NM1 - 6

GENERAL CORRESPONDENCE

YEAR(S): 2005-2003

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

January 31, 2005

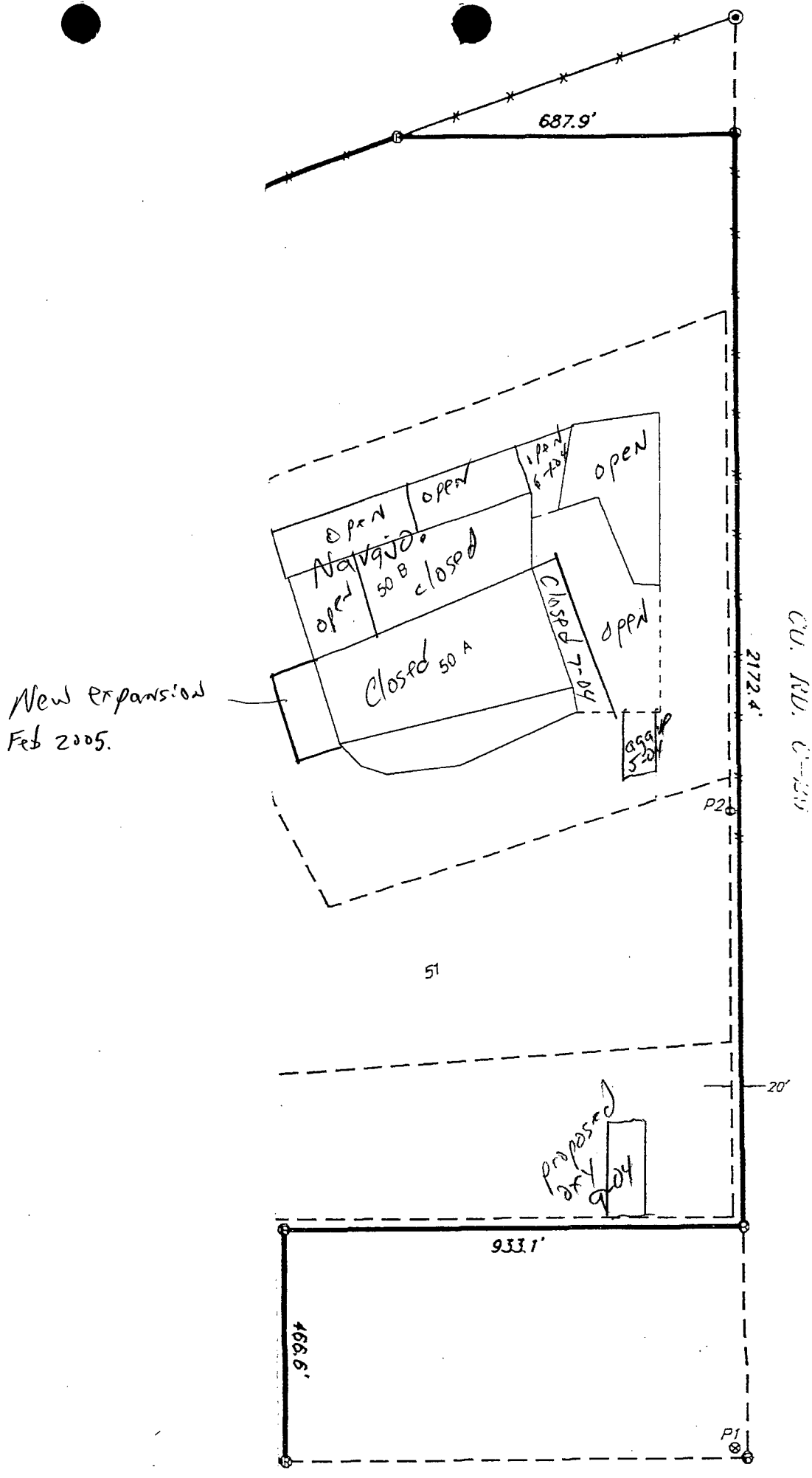
Ed Martin
NMOCD
1220 South St. Francis Drive
Santa Fe, NM 87505

Dear Mr. Martin,

CRI is expanding our cell in the solid waste area. Please see attached plot map.

Sincerely,

David Parsons


687.9'
open
open
open
Navajo
open
50 B
closed
Closed 7-04
open
Closed 50 A
New expansion
Feb 2005.
2172.4'
P2
51
20'
proposed
933.1'
466.6'
P1

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

November 1, 2004

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241

Dear Mr. Marsh: NM-1-0006

The New Mexico Oil Conservation Division has received your request to extend the perimeters of certain existing evaporation pits at your facility. This request, dated October 26, 2004, is hereby approved.

This approval does not relieve Controlled Recovery, Inc. (CRI) of any future liability should its operations at this site cause harm to fresh waters, public health or the environment. Nor does it relieve CRI of its responsibility to comply with the rules and regulations of any other governmental agency.

If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin

Edwin E. Martin
Environmental Bureau

cc: Hobbs OCD office

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

October 26, 2004

Mr. Ed Martin
State of New Mexico
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Evaporation facility at CRI, Lea County New Mexico Order R-9166.

Dear Mr. Martin,

CRI is requesting approval to increase capacity of our existing operation for evaporation of fluids.

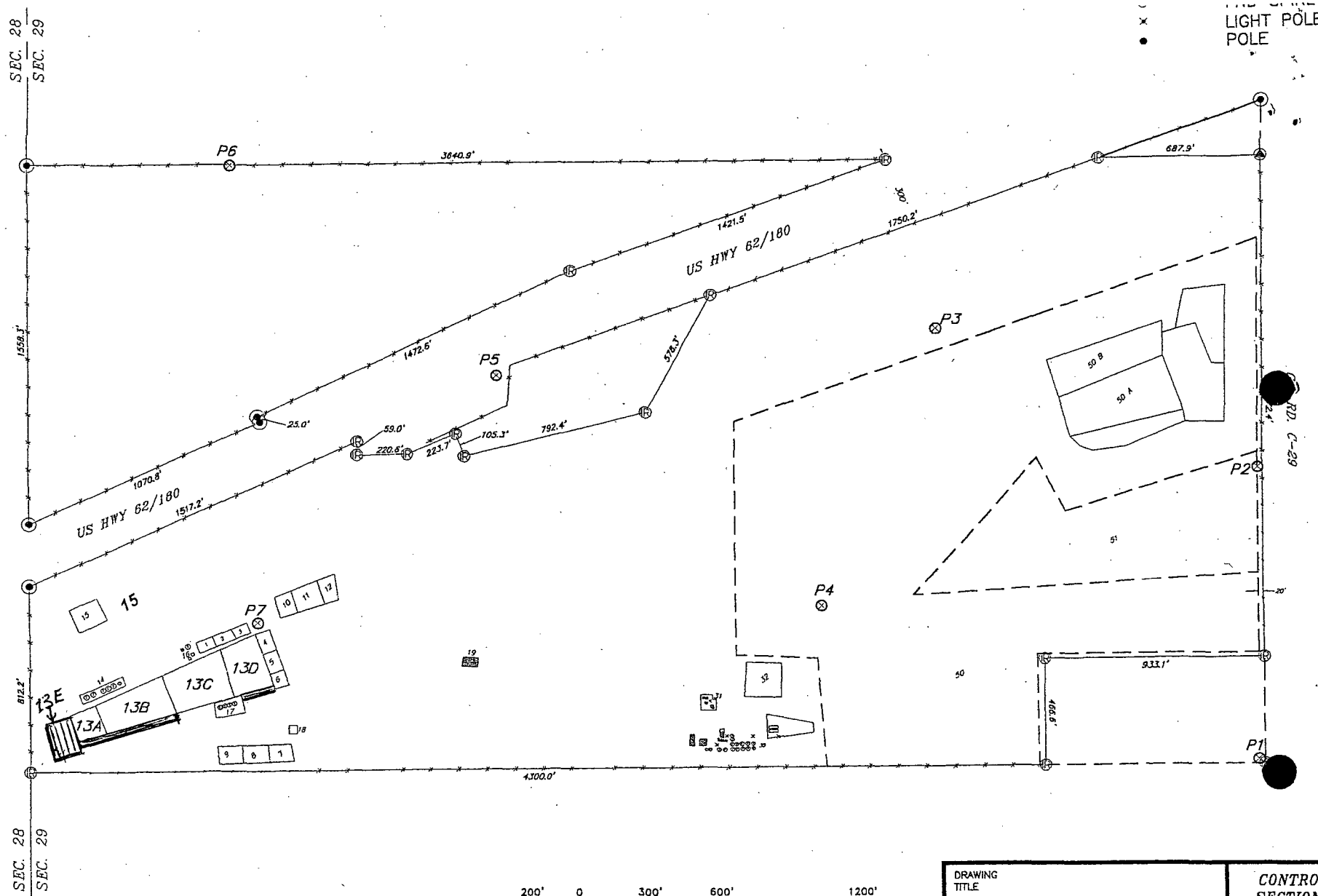
Enclosed please find site Plan "A" the current operational Plan and site Plan "B" the proposed changes.

The changes include 13E 100'x210'x20', 13A 30' South extension, 13B 30' South extension, 13D 30' South extension.

Please call if I may provide additional information.

Sincerely,

Ken Marsh



DRAWING TITLE

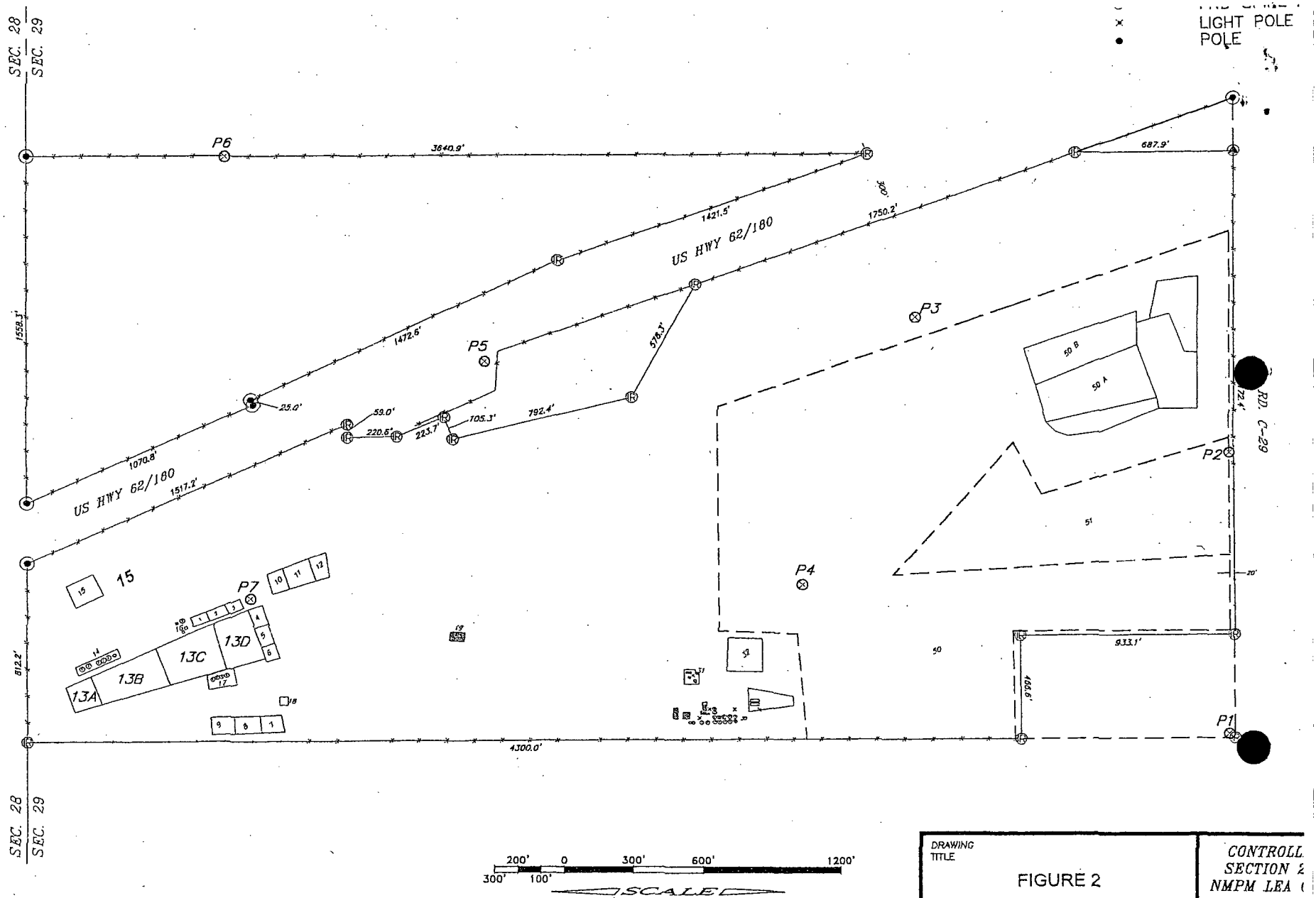
FIGURE 2

SITE PLAN

CONTROLL
SECTION 2
NMPM LEA (

DRAWN BY	CHK'D BY
EJS	DB
DATE	APPR BY
8-2-02	—

Site Plan "B"



DRAWING TITLE

FIGURE 2

SITE PLAN

CONTROLL
SECTION 2
NMPM LEA (

DRAWN BY	CHK'D BY
EJS	DB
DATE	APPR BY
8-2-02	–

Site Plan"A"

Martin, Ed

To: Ken Marsh (E-mail)
Subject: Approvals

NM-1-6

Regarding your letters dated September 20, 2004 and September 27, 2004 concerning your request for an extension of time to close Pit #13 and your planned expansion, respectively.

