

GW - 396

**PERMITS,
RENEWALS,
& MODS
Application**

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, May 12, 2009 4:21 PM
To: 'randyamandboys@aol.com'
Cc: 'Michael Myers'; Swazo, Sonny, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD
Subject: GW-396, Jal Quality Transport Inc. Admin Complete
Attachments: GW-396; NEW DP Admin Complete Letter.pdf; GW-396, NEW Draft Permit.pdf; GW-396, OCD PN.pdf; New & Mod WQCC PN Rules.pdf; New & Mod PN Flow Chart.pdf

Mr. Randy Crawford,

The OCD has determined your submitted application, GW-396, for your Jal facility to be **Administratively Complete**.

Attached is documentation referencing the milestone (1) Admin. Complete letter, (2) Draft Permit for your review, and (3) the OCD version of the public notice.

Also attached is the

(1) WQCC rules for processing your approved public notice, please review. **Submit to the OCD the locations (*the OCD needs to approve these locations prior to posting*) of the additional postings and the list of land owners within a 1/3 mile radius.**

(2) flow chart of how this process works.

I will continue with the technical review of your application.

Please submit your lists and locations to me ASAP.

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



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 12, 2009

Mr. Randy Crawford
Quality Transportation
7 Crawford Lane
Jal, New Mexico 88252

**Re: New discharge plan permit, GW-396
Jal Quality Transport Service Company
Lea County, New Mexico**

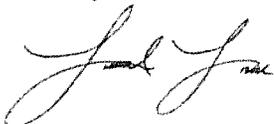
Dear Mr. Crawford:

The New Mexico Oil Conservation Division (NMOCD) has received Quality Transport Inc.'s request and initial fee, dated March 17, 2009 for a new discharge permit for their Jal Oil and Gas Service Company located in Section 31, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. The Oil Conservation Division has identified this facility as GW – 396 as their discharge permit, please reference all future submitted documentation with this number. The initial submittal and subsequent inquires have provided the required information in order to deem the application "administratively" complete.

The New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC for a new discharge plan **was satisfied and demonstrated** to the NMOCD. The applicant shall now publish, one time only, the approved notice. The applicant shall submit to the agency locations and listings of other specific postings for approval. 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. 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,



Leonard R. Lowe
Environmental Engineer

LRL/lrl



May 12, 2009
Page 2

xc: OCD District II, Artesia office



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 12, 2009

Mr. Randy Crawford
Quality Transportation
7 Crawford Lane
Jal, New Mexico 88252

Re: New Discharge Permit, GW-396
Jal Oil and Gas Service Company
Section 31, Township 24 South, Range 37 east, NMPM,
Lea County, New Mexico

Dear Mr. Crawford:

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 **Quality Transport Inc.'s**, (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 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. 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,

Glenn von Gonten
Acting 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 facility fee for an oil and gas service company is \$1700.00. Please submit this amount with a signed copy of the permit and return to the OCD within 30 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, 2014** 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 March 2009 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 Part 35 Waste: Pursuant to OCD Part 35 (19.15.35.8 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 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 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 of this facility on January 20, 2009. Mr. Randy Crawford provided the inspection. All photographs referenced below are located in the attachment of this permit. The inspection concluded the following:

Quality Transport Inc. shall resolve these concerns and report within XX days, by Month Day Year. The report shall be submitted, with photographs, to the Environmental Bureau Oil Conservation Division identifying the resolutions to the concerns.

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: Newly Permitted Facility:

A. A copy of the discharge permit, GW-396, shall be kept on site at all times.

- B. Quality Transport Inc. management shall present the discharge permit conditions to all its employees. Employees shall be made aware of possible discharges at the facility and made aware of the permit location on site.
- C. The OCD has an Artesia office. Mike Bratcher is the Environmental Engineer at this location and he can be reached at 575-626-0857. All spills shall be reported to Mr. Bratcher.
- D. The Santa Fe OCD Environmental Bureau processes all discharge plan permits, refer all questions to the Santa Fe office.

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

Mr. Randy Crawford
Jal Quality Transport Inc.
GW-396, Jal Oil and Gas Service Company
May 12, 2009

Company Representative- Signature

Title _____

Date: _____

DRAFT

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-396) Mr. Randy Crawford, 7 Crawford Lane, Jal N.M., has submitted a new application for a discharge plan permit for their Oil and Gas Service Company at 7 Crawford Lane, Jal N.M., located in the Section 31, Township 24 South, Range 37 East, NMPM, Lea County. The facility is an oilfield trucking company that provides the hauling of produced water for the oil and natural gas industry. Approximately 25 – 35 gallons/day of KCL are mixed, 500 gallons of paraffin, 110 of motor oil and 1200 bbls of oil field waste are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 72 - 80 feet, with a total dissolved solids concentration of approximately 1640 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 12th day of May 2009.

