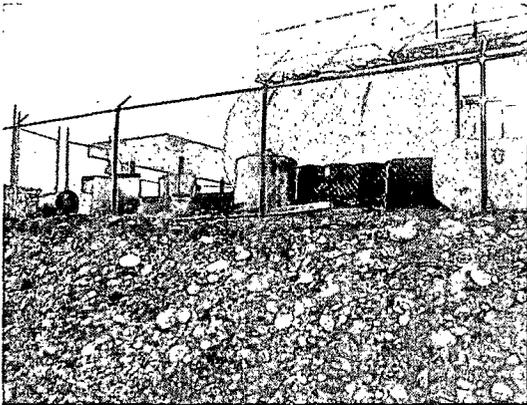


Photo 8: Adjacent facility, Bubble City, east of BJ Services with abandon tanks.



New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**  
Governor  
**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



May 8, 2008

Mr. Josh Morrissette  
BJ Services Company USA  
11211 FM 2920  
Tomball, TX 77375

Re: **New Discharge Permit**  
BJ Services, Dyna-Coil Services and Process Pipeline Services (GW-375)  
NE/4 NE/4 Section 23, Township 29 North, Range 13 West, NMPM,  
San Juan County, New Mexico

Dear Mr. Morrissette:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **BJ Services Company USA** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price  
Environmental Bureau Chief

Attachments-1  
xc: OCD District Office



## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division (“OCD”) has received the required \$100.00 filing fee. The fee for a Oil and gas service company is \$1700.00 was received and processed on February 2008.
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**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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**B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all

pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

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## **12. Underground Process/Wastewater Lines:**

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**13. Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

**14. Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD performed an inspection on April 23, 2008. Below are findings of this facility. Reference all photos in attachment:

1. Photo 1: PVC tubing south of main building is unidentified. Identify history and purpose of tubing.
2. Photo 2 & 3: Concrete slab might have been a fueling station. If so there might be an underground storage tank on this premise. BJ Services shall verify.
3. Photo 4 – 7: Chemical storage holding area has questionable secondary containment. (1) Ply boards separating the chemical totes and the liner may compromise the integrity of the liner. (2) The actual “berm” function does not seem to be engineered enough to sustain itself. At time of inspection the southwest corner of entire containment was manipulated. OCD rules state, by definition, “Berm shall mean an embankment or ridge constructed to prevent the movement of liquids, sludge, solids or other materials.” BJ Services shall re-engineer their secondary containment to reduce their possibility of an unauthorized discharging on to the ground.
4. Photo 8: It appears that the previous vendor adjacent to the facility located on the east side has left questionable containers that could cause a concern for BJ Services. As a suggestion, BJ Services should reduce this potential concern.

BJ Services has 120 days to resolve issues 1 – 3 and submit a report of these issues. This report shall contain photographs where applicable.

**17. Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22. Closure Plan and Financial Assurance:** Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

**23. Certification: (Owner/Operator)**, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

Title \_\_\_\_\_

Date: \_\_\_\_\_



Photo 1: Identify purpose of extruding PVC pipe. UST?

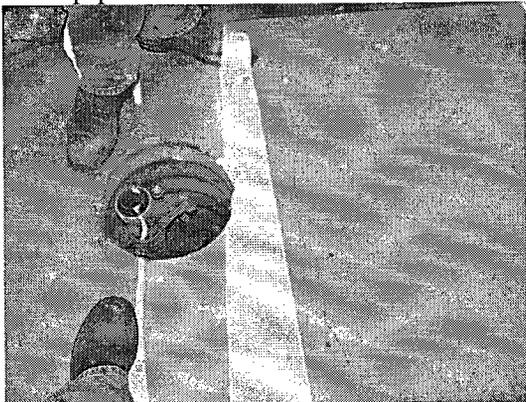


Photo 2: Unknown reason for slab of concrete. UST?



Photo 3: Assumed old tanking station. UST?

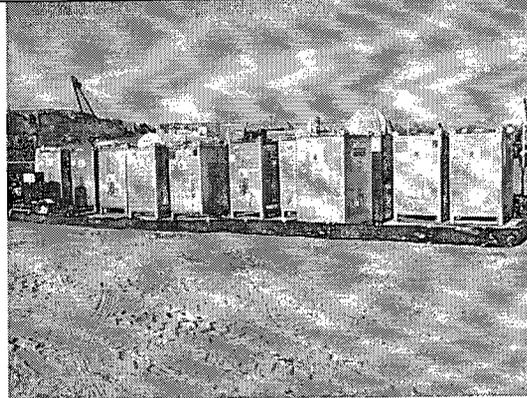


Photo 4: Chemical storage within secondary containment.

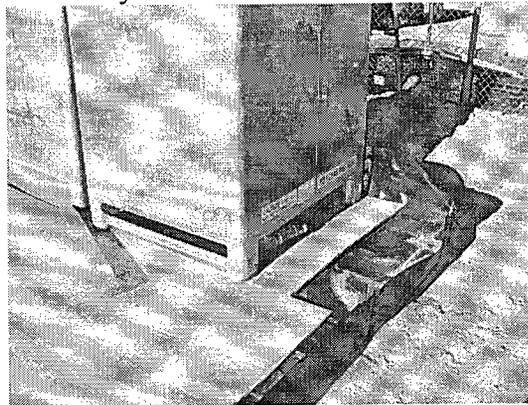


Photo 5: Close up of lined only secondary containment.



Photo 6: Chemical location near edge of facility.

OCD Inspection BJ Services, 3111 Bloomfield Hwy., GW - 375

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Mr. Josh Morrissette and Facility representatives

Date: 04.23.08

Time: 8:00 – 8:40

Page 2

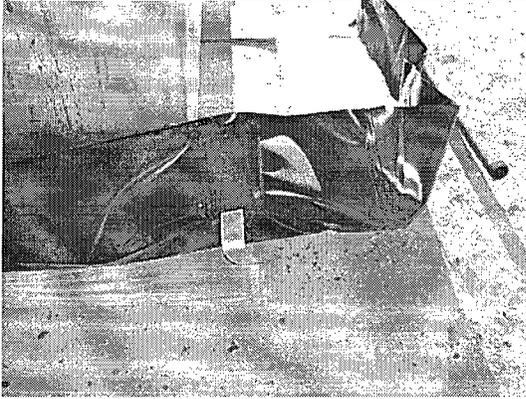


Photo 7: Corner of secondary containment deformed.