These are both hereby approved. If you have any questions, please contact me.

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Phone: 505-476-3492
Fax: 505-476-3471

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

September 27, 2004

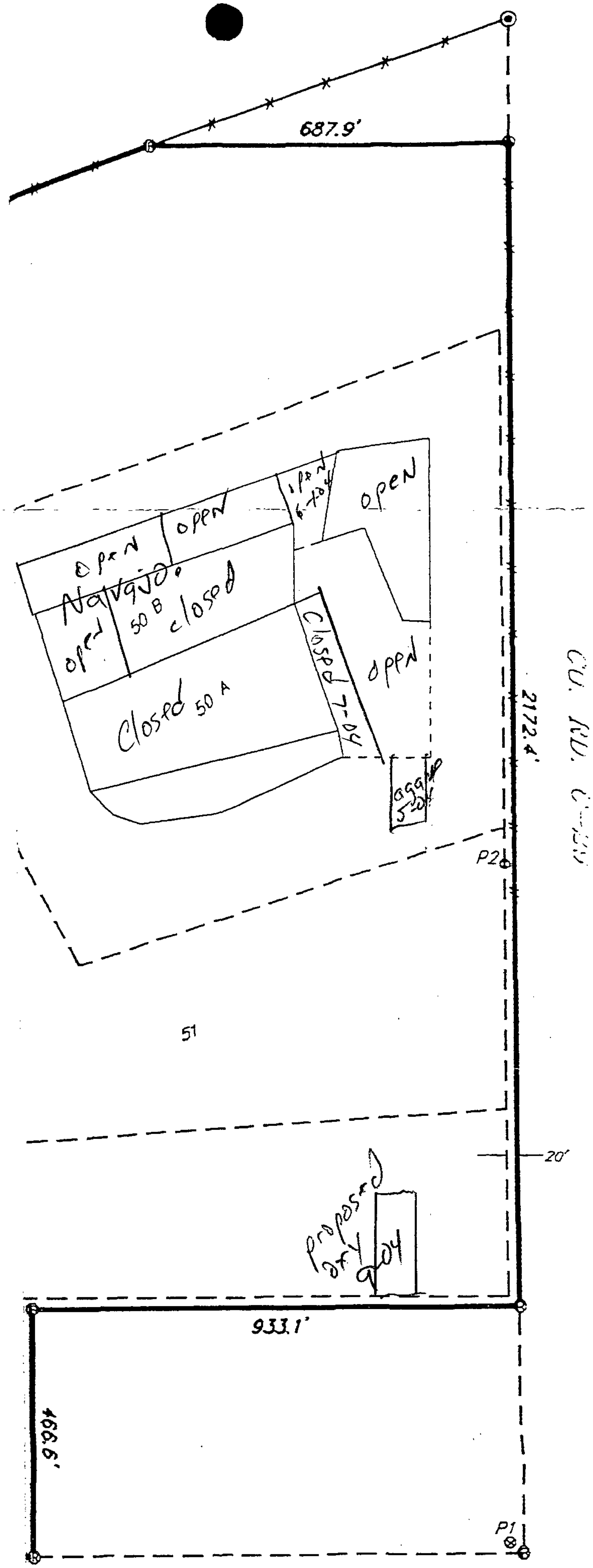
Ed Martin
NMOCD
1220 South St. Francis Drive
Santa Fe, NM 87505

Dear Mr. Martin,

CRI is expanding the cell in the solid waste area for Occidental Permian. Please see attached plot map.

Sincerely,

David Parsons


687.9'
open
open
open
open
Navajo
open
50 B
closed
Closed 50 A
Closed 7-04
open
2172.4'
P2
51
20'
933.1'
466.6'
P1

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

September 20, 2004

Ed Martin
New Mexico Oil Conservation Division
1220 South St Francis Drive
Santa Fe, NM 87505

RE: Closure of Pit 13 at CRI Facility.

Dear Mr. Martin,

CRI is requesting an extension of time to close Pit 13. CRI's treating plant boiler must undergo a complete retube and rebuild. Repairs cannot commence before October 11, 2004. Estimated completion is November 04, 2004.

CRI requests a new closure date of April 01, 2005.

Please call if I may provide additional information.

Sincerely,

Ken Marsh

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

July 14, 2004

NM-1-0006

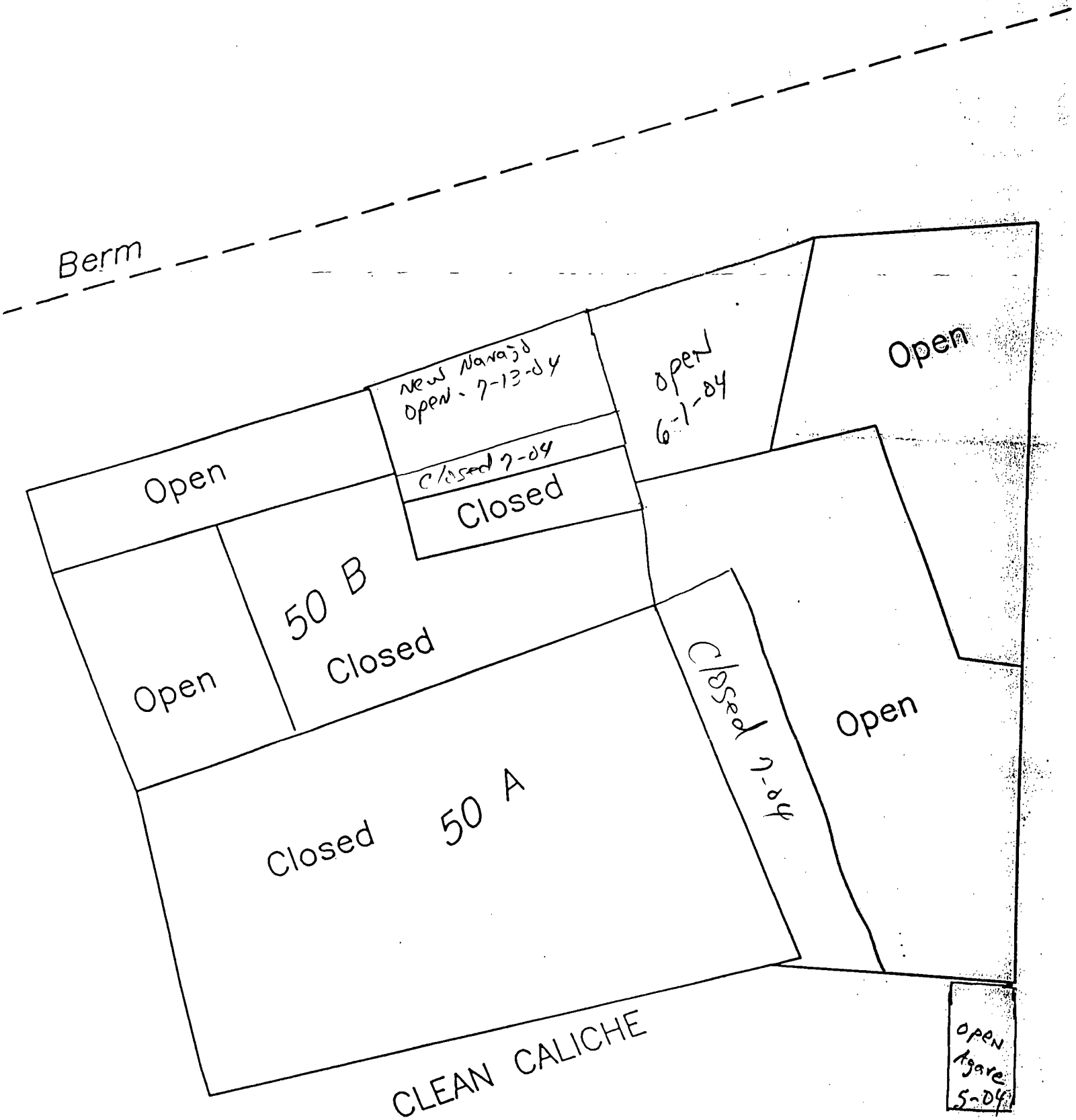
Ed Martin
NMOCD
1220 South St. Francis Drive
Santa Fe, NM 87505

Dear Mr. Martin,

CRI is expanding the cell in the solid waste area for Navajo Refining. Please see attached plot map.

Sincerely,

David Parsons


Berm
Open
New Navajo
Open - 7-13-04
Closed 7-04
Closed
open
6-1-04
Open
Open
50 B
Closed
Open
Closed 50 A
Closed 7-04
Open
CLEAN CALICHE
Open
Agave
5-04

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388 • HOBBS, NM 88241 • (505) 393-1079

File

June 3, 2004

NM-1-0006

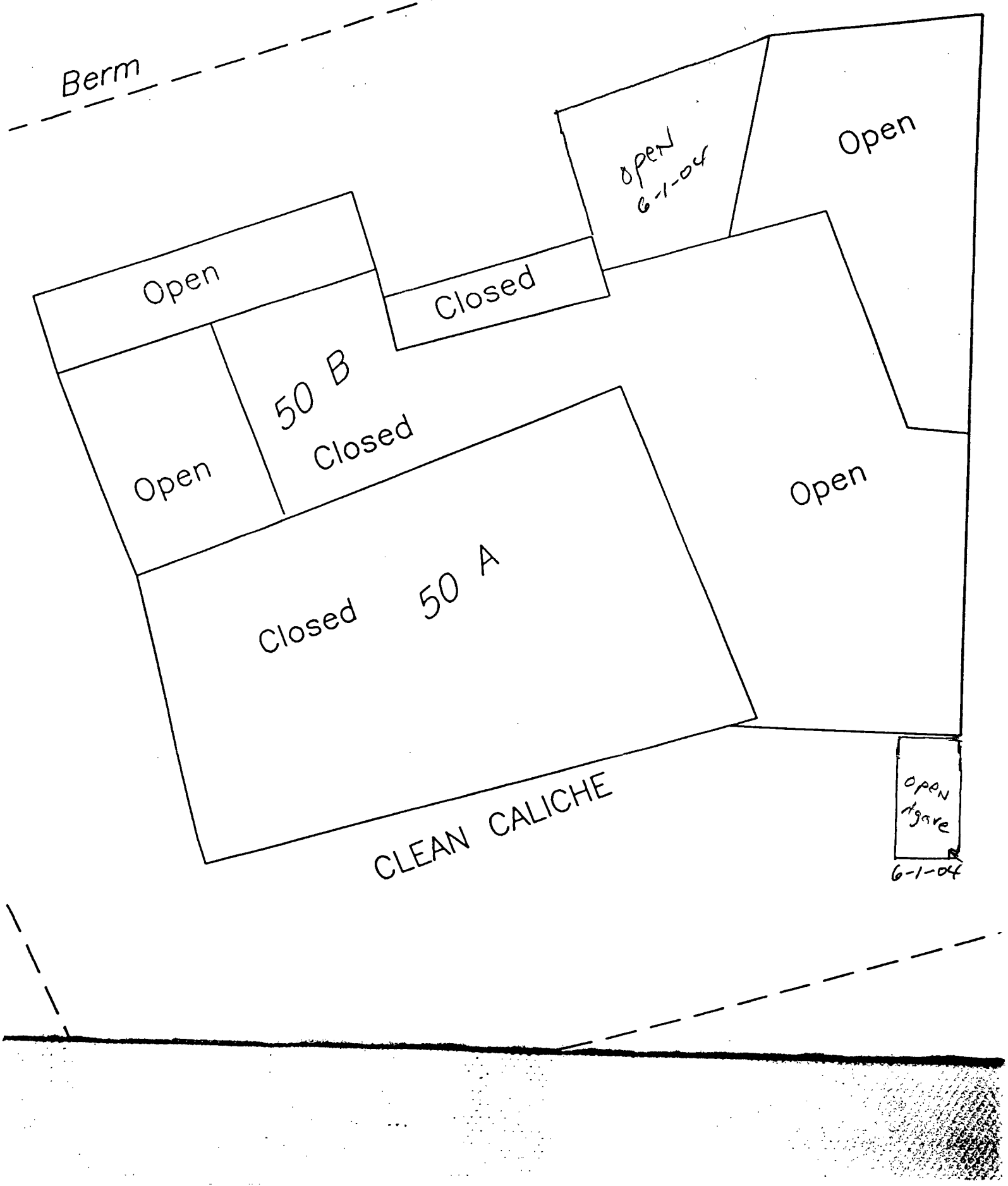
Martyne Kieling
NMOCD
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: CRI R9166 Lea County, NM.