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

1. A brief description of the activities that produce the discharges are as follows:
 - (a) This facility is primarily the main office. Activities at this location include parking for overnight stay for the vehicles from the Jal yard area, record keeping, and payroll for the company.
 - (b) Some liquid KCL is mixed at this facility but on rare occasions. The amount mixed depends on the job order and usually varies between 5 – 10 gallons per job order. The KCL is stored in an approved container with a drip pan below to catch any spillage that may take place.
2. A brief description of the expected quality and volume of the discharge for this facility includes:
 - (a) There is a 55 gallon drum of liquid KCL that is stored on site for occasions when needed. The KCL liquid is stored in an approved container and has a drip pan below it to catch any liquids that might be released from the drum.
 - (b) Very little activities take place in the Jal yard. There are no other chemicals that might be of any threat that are stored or mixed at this site.
3. The total dissolved solids concentrations and the depth to ground water most likely to be affected by the discharges are as follows:
 - (a) The depth to ground water adjacent the Jal yard is approx. 72-80 feet.
 - (b) TDS levels of the groundwater adjacent the Jal yard are 1640mg/L.

PUBLIC NOTICE

✓ ①
Quality Transportation Inc., 7 Crawford Lane, Jal New Mexico 88252, has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for a new discharge plan permit GW-396 for their trucking and transportation yard located in Section 31, Township 24S, Range 37E, in Lea county New Mexico. The physical address of the facility is 7 Crawford Lane Jal, NM 88252. The facility is ✓ ② located approximately 2.5 miles North of Jal New Mexico on Hwy 18.

The facility is home to an oilfield trucking company that hauls produced water and oilfield waste material to a public approved disposal for their respected clients. Approximately 1200 barrels of oilfield wastes and ✓ ④ produced water are transported to disposal daily. Only liquids that are approved to be stored at the facility will be allowed on the premises. All other liquids and wastes will be disposed of at an approved disposal site. All disposal sites are approved OCD disposal sites. There aquifer most likely to be affected is 72 – 80 feet in depth and the total dissolved solids ✓ ⑤ concentration of the groundwater is 1640mg/L.

Any interested person or persons may obtain information; submit comments or request to be placed on a facility-specific mailing list for further notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. ✓ b Francis Drive, Santa Fe, New Mexico 87505, telephone (505) 476-3492. The ✓ 7 OCD will accept the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

Approval 05/12/09

Lowe, Leonard, EMNRD

From: Michael Myers [mmcm Myers@gmail.com]
Sent: Wednesday, May 06, 2009 11:21 AM
To: Lowe, Leonard, EMNRD
Subject: Lab Results - QT Water well
Attachments: H17364_QT[1].pdf

Mr. Lowe,

Here is the results from the Lab.

Thanks,

Mike E. Myers

This inbound email has been scanned by the MessageLabs Email Security System.

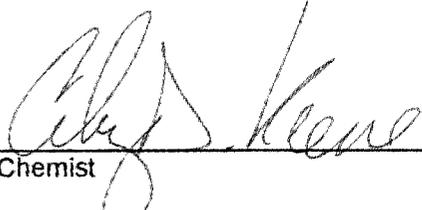


ANALYTICAL RESULTS FOR
 QUALITY TRANSPORTATION, INC.
 ATTN: MIKE MYERS
 7 CRAWFORD LANE
 JAL, NM 88252

Receiving Date: 05/05/09
 Reporting Date: 05/06/09
 Project Number: NOT GIVEN
 Project Name: QT H₂O WELL
 Project Location: NOT GIVEN

Sampling Date: 05/05/09
 Sample Type: GROUNDWATER
 Sample Condition: INTACT
 Sample Received By: CK
 Analyzed By: TR

| LAB NUMBER | SAMPLE ID | TDS (mg/L) |
|-----------------------------|------------|---------------|
| Analysis Date: | | 05/05/09 |
| H17364-1 | WATER WELL | 1,640 |
| | | |
| | | |
| | | |
| | | |
| Quality Control | | NR |
| True Value QC | | NR |
| % Recovery | | NR |
| Relative Percent Difference | | 4.3 |
| METHOD: EPA 600/4-79-020 | | 160.1 |



 Chemist

05/06/09

 Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for professional services, shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



ARDINAL LABORATORIES
 101 East Marland, Hobbs, NM 88240
 (575) 393-2326 Fax (575) 393-2476

