

GW - 28

**Engineering
Drawings**

**Sanitary
Wastewater
Proposal**

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, September 29, 2010 3:45 PM
To: 'Moore, Darrell'
Cc: Lackey, Johnny; VonGonten, Glenn, EMNRD; Dade, Randy, EMNRD
Subject: RE: Liquid Waste Sewers

Darrell:

Hi. OCD can see by your e-mail with attached map and regulations that the method for "flowable fill" is acceptable. However, do you have any photos or documentation that verifies that bathrooms 2,4, 6 and 8 were ruptured, i.e., photos, and documentation of fill materials used to fill ruptured tanks?

Second question is any photos of the tie-in of bathrooms 1, 5 and 7 with the City of Artesia POTW?

OCD just needs some kind of field documentation that verifies that the work was actually done. Thanks in advance for your cooperation in this matter.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Moore, Darrell [<mailto:Darrell.Moore@hollycorp.com>]
Sent: Friday, September 17, 2010 9:06 AM
To: Chavez, Carl J, EMNRD
Cc: Lackey, Johnny; VonGonten, Glenn, EMNRD
Subject: RE: Liquid Waste Sewers

Carl

There are no engineering drawings for this project. I have attached an aerial of the plant that shows the eight bathrooms numbered 1 thru 8. Numbers 1, 5 and 7 were tied into the City of Artesia POTW system that runs thru the refinery. Numbers 2, 3, 4, 6 and 8 were completely removed (sinks, urinals, commodes, etc). The underground tanks associated with each bathroom had holes knocked into the bottom of them and were filled with "flowable fill" as required by the NMED Liquid Waste Bureau. I have also attached a copy of the emails between John Wells with NMED Liquid Waste and myself regarding the closure of these systems. As you can see, filling with "Flowable Fill" is a perfectly acceptable closure method.

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Sent: Friday, September 10, 2010 2:30 PM
To: Moore, Darrell
Cc: Lackey, Johnny; VonGonten, Glenn, EMNRD
Subject: RE: Liquid Waste Sewers

Darrell and Johnny:

Please submit your engineering drawings with the exact locations of the below-ground sewer tank system(s) with a detailed engineering specifications and procedures for closing out the tanks for the OCD to review, confirm that the

conditions of the discharge permit were met, and make a final determination that they were properly closed. NRC should reference any approved work plans (see links to information related to the refinery sewer line project, etc. below).

Renewals, Mods & Application New Construction & Underground Sewer Lines

http://ocdimage.emnrd.state.nm.us/Imaging/FileStore/SantaFeAdmin/AO/62756/pENV000GW00029_146_AO.tif

Engineering Drawings Sanitary Waste Water Proposal

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OCD is the lead on the sanitary sewer project and has determined that the brief summary sent by Darrell Moore falls short of OCD expectations. Please submit the information within 30 days or by COB October 8, 2010 of the date of this message.

Please contact me if you have questions. Thank you.

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File: OCD Online "GW-28 Engineering Drawings Sanitary Waste Water Proposal" and "GW-28 Permits, Renewals, and Mods Application New Construction & Underground Sewer Lines"

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From: Wells, John, NMENV [john.wells@state.nm.us]

Sent: Tuesday, March 23, 2010 2:22 PM

To: Moore, Darrell

Subject: RE: Sewer Systems at Navajo

Hi Darrell,

Absolutely, flowable fill is acceptable to NMED. I have pasted NMED's "abandonment regulations" below. As noted in section B below, the tank bottom should be ruptured or opened after pumping the contents, then fill it with flowable fill.

As noted in section C below, contact NMED's Carlsbad office at (575) 885-9023 to inquire as to whether our inspectors will require an inspection prior to final filling of the tanks. It is possible that an inspection will not be required, depending on available time & availability of staff or other possible factors.

Thank you for keeping me informed of the progress.

John Wells

NMED Liquid Waste Specialist

District IV, Roswell Field Office

(575) 624-6046

20.7.3.307 STANDARDS; ABANDONED SEWERS AND ON-SITE LIQUID WASTE SYSTEMS:

A. Every abandoned building sewer, or part thereof, shall be plugged or capped within five (5) feet of

the property line using a cap or plug prescribed by the uniform plumbing code.

B. Every cesspool, holding tank, septic tank, seepage pit or other liquid waste treatment unit that has

been abandoned or has otherwise been discontinued from further use or to which no waste or building sewer from a

plumbing fixture is connected shall have the liquid waste pumped there from and properly disposed. The bottom of

the unit shall be opened or ruptured, or the entire unit collapsed so as to prevent the unit from retaining water. The

unit shall be completely filled with earth, sand, gravel, concrete or other approved material.