Enclosed please find plot of expansion of solid waste cell and Agave cell as per our letter on April 07, 2004.

Sincerely,

Ken Marsh


Berm
open
6-1-04
Open
Open
Closed
50 B
Closed
Open
Open
Closed
50 A
CLEAN CALICHE
open
6-1-04

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 5, 2004

File

Mr. Michael H. Feldewert
Holland and Hart, LLP
110 North Guadalupe
Suite 1
Santa Fe, NM 87501

Dear Mr. Feldewert:

This is in response to your letter dated July 26, 2004 requesting that notification be made to you, on behalf of Controlled Recovery, Inc, of any applications for or modifications to surface waste management permits.

We do not maintain such a separate notification list for these types of permits. All permit applications for new surface waste management facilities and major modifications to existing facilities are published in a newspaper of general circulation in the area in which the facility is or will be located. The Oil Conservation Division also places these notices on our web site, which may be accessed at http://www.emnrd.state.nm.us/ocd/. From the date of publication and posting, the public has thirty (30) days in which to comment and request a hearing if they so desire.

OCD does maintain a master notification list containing names of individuals and organizations that wish to be kept informed of new discharge permits and major modifications to facilities covered by such permits. C.R.I. is currently on this list. OCD will begin including notification to these persons of surface waste management facility permits and major modifications. We have added all operators of surface waste management facilities to the list so that all such operators may participate in any decision concerning any such facilities including formal enforcement actions.

If you have any further questions about this matter, please do not hesitate to contact me.

Sincerely,

Mark E. Fesmire, P.E.
Director, Oil Conservation Division

HOLLAND&HART LLP
THE LAW OUT WEST

Michael H. Feldewert
mfeldewert@hollandhart.com
Recognized Specialist in the Area of Natural Resources - oil and gas law - New Mexico Board of Legal Specialization

July 26, 2004

RECEIVED

JUL 27 2004

OIL CONSERVATION DIVISION

Mark E. Fesmire, P.E.
Oil Conservation Division
New Mexico Energy, Minerals &
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87504

Re: *Request by Controlled Recovery Inc. to be placed on a notification list for any application to operate or modify a Surface Waste Management Facility located in Lea or Eddy Counties, New Mexico.*

Dear Mr. Fesmire:

Controlled Recovery Inc. ("CRI") operates a commercial surface waste management facility in Lea County, New Mexico, under the authority of Division Order R-9166. As a result, it is likely that CRI's facility will be affected by any application filed with the Division to operate or modify a surface waste management facility located in Lea or Eddy County. CRI therefore requests that the Division provide notification to this office of any application filed with the Division to operate or modify a surface waste management facility located in Lea or Eddy County, New Mexico, so that CRI may be afforded the right to comment upon and participate in any decision concerning these applications.

Thank you for your attention to this matter.

Sincerely,

Michael H. Feldewert

MHF/jlp

cc: Roger Anderson, OCD Environmental Bureau Chief
Ken Marsh, president of CRI

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

August 4, 2004

NM-1-0006

Ed Martin
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Controlled Recovery, Inc.
S/2 N/2 and N/2 S/2 Section 27 Township 20 South Range 32 East, Lea County

Dear Mr. Martin,

CRI is planning to add tankage at our facility for produced water to extend retention time.

CRI will furnish details on completion of the job.

Please call if I may provide additional information.

Sincerely,

Ken Marsh

HOLLAND&HART LLP

Michael H. Feldewert
Recognized Specialist in the Area of
Natural Resources - oil and gas law -
New Mexico Board of Legal Specialization

2004 JUL 27 AM 9 10

mfeldewert@hollandhart.com

July 26, 2004

VIA HAND DELIVERY

NM-1-0006

David K. Brooks, Legal Bureau
New Mexico Energy, Minerals and
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Controlled Recovery Inc., v. Chris Williams et al.
Cause No. CV 2001-310G

Dear David:

Under paragraph C of the attached executed Settlement Agreement, CRI agreed to close storage Pits 13 and 16 within six months. CRI has successfully closed Pit 16 and is in the process of removing and processing material from Pit 13. However the large track hoe, which is used to remove material from the pit, has experienced mechanical problems that will require extensive repair. CRI therefore requests an extension until October 5, 2004, to complete closure of Pit 13.

Please also note that the pit numbers have changed on the current plot plan. Pit No. 13 is now No. 32, and Pit No. 16 (which is now closed) is Pit No. 15.

Thank you for your attention to this matter.

Sincerely,

Michael H. Feldewert

MHF/jlp

Enclosures

FIFTH JUDICIAL DISTRICT COURT
STATE OF NEW MEXICO
COUNTY OF LEA

CONTROLLED RECOVERY INC.,
a New Mexico Corporation,

Plaintiff,

vs. **NO. CV-2001-310**

CHRIS WILLIAMS, New Mexico Oil Conservation Division District 1 Supervisor, Hobbs, New Mexico; NEW MEXICO OIL CONSERVATION DIVISION, a State Agency; and LORI WROTENBERY, New Mexico Oil Conservation Division Director,

Defendants.

STIPULATION OF DISMISSAL

Pursuant to Rule 1-041(A)(1)(b) NMRA 2004, the parties, having reached a settlement, hereby dismiss this action with prejudice.

Respectfully submitted:

HOLLAND & HART, LLP

By: _____

Michael H. Feldewert
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. Gene Samberson
Post Office Drawer 1599
Lovington, NM 88260
(505) 396-5303

ATTORNEYS for CONTROLLED RECOVERY, INC.

By: David K. Brooks

David K. Brooks
Special Assistant Attorney General
Oil Conservation Division
Energy, Minerals & Natural Resources Department
State of New Mexico
1220 South St. Francis Drive
Santa Fe, NM 87505
(505) 476-3450

ATTORNEY for DEFENDANTS

3197157_1.DOC

SETTLEMENT AGREEMENT

This Settlement Agreement is entered into as of the ____ day of ___, 2004, by and between Controlled Recovery, Inc. ("CRI") and the New Mexico Oil Conservation Division of the Energy Minerals and Natural Resources Department ("Division").

WHEREAS, CRI operates a commercial surface waste management facility in Lea County, New Mexico, under the authority of Division Order R-9166;

WHEREAS, by letters dated July 3, 2000; September 27, 2000; and July 6, 2001, the Division sought to "re-permit" CRI's facility, impose new operational conditions, and revoke certain netting exemptions CRI has operated under since 1991;

WHEREAS, on August 17, 2001, CRI filed a Complaint for Declaratory and Injunctive Relief in the Fifth Judicial District Court of the State of New Mexico, Lea County, against the Division, its director and its district supervisor seeking declaratory and injunctive relief in a case styled *Controlled Recovery Inc., v. Chris Williams et al.*, Cause No. CV 2001-310G ("CRI's Complaint");

WHEREAS, without admission of liability or fault, the parties desire to resolve the issues raised by the Division's letters and CRI's Complaint without the necessity of further litigation and the costs associated with such litigation.

NOW, THEREFORE, in consideration of the mutual covenants and agreements of the parties and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, and for the purpose of fully and completely resolving the claims asserted in CRI's Complaint and all other claims, known or unknown, arising out of or concerning the operation of CRI's facility in Lea County, the parties agree as follows:

A. **Withdrawal of Prior Letters and Recognition of No Violations.** The letters issued by the Division to CRI Dated July 3, 2000; September 27, 2000; and July 6, 2001 are hereby withdrawn and shall have no force or effect. The Division acknowledges that to the best of its knowledge, pending formal inspection, CRI's facility is in full compliance with all applicable rules and orders of the Division.

B. **Netting Exemptions Remain.** The netting exemptions issued by the Division for CRI's facility in July of 1991 under Permit No. H-76 and by letter dated April 7, 1997, remain in full force and affect.

C. **Closure Plan, Bonding, and Closure of Pit Nos. 13 and 16.** The Division accepts and approves the closure plan submitted by CRI on September 1, 2000. CRI shall immediately increase its closure bond with the Division to the total amount of $53,000 plus tax. In addition, CRI shall close within six months storage pits Nos. 13 and 16 pursuant to CRI's closure plan. In the event that these storage pits are not closed within 6 months of the execution of this Settlement Agreement,

then CRI shall further increase its closure bond to a total amount of $73, 000 plus tax.

D. **Operational Conditions.** In addition to the operational conditions imposed on CRI's facility by Order R-9166 and Division Rule 711.C and 711.D as presently codified and enacted, CRI agrees to abide by the following additional operational conditions:

Overall Facility Operation

1. The facility must be fenced and have a sign at each entrance. The sign must be legible from at least 50 feet and contain the following information: a) name of the facility; b) location by section, township and range; c) emergency phone number; and d) OCD order number.

2. The facility will be maintained, contoured, and bermed to prevent runoff and runon of the portion of the facility containing contaminated solids and liquids.

3. All above ground tanks and fuel tanks will be bermed, the current berm height will be maintained, and the tanks will be labeled as to the contents with standard hazard labels.

4. Sumps and below grade tanks without leak detection systems shall have their integrity tested annually. Sumps and below grade tanks that can be removed from their emplacements may be tested by visual inspection. Other sumps and below grade tanks shall be tested by appropriate mechanical means.

5. Sumps and below grade tanks will be inspected weekly and fluid will be removed as necessary to prevent overflow. If any defects are noted, repairs must be made as soon as possible.

6. All saddle tanks and drums containing materials other than fresh water must be labeled as to contents with standard hazard labels.

7. A checklist of all inspections at CRI's facility will be kept and maintained for Division review.

8. The OCD shall be notified prior to the installation of any pipes or wells or other construction within the boundaries of the facility that are not associated with the operation of the facility.

9. Any major design changes to CRI's facility must be submitted to the Division's Santa Fe Office for approval.

Pond and Pit Operation

10. All produced water must be unloaded into tanks. The produced water must reside in the tank and skim pit system long enough to allow for oil separation. Oil recovered must be stored in above-ground storage tanks.

11. All pits and ponds that contain liquids must have sufficient freeboard to prevent overtopping and a minimum freeboard of (1) one foot.

12. Free oil within the ponds and pits must be removed as soon as possible.

13. Ponds and pits will be inspected on a weekly basis and, if any defect is noted, repairs must be made as soon as possible.

14. A sign or other such marker with the pit/pond number must be clearly posted at each pit/pond location.

H2S Prevention & Contingency Plan

15. CRI personnel will wear H2S personnel monitors under circumstances in which H2S may be present, including the unloading of materials that may contain H2S. The monitors shall issue a visual and audible signal at 10 ppm of H2S in the ambient air that becomes more rapid at 20 ppm. An inspection for the presence of H2S shall be conducted weekly and reported on the inspection checklist.

16. In the event that a reading of 10 ppm is registered at CRI's facility, CRI personnel will evacuate the area and CRI will monitor H2S levels along the downwind boundary of the facility. If H2S levels reach 20 ppm, the facility will be closed and notification will be given to the following:

    New Mexico State Police
    Lea County Sheriff
    The Division's Hobbs District office

17. CRI will notify Calaway Safety in Hobbs to provide personnel, equipment, and supplies to mitigate the source of an H2S reading of 10 ppm or greater.

18. CRI will log and report to the Division all incidences where a reading of 10 ppm H2S or greater is registered at CRI's facility.

Treating Plant Operations

19. The treating plant will be inspected weekly and if any defect is noted repairs will be made as soon as possible. If the defect will jeopardize the integrity of the plant, the plant will be shut down until repairs have been completed.

20. The treating plant may use diesel and gasoline from storage tanks that are to be pulled, repaired, or replaced. This material may only be used in the treating plant as a product to aid in the chemical treatment and blending of crude oil.

21. CRI shall submit to the Division a functional diagram or engineering schematic that depicts the functioning of the treating plant as a whole, and each major element thereof.

Solid Waste Disposal

22. CRI shall submit to the Division a general plan of operations for solid waste disposal areas 50 and 51 that will provide a written description of the ongoing excavation and closure operations. CRI will also submit an updated plat showing all current disposal cells and past burial operations.