| BILL TO | | | ANALYSIS REQUEST | | |
|---|---------------------------------|--|------------------|--|--|
| P.O. #: | | | | | |
| Company: <i>SAME</i> | | | | | |
| Attn: <i>Ready Crawford</i> | | | | | |
| Address: | | | | | |
| City: <i>Jal</i> | | | | | |
| State/NM Zip: <i>88252</i> | | | | | |
| Phone #: <i>575-390-3962</i> | | | | | |
| Fax #: <i>575-393-2273</i> | | | | | |
| Company Name: <i>Quality Transportation Inc</i> | Project Name: <i>QT Ho well</i> | | DATE TIME | | |
| Project Manager: <i>Mike Myers</i> | Project Location: <i>Jal</i> | | DATE TIME | | |
| Address: <i>7 Crawford Lane</i> | Project Owner: <i>Jal</i> | | DATE TIME | | |
| City: <i>Jal</i> | Project Name: <i>QT Ho well</i> | | DATE TIME | | |
| Phone #: <i>575-390-3962</i> | Project Location: <i>Jal</i> | | DATE TIME | | |
| State/NM Zip: <i>88252</i> | Project Owner: <i>Jal</i> | | DATE TIME | | |
| Fax #: <i>575-393-2273</i> | Project Name: <i>QT Ho well</i> | | DATE TIME | | |
| Sampler Name: <i>Jal</i> | | | DATE TIME | | |
| FOR LAB USE ONLY | | | DATE TIME | | |
| Lab I.D. <i>H17364-1</i> | | | DATE TIME | | |
| Sample I.D. <i>Waterwell</i> | | | DATE TIME | | |
| Matrix: <input checked="" type="checkbox"/> GROUNDWATER | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> WASTEWATER | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> SOIL | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> OIL | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> SLUDGE | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> OTHER: | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> ACID/BASE | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> ICE / COOL | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> OTHER: | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> # CONTAINERS | | | DATE TIME | | |
| Matrix: <input type="checkbox"/> (G)PAB OR (G)OMP | | | DATE TIME | | |

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable services. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or resulting in the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Sampler Relinquished: _____ Date: _____ Time: _____
 Relinquished By: *[Signature]*
 Delivered By: (Circle One) UPS - Bus - Other:
 Temp. *24.5°C* Sample Condition: Cool Intact
 Checked By: *[Signature]* (Initials) *CDK*
 Received By: *[Signature]*
 Date: *5/5/09* Time: *12:40*
 Received By: *[Signature]*
 Date: *5/5/09* Time: *10:21*
 Remarks: *MMCMYERS@igmail.com*

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

#26

Lowe, Leonard, EMNRD

From: Michael Myers [mmcm Myers@gmail.com]
Sent: Friday, May 01, 2009 9:01 AM
To: Lowe, Leonard, EMNRD
Subject: Quality Transportation Jal NM Yard
Attachments: QT revisions.doc *GW-396*

Mr. Lowe,

Here are the revisions on the Jal NM yard. The revisions for the Carlsbad yard are to follow. I wanted to get this information to you since it is complete. e Jal yard.

I am not sure of the TDS for the Jal yard. if you need an amount or number please let me know.

Thanks,
Mike E. Myers

This inbound email has been scanned by the MessageLabs Email Security System.

5.4.9 → waiting on TDS.

1. A brief description of the activities that produce the discharges are as follows:
 - (a) This facility is primarily the main office. Activities at this location include parking for overnight stay for the vehicles from the Jal yard area, record keeping, and payroll for the company.
 - (b) Some liquid KCL is mixed at this facility but on rare occasions. The amount mixed depends on the job order and usually varies between 5 – 10 gallons per job order. The KCL is stored in an approved container with a drip pan below to catch any spillage that may take place.
2. A brief description of the expected quality and volume of the discharge for this facility includes:
 - (a) There is a 55 gallon drum of liquid KCL that is stored on site for occasions when needed. The KCL liquid is stored in an approved container and has a drip pan below it to catch any such liquids that might be released from the drum.
 - (b) Very little activities take place in the Jal yard. There are no other chemicals that might be of any threat that are stored or mixed at this site.
3. The total dissolved solids concentrations and the depth to ground water most likely to be affected by the discharges are as follows:
 - (a) The depth to ground water adjacent the Jal yard is approx. 72-80 feet.
 - (b) Because of the low levels of activities, mixing, rinsing or storage of wet or dry chemicals in the Jal yard the total TDS are expected to be at a low level. Actual measurements of TDS have not been conducted. X

Lowe, Leonard, EMNRD

From: Michael Myers [mmcm Myers@gmail.com]
Sent: Monday, April 27, 2009 5:04 PM
To: Lowe, Leonard, EMNRD
Subject: Re: Quality Transport recent submittal

Mr. Lowe,

I expect to have the information to you by Friday at the latest. We had our meeting in Hobbs last week and I visited with the folks in the OCD office and I let them know that I would be getting the information you requested to you this week. I am sorry if you were not informed of my arrangements. I hope to have the rest of the info no later than Friday. I was out in Houston all week last week and just got home on Sunday. Thanks for your patience and understanding,

Mike E. Myers

On Mon, Apr 27, 2009 at 4:14 PM, Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us> wrote:

Mr. Myers,

When do I expect to have the information needed for my inquires?

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

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

From: Lowe, Leonard, EMNRD
Sent: Friday, April 17, 2009 4:14 PM
To: 'Michael Myers'
Cc: Swazo, Sonny, EMNRD; VonGonten, Glenn, EMNRD; Sanchez, Daniel J., EMNRD
Subject: Quality Transport recent submittal
Importance: High

Mr. Myers,

I have reviewed your submitted information in reference the Administratively Incomplete letters for Quality Transportation discharge plan applications for the QT Carlsbad, GW-395 and QT Jal, GW-396 facilities.