Photo 8: Adjacent facility, Bubble City, east of BJ Services with abandon tanks.

## Lowe, Leonard, EMNRD

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**From:** Joshua.Morrisette@bjservices.com  
**Sent:** Friday, February 08, 2008 11:48 AM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** RE: GW-375, Administratively Complete (3111 Bloomfield Highway, Farmington N.M.)

Leonard - Sorry we weren't able to get on the phone. Your e-mail explanation makes sense and we will move forward with the public notice process. Thanks for your help.

Josh

BJ Services Company, USA  
J. Morrisette  
HSE Specialist  
11211 FM 2920  
Tomball, TX 77375  
Office: 281.357.2573  
Mobile: 713.705.4875  
Fax: 281.357.2585

"Lowe, Leonard, EMNRD"  
<Leonard.Lowe@state.nm.us>

To <Joshua.Morrisette@bjservices.com>  
cc  
Subject RE: GW-375, Administratively Complete (3111 Bloomfield Highway, Farmington N.M.)

02/08/2008 12:45 PM

Mr. Josh Morrisette,

The Public Notice that I sent to you along with the **Admin complete letter** and **Draft permit** is what **WE** the **NMOCD** will publish as part of the renewal process. The information stated there is much like what you, the applicant, will be stating, except that it is from *US* to the public. We have to send it out to the applicant as part of the notification of Administratively Complete process. It can be confusing, but we have to do it. I would prefer not to though, but what do I know.

Your SCENERIO 2 is correct. Your attached version of the **public notice is acceptable** and is therefore **approved by the NMOCD for publication**. Please translate it in to Spanish and publish along side English version.

Use your approved Public Notice for all Notices required (1 – 5). Your postings shall be in English and in Spanish as well.

Prior to actually posting in areas, 1 & 2, please submit to the NMOCD information of the location of these two places prior to posting.

For Proof please submit a photograph of the Location postings and date when they were posted. Ensure that these postings can endure the elements for a minimum of 30 days. At the end of the 30 day period another

2/8/2008

photograph shall be taken prior to removal.

If you have any questions please feel free to call me.

llowe

**Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

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**From:** Joshua.Morrisette@bjsservices.com [mailto:Joshua.Morrisette@bjsservices.com]  
**Sent:** Thursday, February 07, 2008 4:16 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Powell, Brandon, EMNRD  
**Subject:** Re: GW-375, Administratively Complete (3111 Bloomfield Highway, Farmington N.M.)

Leonard - Thanks for all the information. However, I am a little confused on the public notice aspect of this. This is how I understand it:

Within 30-days we must:

1. Post 2' by 3' signs at the property in English and Spanish
2. Post another notice in a place conspicuous to the public (Library, Chamber of Commerce, or Town Hall?)
3. Provide written notice by mail to all property owners within 1/3 of a mile (if none then mail to the next adjacent)
4. Provide certified mail notice to the owner of the subject property, if not the applicant
5. Publish in general circulation newspaper a public notice at least 3" by 4" not in the classified or legal section.

Within 15-days of completing the above we must:

1. Submit all proof of items 1-4 above to the OCD

The main thing I am confused about is the actual public notice verbage that should be used. In your e-mail you sent me a completed Notice of Publication and one that is a template.

Scenario 1

Use the completed one because it meets all the content requirements for the public notice. I would have this whole thing published in the newspaper, placed in the area conspicuous to the public, provided to the adjacent property owners and to the property owner of our facility. I would use the bold text for our signs.

Scenario 2

Use the template provided, make it specific to our facility and translate that whole thing into Spanish for the newspaper. This verbage would also be used for our sign, the conspicuous public place notification, the adjacent property owner and the property owner of our facility letters.

2/8/2008

I have attached the site specific template if we are to follow Scenario 2. Please let me know if I am way off base here and if it is okay to follow public notice Scenario 1. Thanks.

Josh

BJ Services Company, USA  
J. Morrissette  
HSE Specialist  
11211 FM 2920  
Tomball, TX 77375  
Office: 281.357.2573  
Mobile: 713.705.4875  
Fax: 281.357.2585

"Lowe, Leonard, EMNRD" <Leonard.Lowe@state.nm.us>

02/05/2008 10:56 AM

To <Joshua.Morrissette@bjservices.com>

cc "Powell, Brandon, EMNRD" <Brandon.Powell@state.nm.us>

Subject GW-375, Administratively Complete (3111 Bloomfield Highway, Farmington N.M.)

Mr. Josh Morrissette,

The submitted Discharge Plan Application for the BJ Services Dyna-Coil Services and Process Pipeline Services Division has been determined **Administratively Complete**.

Attached is the **Admin. Complete Letter, DRAFT Permit, and OCD Public Notice** for your records.

I have also attached the **New & Mod WQCC PN Rules, New & Mod PN Flow Chart** and an **Applicant Public Notice Example**. The PN rules indicate procedures and requirements needed for your Public Notice (fonts in red relate to NEW Discharge Permits). The flow chart shows the process and procedure of a new Discharge Plan application. The Example, just replace all items highlighted in yellow to reflect your facility.

Please note that your Public Notice shall be approved by the NMOCD prior to publication to the public. I shall be waiting on your submission soon for review.

If you have any questions please feel free to contact me at my information below.