23. Mechanical stabilization of liquids may be used prior to disposal.

24. Free liquids will not be disposed of in the solid waste disposal pits.

25. The solid waste disposal area will be inspected on a weekly basis and, if any defect is noted, repairs must be made as soon as possible.

26. The solid waste disposal area will be bermed to prevent runon and runoff of rain and storm water.

27. All trash accepted at the facility that has the potential for blowing away or being transported by other vectors must be covered with soil within 24 hours of disposal into the solid waste pit.

28. The Division will be notified before any new cells or expansion of existing cells in the solid waste disposal area are constructed.

E. **Dismissal of Complaint.** Upon the execution of this agreement, CRI's Complaint shall be dismissed, with each party bearing their own attorneys' fees, costs, expenses, and disbursements. The parties will cooperate to promptly file all documents necessary to accomplish such dismissal.

F. **No admission.** This Agreement represents the settlement of disputed claims, and does not constitute an admission of the correctness of any position asserted by any party, or an admission of liability of any wrongdoing by any party.

G. **Construction.** This Agreement shall be construed based upon its terms and stated intent, including the recitals, and shall not be construed in the favor of one or another party based upon who may have contributed to its drafting, or on any other basis.

H. **Counterparts.** This Agreement may be executed in counterparts, each of which is hereby deemed an original, but all of which together shall constitute one and the same instrument.

I. **Entire Agreement.** This Agreement constitutes the entire agreement between the parties, and any modification of or addition to this agreement must be in writing and signed by all parties hereto.

J. **Authority.** The signatories to this agreement represent and warrant that they have full power and authority to enter into this Agreement on behalf of the parties indicated.

K. **Advice of Counsel.** The parties acknowledge that they have been and are fully advised by competent legal counsel of their own choice, that they have read this entire agreement and fully understand its terms and conditions of this Agreement, and that their execution of this Agreement is with the advice of counsel and of their own free will and desire.

L. **Binding on Successors.** This agreement shall bind and benefit the successors and assigns of CRI's facility, provided this provision should not authorize transfer of CRI's facility or permit without permission of OCD in accordance with Order No. R-9166 and Rule 711.

IN WITNESS WHEREOF, the parties have executed this Agreement by their duly authorized representatives, whose signatures appear below.

NEW MEXICO ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT

By: _____
Joanna Prukop, Secretary

NEW MEXICO OIL CONSERVATION DIVISION

By: _____
Lori Wrotenbery, Director

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 10, 2004

Mr. Michael H. Feldewert
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504-2208

NM-1-0006

Dear Mr. Feldewert:

The New Mexico Oil Conservation Division has received your letter, dated July 26, 2004, on behalf of Controlled Recovery, Inc. (CRI) requesting an extension until October 5, 2004 to complete closure of Pit 13 at the CRI facility.

This request is hereby approved. The new deadline for closure of pit 13 is October 5, 2004. Please advise if further developments should prevent CRI from meeting this new deadline.

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin

Edwin E. Martin
Environmental Bureau

Cc: Chris Williams, NMOCD, Hobbs
David K. Brooks, Legal Bureau, Santa Fe

HOLLAND&HART LLP
THE LAW OUT WEST

Michael H. Feldewert
Recognized Specialist in the Area of
Natural Resources - oil and gas law -
New Mexico Board of Legal Specialization

mfeldewert@hollandhart.com

VIA HAND DELIVERY

David K. Brooks, Legal Bureau
New Mexico Energy, Minerals and
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

NM-1-0006

Re: Controlled Recovery Inc., v. Chris Williams et al.
Cause No. CV 2001-310G

Dear David:

Attached is my July 26th letter that I understood had been delivered to your office last Monday. I apologize for any confusion

Sincerely,

Michael H. Feldewert

MHF/

Enclosures

HOLLAND&HART LLP
THE LAW OUT WEST

Michael H. Feldewert
Recognized Specialist in the Area of
Natural Resources - oil and gas law -
New Mexico Board of Legal Specialization

mfeldewert@hollandhart.com

July 26, 2004

VIA HAND DELIVERY

David K. Brooks, Legal Bureau
New Mexico Energy, Minerals and
Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Controlled Recovery Inc., v. Chris Williams et al.
Cause No. CV 2001-310G

Dear David:

Under paragraph C of the attached executed Settlement Agreement, CRI agreed to close storage Pits 13 and 16 within six months. CRI has successfully closed Pit 16 and is in the process of removing and processing material from Pit 13. However the large track hoe, which is used to remove material from the pit, has experienced mechanical problems that will require extensive repair. CRI therefore requests an extension until October 5, 2004, to complete closure of Pit 13.

Please also note that the pit numbers have changed on the current plot plan. Pit No. 13 is now No. 32, and Pit No. 16 (which is now closed) is Pit No. 15.

Thank you for your attention to this matter.

Sincerely,

Michael H. Feldewert

MHF/

Enclosures

RECEIVED

DEC 1 0 2003

OIL CONSERVATION DIVISION

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

New Mexico
Energy Minerals and Natural Resources

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

Form C-138
Revised March 17, 1999

Submit Original Plus 1 Copy to Appropriate District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☒	4. Generator Navajo Refining 5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter CRI
3. Address of Facility Operator P.O. Box 388, Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main, Hobbs	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator, one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

07-26-01B

D370/371 Catalyst generated in drying the air used by instrumentation.

I am enclosing a certificate of waste status, analytical, chain of custody, and process of knowledge letter to approve this waste stream for the year 2001.

RECEIVED

AUG 14 2001

Environmental Bureau
Oil Conservation Division

Estimated Volume 20 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE Carmella Van Maanen TITLE: Bookkeeper DATE: 7-26-01

Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Carmella Van Maanen TELEPHONE NO. (505) 393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: 8-17-01

APPROVED BY: _____ TITLE: _____ DATE: 8/14/01

...URAL RESOURCE
...ATION COMMISSION
...13087
...Texas 78711-3087

...rint or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. N M D 0 4 8 9 1 8 8 1 7	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Navajo Refining Co.
P.O. Box 159
Artesia, NM 88210

4. Generator's Phone (505) 748-3311

A. State Manifest Document Number 02687986

B. State Generator's ID

5. Transporter 1 Company Name: DTJ

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: CRI
Hwy 180
Carlsbad, NM 88220

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone (505) 887-6504

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. Non Hazardous Waste, Contaminated Soil, Solid, N.O.S.	0 0 1	C M	10	Y	
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above: Mol Sive 0370/371 07-26-01B

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

24 Hour Phone: (505) 748-3311

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Charlie Plymale | Signature: [signature] | Month Day Year: 04 10 03

GENERATOR

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: Anthony Yeager | Signature: Anthony Yeager | Month Day Year: 04 10 03

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

19. Discrepancy Indication Space: Non HAZ Molsive

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Date

Printed/Typed Name: Jason Nall | Signature: [signature] | Month Day Year: 04 10 03

FACILITY

White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

NAVAJO REFINING COMPANY

FAX
(505) 746-5283 DIV. ORDERS
(505) 746-5481 TRUCKING
(505) 746-5458 PERSONNEL

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159
TELEPHONE (505) 748-3311

FAX
(505) 746-5419 ACCOUNTING
(505) 746-5451 EXECUTIVE
(505) 746-5421 ENGINEERING
(505) 746-5480 P / L

July 23, 2001

Ken Marsh
CRI
P.O. Box 388
Hobbs, NM 88214

Ken,

I would like to get Catalyst D-370/371 profiled into your facility. This catalyst aides in drying the air that is used by some of our instrumentation. I am enclosing a recent analysis of this catalyst. This catalyst is NON HAZARDOUS and would be transported in 20 yard roll off bins by Champion Inc.

Sincerely,

Charlie Plymale
Environmental Specialist

07-26-01 B

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 25, 2003

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241

RE: Controlled Recovery, Inc. letter dated November 10, 3003
Controlled Recovery, Inc. Permit NM-01-0006
S/2 N/2 and N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico

Dear Mr. Marsh:

The New Mexico Oil Conservation Division (OCD) received your unsigned letter dated November 10, 2003. This letter is a response to that letter.

Regarding CRI Item 1. The OCD has reviewed the language in Permit NM-01-0006 and agrees that CRI was arguably in compliance with the signage requirement as stated in the permit. However, the OCD believes that the intent of the signage requirement is to provide emergency responders with information. In this incident, the emergency responders did not have the necessary information. This permit condition should and will be clarified to say that the facility must have a sign at each entrance that is legible from 50 feet.

Regarding CRI Item 2. The OCD does recognize that CRI knew that the OCD had been notified of the incident and that personnel from both OCD and CRI met at the facility on May 24, 2003. We agree that the notice requirements of the permit were satisfied. Please note that the OCD considers a fire a release. Division Rule 116.B.b.i is the correct reference.

Regarding CRI Item 3. After reviewing the 11 waste streams that were listed, the OCD finds that CRI did accurately cite a more recent C-138 approval for waste items 5 and 10. However, the approval for item 5, pipeline filters, C-138 number 10-24-01 dated 11-5-01, was good for only 20 cubic yards and had expired. In addition, the approval for item 10, Catalyst D-342, C-138 number 10-001 dated 10-11-00, was good for only 20 cubic yards, was based on 1998 data and had expired. The OCD reviewed the C-138 on file for waste Item 11, Catalyst D-370 and D-271, and found that C-138 number 07-26-01B dated 08-14-01 is not on file. Please send a copy to the OCD so we may verify the information. For the remainder of the waste items listed, the OCD stands by its original findings. The findings regarding the waste streams were based on the

status of records at the time of the June inspection, not actions CRI later took to update the C-138's.

The OCD believes that this letter has addressed the concerns in the CRI letter dated November 10, 2003 and would suggest that we leave it at that and move forward and finalize the permit language. The OCD will also be reviewing the C-138 process and asking for industry input to determine what type of changes may need to be made to make the process clear and more useful to all.

Sincerely,

Gail MacQuesten
Assistant General Counsel

GM/mjk

Attachments
xc: Hobbs OCD Office
Sandra Martin, NMED HWB Acting Bureau Chief

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

November 10, 2003

Gail MacQuesten
Assistant General Counsel
New Mexico Energy, Minerals and Natural Resources Department
Mew Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Ms. MacQuesten,

CRI is in receipt of your "Warning" letter and is surprised at the Division's suggestion that this minor incident raised "questions regarding the hazardous nature of the waste." CRI's facility has been permitted by Division Order R-9166 since 1990, and there has never been any question regarding the "hazardous nature" of the waste received at this facility.

• signs in rule
• all entrances

Item 1: Failure to maintain signage.

The main entrance to CRI's facility off US Hwy 62-180 had a sign in place at the time of the fire. Only the sign at CRI's east gate was face down due to a recent windstorm. As a result, the Division is incorrect in asserting that CRI did not have a sign at the entrance at the time of the fire.

Moreover, the only basis for the Division's Warning concerning this matter is a reference to the Division's unlawful attempt in July of 2001 to "re-permit" CRI's facility under a permit entitled "NM-01-006." This letter directive by the Division is the subject of an injunction proceeding in state district court. As a result, CRI presently operates under Division Order No. R-9166, not under any July 2001 "permit." Neither Order No. R-9166 nor Division Rule 711 contain any requirements concerning signage. Thus, no Division rule or order has been violated.

Item 2: Failure to notify the OCD within 24 hours.

Division representatives Buddy Hill and Gary Wink were notified of the incident *on the day it occurred.* See Form C-141 dated 6-3-03. CRI Representative Jason Null met with OCD Representative Buddy Hill at the CRI site on the day of the incident. See letter of June 03, 2003, from David Parsons, letter of June 05, 2003 from David Parsons, and

OCD incident investigation report. As a result, verbal notification was provided to the Division within 24 hours. Moreover, your reference to Division Rule 11.6C.1 is puzzling since this rule only applies when there is an unauthorized release. There was no release of any volume of material at CRI's facility.

The quotation in your letter to other notification requirements is apparently a reference to the Division's unlawful attempt in July of 2001 to "re-permit" CRI's facility under a permit entitled "NM-01-006." CRI presently operates under Order No. R-9166 and the Division's published rules and regulations. Neither this Order nor the Division's rules contain any notification requirements that were not complied with in this case. There is simply no basis for the Division's contention that CRI failed to meet all applicable notice obligations for this incident.

Item 3: Failure to complete proper documentation.