See responses below:

GW-396, Jal QT facility

1. The OCD requested, "A brief description of the activities that produce the discharge to the application", **meaning**, what are the activities at this facility? What does the facility do?

Please respond to this inquiry as it is still an open item ASAP.

2. The OCD requested, "A brief description of the expected quality and volume of the discharge", **meaning** a description of what fluids/dry chemicals, waste streams, etc are present at this facility.

Please respond to this inquiry as it is still an open item ASAP.

3. The OCD requested, "the depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge.", **meaning**, information of the groundwater at the facility located in Jal or adjacent. NOT the ground water of all the areas that QT conducts business, which is what was reported. Also no TDS was given.

Please respond to this inquiry as it is still an open item ASAP.

Please clarify these issues with the OCD.

4. Your public notice was approved. Please translate to Spanish and post per the WQCC requirements. See attachment.

GW-395, Carlsbad QT facility

1. Thank you for providing the Township/Section/Range
2. A brief description of the activities that produce the discharge to the application **Please respond to this inquiry as it is still an open item ASAP.**
3. A brief description of the expected quality and volume of the discharge **Please respond to this inquiry as it is still an open item ASAP.**
4. depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge **Please respond to this inquiry as it is still an open item ASAP.**
5. The applicant version of the public notice was denied, please resubmit. It is identical to GW-395's. Two different locations should have different ground water depths and characteristics.

Please respond. I have attached your submittal to this e-mail.

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

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.

This inbound email has been scanned by the MessageLabs Email Security System.



New Mexico Energy, Minerals and Natural Resources Department

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

2009 APR 17 AM 11 07

Mark Fesmire
Division Director
Oil Conservation Division



March 20, 2009

Mr. Randy Crawford
Quality Transportation
7 Crawford Lane
Jal, N.M. 88252

IMMEDIATE ATTENTION REQUIRED- DEADLINE ENCLOSED

Certified Letter: 7002 0510 0003 5125 2058

RE: New Discharge Permit, GW-396
Jal Quality Transportation Facility
7 Crawford Lane
Jal, N.M. 88252

The New Mexico Oil Conservation Division (NMOCD) has received Quality Transportations application and initial fee, dated March 17, 2009 for a new discharge plan permit for their Oil and Gas Service Company located in Section 31, Township 24 south, Range 37 East, NMPM Lea County, New Mexico. The initial submittal did not provide the required information and therefore the OCD has declared your application to be "administratively" incomplete.

The OCD is requesting the following information, per subsection F of 20.6.2.3108 NMAC:

- (1) a brief description of the activities that produce the discharge described in the application
- (2) a brief description of the expected quality and volume of the discharge
- (3) the depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge.

In addition to the above stated items the OCD request:

- (1) The applicant version of the public notice for review.

Under the WQCC, an applicant for a new discharge plan permit is required to provide public notice. I have enclosed the relevant WQCC rules and regulations to provide direction for this task. The notice process is accomplished through a series of stages. I have attached a flow chart of this process and an example of an applicant public notice for clarification. Please review the materials I have



New Discharge Permit – GW-396
Quality Transportation Inc.
Jal NM Yard

Cert. Letter # 70020510000351252058

In reference to the letter we are submitting the following additions to the application:

(1) A brief description of the activities that produce the discharge are as follows:

- I. Quality Transportation is not an owner of any of the properties that will produce the waste the needs to be transported to disposal.
- II. Quality is hired by their respected clients to transport the wastes to the approved waste station or disposal site of the client's choice.
- III. The wastes that are being transported to an approved waste site are primarily produced water from oil and gas properties. Some occasions Quality is asked to clean up and dispose of hydrocarbons from an oil spill. Both Produced water and hydrocarbons are removed from the client's property and hauled to an approved

(2) A description of the expected quality and volume of the discharge is going to be based on the quantity of work ordered on a daily basis. Quality Transportation usually can haul anywhere from 8 – 12 loads of produced water on a daily basis. Sometimes less than that. A good average is 1200 bbls of produced water transported to disposal daily. The quality of the produced water depends on the area and the producing zone from which the water is being removed or extracted. Quality has no control of the water quality they are just a transport company that is hired to remove the wastes to an approved facility to dispose of.

(3) The depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge is as follows:

- I. The depth of the ground water varies from site to site. All disposal sites that are used by Quality Transportation are owned and operated by their clients. The depth of the ground water is between 85 ft all the way down to 130 ft.
- II. As for the total dissolved solids, they vary from site to site as well. Most produced water transported to disposal is below 250,000 parts chloride. Other water hauled most likely will be between 130,000 – 180,000 parts chloride.