Thank you for your attention.

llowe

**Leonard Lowe**  
Environmental Engineer

2/8/2008

Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

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[attachment "GW-375 Admin.Comp.Let.pdf" deleted by Joshua Morrissette/QUALITY/BJ/BJSERVICES] [attachment "GW-375 DRAFT Permit.pdf" deleted by Joshua Morrissette/QUALITY/BJ/BJSERVICES] [attachment "GW-375 OCD PN.pdf" deleted by Joshua Morrissette/QUALITY/BJ/BJSERVICES] [attachment "New & Mod WQCC PN Rules.pdf" deleted by Joshua Morrissette/QUALITY/BJ/BJSERVICES] [attachment "New & Mod PN Flow Chart.pdf" deleted by Joshua Morrissette/QUALITY/BJ/BJSERVICES] [attachment "GW-XXX Applicant PN example.doc" deleted by Joshua Morrissette/QUALITY/BJ/BJSERVICES]

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PUBLIC NOTICE

(BJ Services Company, U.S.A. 11211 FM 2920, Tomball, TX 77382) has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for a new discharge plan permit discharge plan (GW-375) for their Farmington Dyna-Coil & PPS District located in the NE ¼, NE ¼ of Section 23, Township 29 North, Range 13 West in San Juan County, New Mexico. The physical address of the facility is 3111 Bloomfield Highway, Farmington, NM 87401. The facility is located approximately 2 miles southeast of downtown Farmington, approximately 0.5 miles north of the San Juan River and approximately 1 mile south of the Animas River.

(3) The facility provides services for oil and gas wells and pipelines. (Approximately 5 gallons of methanol may be generated as waste in any given month.) The aquifer most likely to be affected is approximately 30 feet in depth, and the total dissolved solids concentration of this aquifer is approximately 1,500 to 2,500 mg/l.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

APPROVED 02/08/08

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6 & 7



## Lowe, Leonard, EMNRD

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, February 05, 2008 9:57 AM  
**To:** 'Joshua.Morrisette@bjservices.com'  
**Cc:** Powell, Brandon, EMNRD  
**Subject:** GW-375, Administratively Complete (3111 Bloomfield Highway, Farmington N.M.)  
**Attachments:** GW-375 Admin.Comp.Let.pdf; GW-375 DRAFT Permit.pdf; GW-375 OCD PN.pdf; New & Mod WQCC PN Rules.pdf; New & Mod PN Flow Chart.pdf; GW-XXX Applicant PN example.doc

Mr. Josh Morrisette,

The submitted Discharge Plan Application for the BJ Services Dyna-Coil Services and Process Pipeline Services Division has been determined **Administratively Complete**.

Attached is the **Admin. Complete Letter**, **DRAFT Permit**, and **OCD Public Notice** for your records.

I have also attached the **New & Mod WQCC PN Rules**, **New & Mod PN Flow Chart** and an **Applicant Public Notice Example**. The PN rules indicate procedures and requirements needed for your Public Notice (fonts in red relate to NEW Discharge Permits). The flow chart shows the process and procedure of a new Discharge Plan application. The Example, just replace all items highlighted in yellow to reflect your facility.

Please note that your Public Notice shall be approved by the NMOCD prior to publication to the public. I shall be waiting on your submission soon for review.

If you have any questions please feel free to contact me at my information below.

Thank you for your attention.

llowe

### **Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

February 5, 2008

Mr. Josh Morrisette  
BJ Services Company USA  
11211 FM 2920  
Tomball, TX 77375

**Re: New Discharge Plan Permit GW-375  
BJ Services, Dyna-Coil Services and Process Pipeline Service  
Oil and Gas Service Company  
San Juan County, New Mexico**

Dear Mr. Morrisette:

The New Mexico Oil Conservation Division (NMOCD) has received BJ Services Company USA's request and initial fee, dated January 23<sup>rd</sup>, 2008 for a new discharge plan for their Oil and Gas Service company, 3111 Bloomfield Highway, Farmington, N.M. 87401, located in the NE/4 NE/4 of Section 23, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. The New Mexico Oil Conservation Division has designated this facility to be identified as GW - 375 for their discharge Plan. The initial submittal and subsequent inquires have provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC for a new discharge plan must be satisfied and demonstrated to the NMOCD. Each public notice must be approved by the OCD prior to the applicant posting them to the public. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us). On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leonard R. Lowe".

Leonard R. Lowe  
Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

February 5, 2008

Mr. Josh Morrisette  
BJ Services Company USA  
11211 FM 2920  
Tomball, TX 77375

Re: **New Discharge Permit**  
BJ Services, Dyna-Coil Services and Process Pipeline Services (GW-375) **DRAFT**  
NE/4 NE/4 Section 23, Township 29 North, Range 13 West, NMPM,  
San Juan County, New Mexico

Dear Mr. Morrisette:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **BJ Services Company USA** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail [leonard.lowe@sate.nm.us](mailto:leonard.lowe@sate.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price  
Environmental Bureau Chief

LWP/lrl

Attachments-1  
xc: OCD District Office

## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division (“OCD”) has received the required \$100.00 filing fee. *The flat fee for a Oil and Gas Service Company is \$1700.00 and was processed on February 5, 2008 Please submit the signed certification item 23 of this document after the final permit is issued in approximately 45 days. Checks should be made out to the New Mexico Water Quality Management Fund.*
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on Month, Day, Year** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its January 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class

II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

**B. Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

**7. Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

**8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

**9. Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

**10. Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

**11. Below-Grade Tanks/Sumps and Pits/Ponds.**

**A.** All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein.

Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

**B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

**C.** The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

**D.** The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

## **12. Underground Process/Wastewater Lines:**

**A.** The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

**B.** The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**13. Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells, that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

**14. Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

**17. Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22. Closure Plan and Financial Assurance:** Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

**23. Certification: (Owner/Operator),** by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

Title \_\_\_\_\_

Date: \_\_\_\_\_

## NOTICE OF PUBLICATION

### STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**(GW-375) BJ Services Company USA., Mr. Josh Morrissette, HSE Specialist, 11211 FM 2920, Tomball, TX 77375, has submitted an application for a new discharge plan permit for their Oil and Gas Service Company, 3111 Bloomfield Highway, Farmington N.M. 87401, located in the NE/4 NE/4 of Section 23, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. Approximately 5000 gallons of Diammonium EDTA, 2000 gallons of Tetra Ammonium EDTA and 110 gallons of PCI-20 are stored at this facility and are used for its oil and gas related business. Its waste streams consist of approximately 5 gallons of methanol and varying amount of general office waste. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 30 feet, with a total dissolved solids concentration of approximately 1,500 – 2,500 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5<sup>th</sup> day of February, 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

**Lowe, Leonard, EMNRD**

---

**From:** Joshua.Morrisette@bjservices.com  
**Sent:** Tuesday, February 05, 2008 8:48 AM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** Re: GW-375, BJ Services (3111 Bloomfield Highway, Farmington N.M.)