C. The top cover or arch over the cesspool, holding tank, septic tank, seepage pit or other liquid waste

treatment unit shall be removed or collapsed before filling and the filling shall not extend above the top of the

20.7.3 NMAC 17

vertical portions of the sidewalls or above the level of any outlet pipe until inspection or authorization by the

department. After such inspection or authorization, the cesspool, holding tank, septic tank, seepage pit or other

liquid waste treatment unit shall be filled to the level of the top of the ground.

D. Where on-site treatment systems are abandoned consequent to connecting any premises with a public sewer, the permittee making the connection shall fill all abandoned treatment units as required by the

department within 30 days from the time of connection.

[20.7.3.307 NMAC - Rp, 20.7.3.410 NMAC, 9/1/05]

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Phone Number 575-746-5281
Cell Number 575-703-5058
Fax Number 575-746-5451

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As of August 18, 2010, all of Navajo Refining Company's septic tanks have had the bottoms bored thru and filled with flowable fill. All bathrooms in the plant are now hard piped to the City of Artesia POTW.

Darrell Moore
Environmental Manager for Water and Waste
Navajo Refining Company, LLC

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Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, September 03, 2010 9:29 AM
To: 'Moore, Darrell'
Cc: 'Lackey, Johnny'; VonGonten, Glenn, EMNRD
Subject: RE: Liquid Waste Sewers

Darrell:

Please send OCD the details of the underground sewage tank closures implemented by the Navajo Refining Company (NRC). As I indicated in my 8/25 e-mail, I think Navajo is attempting to bring closure to Section 17(iv) of the discharge permit? I found NRC correspondence dated May 16, 2008 associated with the Waste Water Treatment/Sanitary Effluent Recycle Project.

Please reference and/or identify the basis or intent of your communication. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Moore, Darrell [mailto:Darrell.Moore@hollycorp.com]
Sent: Wednesday, August 25, 2010 2:31 PM
To: Wells, John, NMENV; Chavez, Carl J, EMNRD
Subject: Liquid Waste Sewers

Gentlemen

As of August 18, 2010, all of Navajo Refining Company's septic tanks have had the bottoms bored thru and filled with flowable fill. All bathrooms in the plant are now hard piped to the City of Artesia POTW.

Darrell Moore
Environmental Manager for Water and Waste
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Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, August 25, 2010 3:14 PM
To: 'Moore, Darrell'; Wells, John, NMENV
Cc: Lackey, Johnny; VonGonten, Glenn, EMNRD; Dade, Randy, EMNRD
Subject: RE: Liquid Waste Sewers

Darrell:

I believe you are stating that Navajo Refining Company (NRC) has complied with the applicable sections of the OCD Discharge Permit below. Right? I recall that there was an extension to the 3 months listed below. If not, please specify what provision or section(s) of the OCD Discharge Permit it is attempting to address.

17. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections. Subsequent to the OCD's February 19-21, 2007 inspection; February 27, 2008 meeting in Santa Fe, and March 13, 2008 inspection of the facility, the following requirements apply:

iv The owner/operator shall submit a sanitary waste water proposal to close all existing below ground sanitary effluent tanks; treat and/or dispose of all sanitary waste water effluent through the refinery process area(s) and refinery permitted UIC Class I Injection Wells east of the refinery within 3 months of permit issuance to the OCD. The owner/operator shall follow NMED guidelines for removal or in place decommissioning of all below ground sanitary waste water closed tank systems. The owner/operator shall stop discharging sanitary effluent waste water into the below ground closed tank systems within 24 months of completion of the City of Artesia's sewer upgrade project. Since the proposal will involve treatment and disposal via oil and gas operations at the facility, the owner/operator shall deal directly with OCD on the treatment and disposal of sanitary effluent at the refinery with a courtesy copy of the proposal sent to the NMED-Pollution Prevention Office. Currently, the refinery discharges a maximum of 50 bbl/day of sanitary effluent into underground tanks (closed tank systems) that are pumped out and disposed at the local WWTP as needed.

Please clarify what your e-mail message below is satisfying in the OCD discharge permit. For example, it appears that NRC decommissioned the below ground sanitary tank systems in place by plugging them? "Flowable fill" does not sound impermeable to me.... There is no flow percolating downward through the tanks anymore? Please provide NMED guidelines followed for the decommissioning in place for OCD to confirm that NRC followed NMED guidelines. Any schematics that reflect actual scale and decommissioning details would also be appreciated. A detailed explanation of how sanitary waste water effluent is treated or disposed through the refinery process area(s) and refinery permitted UIC Class I Injection Wells east of the refinery is needed. Please provide a courtesy copy of the proposal NRC sent to the NMED- Pollution Prevention Office.