①

PUBLIC NOTICE

Quality Transportation Inc., 7 Crawford Lane, Jal New Mexico 88252, has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for a new discharge plan permit GW-396 for their trucking and transportation yard located in Section 31, Township 24S, Range 37E, in Lea county New Mexico. The physical address of the facility is 7 Crawford Lane Jal, NM 88252. The facility is located approximately 2.5 miles North of Jal New Mexico on Hwy 18.

The facility is home to an oilfield trucking company that hauls produced water and oilfield waste material to a public approved disposal for their respected clients. Approximately 1200 barrels of oilfield wastes and produced water are transported to disposal daily. Only liquids that are approved to be stored at the facility will be allowed on the premises. All other liquids and wastes will be disposed of at an approved disposal site. All disposal sites are approved OCD disposal sites. There aquifer most likely to be affected is 80 – 130 feet in depth and the total dissolved solids concentration is approximately 420mg/l.

Any interested person or persons may obtain information; submit comments or request to be placed on a facility-specific mailing list for further 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 the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.



[Home](#) | [Help](#) | [Sign In](#)

[Track & Confirm](#)

[FAQs](#)

Track & Confirm

Search Results

Label/Receipt Number: **7002 0510 0003 5125 2058**

Status: **Delivered**

Your item was delivered at 12:35 PM on April 2, 2009 in JAL, NM 88252.

[Additional Details >](#)

[Return to USPS.com Home >](#)

[Go >](#)

Track & Confirm

Enter Label/Receipt Number.

Notification Options

Track & Confirm by email

Get current event information or updates for your item sent to you or others by email. [Go >](#)

[Site Map](#)

[Contact Us](#)

[Forms](#)

[Gov't Services](#)

[Jobs](#)

[Privacy Policy](#)

[Terms of Use](#)

[National & Premier Accounts](#)

Copyright© 1999-2007 USPS. All Rights Reserved.

No FEAR Act EEO Data

FOIA



United States Postal Service
Empowering the World



Integrity
Innovation
Service



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



March 20, 2009

Mr. Randy Crawford
Quality Transportation
7 Crawford Lane
Jal, N.M. 88252

IMMEDIATE ATTENTION REQUIRED- DEADLINE ENCLOSED

Certified Letter: 7002 0510 0003 5125 2058

**RE: New Discharge Permit, GW-396.
Jal Quality Transportation Facility
7 Crawford Lane
Jal, N.M. 88252**

The New Mexico Oil Conservation Division (NMOCD) has received Quality Transportation's application and initial fee, dated March 17, 2009 for a new discharge plan permit for their Oil and Gas Service Company located in Section 31, Township 24 south, Range 37 East, NMPM Lea County, New Mexico. The initial submittal did not provide the required information and therefore the OCD has declared your application to be "administratively" incomplete.

The OCD is requesting the following information, per subsection F of 20.6.2.3108 NMAC:

- (1) a brief description of the activities that produce the discharge described in the application
- (2) a brief description of the expected quality and volume of the discharge
- (3) the depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge.

In addition to the above stated items the OCD request:

- (1) The applicant version of the public notice for review.

Under the WQCC, an applicant for a new discharge plan permit is required to provide public notice. I have enclosed the relevant WQCC rules and regulations to provide direction for this task. The notice process is accomplished through a series of stages. I have attached a flow chart of this process and an example of an applicant public notice for clarification. Please review the materials I have



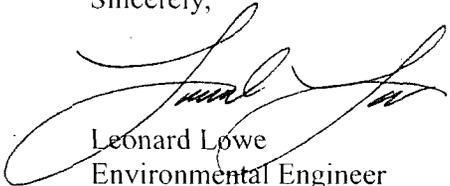
March 20, 2009

Page 2

enclosed and submit the public notice for our review. Once approved the notice shall be used for all other additional postings as indicated by the WQCC rules and regulations.

Please submit the above stated information within 15 days of receipt of this letter. If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or e-mail 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,



Leonard Lowe
Environmental Engineer

LRL/lrl

- xc: Larry Johnson, Environmental Engineer, OCD Aztec District I
Buddy Hill, Supervisor, OCD Hobbs District I
Sonny Swazo, Assistant General Counsel, OCD Santa Fe
Daniel Sanchez, Enforcement and Compliance Manager, OCD Santa Fe

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 3/17/09

or cash received on _____ in the amount of \$ 100⁰⁰

from Quality Transport Inc.