Leonard - See responses in bold.

1. You identify the general type of operation for this facility as I have recognized for all other BJ Services facilities. Is this still the same for this facility? **Yes it is the same. Our Dyna-Coil Services and Process Pipeline Services Divisions will be using this yard.** Does this facility have special purposes? **No special purpose, just equipment and chemical storage.**
2. What is the TDS of the ground water you have identified in your log borings? **It is 1,500 to 2,500 mg/L**
3. What newspaper do you intend on using for your public notice? **Farmington Daily Times**
4. Is this facility in operation? **Yes.** If so, how long has it been in operation? **About 2 months**
5. Do you have any sumps at this facility? **No**

Please let me know if there is anything else. Thanks.

Josh

BJ Services Company, USA  
J. Morrisette  
HSE Specialist  
11211 FM 2920  
Tomball, TX 77375  
Office: 281.357.2573  
Mobile: 713.705.4875  
Fax: 281.357.2585

"Lowe, Leonard, EMNRD"  
<Leonard.Lowe@state.nm.us>

To <Joshua.Morrisette@bjservices.com>  
cc  
Subject GW-375, BJ Services (3111 Bloomfield Highway, Farmington N.M.)

02/04/2008 05:25 PM

Mr. Morrisette,

The NMOCD has received your submitted discharge plan for the BJ Services Bloomfield highway facility.

The NMOCD identifies this Discharge Plan Permit as GW-375. Please reference this GW number in all situations pertaining to this facility.

A few questions for you:

2/5/2008

1. You identify the general type of operation for this facility as I have recognized for all other BJ Services facilities. Is this still the same for this facility? Does this facility have special purposes?
2. What is the TDS of the ground water you have identified in your log borings?
3. What newspaper do you intend on using for your public notice?
4. Is this facility in operation? If so, how long has it been in operation?
5. Do you have any sumps at this facility?

Please get back to me on these questions.

Thank you,

llowe

**Leonard Lowe**

Environmental Engineer

Oil Conservation Division/EMNRD

1220 S. St. Francis Drive

Santa Fe, N.M. 87505

Office: 505-476-3492

Fax: 505-476-3462

E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)

Website: <http://www.emnrd.state.nm.us/ocd/>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

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Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.



January 23, 2008

CERTIFIED MAIL NO. 7007 0710 0003 8375 1621  
RETURN RECEIPT REQUESTED

New Mexico Environmental Department  
Oil Conservation Division  
Attn: Leonard Lowe  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

RE: Discharge Plan Application & Associated Fee  
BJ Services Company, USA  
11211 FM 2920  
Tomball, TX 77375

Dear Mr. Lowe:

Enclosed is a Discharge Plan Application for a new BJ Services Company, USA Facility located at 3111 Bloomfield Highway, Farmington, NM. Also enclosed is check number 3209438 in the amount of \$1,800.00 for payment of the associated administrative and permit fees.

If there are any questions or comments, please contact me at (281) 357-2573.

Thank You.

Josh Morrissette  
HSE Specialist

Enclosures

RECEIVED  
2008 JAN 28 PM 2 00

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS,  
REFINERIES, COMPRESSOR, GEOTHERMAL FACILITIES  
AND CRUDE OIL PUMP STATIONS**

(Refer to the OCD Guidelines for assistance in completing the application)

New       Renewal       Modification

1. Type: OIL FIELD SERVICES
2. Operator: BJ SERVICES COMPANY, USA  
Address: 3111 Bloomfield Highway, Farmington, NM 87401  
Contact Person: JOSH MORRISSETTE Phone: 281.357.2573
3. Location: NORTH /4 EAST /4 Section 23 Township 29 NORTH Range 13 WEST  
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: JOSH MORRISSETTE

Title: HSE SPECIALIST

Signature: 

Date: 1-23-2008

E-mail Address: joshua.morissette@bjsservices.com

# **BJ Services Company, U.S.A.**

## **Discharge Plan – Farmington, New Mexico**

**January 2008**

### **I. Type of Operation**

BJ Services Company, U.S.A. provides oilfield services, including cementing, acidizing, and fracturing services at oil and gas well sites. BJ Process & Pipeline Services is the largest service provider of process and pipeline commissioning, maintenance and inspection applications.

### **II. Operator**

BJ Services Company, U.S.A. (Process & Pipeline Services)  
3111 Bloomfield Hwy  
Farmington NM. 87401  
Contact: Ralph Williams  
505-360-0019

BJ Services Company, U.S.A (Dyna-Coil Services)  
3111 Bloomfield Hwy  
Farmington NM. 87401  
Contact: Steve Crawford  
505-327-7775

### **III. Location**

Northeast Quarter of the Northeast Quarter of section Twenty-Three, in Township Twenty-Nine North of Range Thirteen West, N.M.P.M., San Juan County, New Mexico (See Attachment 1, Figure 1 – Site Location)

### **IV. Landowner of Facility Site**

Padilla Properties Inc.  
446 C.R. 3000  
Aztec N.M. 87410  
505-330-8781  
Contact: Ray Padilla

### **V. Facility Description**

See Attachment 1, Figure 2 – Facility Layout

**VI. Materials Stored or Used at the Facility**

Material	Hazardous Ingredients	Form	Type of Container	Estimated Volume Stored (gallons)	Location
Versol 2665	Diammonium EDTA	liquid	Totes	5000	Area A
Versol 2675	Tetra ammonium EDTA	liquid	Totes	2000	Area A
PCI - 20	Various	liquid	Drums	110	Area A

**VII. Sources of Effluent and Waste Solids**

Waste Type	Source and Composition	Volume per Month	Major Additives
General office waste	Office operations	Various	Office Waste
Off-spec Chemical	Equipment Tubing	~ 5-gallons	Methanol

**VIII. Current Liquid and Solid Waste Collection/Treatment/Disposal Procedures**

Waste Type	On Site Handling	Disposal	Disposal Facilities
General office waste	Dumpster	Offsite	Waste Management of N.M. #78 CR 3140 Aztec, N.M. 87410 505-327-6284
Off-spec Chemical	Drums or buckets	Offsite	Univar 311 Lark Avenue Odessa, TX 79760

**IX. Proposed Modifications**

Currently there are no modifications scheduled.