Your letter suggests that 11 items of waste have not been properly documented by CRI pursuant to the provisions of Rule 711.C.4.b. CRI's response to each of the 11 items identified in you letter is as follows:

1. DAF
Approval 09-004 on 9-28-00.
Approval # 06-25-03A on 7-21-03.

2. CONTAMINATED SOIL
Approval 02-028A & 02-28B – on 03-18-02.
Approval #10-21-03 dated 10-27-03

3. FCC CAT FINES
Approval 01-10-02A, 1-22-02

4. ASPHALT CANS
Approval 08-005, 08-10-2000. Blanket approval by letter dated May 09, 2001.

5. PIPELINE FILTERS
Approval 10-24-01, 11-5-01

6. BLAST SAND
Shipped under approval 10-006, 10-24-00

7. CHLORIDE GUARD
Shipped under 10-001 approved 10-?-00

8. ASPHALT
Shipped under approval 06-03-01, 07-2-01

9. ASPHALT

Shipped under approval 06-03-01, 07-2-01

10. CATALYST D342
Shipped under approval 10-001, 10?-00

11. CATALYST D370/371
Shipped under approval 07-26-01B, on 08-14-01

All shipment were shipped under case by case manifests from Navajo to CRI. The manifests are for each load, reference the C-138 approval number, are evidence that the process has not changed and the contents are non-hazardous. The manifest provide the following: The volume, the transporter, the manifest number, address and phone number of Navajo, address and phone number of CRI, description of material, date shipped, date received, signatures of generator, shipper, and receiver and a generators certification.

Generators Certification – I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Unless the Division apprizes otherwise, CRI will assume that this response alleviates the concerns giving rise to your Warning letter.

Please feel free to call if you have any questions.

Sincerely,

Ken Marsh
President

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

August 20, 2003

Martyne Kieling
NMOCD
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Controlled Recovery, Inc. facility Lea County, New Mexico S/2 N/2 and N/2 S/2 Section 27, Township 20 South, Range 32 East.

Dear Ms Keiling,

CRI request approval to mix and stabilize liquid waste with soils to be placed in the solids pits. The mixing will take place on a site which is for future solid disposal. Upon excavation of the site any contaminated surface soil will be placed in the solid pit. All stabilized material will pass the paint filter test.

This is the process proposed by Randy Bayliss in his comments on closure costs for CRI.

Please call if I may provide additional information.

Sincerely

Ken Marsh

Approved by: _____
NMOCD

Date: _____

Comments:

CRI welcomes NMOCD comments, suggestions, and advice on matters relating to our business conducted under order R9166 and Rule 711 by authority of New Mexico statutes and Water Quality Control Commission regulations.

CRI has implemented many actions, procedures, and policies recommended by NMOCD that are not required by statute, rule, or permit condition.

CRI has implemented actions, procedures, policies, and business practices that are not required by statute, rule or permit conditions or by NMOCD recommendations. These are the result of CRI's policy to be responsible to our clients and maintain CRI's excellent reputation in the industry.

CRI has and will continue to be courteous, responsive, timely, and will act in good faith in all actions with NMOCD.

CRI Mission:

CRI's goal is to exceed the requirements and standards with which we are charged that our clients and the communities we serve receive the results they expect and deserve.

CRI Policy:

CRI will utilize the most current technologies for the planning and execution of our job requirements. We will be proactive in regulatory matters and stewards of the environment and public health. Our commitment is to provide the highest level of professional service in the industry.

There have been misunderstandings, misinformation, misstatements of facts, and untimely reactions concerning this incident, investigation, and reporting. CRI would appreciate the timely resolution of these issues.

The C-138 approval process has been beset with problems since its inception-CRI has requested fixes to the problems by written and verbal messages on numerous occasions. The past few months have shown some improvement. Past problems include – C-138's not being sent from Hobbs office (left on desk), C-138's being sent to Artesia office, C-138's disappearing (never to reappear); C-138's not processed for up to 30 days. And C-138's not processed in a timely manner because of NMOCD staffing problems.

CRI attempted to shorten the process time by asking for ongoing approval for the same waste stream as indicated by requests for approval being dated at year end. The person responsible for this program was terminated for disciplinary reasons which caused CRI some problems with the approval process.

There is no consistent policy, no established protocol, and no rules which directly deal with useful life of analytical data, or duration of C-138 approval. NMOCD has been helpful in trying to streamline the process but have not been successful. The same is to be said of CRI.

CRI and NMOCD share the problems with the C-138 process.

CRI hereby commits to apply our resources to this issue and asks that NMOCD make and fulfill the same commitment.

There is no evidence that any improper material was shipped to CRI and most certainly no hazardous waste. The cause of the fire remains unknown. The words "warning and violation" are not appropriate in NMOCD's letter.

The OCD has authority over Rules and Regulations that govern this site. The involvement of NMED Hazardous Waste Bureau seems to undermine the objectives and authority of NMOCD.

In light of the recent rash of criticism generated by the public against oil and gas producers and NMOCD, statements in public documents add impetus to suggestions that all these issues should be transferred to NMED.

CRI does not agree with any change in the regulatory agencies.

guidelines and procedures - clear + in sequence of steps
re: an understood process

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

October 23, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241

RE: WARNING
Controlled Recovery, Inc. Permit NM-01-0006
S/2 N/2 and N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico

Dear Mr. Marsh:

The New Mexico Oil Conservation Division (OCD) was notified by Neil Gore, Battalion Chief of the Hobbs Fire Department, at 3:35 pm Saturday, May 24, 2003 of a fire at the Controlled Recovery, Inc. (CRI) surface waste management facility. The fire was located in the solid waste pit that is dedicated to Navajo Refining Co. and receives non-exempt waste. In response OCD initiated a facility and document inspection of the Controlled Recovery, Inc. facility. Because this incident and lack of signage caused confusion among the respondents and the occurrence of a fire led to questions regarding the hazardous nature of the waste, the OCD performed an investigation. This letter provides the findings of the inspection that was initiated due to the fire. In this way the OCD is able to document what occurred and what actions were performed as a result.

Item 1:

The responding Monument Fire Department did not know whom to contact in case of emergency because the sign at the east entrance gate to the CRI facility had blown down and was face down on the ground (see photo 1). Additionally, it appears that the Hobbs Fire Department was uncertain about who CRI was. The Monument and Hobbs Fire Departments did not know that CRI stood for Controlled Recovery Inc. and thus had difficulty finding the company name in the phone directory or in their records. The State Police notified CRI about the fire at 3:25 pm, Saturday, May 24, 2003 and again at 3:35 pm. The OCD emergency personnel notified CRI about the fire at 3:44 pm on Saturday, May 24, 2003. On Tuesday morning (after the Memorial Day Holiday), May 27, 2003, CRI called the OCD Hobbs district office and followed up with a written notification on May 28 and June 5, 2003. OCD Hobbs environmental personnel inspected the CRI facility on May 27, 2003 (see photos 3 and 4).

Violation 1: Failure to Maintain Signage

The sign at the east entrance to the CRI facility was not legible for the responding emergency personnel/ Permit NM-01-0006, July 6, 2001 Overall Facility Operation, Item 1, Page 1, requires that "The facility must be fenced and have a sign at the entrance. The sign must be legible from at least (50) feet..."

The OCD Environmental Bureau personnel inspected the CRI Facility on June 12, 2003 and found that CRI had repaired the sign and it was legible (see photo 2).

Violation 2: Failure to Notify the OCD Within 24 Hours

In accordance with Rule 116.C.1, Permit NM-01-0006, July 6, 2001, Page 7/ Reporting and Record Keeping, Item 4, states "CRI must notify the OCD Santa Fe and Hobbs offices within 24 hours of any fire,..." The OCD has reviewed the timeline as to who was notified at what time and has found that CRI knew that the OCD had been notified by the Fire Department on Saturday, May 24, 2003; it did not follow up with its own notification to the OCD Hobbs District office until Tuesday morning, June 27, 2003, approximately 80 hours after the fire was first reported.

CRI must adhere to the permit notification requirement and must not rely on a third party report.

Item 2:

The OCD performed an in-house document review of all C-138's "Request(s) for Approval to Accept Solid Waste" on file in the OCD Santa Fe office and approved from January 1998 through May 2003 covering deliveries of waste into the CRI facility. On June 11, 2003 the OCD inspected the waste manifests at Navajo Refining Co. that documented waste deliveries from the refinery into the CRI facility. The OCD only had enough time to review waste manifests that were dated from September 26, 2002 to June 9, 2003. On June 12 and 13, 2003 the OCD inspected the CRI waste acceptance documents and manifests covering deliveries from Navajo Refining into the CRI facility from September 26, 2002 to June 9, 2003, and the approved C-138's on file with CRI.

After reviewing the approved C-138's on file in the OCD office in Santa Fe, the manifested waste streams at the Navajo Artesia Office and the manifested waste streams and C-138's on file at CRI, the OCD has found the following items to be in compliance: (See Attached Table)

1. There was an approved C-138 dated November 5, 2002 for two (2) shipments of contaminated soil that covered waste shipped on November 21, 2002.
2. There was an approved C-138 dated June 4, 2002 for four (4) shipments of hydroblast soil that was shipped on June 9, 2002.
3. There were 45 shipments of concrete that did not have an approved C-138. However, uncontaminated concrete was approved by letter dated May 9, 2001.

4. There were 39 shipments of trash and debris that did not have a current C-138. However, trash and uncontaminated debris waste was approved by a letter dated May 9, 2001.
5. There were 76 shipments of fluoride precipitate that were last approved by a C-138 dated December 7, 1999, which covered 360 barrels a week. There was no expiration date on the approval. However, the OCD requires new analytical on waste streams every two years and will be requiring new documentation on this waste stream.

The OCD has found that the following list of items are not properly documented: (See Attached Table)

1. There were 129 shipments of DAF that did not have a current C-138. This type of waste was last approved by a C-138 dated October 3, 2000, which covered only 30 super sacks.
2. There were 54 shipments of contaminated soil that did not have a current C-138. This type of waste was last approved by a C-138 dated March 18, 2002, which expired December 31, 2002.
3. There were 23 shipments of FCC cat fines that did not have a current C-138. This type of waste was last approved by a C-138 dated October 10, 2000, which covered only 30 super sacks.
4. There were 10 shipments of asphalt sample cans that did not have a current C-138. This type of waste was last approved by a C-138 dated August 10, 2000, which covered only 10 drums.
5. There were seven (7) shipments of filters or pipeline filters that did not have a current C-138. This type of waste was last approved by a C-138 dated February 24, 2000 (pipeline filters) and November 5, 1999 (injection well filters), which covered only 20 cubic yards and 10 cubic yards respectively.
6. There were six (6) shipments of blast sand that did not have a current C-138. This type of waste was last approved by a C-138 dated October 24, 2000 and March 18, 2000 both of these were from specific product tanks, which covered 30-55 gallon drums and 15-55 gallon drums respectively.
7. There were six (6) shipments of chloride guard that did not have a current C-138. This type of waste was last approved by a C-138 dated August 10, 1998, which covered only 15 cubic yards.
8. There were four (4) shipments of asphalt from Tank 433 that did not have a current C-138. This type of waste has not been previously approved.
9. There were two (2) shipments of asphalt that did not have a current C-138. This type of waste was last approved by a C-138 dated July 2, 2001, which expired December 31, 2001.
10. There were two (2) shipments of D-342 catalyst that did not have a current C-138. This type of waste has not been previously approved.
11. There was one (1) shipment of D-370/D371 mole sieve that did not have a current C-138. This type of waste has not been previously approved.

Violation 3: Failure to Complete Proper Documentation

CRI has violated Rule 711.C. 4.b, Non-exempt, Non-hazardous Oilfield Wastes, which provides that "prior to acceptance, a "Request For Approval To Accept Solid Waste," OCD Form C-138, accompanied by acceptable documentation to determine that the waste is non-hazardous, shall be submitted to the appropriate District office. Acceptance will be on a case-by-case basis after approval from the Division's Santa Fe office." The requirement of this rule is reflected in Permit NM-01-0006, July 6, 2001, Page 5, Waste Acceptance Documentation, Item 1.b.i.

The OCD will begin quarterly reviews of waste acceptance documentation, manifests and Form C-138's regarding wastes received into the CRI facility. Quarterly reviews will be performed by the OCD for a minimum of one year from the date of this letter.

If the violations noted herein are repeated in the future, the Division will take further enforcement action that may include filing application for a compliance order and civil penalties. In addition, the OCD has referred this matter to New Mexico Environment Department, Hazardous Waste Bureau. The OCD reserves the right to re-open this case based upon investigation results from the New Mexico Environment Department.

If you have any questions please contact Martyne Kieling at (505) 476-3488.

Sincerely,

Gail MacQuesten
Assistant General Counsel

GM/mjk

Attachments
xc: Hobbs OCD Office
Sandra Martin, NMED HWB Acting Bureau Chief

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

Oil Commission Division
1625 N. French Dr
Hobbs, NM 88240

Hobbs District Office

RE: Smoldering Debris in Pit at Disposal Facility.

CRI was contacted at 3:25 P.M. Saturday, May 24, 2003, by Joanna with the State Police Department of a possible fire at our disposal facility located at Halfway, NM. Two subsequent calls were logged t 3:35 P.M. from Sgt Rios with the State Police and at 3:44 P.M. from Buddy with O.C.D.