for GW-396

Submitted by: LAWRENCE TORRES Date: 3/18/09

Submitted to ASD by: LAWRENCE TORRES Date: 3/18/09

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

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

2009 MAR 18 PM 1 22

**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 and Gas Service Company - # GW-396

2. Operator: Quality Transportation Inc.

Address: 7 Crawford Lane Jal NM 88252

Contact Person: Randy Crawford Phone: 575-395-2273

3. Location: /4 /4 Section 31 Township 24 S Range 37 E
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.

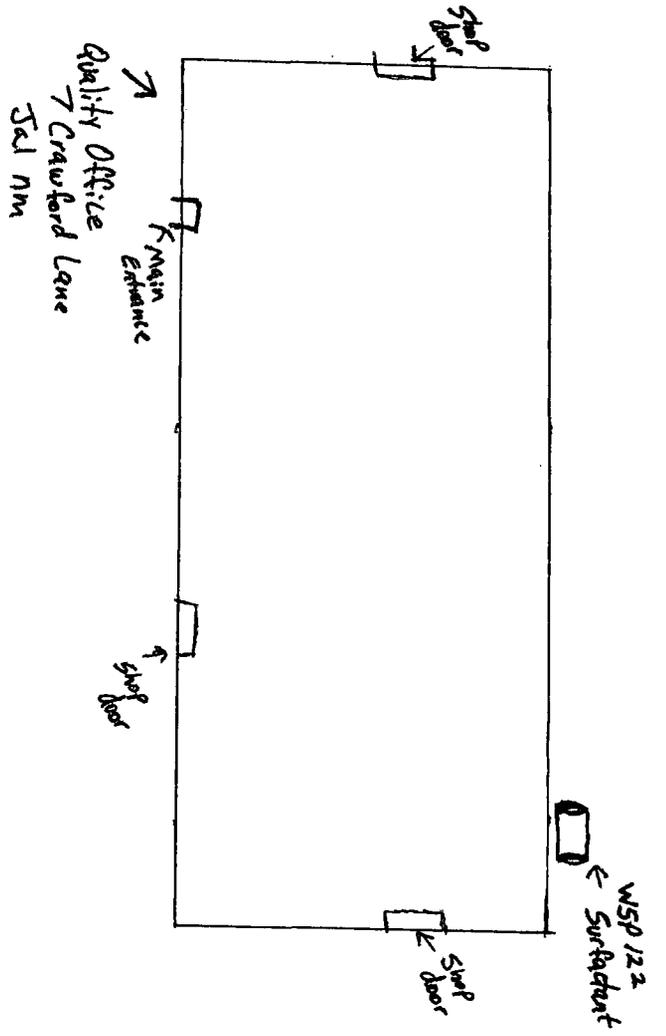
Name: Randy Crawford

Title: owner

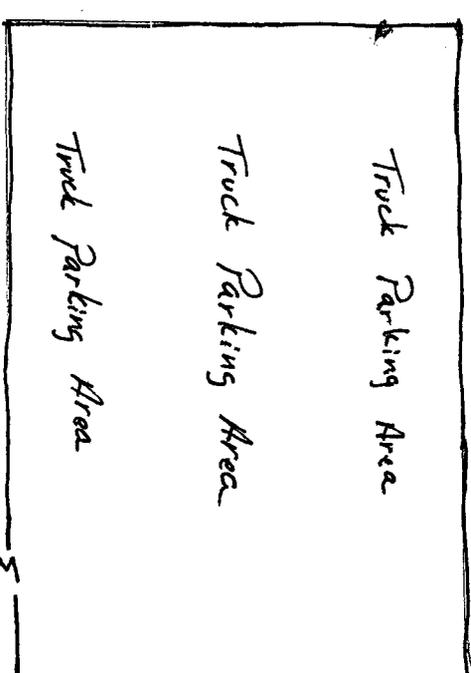
Signature: Randy Crawford

Date: 3/17/09

E-mail Address: _____



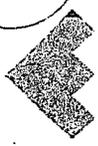
Quality Transportation Inc.
 JAL NM OFFICE
 575-395-2273



Google™ Address Jal, NM
Maps

Get Google Maps on your phone
Text the word "GMAPS" to 466453





Weatherford®

Reaction K156

KCL substitute

FOR INDUSTRIAL USE ONLY

READ MSDS BEFORE USE!

CAUTION

Combustible liquid and vapor. Harmful by inhalation, in contact with skin and if swallowed. Vapors may cause drowsiness and dizziness.

DIRECTIONS FOR USE:

Read the product technical data sheet, or consult a company representative for information on the proper use of this material!

PERSONAL PROTECTIVE EQUIPMENT:

Use personal protective equipment as required. Keep working clothes separately.

IN CASE OF FIRE:

Water, Alcohol foam, Polymer foam, Dry chemical powder, Carbon dioxide (CO2).

DOT PROPER SHIPPING NAME:

Non bulk: Not regulated for transport

Bulk: Combustible liquids, n.o.s., (Methanol), Class 3, UN1993, PG III

IN CASE OF SPILL:

Clean up in accordance with all applicable regulations.

FIRST AID:

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention if irritation develops or persists.

Skin: Wash off with soap and water. Get medical attention if irritation develops or persists.

Inhalation: If breathing is difficult, remove to fresh air and keep at rest in a position comfortable for breathing. Get medical attention immediately.

Ingestion: If swallowed, seek medical advice immediately and show this container or label. Do not induce vomiting without medical advice.

HANDLING AND STORAGE:

Do not handle or store near an open flame, heat or other sources of ignition. Use only with adequate ventilation. Wash thoroughly after handling. Avoid prolonged exposure. Prevent electrostatic charge build-up by using common bonding and grounding techniques. Store in a closed container away from incompatible materials.