**X. Inspection and Maintenance**

See Attachment 2, Base/District HSE Inspection Form

**XI. Contingency Plan**

See Attachment 3, Facility Emergency Response Contingency Plan

## **XII. Storm Water Best Management Practices**

See Attachment 4, Storm Water Best Management Practices

## **XIII. Site Characteristics**

Bodies of Water: None

Arroyos: None

Groundwater Characteristics: Depth to Groundwater (bgs): See Attachment 5 for boring log.

Flooding Potential: None

# **ATTACHMENT 1**

## **FIGURES**



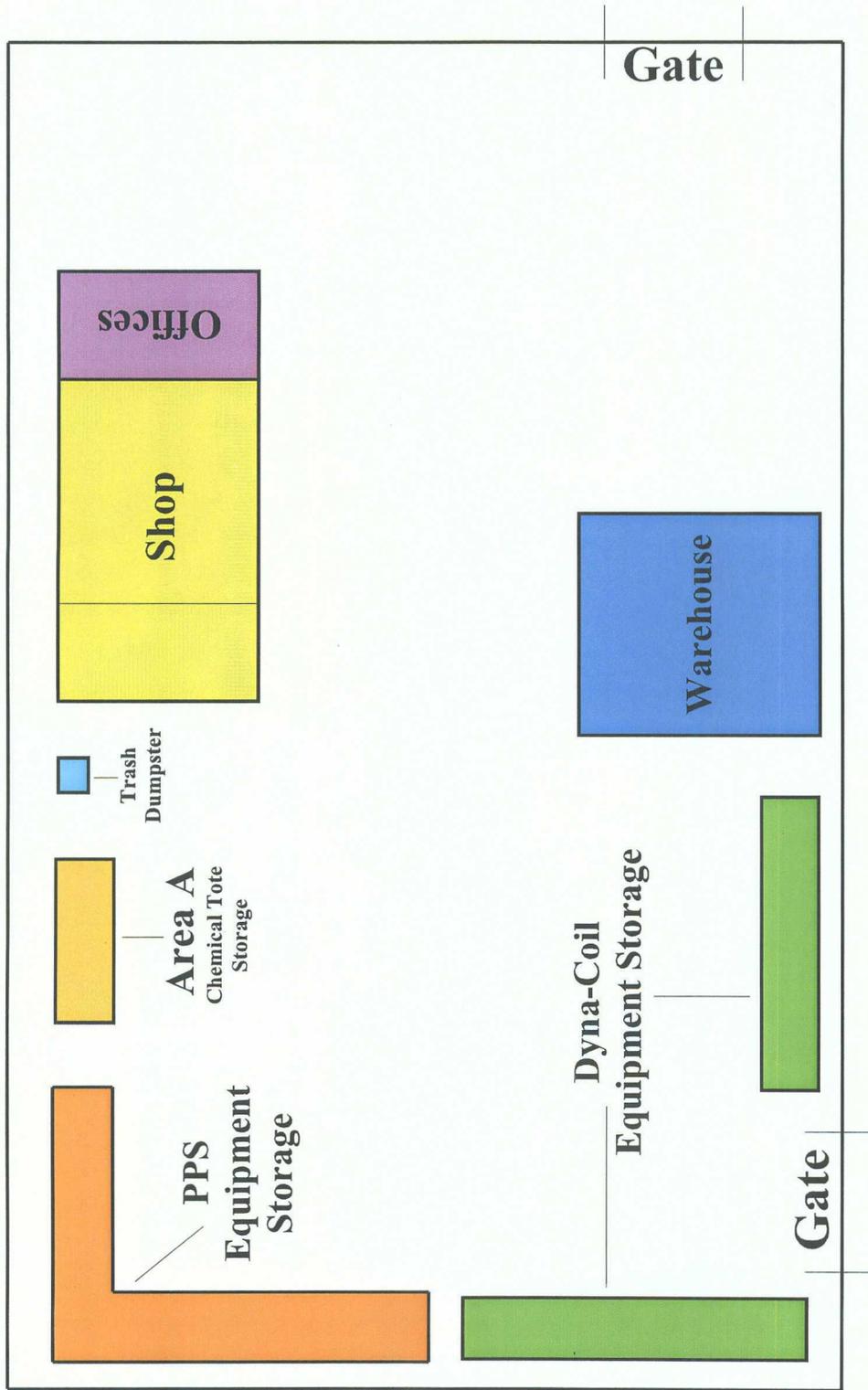
**BJ Services Company, USA**  
 11211 FM 2920  
 Tomball, Texas 77375

**Figure 1: Site Location**

Farmington PPS & Dyna-Coil  
 3111 Bloomfield Highway  
 Farmington, NM 87401

REVISION DATE:  
 12/19/07

DRAWN BY:  
 JCM



**BJ Services Company, USA**

11211 FM 2920

Tomball, Texas 77375



**Figure 2: Facility Layout**

Farmington PPS & Dyna-Coil  
3111 Bloomfield Highway  
Farmington, NM 87401

Not To Scale

REVISION DATE:  
12/19/07

DRAWN BY:  
JCM

**ATTACHMENT 2**

**BASE/DISTRICT HSE INSPECTION  
REPORT**

**PPS Inspection - 2007**  
**Base/District HSE Inspection Report**



Region: US Mexico Latin America  
District/Base: Farmington New Mexico  
Inspector: \_\_\_\_\_