CRI employee arrived on site shortly after 4:00 P.M. and met with Hobbs Fire Department, Monument Fire Department and State Police. Inspection by employee found smoldering debris located in one disposal pit. Employee informed State Police he would cover it with soil and all emergency personnel left. Exact cause is unknown. CRI will keep debris covered with soil to prevent future occurrence.

The facility was closed and secured by locked gates. A sign with emergency phone numbers is located just inside entrance gates and is visible from the gate.

If any other reporting is necessary please contact me immediately.

Sincerely,

David Parsons

Hand delivery
5-28-03
2:30pm
By David Parsons

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

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Contact
Controlled Recovery, Inc.	David Parsons
Address	Telephone No.
P.O. Box 388 Hobbs, NM	505-393-1079
Facility Name	Facility Type
	Disposal

Surface Owner	Mineral Owner	Lease No.
Controlled Recovery, Inc.		

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	27	20	32					Lea

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Fire	N/A	N/A
Source of Release	**Date and Hour of Occurrence**	**Date and Hour of Discovery**
Solids Pit	May 24, 2003 12:11	Same
Was Immediate Notice Given?	**If YES, To Whom?**	
☒ Yes ☐ No ☐ Not Required	Buddy Hill (Buddy notified Gary Wink)	
By Whom?	**Date and Hour**	
Neil Gore Jason Null(CRI), Hobbs Fire Depart.	May 24, 2003 5:15 P.M.	
Was a Watercourse Reached?	**If YES, Volume Impacting the Watercourse.**	
☐ Yes ☒ No		

If a Watercourse was Impacted, Describe Fully.*

N/A

Describe Cause of Problem and Remedial Action Taken.*

Unknown-covered with dirt.

Describe Area Affected and Cleanup Action Taken.*

Solids Pit - covered with dirt.

our copy.
DP
delivered to OCD
6-3-03
attn: Paul Schaefer

I hereby certify that the information given above is true and complete to the best of my kn regulations all operators are required to report and/or file certain release notifications and public health or the environment. The acceptance of a C-141 report by the NMOCD mark should their operations have failed to adequately investigate and remediate contamination or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve th federal, state, or local laws and/or regulations.

Signature: David Parsons	
Printed Name: David Parsons	Approved by District Supervisor:
Title: Vice-President	Approval Date: / Expiration Date:
Date: 06-03-03 Phone 505-393-1079	Conditions of Approval: / Attached ☐

Attach Additional Sheets If Necessary

CRI

CONTROLLED RECOVERY INC.

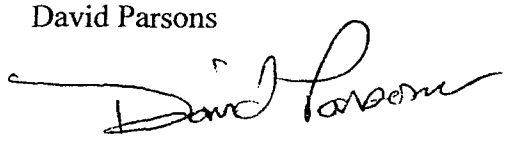
P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

June 3, 2003

Follow up

Notice was given to Hobbs OCD District Office by phone on 1st business day following incident – Tuesday May 27th at approximately 9:00 A.M. Message was left by Ken Marsh on Paul Scheely's voice mail. A written follow up report of known events was delivered to OCD Hobbs office Attn: Paul Scheely on Wednesday May 28th.

David Parsons



CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

June 5, 2003

Oil Conservation Division
Hobbs District Office
1625 N French Dr
Hobbs, NM 88240

RE: Follow up report on smoldering debris at Disposal Facility.

Since my previous report I have learned that Monument Fire Department responded to our facility sometime after midnight Saturday, May 24th. Our facility sign located just inside the gate had sustained wind damage within the last few days and had blown down in front of the post that held it up. All necessary information is on the sign, however it was laying face down and we had not flipped it over to be easily read. We have since put up new plywood and reattached the sign.

Hobbs Fire Department, not knowing CRI stood for Controlled Recovery, Inc., could not find any information in their emergency manual. Emergency response phone numbers were given to David Hooten's office (City of Hobbs emergency response) and are probably under Controlled Recovery as well.

After CRI was notified of the fire, the Fire Department notified Navajo Lea Refinery in Lovington. Steve Terry was notified and he in turn called the Artesia facility with the call then being forwarded to Jeff Byrd in their Environmental Department. Jeff contacted Phil Youngblood and they visited the site late Saturday afternoon. Darrell Moore and Charlie Plymale with the Environmental Division of Navajo were notified Tuesday morning.

Cause of the fire remains unknown. A site inspection was done Thursday, May 29th by Darrell Moore and Charlie Plymale, (Navajo) and David Parsons and Lary Parker of CRI. The catalyst in question was located on the south side of the pit and does not appear to have burned. Evidence that would indicate as large a fire as was reported was not found. There were very little ashes and very little smoke stain to the walls of the pit. Card board, plastic, wooden pallets and other debris that could have burned are still in the pit. The fire seemed to have been mostly in the Southeast corner of the pit in approximately 50' square area.

CRI was first notified at 3:25 P.M. Saturday, May 24th. CRI employee Jason Null traveled to location. Upon arrival he called plant manager John Phillips and reported to

him that some smoke was coming from the pit. John told him (Jason) to cover with soil. He also attempted to notify me (David Parsons), when he could not get me he called Lary Parker.

Hobbs Fire Department had asked if EPA had been notified and Jason Null relayed the message to Lary Parker. Lary told him that EPA did not have jurisdiction over CRI, and that OCD is the regulatory agency. Jason relayed this message to Hobbs Fire Department. This was also relayed to Buddy Hill with OCD with some misunderstanding that Jason was referring to OCD instead of EPA.

I was out of town Saturday, May 24th and when I checked my voice mail at approximately 11:30 P.M. I had messages from Lary Parker (CRI) and Gary Wink (OCD). I talked to Jason Null and Lary Parker at that time and they told me about the fire and what had been done. I determined that OCD had been notified and Buddy Hill had visited the site.

Sincerely,

David Parsons

DRAFT

INCIDENT INVESTIGATION
CONTROLLED RECOVERY INC. (CRI)
Surface Waste Management Facility, Phone 505-393-1079

Emergency Response May 24, 2003

Saturday 12:11 am - Lea County Sheriff's Department received a call regarding a fire in a pit on Highway 62/180 at mile marker 66. The call was forwarded to the Hobbs Fire Department (F.D.). Hobbs F.D. in turn had the call transferred to the Monument F.D. (Conversation with Delana, Lea County Sheriff Department, 505-393-2515)

Saturday 12:?? am - Monument F.D. responded to the call. They cut the lock and entered from the east side of the facility off County Road C-29. The F.D. personnel did not know the owner of the location; there was no emergency phone number posted on the east entrance sign. Upon entering the facility Monument F.D. saw a fire in a pit with flames that were 10 to 15 feet high. The material in the pit was unknown it was dark and the pit was full of smoke. CRI personnel were not present. The Monument F.D. proceeded to put water on the fire until about 4:45am. (Conversation with David Campbell, Monument F.D., 505-391-0739)

Saturday 12:30 ? pm – Monument F.D. was called out again to a fire at CRI. The F.D. proceeded to put water on the fire. (Conversation with David Campbell, Monument F.D.)

Saturday 3:30 pm – Hobbs F.D. Battalion Chief, Neil Gore, received a phone call from the Lea County Sheriff's Department, Sergeant Johnny Rivas, regarding a hazardous materials fire at CRI. Neil Gore and Johnny Rivas decided to meet at the CRI facility to determine the status of the situation. (Conversation with Neil Gore, Hobbs F.D., Battalion Chief, 505-397-9308)

Saturday 3:35 pm – Oil Conservation Division Emergency Responder, Buddy Hill, received a call regarding a fire at CRI from Neil Gore the Battalion Chief of the Hobbs F.D. Buddy Hill called Gary Wink with the OCD and was given the phone number for CRI. Buddy Hill called the CRI number and the answering service put him in touch with Jason Null. Jason upon hearing about a reported fire proceeded to the CRI facility. This was reportedly the first time that CRI had been notified about the fire. (Conversation with Buddy Hill, OCD Hobbs, 505-631-5282)

Saturday afternoon - Neil Gore arrived at CRI after the Monument F.D. had already left. There was not an emergency number on the east entrance sign. The Hobbs F.D. Emergency Manual did not contain any information regarding this facility and a quick check of a phone book had no listing for a CRI. Neil Gore did not know at that time that CRI stood for Controlled Recovery Inc. Only Jason Null, a backhoe operator for CRI, was there. Jason Null said that this type of thing "fire" had happened before and that the pit that was smoldering at this time was dedicated to Navajo Refinery waste. Darrel Moore from Navajo Refinery was called regarding waste documentation to help determine the type of waste that was on fire and how to handle the fire. It was determined the best way to manage the fire was to smother it with dirt. The Neil Gore and Johnny Rivas had the

backhoe operator smothered the fire with dirt. (Conversation with Neil Gore, Hobbs F.D., Battalion Chief, 505-397-9308)

Saturday 5:15 pm - Oil Conservation Division Emergency Responder, Buddy Hill, arrived at CRI. The only person at the facility was the backhoe operator for CRI, Jason Null. All *others had left. The pit was still smoldering slightly.* Jason was using a backhoe to pull up plastic trash bags and then was covering the area with dirt. Jason Null told Buddy Hill that smoldering fires happen quite often. Jason Null told Buddy Hill that he had called his boss and reported that OCD personnel were on their way. Jason's boss told him not to be concerned about OCD because they have no authority over CRI. (Conversation with Buddy Hill, OCD Hobbs personnel.)

Tuesday 7:29 am – OCD Santa Fe Permit Writer, Martyne Kieling, received a call from Hobbs personnel, Larry Johnson and Paul Sheeley, regarding a fire at CRI over the weekend. Martyne Kieling called the respondents to patch together the complete story of what had happened. OCD Hobbs personnel were asked to inspect CRI again and to take photos. (Martyne Kieling)

Tuesday 9:30 am - OCD personnel Roger Anderson, Wayne Price, and Martyne Kieling, talked to Darrel Moore with Navajo Refining. According to Darrel Moore the waste most likely to have caused the fire was a chloride guard catalyst D-342 and/or D-363. A shipment of this waste was sent from Navajo to CRI on May 21, 2003. This waste stream is regularly shipped out to CRI. This catalyst has iron sulfide caked onto it. Navajo will be preparing a letter documenting the process in which the catalyst is used and the standard procedures used when handling this waste stream. (Conversation with Darrel Moore and Charlie Plymel, Navajo Refinery)

Iron sulfide is pyrophoric (any material igniting spontaneously or burning spontaneously in air), produces sulfur dioxide (SO_2) when burning, and when water is added to a fire will produce hydrogen sulfide (H_2S) and sulfuric acid (H_2SO_4). This material will ignite in the presences of other combustibles materials such as paper or hydrocarbons .

Tuesday 10:00 am – OCD personnel Roger Anderson, Wayne Price and Martyne Kieling, talked to David Cobrain with the New Mexico Environment Department Hazardous Waste Bureau (NMED HWB). The presence of a pyrophoric material in the CRI facility caused concern that a Characteristically Hazardous Waste was accepted into the CRI Facility. The Hazardous Waste Bureau will be checking into the classification of this waste and will be getting back with us. (Conversation with David Cobrain, NMED HWB, 428-2541).

Tuesday morning - OCD personnel, Larry Johnson, inspect the CRI facility and took photos. The pit was still smoldering. (See attached photos)

PERMIT NM-01-0006, RULE 711 AND RULE 116 ISSUES

1. The East entrance sign to CRI does not contain the required emergency information (see Photo 1). This was the entrance used by all emergency responders to this incident. The permit language should be changed to clearly state that all entrances must have a sign with all the required information.

Overall Facility Operation

1. The facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty feet and contain the following information: a) name of the facility; b) location by section, township and range; and c) emergency phone number.

2. The OCD has not been contacted by CRI. It has been over 72 hours since the fire was called in. See the attached Rule 116 for reporting requirements.

Reporting and Record Keeping:

5. CRI must notify the OCD Santa Fe and Hobbs offices within 24 hours of any fire, break, leak, spill, blowout or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

3. The OCD has not received a C-138 "Request For Approval To Accept Solid Waste" on file for chloride guard catalyst D-342 and/or D-363 for the shipment by Navajo Refining on May 21, 2003. It also appears that there have been many shipments of non-exempt wastes to CRI from Navajo Refining that CRI has not requested approval for.

Rule 711 or permit language?