HMS® HMS® HMS® HMS® HMS® HMS® HMS® HMS®

| | | | |
|---------------------|--|-----|--|
| HEALTH | | * 1 | |
| FLAMMABILITY | | 2 | |
| PHYSICAL HAZARD | | 0 | |
| PERSONAL PROTECTION | | | |

HMS® is a registered trade and service mark of the NPCA.

USE PPE TO REDUCE RISK OF EXPOSURE!

HANDLE ALL CHEMICALS WITH CAUTION!

RIGHT TO KNOW LAW:

This product does not contain a chemical known to the State of California to cause cancer, birth defects or other reproductive harm.
Contains: 67-56-1

LOT:
DATE: 4 FEBRUARY 2009

WEATHERFORD ENGINEERED CHEMISTRY
515 POST OAK BLVD • HOUSTON, TEXAS 77027 • PH: 713-693-4383



Weatherford®

WSP 122

Surfactant

FOR INDUSTRIAL USE ONLY

READ MSDS BEFORE USE!

WARNING

Flammable liquid. Do not get this material in your eyes, on your skin, or on your clothing.

DIRECTIONS FOR USE:

Read the product technical data sheet, or consult a company representative for information on the proper use of this material!

PERSONAL PROTECTIVE EQUIPMENT:

Avoid contact with skin. Avoid contact with eyes. Structural firefighters protective clothing provides limited protection in fire situations ONLY; it is not effective in spill situations. Use personal protective equipment as required. Keep working clothes separately.

IN CASE OF FIRE:

Water. Water spray. Water fog. Foam. Dry chemical. Carbon dioxide (CO2).

DOT PROPER SHIPPING NAME:

Non bulk: Flammable liquids, n.o.s., (ISOPROPYL ALCOHOL and METHANOL), Class 3, UN1993, PG III

Bulk: Flammable liquids, n.o.s., (ISOPROPYL ALCOHOL and METHANOL), Class 3, UN1993, PG III

IN CASE OF SPILL:

Clean up in accordance with all applicable regulations.

FIRST AID:

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention if irritation develops or persists.

Skin: Immediately flush skin with plenty of water. Get medical attention if irritation develops or persists.

Inhalation: Do not use mouth-to-mouth method if victim inhaled the substance.

Ingestion: Drink 1 or 2 glasses of water. Do not induce vomiting without medical advice.

HANDLING AND STORAGE:

Do not handle or store near an open flame, heat or other sources of ignition. Avoid release to the environment. Avoid prolonged exposure. Refrigeration recommended. Keep containers tightly closed in a dry, cool and well-ventilated place. Store in accordance with local/regional/national/international regulation.

LOT:
DATE: 21 NOVEMBER 2008

1020597

| | |
|---------------------|---|
| HEALTH | 2 |
| FLAMMABILITY | 3 |
| PHYSICAL HAZARD | 0 |
| PERSONAL PROTECTION | |

HMS® is a registered trade and service mark of the NPCA.

USE PPE TO REDUCE RISK OF EXPOSURE!

HANDLE ALL CHEMICALS WITH CAUTION!

RIGHT TO KNOW LAW:

WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.
Contains: 108-88-3, 67-63-0, 67-56-1

WEATHERFORD ENGINEERED CHEMISTRY
515 POST OAK BLVD • HOUSTON, TEXAS 77027 • PH: 713-693-4383

Discharge Plan Cont.
Quality Transportation Inc.

4. Landowner name and telephone number – Randy Crawford 7 Crawford Lane of Jal NM. Telephone number of 575-395-2273.
5. See attached sketch diagram of facility.
6. See attached list of materials that are stored on site.
7. Quality Transportation Inc. being a transportation company primarily hauls produced water of other operators. No wastes of products that are hauled are kept on site. Each load of produced water hauled is taken to an approved disposal site. The average daily waste hauled to disposal is an approximate number of 1200 bbls daily.
8. Quality Transportation Inc. is a transportation company that provides a method of disposal for its clients. Once Quality is notified by their respected clients that they need to remove the produced waste (produced water) they travel to location and pickup the waste by on loading the waste into their trailer of the transport truck and haul off their clients waste. When they are finished they leave behind a haul ticket for the client. This is to be used as a record of what amount of waste was hauled to disposal. Once at an approved disposal site the driver then off loads the waste into the disposal and leaves a disposal ticket for the amount of waste that was off loaded at the site.
9. N/A
10. A routine inspection of Quality Transportation Inc. property takes place on a monthly basis. A walk through inspection of the facility is conducted and findings of non compliance issues are reviewed. If there is a finding that needs immediate attention it is taken care of in a manner that is cost effective and environmentally sound.
11. See attached contingency plan
12. N/A
13. N/A

Contingency Plan

Title: Loss of waste material being transported

Location: Quality Transportation Inc. Jal, N.M.