Job Title of Inspector(s): \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

Product Line : PPS

**Key**

N/A - Not Applicable (Default Value)  
0 - Needs Immediate Attention  
1 - Needs Attention  
2 - Meets Standards

**Housekeeping Key**

N/A - Note Applicable (Default Value)  
0 - Needs Immediate Attention  
1 - Poor  
2 - Needs some attention  
4 - Good - Meets Standards

**SUMMARY - AREAS**

HSE Management Standards  
General Facility Conditions  
Shop(s)  
Wash Bay  
Chemical Warehouse  
Environmental

**QUESTIONS**

**HSE Management Standards**

- |    |   |
|----|---|
| 1  | Managers and Supervisors demonstrate ability to navigate QHSE Standards and other HSE system databases                                |
| 2  | Managers and Supervisors are knowledgeable of the QHSE Standards that apply to their area of responsibility (have read the standards) |
| 3  | HSE Plan for facility, region, or country in place per standard (QHSE Standard - Health & Safety 3.8)                                 |
| 4  | All Trainers are competent (demonstrated by CAP participation, certifications, education, or Training Plan in place)                  |
| 5  | Field personnel oriented per standards prior to field assignment (QHSE Standard - Health & Safety 6.3 plus Region Req'd orientation)  |
| 6  | Facility APT in place per standard (QHSE Standards - Health & Safety 5.2)   |
| 7  | HSE Facility and Jobsite Inspections by region/district staff are current for previous quarter  |
| 8  | Corrective actions from previous inspections (30 days and older) are closed out   |
| 9  | Journey Management guidelines followed (QHSE Standard - Health & Safety Section 14. )   |
| 10 | Quality of accident reports - complete, corrective action taken, and closed out   |

**General Facility Conditions**

- |   |  |
|---|--|
| 1 | Emergency plans for fire, injury or chemical spill (posted, current)     |
| 2 | Fire extinguishers - (operable, inspected, proper location, proper type) |

3	Personal protective equipment (used as required)
4	PPE available for visitors or vendors
5	Trained first aiders at facility (sufficient number, identified, posted )
6	Safety signs and notices (sufficient number, all hazards, current)
7	Safety bulletin board (current)
8	Entryway/gateway (signed, unobstructed )
9	Parking (sufficient, unobstructed, signed)
10	Road surfaces (safe, maintained)
11	Lighting (sufficient, working, assess both internal and external)
12	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
13	Electrical panels and wiring (labeled, secure, maintained)
14	Landscape (presentable, maintained)
15	Safety signs for LTI free days (up to date, visible)
16	Notice to visitors and vendors (where to go, posted)
17	Speed limit signs (posted, visible, adhered to)
18	Security fence (sufficient, maintained)
19	Fixed stairs, ladders, walkways, handrails, gates and doors (maintained, clear, safe)
20	Material safety data sheets (accessible locally, current) Dispatch?
21	Containers (appropriate, stacked, labeled)
22	Pallets (adequate, maintained, safe)
23	Noise levels (signage, measured)
24	Flammable gas (caged, signed, segregated )
HK	Housekeeping ( Rating 0,1,2,4 )

**Shop(s)**

1	Hand tools (condition, noise, sufficient number, proper storage)
2	Grinding equipment (signs/visibility, tool rests, wheels inspected/maintained)
3	Welding and cutting equipment (stored properly, flash back arrestors, welding screens)
4	Cranes, hoists and jacks (capacity signed, periodic inspection, tested, records )
5	Lubrication area (clean, labeled, spill controls )
6	Parts storage (secure, labeled, clean, records)
7	Overhead storage area (posted for capacity, heavy items below, undamaged, secured to hazard points on floor)

8	Battery charging and storage area (separate, clean, ventilated)
9	Painting and paint storage area (contained, labeled, appropriate)
10	Cleaning agents and solvents area (storage, ventilated or enclosed, hazard signage, MSDS available)
11	Work benches ( clean, tidy, vice condition)
12	Oily rag containers (enclosed, metal, labeled)
13	Lockout/tagout procedures (adhered, monitored, effective, understood)
14	Ladders (checked periodically and tagged, not painted)
15	Machine tools (pillar drill, lathe, etc.) (maintained, guarded, PPE available, signage, tested)
16	Used oil and filters being properly handled
17	Used anti-freeze being properly handled
18	Air compressors (belts guarded, auto start signage, PRV's checked annually/tagged)
19	Overhead doors (height marked, good working order)
20	Aerosols free of chlorinated hydrocarbons
HK	Housekeeping ( Rating 0,1,2,4 )

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### Wash Bay

1	Pressure Washer in separate room
2	Sumps clean & routinely maintained
3	Wash water contained on wash bay
4	Wash water and sump sludge properly managed
5	Wash wands in good condition
HK	Housekeeping ( Rating 0,1,2,4 )

---

### Chemical Warehouse

1	All chemicals (identified, labeled)
2	Dry chemicals stored properly
3	Safety shower and eyewash (maintained, tested)
4	Hoses, piping and valves (clear, operable, stowed appropriately)
5	Tanks vented to outside
6	Proper Handling of empty containers
7	Floors (flat, clean, impermeable)

8	Sump (empty, clean, isolated )
9	Racking (capacity signed, inspections)
10	Waste/surplus chemicals (routinely identified, correct storage, correct and regular disposal)
11	Proper stacking (drums and bag pallets no more than three [3] high)
12	Empty containers being removed frequently & properly
HK	Housekeeping ( Rating 0,1,2,4 )