Waste Acceptance Criteria

1. The facility is authorized to accept only:
   b. "Non-hazardous" non-exempt oilfield wastes that do not contain NORM. These wastes may be accepted on a case-by-case basis after a hazardous waste determination is made. Samples, if required, must be obtained from the wastes prior to removal from the generator's facility and without dilution in accordance with EPA SW-846 sampling procedures. All "non-hazardous" non-exempt wastes received at the facility must be accompanied by:
      i. An approved OCD Form C-138 "Request For Approval To Accept Solid Waste."
      ii. A "Generator Certificate of Waste Status" signed by the generator.
      iii. A verification of waste status issued by the appropriate agency, for wastes generated outside OCD jurisdiction. The agency verification is based on specific information on the subject waste submitted by the generator and demonstrating the exempt or non-hazardous classification of the waste.

4. The Navajo plant solid waste was not covered to prevent items from blowing away. Daily cover would have prevented oxygen from reaching the catalyst and may have prevented the fire. See the attached letters dated May 9, 2001 and May 10, 2001 regarding approvals to accept plant solid waste such as cardboard boxes, pallets, paper, insulation, plastic, rags.

Landfill Operation

3. Any trash accepted into the facility containing paper, paper bags or other trash that has the potential for blowing away or being transported by other vectors must be covered with soil upon the day of delivery and disposal into the solid waste pit.

RESPONSE TO INCIDENT INVESTIGATION

PERMIT NM 01-0006 RULE 711 AND RULE 116 ISSUES

1.) Please see narrative of David Parsons; please see photos in past OCD reports showing signs at both entrances. CRI will install a 2nd sign with phone numbers at each entrance.

2.) Please see David Parsons narrative. Ken Marsh (CRI) notified Paul Sheeley (OCD Hobbs) by voice mail (393-6161) @ 9:00 a.m. Tuesday, May 27, 2003 (Monday May 26 was Memorial Day Holiday and all OCD offices were closed).

3.) The statement is incorrect CRI does not agree with this allegation.

Waste Acceptance Criteria:

1. b i. Is the only statement in this section that is correct. Please see Rule 711 attached. Please compare the language in the Rule to the language in the incident investigation draft.

4.) The cause of the fire has not been determined.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

MEMORANDUM

To: Lori Wrotenbery, OCD Division Director
Through: Roger Anderson, OCD Environmental Bureau Chief
From: Martyne Kieling, OCD Environmental Geologist MK
Subject: Waste Documentation Inspection at Navajo Refinery and Corresponding Waste Acceptance Document Review at Controlled Recovery, Inc.
Date June 25, 2003

Ed Martin and I conducted a waste document review at the Navajo Refinery Artesia office on June 11, 2003. The documents that were reviewed consisted of waste manifests from Navajo Artesia Refinery to Controlled Recovery Inc (CRI). The waste manifests covered the time period from September 26, 2002 through June 9, 2003.

On June 12 and 13 of 2003 a waste documentation review was conducted at the CRI office in Hobbs. The documents that were reviewed consisted of CRI waste acceptance documents that referenced the Navajo Refinery manifest numbers.

The data collected from Navajo and CRI was placed into a spreadsheet so that it could be compared to a separate spreadsheet that contains all of the Forms C-138 "Request for Approval to Accept Solid Waste" that have been approved by the OCD.

After reviewing all of the data that was collected, I have determined that the waste that was generated and shipped from the Navajo Artesia Refinery and accepted by CRI between January 1, 2003 and June 9, 2003 was not covered by an approved Form C-138. * Note*

I have also determined that except for three shipments of hydrocarbon contaminated soils shipped on November 21, 2002, November 12, 2002 and October 24, 2002 the waste generated and shipped from the Navajo Artesia Refinery and accepted by CRI between September 26, 2002 and December 12, 2002 was not covered by an approved form C-138. * Note*

Due to limited time during this inspection, records were only reviewed back to September 26, 2002.

Rule 711 "Applicable To Surface Waste Management Facilities Only" requires certain documentation and approvals for non-exempt waste. All waste generated at the Navajo Refinery is non-exempt. Please review the following Rule 711 citation:

711.C.4 The permittee shall require the following documentation for accepting wastes, other than wastes returned from the wellbore in the normal course of well operations such as produced water and spent treating fluids, at commercial waste management facilities:

(b) Non-exempt, Non-hazardous Oilfield Wastes: Prior to acceptance, a "Request For Approval To Accept Solid Waste", OCD Form C-138, accompanied by acceptable documentation to determine that the waste is non-hazardous shall be submitted to the appropriate District office. Acceptance will be on a case-by-case basis after approval from the Division's Santa Fe office.

Attached please find the data spreadsheet that lists 366 shipments of waste from Navajo to CRI. Out of 366 shipments there were 277 documented as received by CRI. Out of the 366 shipments there were 89 that were not documented at CRI as having been received. I will note that we were limited in the amount of time that we had available for the records inspection and therefore may have missed some of the corresponding CRI documentation.

After reviewing all the documentation available during the time given it is my opinion that CRI has violated Rule 711.C.4.b with regards to accepting non-exempt oilfield waste from the Navajo Refinery in Artesia from September 26, 2002 through June 9, 2003.

* Note* The waste manifests reviewed at Navajo that listed office and shop trash from roll-off bins in the refinery were not placed into the spreadsheet. I made the determination that these wastes were approved for acceptance into Controlled Recovery Inc under the approval letter dated May 9, 2001 (see attached approval letter).

"MISSTATEMENTS"

INCIDENT INVESTIGATION

Saturday 5:15pm

Jason Null was asked by (unknown) if EPA had been notified. Jason's boss told him EPA was not the regulatory authority, CRI was under NMOCD authority.

Tuesday 9:30am

Darrell Moore and Charlie Plymale did not say that "the catalyst has iron sulfide caked on to it."

Tuesday 10:00am

The cause of the fire is unknown "The presence of a pyrophoic material" has not been established.

1. Permit NM 01-0006, Rule 711 and Rule 116 issues: There is no permit NM 01-0006, CRI operates under Order R9166. There are no signage requirements.

2. The OCD was notified by contact between Jason Null (CRI) and Buddy Hill (NMOCD). Rule 116 applies only when there is an unauthorized release. There was no release of any volume of material at CRI's facility.

3. All shipments from Navajo that require C-138 approvals have been shipped under an approved C-138.

WASTE ACCEPTANCE CRITERIA

Item 1.b i is the only item in this section that is correct.

4. The cause of the fire is unknown. There is no evidence that the Catalyst was involved in the fire. Photos and visual inspection do not indicated any burning of the Catalyst.

MEMORANDUM JUNE 23, 2003

The reporting of shipments was not correct. CRI supplied subsequent information to OCD in an attempt to achieve proper reporting.

The investigation was incomplete due to budget and time constraints by NMOCD staff, and inadequate preparation of investigative protocol.

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

November 18, 1997

Chris Williams
Oil Conservation Division
P.O. Box 1980
Hobbs, New Mexico 88241

Dear Mr. Williams,

The recent training session that was held for the correct preparation of various Oil Conservation Division forms shows that the spirit for better working relations between the industry and the OCD is alive and well.

Controlled Recovery, Inc. would request that you hold a session to cover disposal and reclaiming operations. We would suggest that the trucking companies, disposal facilities, land farms, SWD, treating plants, service companies, gas plants, and other interested generators of waste be be included and cover exempt verses non-exempt, required forms, and responsibility for filing the forms and record retention.

We have presented to Wayne Price our in house requirements for C138 approval and asked for the clarification of the completeness of the material we send to our clients.

We ask your assistance in developing a plan to reduce the time required to get C138's approved.

Enclosed please find a list compiled by our staff of items we would like clarified as acceptable to the OCD.

Sincerely,

Ken Marsh

Enclosures

cc: Wayne Price

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

1.) Turn around time for C138 submittal

2.) Classification of Oil field and Non Oil field

3.) Clarification of Process Knowledge

4.) Clarification of acceptable analytical

5.) Proper testing procedures

6.) Verification of Exempt and Non Exempt

7.) Clarification of acceptable sampling procedures

8.) Clarification of proper preservation of samples

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
DISTRICT I Hobbs
PO BOX 1980
Hobbs, NM 88241-1981
(505) 393-6161

Jennifer A. Salisbury
CABINET SECRETARY

April 2, 1998

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 369
Hobbs, NM 88241

Re: C-138 BJ Services Artesia Facility dated 3/30/98,# 03-017

Dear Mr. Marsh:

Please find enclosed the above referenced C-138s returned for the following error and/or errors:

*** These documents were deficient in line item #9. There was no circled selection.

The NMOCD is once again requesting that CRI perform a more detail critical review of these type submittals to prevent and/or decrease these type of errors which cost the NMOCD extra man-hours and also increases the overall approval process for you and your client.

The NMOCD would appreciate any assistance you may provide in this manner and if you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor
Martyne Kieling-Environmental Bureau, Santa Fe, NM
Roger Anderson-Environmental Bureau Chief, Santa Fe, NM

attachments- returned C-138

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

April 3, 1998

Lori Wrotenbery
Director
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Ms. Wrotenbery,

Please examine at your convenience the attached pages. Was this caused by our meeting April 1., 1998?

Sincerely,

K. Marsh

Ken Marsh

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

April 3, 1998

Mr. Wayne Price
New Mexico Oil Conservation Division
P.O. Box 1980
Hobbs, New Mexico 88241

Re: C138 Navajo Artesia Facility dated March 30, 1998 # 03-018

Dear Mr. Price,

Controlled Recovery, Inc. has resubmitted the above referenced C138 with the item number nine circled.

This C138 was signed by Billie Charo, who is an employee of Controlled Recovery, Inc.

Your letter addressed to me concerning this matter is a very nicely done case of bureaucratic hand spanking, evidently for some of my past comments, association with industry related personnel, or actions, and points out my incompetence to Controlled Recovery, Inc.'s clients.

You and I have had discussions about the failure of the C138 to conform to Rule 711.

Line item number nine seems to be more for Oil Conservation Division use than the receiving facility. The three items in number nine are statements not choices or selections, furthermore all three are incorrect and do not conform to Rule 711. I suggest it is New Mexico Oil Conservation Division's duty to circle number nine not Controlled Recovery, Inc.

The C138 is required only for non-exempt, non-hazardous oilfield waste, please see Section C of Rule 711. It would have not been submitted were it an exempt waste.

The C138 was attached to a letter from Navajo Refining detailing the origin and process generating the waste and a certificate of waste status of **non-exempt waste material** as well as acceptable documentation to determine that the waste is non-hazardous. Item number one indicates non-exempt waste.

You have approved C138's in the past that did not have line number nine circled, as has NMOCD Santa Fe. I assumed this was because inclusion of the above referenced documents clearly indicates the status of the material and your recognition of the inconsistencies of form C138.

All exempt oil field wastes do not require a certificate of waste from the generator. All requests for approval to accept non-exempt wastes are not required to be accompanied by "necessary chemical analysis". Rule 711 does not require that all transporters must certify the wastes delivered are only those consigned for transport, our company policy requires this certification.

Perhaps a detailed review of Rule 711 would be helpful to you in your diligent effort to regulate the industry.

You mention time and effort caused by our failure to circle item number nine You could have solved all this with a phone call or approving the C138 as you have in the past.

The C138 indicates that the original plus one copy be submitted to the appropriate district office. This is not required by Rule 711 and Controlled Recovery, Inc. has never submitted a copy. I point this out so that you may use this as a reason to reject any future C138's.

I applaud you for your vigilance but not for your vengeance.

You have your job, as does Controlled Recovery, Inc. We both have been professional in our approaches to our responsibilities in the past, consequently I am unable to understand the reason for this action. Please remember that good communication and relationships benefit NMOCD and the industry you regulate.

Sincerely,

Ken Marsh

Cc:

Lori Wrotenbery	Director NMOCD
Chris Williams	District Supervisor NMOCD
Martyne Kieling	Environmental Bureau Santa Fe
Roger Anderson	Environmental Bureau Chief Santa Fe
Darrell Moore	Navajo Refining Artesia

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388, HOBBS, NM 88241 (505) 393-1079

June 3, 1999

Roger Anderson
NMOCD
2040 South Pacheco
P. O. Box 6429
Santa Fe, NM 87505-5472

RE: C-138

Dear Mr. Anderson:

CRI and others that must use the C-138 Form are experiencing unnecessary time delays in getting the approvals back.

We (you and I) have had conversations about this on quite a few occasions.

I have said, "The system is broken, please fix it." Your reply, "It's not broken, but we are working on it."

Please show us some results. These delays are not conducive to proper waste management by the generators who grow increasingly frustrated by the "broken" approval process.

Sincerely,

Ken Marsh

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388, HOBBS, NM 88241 (505) 393-1079

March 3, 2000

Martyne J. Kieling
2040 S. Pacheco
Santa Fe, NM 87505

RE: C-138 submittals

Dear Martyne:

We spoke on the afternoon of Monday, February 28th, and you advised me that you had signed C-138 submittals beginning with our number 02-008 through 02-013, and sent them to the Hobbs OCD office on Friday, February 25, 2000.