Plan ID: QTIJY01

Plan Purpose:

In the event of a release of waste material/materials these steps need to be followed:

1. Notify management of the release in a timely manner
2. Stay on or at location of the release until supervisor has arrived
3. Control release if safe to do so
4. Control or limit public involvement

Distribution List:

Randy Crawford – Owner: 575-441-2153

Quality Transportation: 575-395-2273

Responsible Personnel:

In the event of an actual emergency notification to Randy Crawford owner of Quality Transportation Inc. Jal NM will be made. Randy Crawford is deemed as administrator of the response and recovery of any such release.

Reason for failure:

Determine the reasons for the release:

Identify the possible reason for the failure in priority order.

Warning indicators:

Identify warning signs or indicators of the failure or release.

Response and actions should determine what actually went wrong or failed and how long it will take to fix the problem.

Areas Affected:

Identify areas that are affected:

List areas that may be affected

Recovery Time Objective: (RTO)

State the time it will take to recover the release.

Notification:

In the case of an emergency call:

Randy Crawford: 575-441-2153

Quality Dispatch: 575-395-2273

Managers/Supervisors

Local and State EMS: 911

Updates and Plan Location:

When implemented record events on attached Business Interruption Event Log.

Review and update when there are additional or changed conditions specified.

Locations of the plan are specified above.

A copy of the plan is made accessible to appropriate staff specified.

Additional Resources:

If it is determined that additional resources are needed Quality Transportation will make the decision to notify such resources.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

RECEIVED
2009 FEB 9 PM 2 04

MR. Leonard Lowe
OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DRIVE
SANTA FE, NEW MEXICO 87505

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Randy Crawford
 Quality Transportation
 7 Crawford Lane
 Jal, NM 88252

2. Article Number

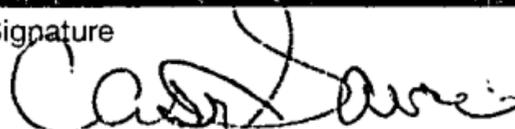
(Transfer from service label)

7002 0510 0003 5125 2065

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X


 Agent Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below:

 No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes



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



February 2, 2009

Certified Mail: 7002051000035125206

Mr. Randy Crawford
Quality Transportation
7 Crawford Lane
Jal, N.M. 88252

IMMEDIATE ATTENTION REQUIRED- DEADLINE ENCLOSED

Re: Discharge Plan Request designated **GW-396**
Quality Transport Trucking
Unit letter H of Section 31, Township 24 South, Range 37 East
Jal, N.M., Lea County

Certified Mail Number: 7002 0510 0003 5125 2065

Dear Mr. Crawford:

The Environmental Bureau of the New Mexico Oil Conservation Division (NMOCD) performed an inspection of the above stated facility on January 21, 2009. The OCD has determined that this facility must submit a discharge plan application for this Oil and Gas Service Company. The OCD identified a discharge plan number for this facility as GW-396; please annotate this in all documentation pertaining to this facility's discharge plan application.

The "Discharge Plan Application for Service Companies, Gas Plants, Refineries, Compressor, Geothermal Facilities and Crude Oil Pump Stations Guidelines" can be found on our website <http://www.emnrd.state.nm.us/ocd/EH-DischargePlanGuidelines.htm>. You will recall that these materials were provided to you at the time of inspection.

Under the WQCC, an applicant for a new discharge plan is required to provide public notice. I have enclosed the relevant WQCC rules and regulations to provide direction for this task. The notice process is accomplished through a series of stages. I have attached a flow chart of this process for clarification which I believe you will find helpful. Please review the materials I have enclosed and submit the public notice for our review.

The OCD Environmental Bureau is obligated by the New Mexico Water Quality Control Commission to protect the ground waters of the state of New Mexico. The OCD performs this task by reviewing applications and issuing permits for Discharge Plans. **Please submit the discharge plan application to the OCD office within 45 days of receipt of this letter, no later than March 19, 2009.** Include with your application the \$100.00 filing fee, which must be submitted with the application and made payable to the New Mexico Water Quality Management Fund.

Oil Conservation Division * 1220 South St. Francis Drive

* Santa Fe, New Mexico 87505

* Phone: (505) 476-3440 * Fax (505) 476-3462* <http://www.emnrd.state.nm.us>

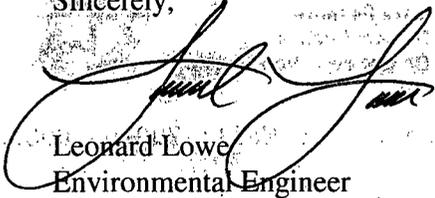


February 2, 2009

Page 2

If you have any questions pertaining to this process please call me at (505) 476-3492 or e-mail me at leonard.lowe@state.nm.us.

Sincerely,



Leonard Lowe
Environmental Engineer

xc: Larry Johnson, Environmental OCD District I Office
Mikal Altamore, Assistant General Counsel, Santa Fe
Daniel Sanchez, Enforcement and Compliance Manager, Santa Fe