Please let me know how soon you can provide the requested information to the OCD. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Moore, Darrell [mailto:Darrell.Moore@hollycorp.com]

Sent: Wednesday, August 25, 2010 2:31 PM

To: Wells, John, NMENV; Chavez, Carl J, EMNRD

Subject: Liquid Waste Sewers

Gentlemen

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Chavez, Carl J, EMNRD

From: Wells, John, NMENV
Sent: Friday, May 23, 2008 10:58 AM
To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD; 'Moore, Darrell'; Monzeglio, Hope, NMENV; Beatty, Gary, NMENV; Olson, Bill, NMENV
Subject: RE: Navajo Refinery Company, LLC Artesia Refinery (GW-28) & May 16, 2008 Waste Water Treatment/Sanitary Effluent Recycle Project Letter (letter)

Hello Mr. Chavez,

I work in NMED's Liquid Waste Program, which regulates on-site liquid waste systems that are designed to receive and do receive 2,000 gallons or less of liquid waste per day, and that do not generate discharges that require a discharge plan pursuant to 20.6.2 NMAC or a national pollutant discharge elimination system permit. Because Navajo Refining Company's liquid waste discharges exceed 2,000 gallons per day, NMED's Liquid Waste Program does not regulate these discharges.

If you have any questions or concerns regarding this matter, I may be contacted at (575) 624-6046.
 Sincerely,

John Wells

*N.M.E.D. Liquid Waste Specialist
 District IV, Roswell Field Office
 1914 W. 2nd St., Roswell, NM 88201
 Phone:(575) 624-6046*

From: Chavez, Carl J, EMNRD
Sent: Wednesday, May 21, 2008 3:58 PM
To: Wells, John, NMENV
Cc: Price, Wayne, EMNRD; Moore, Darrell; Monzeglio, Hope, NMENV
Subject: Navajo Refinery Company, LLC Artesia Refinery (GW-28) & May 16, 2008 Waste Water Treatment/Sanitary Effluent Recycle Project Letter (letter)

Mr. Wells:

Good afternoon. The NM Oil Conservation Division (OCD) met with Navajo Refinery Personnel on May 8, 2008, to discuss the renewal of their discharge permit and resolution of their Class V Provision of the OCD Discharge Permit. There was discussion about NMED concerns about the existing sanitary system at the refinery and there have been some recent City of Artesia sanitary sewer line changes adjacent to the refinery.

The Navajo Refinery would like to submit a work plan and project schedule for implementing an upgrade to its waste water treatment plant as specified in Mr. Jim Resinger's (Navajo) letter of May 16, 2008 (you were copied in the letter). Mr. Resinger has indicated that the upgrade could be completed within the next 24 months and would address NMED and OCD concerns associated with its sanitary sewer system(s).

The OCD would like to set target dates for completion of the upgrade into the OCD discharge permit. Consequently, I am writing to communicate with the NMED and determine whether this upgrade would address the NMED's current concerns? Similar to another refinery in Gallup, NM where the OCD required the company to complete a pilot study for the best handling and treatment of its sanitary effluent at the refinery, we are making great progress on upgrades that will prevent pollution while conserving water and saving the company money.

I would appreciate a response from NMED related to Mr. Resinger's letter as I am working to complete the discharge permit for the Navajo Artesia Refinery by the end of May 2008, which will require public notice, etc. and posting of the discharge permit on the OCD Website. This is an opportune time for the agencies (OCD and

6/10/2008

NMED) to move forward and allow the refinery to implement a solution to existing sanitary issues. I look forward to hearing from you.

Please contact me to discuss. Thanks for your cooperation in this matter.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
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6/10/2008

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To: Chavez, Carl J, EMNRD
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Sincerely,

John Wells

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Phone:(575) 624-6046*

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Please contact me to discuss. Thanks for your cooperation in this matter.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/index.htm>
(Pollution Prevention Guidance is under "Publications")

6/10/2008

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, July 10, 2008 11:30 AM
To: Chavez, Carl J, EMNRD; Wells, John, NMENV
Cc: Price, Wayne, EMNRD; 'Moore, Darrell'; Monzeglio, Hope, NMENV; Olson, Bill, NMENV; Resinger, Jim; 'Lackey, Johnny'
Subject: RE: Navajo Refinery Company, LLC Artesia Refinery (GW-28) & May 16, 2008 Waste Water Treatment/Sanitary Effluent Recycle Project Letter (letter)
Attachments: Navajo Refining Company LLC 5-16-2008.tif

Mr. Wells:

I am writing to provide an update on correspondence related to the Navajo Refining Company, LLC.- Artesia Refinery "Waste Water Treatment/Sanitary Effluent Recycle Project" proposal (see attachment). After speaking with Mr. Bill Olson (NMED- WQB) regarding the Artesia Refinery sanitary effluent proposal, it was agreed that the OCD will be the lead agency on the proposal and will copy the NMED- Pollution Prevention Office on correspondence related to the proposal.