**Environmental**

1	Environmental recordkeeping systems established
2	Permits & registrations available & current when applicable
3	Waste records maintained (Bill of lading, manifests)
4	Waste disposed of by certified or Company approved vendor
5	Environmental plans current (storm water, spill prevention, emergency response)
6	Proper storage of waste materials (segerated and labeled)
7	Spill control material (available, appropriate, utilized)
8	Surface-water/storm-water drains & discharge points free of oil, debris, etc
9	No open containers outside collecting water
10	Yard free of leaks and spills
11	Trash containers closed - Lids viable
12	Containers present to contain leaking drums, fluids or clean up materials
13	All fuel, oil and diesel tanks in good condition
14	All fuel and oil tanks have adequate containment and free of spills

**CORRECTIVE ACTION RESPONSIBILITY**

Corrective Actions Assigned to: \_\_\_\_\_

Due Date for Completion: \_\_\_\_\_

Corrective Action Status: \_\_\_\_\_

**SIGNATURE SECTION**

If you are the relevant District/Facility Manager, Region/Country/Area Manager, District/ HSE Officer or Other Relevant Manager you should sign the report when you have read it. To add your signature to the appropriate section, click the **Edit** button (to enter Edit mode), then click on the **Review and Sign Off** button. This will add your name and the current date to the Accident Report in the relevant section below.

**Reviewed and Signed Off by the Following:-**

Base HSE Officer

BBU / Area / Operations Manager

---

**Division / Region HSE Dept**

---

---

**Division / RBU Manager**

---

---

**Other Relevant Manager - 1**

---

---

**Other Relevant Manager - 2**

---

**ATTACHMENT 3**

**FACILITY EMERGENCY RESPONSE  
CONTINGENCY PLAN**



**BJ SERVICES COMPANY, U.S.A.  
FARMINTON - BJ PROCESS & PIPELINE SERVICES /  
BJ DYNAL-COIL INJECTIONS SERVICES  
EMERGENCY RESPONSE PLAN**

**IN THE CASE OF ANY OIL OR CHEMICAL SPILLS**

Personnel will immediately notify the base HSE officers. The base HSE officers will follow procedures in the US Environmental Standards when reporting spills.

**Base HSE Officers (PPS):**

Kevin O'Dell	HSE Specialist (Casper)	307-472-5845 office 307-259-6323 cell
Jerry McAlpin	Region HSE Manager (Houston)	832-519-2008 office 713-805-0625 cell

**Base HSE Officer (Dyna-Coil):**

Jason Goodwin	Division Safety Training Manager	713-860-6851 office 713-805-0284 cell
---------------	----------------------------------	--

**CHEMICAL SPILLS OCCURRING OFFSITE OR LARGE ONSITE SPILLS**

**Call CURA National Emergency Response Service at (800) 579-2872**

Contact the Environmental Department during working hours at (281)351-8131 (Main Tomball Number). All agency reporting and reports will be taken care by CURA.

Personnel are to obtain the following information from the caller reporting the spill:

Incident Location (address, mile marker, nearest city, etc.)
Person Reporting the Spill (name, title) and phone number
On scene contact (name, title) and phone number
Description of the incident (type and volume of release, substance released, etc.)
Surfaces affected (soil/grass, asphalt, concrete, other)
Water affected (surface, groundwater, coastal)
Sensitive receptors (parks, storm sewer, drainage ditch, residential or populated areas)
Note any initial actions taken to control release

The HSE officer will call the following people, starting at the top of the list until someone on the list is contacted:

Jo Ann Cobb	(281) 357-2572	Office
	(713) 898-6635	Cellular/Pager
	(281) 353-4481	Home
Jake Graf	(281) 357-2705	Office
	(713) 412-7196	Cellular/Pager
	(281) 516-7669	Home
Josh Morrisette	(281) 357-2573	Office
	(713) 705-4875	Cellular/Pager
	(281) 419-0723	Home

Tomball Research & Technology Center	Address: 11211 FM 2920, Tomball, TX 77375
	Main Number: (281) 351-8131
	QHSE Fax (281) 357-2585

Other Contacts (PPS):

Andrew Gorrie	Operations Coordinator (Casper)	307-472-0387 office 307-259-6342 cell
Ralph Williams	Business Unit Manager (Farmington)	505-324-8277 office 505-360-0019 cell

Other Contacts (Dyna-Coil):

Steven Crawford	District Manager (Farmington) Chemical Services	505-327-7775 office 505-320-6339 cell
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**NATIONAL RESPONSE CENTER (Oil Spills) .....**

(800) 424-8802

**IN THE CASE OF FIRE OR ANY OTHER EMERGENCY**

Contact **911** in the case of fire or any other emergency

## **ATTACHMENT 4**

# **STORM WATER BEST MANAGEMENT PRACTICES**

## STORM WATER BEST MANAGEMENT PRACTICES

Best Management Practices (BMPs) must be implemented in the areas identified in below to ensure that storm water runoff is not impacted when it is discharged from the facility. The following table outlines all of the BMPs that are in-place and being implemented at the facility.

Location/Area	BMPs and Description
<b>Shop &amp; Office / Area A</b>	<p><i>Structural</i></p> <ul style="list-style-type: none"> <li>▪ Covered Building – The shop and office area is a covered building which greatly minimizes any exposure to storm water.</li> <li>▪ Sump System – Has been filled in.</li> </ul> <p><i>Non-Structural</i></p> <ul style="list-style-type: none"> <li>▪ Spill Clean-up – Spills inside and outside the shop will be cleaned-up immediately to prevent the spill from migrating out of the shop and impacting storm water runoff.</li> <li>▪ Good Housekeeping – The shop and offices will be kept clean and orderly.</li> <li>▪ Inspections – This area is regularly inspected during facility reviews. Any spills or other problems identified will be addressed immediately.</li> </ul>
<b>Chemical Tote Storage Area / Area B</b>	<p><i>Structural</i></p> <ul style="list-style-type: none"> <li>▪ Secondary Containment – Chemicals are placed within a secondary containment sufficient to contain a catastrophic failure plus adequate freeboard for precipitation.</li> </ul> <p><i>Non-Structural</i></p> <ul style="list-style-type: none"> <li>▪ Spill Clean-up – Spills will be cleaned up with absorbent material immediately and disposed of properly.</li> <li>▪ Good Housekeeping – The chemical storage area will be kept clean and orderly.</li> <li>▪ Inspection – The chemical storage area is inspected regularly during facility reviews. Any spills or other problems identified will be addressed immediately.</li> </ul>