OCD Discharge Permit Language (final permit expected on or before September 10, 2008):

17. OCD Inspections

iv. The owner/operator shall submit a sanitary waste water proposal to close all existing below ground sanitary effluent tanks; treat and/or dispose of all sanitary waste water effluent through the refinery process area(s) and refinery permitted UIC Class I Injection Wells east of the refinery within 3 months of permit issuance to the OCD. The owner/operator shall follow NMED guidelines for removal or in place decommissioning of all below ground sanitary waste water closed tank systems. The owner/operator shall stop discharging sanitary effluent waste water into the below ground closed tank systems within 24 months of permit issuance. Since the proposal will involve treatment and disposal via oil and gas operations at the facility, the owner/operator shall deal directly with OCD on the treatment and disposal of sanitary effluent at the refinery with a courtesy copy of the proposal sent to the NMED- Pollution Prevention Office. Currently, the refinery discharges a maximum of 50 bbl/day of sanitary effluent into underground tanks (closed tank systems) that are pumped out and disposed at the local WWTP as needed.

Additional Navajo Refinery Correspondence July 9, 2008:

Navajo requests that we be allowed 24 months versus 12 months to implement the sanitary effluent waste water project which will transfer sanitary effluent from various points within the refinery to the waste water treatment plant to be recycled with our treated waste water for plant use and injection to disposal wells after treatment. We may be required to construct several buildings within the refinery to meet OSHA siting requirements and relocate our two control rooms. These buildings will have to be tied into the plant oily water drain for treatment and it will require up to 18 months before construction of the buildings are complete and the control rooms are relocated. Upon completion of these tasks the new facilities will be tied into the oily water drain system and the existing facilities will be abandoned. It will take up to 24 months to accomplish this. Johnny Lackey, Navajo Artesia Refinery Environmental Manager

To view information related to the proposal in the future, you may go to:
<http://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pENV000GW00029>
and look for the "Engineering Drawings- Sanitary Waste Water Proposal" thumbnail.

Please contact me if you have questions. Thank you.

7/10/2008

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

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Sent: Wednesday, May 21, 2008 3:58 PM
To: Wells, John, NMENV
Cc: Price, Wayne, EMNRD; 'Moore, Darrell'; Monzeglio, Hope, NMENV
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Carl J. Chavez, CHMM
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7/10/2008



REFINING COMPANY, LLC

FA 2008 MAY 21 PM 2 47

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(575) 746-5481 TRUCKING
(575) 746-5458 PERSONNEL

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FAX
(575) 746-5419 ACCOUNTING
(575) 746-5451 ENV/PURCH/MKTG
(575) 746-5421 ENGINEERING

May 16, 2008

Wayne Price
Environmental Bureau Chief
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Certified Mail/Return Receipt
7002 0510 0002 6870 5821

**RE: Waste Water Treatment/Sanitary Effluent Recycle Project
Navajo Refining Company, L.L.C.**

Dear Wayne:

As we discussed in our May 8th meeting, Navajo is currently evaluating a capital project to upgrade our waste water treatment plant by installing Ultrafiltration, a second Reverse Osmosis (RO) Unit, clarifier and diverting the refinery sanitary effluent to Navajo's waste water treatment plant for biological treatment and recycling.

This project will allow Navajo to recycle over 60 % of the water currently being pumped to injection wells, which without this upgrade has no further beneficial use to Navajo or the city of Artesia. The recycled portion of the treated water will be used as make-up water for the refineries' cooling towers. The improved water quality used as cooling tower make-up increases the cycles in the cooling towers thereby further reducing the amount of well water and City water required for make-up. By recycling the treated water, we will reduce the amount of water currently coming from Navajo's wells and the city of Artesia's water system into the refinery. This system will also eliminate the sanitary waste storage tanks currently in use within the refinery and the need to transport this waste to the city of Artesia's POTW.

All piping and equipment for the proposed upgrade will be installed above ground. The underground sewer lines will continue to be pressure tested as specified in our discharge permit. Although we are early in our project planning we feel the project should be on stream within 24 months. Let me know if OCD has any questions or comments.

Please contact me at 575-746-5497 if you have questions or wish to discuss.

Sincerely,

Jim Resinger
Vice President, Refining

cc: D. Moore
D. Jelmini
J. Lackey
G. Fuller
Carl Chavez, Oil Conservation Division, 1220 South St Francis Dr., Santa Fe, NM 87505
Bill Olsen, NMED, Groundwater Bureau Chief, Harold Runnels Bldg. RoomN2250, 1190 St Francis Dr
Santa Fe, NM 87502
John Wells, NMED, Ground Water, Liquid Waste, 1914 West 2nd, Roswell, NM 88202
Hope Monzeglio, NMED, Hazardous Waste Bureau, 2905 Rodeo Park Dr. East, Santa Fe, NM 87505