**Table 4 Continued – BMP Identification**

<p><b>PPS Equipment Storage Area / Area C</b></p>	<p><i>Non-Structural</i></p> <ul style="list-style-type: none"> <li>▪ Area Maintenance – The soil and/or pavement in this area will be spot treated as necessary to address any leaks from equipment.</li> <li>▪ Preventative Maintenance – The facility has a preventative maintenance program in place to keep equipment in good working order. This program will help keep equipment from leaking.</li> <li>▪ Absorbent material – Employees will place absorbent pads or catchment pans under equipment that leak. The leak should be reported to the Maintenance Supervisor.</li> <li>▪ Absorbent material - Absorbent socks will be placed inside the fence at the facilities two discharge points to prevent oil from leaving the property if the district deems it necessary.</li> <li>▪ Good Housekeeping – The truck parking area will be kept clean and orderly.</li> <li>▪ Inspections – This area is regularly inspected during facility reviews. Any areas, which need attention, will receive it immediately.</li> </ul>
<p><b>Dyna-Coil Equipment Storage Area / Area D</b></p>	<p><i>Non-Structural</i></p> <ul style="list-style-type: none"> <li>▪ Area Maintenance – The soil and/or pavement in this area will be spot treated as necessary to address any leaks from equipment.</li> <li>▪ Preventative Maintenance – The facility has a preventative maintenance program in place to keep equipment in good working order. This program will help keep equipment from leaking.</li> <li>▪ Absorbent material – Employees will place absorbent pads or catchment pans under equipment that leak. The leak should be reported to the Maintenance Supervisor.</li> <li>▪ Absorbent material - Absorbent socks will be placed inside the fence at the facilities two discharge points to prevent oil from leaving the property if the district deems it necessary.</li> <li>▪ Good Housekeeping – The truck parking area will be kept clean and orderly.</li> <li>▪ Inspections – This area is regularly inspected during facility reviews. Any areas, which need attention, will receive it immediately.</li> </ul>
<p><b>Warehouse / Area E</b></p>	<p><i>Structural</i></p> <ul style="list-style-type: none"> <li>▪ Covered Building – The warehouse is a covered building which greatly minimizes any products exposure to storm water.</li> </ul> <p><i>Non-Structural</i></p> <ul style="list-style-type: none"> <li>▪ Spill Clean-up – Spills inside and outside the building will be cleaned-up immediately to prevent the spill from migrating out of the building and impacting storm water runoff.</li> <li>▪ Good Housekeeping – The chemical warehouse area will be kept clean and orderly.</li> <li>▪ Inspections – This area is regularly inspected during facility reviews. Any spills or other problems identified will be addressed immediately.</li> </ul>

**Table 4 Continued – BMP Identification**

<p><b>Trash Dumpsters / See Attachment 1 Figure A</b></p>	<p><i>Structural</i></p> <ul style="list-style-type: none"><li>▪ Lids – Trash dumpsters must remain closed when not in use.</li></ul> <p><i>Non-Structural</i></p> <ul style="list-style-type: none"><li>▪ Spill Clean-up – Spills will be cleaned up with absorbent material immediately and disposed of properly.</li><li>▪ Good Housekeeping – The trash dumpster area will be kept clean and orderly.</li><li>▪ Inspection – The Trash Dumpster area is inspected regularly during facility reviews. Any corrective actions will be addressed immediately.</li></ul>
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**ATTACHMENT 5**

**BORING LOG**

**TEST HOLE LOG & MONITOR WELL DETAIL**  
**MONITOR WELL: MW-5**

Project: BJ Services Co. - Hydrogeologic Investigation  
Project No: 4-1276

Project Location: 3250 Southside River Rd., Farmington, NM		Logged By: Myke Lane	Approved: M K Lane
Drilling Contractor: Envirodrill		Date Started: 6/25/96	Date Completed: 6/25/96
Drilling Equipment: CME-75	Driller: R. Holton	TD Boring (ft): 32.33	Static Water Depth (ft): 27.5
Drilling Method: HSA/ODEX	Borehole Dia. (in): 7.5 / 5.0	TOC Elevation: 99.87	Ground Elevation:
Sampling Method: Split-spoon		Well Casing (Diameter & Type): 2 in. - Sch 40 PVC	
COMMENTS: Static water level noted during drilling and prior to completion of the monitor well.		Slot Size (in): 0.010	Filter Material: Silica Sand 10/20
Well construction depths estimated to nearest 0.5 ft.		Development Method: Bailer	

Depth (feet)	Depth to Water During Drilling (ft)	USCS	Lithology	Field Description & Remarks	Sampled Interval	Field PID Reading	Lab TPH: EPA 418.1 (ppm)	Monitor Well Construction & Remarks
0				ASPHALT over BASE COARSE				
0-10'		SM/SP		Lt. brown medium to fine SILTY SAND, sl. moist, firm to dense.				<p>Well completed with 8 in. bolt-down flush valve cover and locking plug.</p> <p>Change over to ODEX drilling.</p> <p>Top of Bentonite Seal</p> <p>Top of Filter Pack</p> <p>Top of Screened Interval</p> <p>Bottom of Screened Interval.</p> <p>Total Depth Boring: 32.33 ft.</p>
10-15'		SM/SP		SAME AS ABOVE (SAA): med. gray-brown, minor gravel, faint petroleum odor.	58.1	59		
15-20'		SM/SP		SAA, lt. brown, sl. fining downward, no odor.	ND	39		
20-25'		SC/CL		Lt. brown SANDY CLAY to CLAYEY fine SAND, moist, sl. plastic, soft to sl. stiff.	ND	<25		
25-32.33'		GM		GRAVEL (cobbles): 16.5 ft.				
32.33'				No Recovery				
32.33'	27.5			Static Water Level: 27.5 ft.				
				TOTAL DEPTH: 32'-04"				