I still have not received them and we checked our box today.

Can you please help me with this?

I am being bombarded by complaints from customers, wanting to know what we can do to speed up the process.

Thanks for your help.

Sincerely,

Kath Harper

Kath Harper

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388, HOBBS, NM 88241 (505) 393-1079

March 28, 2001

To Whom it May Concern:

I am writing in reference to the problems I have incurred in dealing with the OCD office in Santa Fe, New Mexico over the last several weeks.

As of March 12, 2001 through March 22, 2001, I had faxed and Federal Expressed documentation to Martyne Kieling, who is the Environmental Specialist at the OCD office in Santa Fe. I needed her to approve C-138 permits (see attached). These permits were regarding disposal of oilfield waste in which I needed approval on the same. Said approvals were needed in an expeditious manner.

I attempted to contact Ms. Kieling on March 12, 2001. I could not reach her and was put in touch with her voice mail that informed me that she would be back in her office on March 19, 2001. I attempted numerous times and left several messages to help me get approval on these permits.

I finally received a response from Roger Anderson at the OCD office. Unfortunately, he was unable to resolve this situation and informed me that I would basically have to wait unit Ms. Kieling returned to take care of this matter. My clients were in need of an immediate response.

After putting my clients in an uncomfortable situation, wherein they waited patiently on this matter to be taken care of, I contacted the OCD office on Monday, March 19th wherein I was informed that Ms. Kieling was out of the office "sick" and she would be back in the office the next morning, March 20, 2001.

After numerous attempts to get in touch with Ms. Kieling, I did, in fact, receive a call from her on Friday, March 23, 2001.

I am deeply concerned that the OCD office was not responsive to the environmental needs of the clientele of Controlled Recovery, Inc.

I would appreciate your assistance in looking into this matter so I do not have to face this type of situation in the future.

Sincerely,

Carmella Van Maanen

Carmella Van Maanen
Controlled Recovery, Inc.

Enclosures: as stated

	Submitted	Approved
ESP, Inc.	3-2-01	3-19-01
Mesquite Services	3-5-01	3-21-01
Banta Oilfield	3-7-01	3-21-01
Phillips Petroleum	3-7-01	3-21-01
Brinistool Equipment	3-9-01	3-21-01
Rio Tanks, Inc.	3-9-01	3-21-01
Lone Star Dist.	3-9-01	3-21-01
Dowell Schlumberger	3-12-01	3-21-01
Weatherford Int.	3-8-01	(Resubmitted and pending)

Received
3-22-01
APPX 3:00 pm

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388 • HOBBS, NM 88241 • (505) 393-1079

March 13, 2002

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

Dear Roger:

This is a request for changes to the current methods C-138's are handled. We recently submitted one on March 1st, 2002 (see attached) for Transwestern Pipeline and it was still in the Hobbs office on March 12th, 2002. This is an ongoing problem. I have visited with Martyne Kieling on the possibility of sending these directly to her and she told me that the local office needs to be in the loop. My suggestion would be to copy Hobbs office with what we submit to Santa Fe for their review.

Please review this situation and let me know your decision on the matter.

Sincerely,

David Parsons

No Response.

David Parsons

Wednesday, November 05, 2003, 9:45a.m.

KRM – Continued problems with approval process from OCD.

Tuesday, November 04, 2003

Called Martyne for clarification RE: Plains and Navajo C-138's. I got her voice mail instructing she would return on November 12th. There were instructions to contact Roger by pressing "0" or calling his number. I pressed "0" got an operator and asked to speak with Roger. I got his voice mail and requested him to call me. 24 hours later, I have not heard from him.

Monday, November 03, 2003

Kim called local OCD office to request C117 permit numbers from Marie. Marie returned her call on Tuesday and informed Kim the office would be closed the following days 4th, 5th and 6th and reopen Friday, she (Marie) just happened to be checking in. As you know we are supposed to have prior C117 approval before doing jobs. This puts us and every other transporter in this area, and possibly the entire state, as well as at the disposal site in the position of breaking rules to keep the oilfield in operation.

Is there no fix to the C-138 process? We have been griping and complaining about this system for at least 6 years, with all falling on deaf, uninterested ears. If we test a waste stream and prove it non-hazardous wouldn't it remain non-hazardous if the generating process does not change? Retesting and re-approval seems redundant to me. This puts undue financial burden on the generator and countless man hours to keep up with.

Since we can't do any work – I am taking off for two days. I will return Monday, November 10th.

Sincerely

David Parsons

Issues:

1.) C138

- No response to acceptable documentation as per our in house requirements
- Lost submittals
- Tracking system
- Reproduction of data each time
- If approved once on data why resubmit
- Why to Santa Fe for each resubmittal
- Why not blanket approval for one year
- Why to Artesia each time
- Best practices
- One-year approval of data should be extended if no process change
- Should OCD approve non-exempt waste
- Standard turn around time
- Provision for OCD personnel out of office or on vacation
- OCD denials of acceptable data – hand written notes
- Duplicate testing of same product – pipeline paraffin
- OCD communication with our clients

2.) Oil field service companies

- Definition of Oil Field Service Companies
- Discharge plans
- No equal treatment
- Inspection before approvals
- Santa Fe and Hobbs not in agreement

3.) No or slow response to questions

- Exempt verses non-exempt pits
- Owner of pits
- School for requirements of generators, trucking companies, producers, and consultants
- Correct documentation

1.) How do we handle paperwork being lost?
2.) Why does material generated in Artesia have to be approved by the Artesia NMOCD office as well as the Hobbs NMOCD office?
3.) Why does Navajo have a five-year analytical and every other facility have a one year analytical?
4.) What happens to paperwork when the NMOCD representative is out of the office for a period of several days?
5.) What is the turn around time for a standard approval?
6.) Why doesn't the NMOCD have a tracking system for submittals?
7.) Why is there such a long delay for answering correspondence?
8.) Why has there not been a training seminar for non-hazardous waste disposal?
9.)

[7-1-81...2-1-96; 19.15.9.707 NMAC - Rn, 19 NMAC 15.I.707, 11-30-00]

19.15.9.708 TRANSFER OF AUTHORITY TO INJECT

A. Authority to inject granted under any order of the Division is not transferable except upon approval of the Division. Approval of transfer of authority to inject may be obtained by filing Form C-104 in accordance with Rule 1104 E.

B. The Division may require a demonstration of mechanical integrity prior to approving transfer of authority to inject.

[1-1-50...2-1-96; 19.15.9.708 NMAC - Rn, 19 NMAC 15.I.708, 11-30-00]

19.15.9.709 REMOVAL OF PRODUCED WATER FROM LEASES AND FIELD FACILITIES

A. Transportation of any produced water by motor vehicle from any lease, central tank battery, or other facility, without an approved Form C-133 (Authorization to Move Produced Water) is prohibited.

B. Authorization to transport produced water may be obtained by filing three copies of Form C-133 with the Director of the Division in Santa Fe.

C. No owner or operator shall permit produced water to be removed from its leases or field facilities by motor vehicle except by a person possessing an approved Form C-133.

[1-1-50...2-1-96; 19.15.9.709 NMAC - Rn, 19 NMAC 15.I.709, 11-30-00]

19.15.9.710 DISPOSITION OF TRANSPORTED PRODUCED WATER

A. No person, including any transporter, may dispose of produced water on the surface of the ground, or in any pit, pond, lake, depression, draw, streambed, or arroyo, or in any watercourse, or in any other place or in any manner which will constitute a hazard to any fresh water supplies.

B. Delivery of produced water to approved salt water disposal facilities, secondary recovery or pressure maintenance injection facilities, or to a drill site for use in drilling fluid will not be construed as constituting a hazard to fresh water supplies provided the produced waters are placed in tanks or other impermeable storage at such facilities.

C. The supervisor of the appropriate district office of the Division may grant temporary exceptions to Paragraph A. above for emergency situations, for use of produced water in road construction or maintenance, or for use of produced waters for other construction purposes upon request and a proper showing by a holder of an approved Form C-133 (Authorization to Move Produced Water).

D. Vehicular movement or disposition of produced water in any manner contrary to these rules shall be considered cause, after notice and hearing, for cancellation of Form C-133.

[2-1-82...2-1-96; 19.15.9.710 NMAC - Rn, 19 NMAC 15.I.710, 11-30-00]

19.15.9.711 APPLICABLE TO SURFACE WASTE MANAGEMENT FACILITIES ONLY:

A. A surface waste management facility is defined as any facility that receives for collection, disposal, evaporation, remediation, reclamation, treatment or storage any produced water, drilling fluids, drill cuttings, completion fluids, contaminated soils, bottom sediment and water (BS&W), tank bottoms, waste oil or, upon written approval by the Division, other

oilfield related waste. Provided, however, if (a) a facility performing these functions utilizes underground injection wells subject to regulation by the Division pursuant to the federal Safe Drinking Water Act, and does not manage oilfield wastes on the ground in pits, ponds, below grade tanks or land application units, (b) if a facility, such as a tank only facility, does not manage oilfield wastes on the ground in pits, ponds below grade tanks or land application units or (c) if a facility performing these functions is subject to Water Quality Control Commission Regulations, then the facility shall not be subject to this rule.

(1) A commercial facility is defined as any surface waste management facility that does not meet the definition of centralized facility.

(2) A centralized facility is defined as a surface waste management facility that accepts only waste generated in New Mexico and that:

(a) does not receive compensation for waste management;

(b) is used exclusively by one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended; or

(c) is used by more than one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended under an operating agreement and which receives wastes that are generated from two or more production units or areas or from a set of jointly owned or operated leases.

(3) Centralized facilities exempt from permitting requirements are:

(a) facilities that receive wastes from a single well;

(b) facilities that receive less than 50 barrels of RCRA exempt liquid waste per day and have a capacity to hold 500 barrels of liquids or less or 1400 cubic yards of solids or less and when a showing can be made to the satisfaction of the Division that the facility will not harm fresh water, public health or the environment;

(c) emergency pits that are designed to capture fluids during an emergency upset period only and provided such fluids will be removed from the pit within twenty-four (24) hours from introduction;

(d) facilities that do not meet the requirements of the foregoing exemptions in Subsection A, Paragraph (3) of 19.15.9.711 NMAC, but that are shown by the facility operator to the satisfaction of the Division to not present a risk to public health and the environment.

B. Unless exempt from Section 19.15.9.711 NMAC, all commercial and centralized facilities including facilities in operation on the effective date of Section 19.15.9.711 NMAC, new facilities prior to construction and all existing facilities prior to major modification or major expansion shall be permitted by the Division in accordance with the following requirements:

(1) Application Requirements - An application, Form C-137, for a permit for a new facility or to modify an existing facility shall be filed in DUPLICATE with the Santa Fe Office of the Division and ONE COPY with the appropriate Division district office. The application shall comply with Division guidelines and shall include:

(a) The names and addresses of the applicant and all principal officers of the business if different from the applicant;

(b) A plat and topographic map showing the location of the facility in relation to governmental surveys (1/4 1/4 section, township, and range), highways or roads giving access to the facility site, watercourses, water sources, and dwellings within one (1) mile of the site;

(c) The names and addresses of the surface owners of the real property on which the management facility is sited and surface owners of the real property of record within one (1) mile of the site;

(d) A description of the facility with a diagram indicating location of fences and cattle guards, and detailed construction/installation diagrams of any pits, liners, dikes, piping, sprayers, and tanks on the facility;

(e) A plan for management of approved wastes.

(f) A contingency plan for reporting and cleanup of spills or releases;

(g) A routine inspection and maintenance plan to ensure permit compliance;

(h) A Hydrogen Sulfide Prevention and Contingency Plan to protect public health;

(i) A closure plan including a cost estimate sufficient to close the facility to protect public health and the environment; said estimate to be based upon the use of equipment normally available to a third party contractor;

(j) Geological/hydrological evidence, including depth to and quality of groundwater beneath the site, demonstrating that disposal of oilfield wastes will not adversely impact fresh water;

(k) Proof that the notice requirements of Section 19.15.9.711 NMAC have been met;

(l) Certification by an authorized representative of the applicant that information submitted in the application is true, accurate, and complete to the best of the applicant's knowledge.

(m) Such other information as is necessary to demonstrate that the operation of the facility will not adversely impact public health or the environment and that the facility will be in compliance with OCD rules and orders.

(2) Notice Requirements:

(a) Prior to public notice, the applicant shall give written notice of application to the surface owners of

record within one (1) mile of the facility, the county commission where the facility is located or is proposed to be located, and the appropriate city official(s) if the facility is located or proposed to be located within city limits or within one (1) mile of the city limits. The distance requirements for notice may be extended by the Director if the Director determines the proposed facility has the potential to adversely impact public health or the environment at a distance greater than one (1) mile. The Director may require additional notice as needed. A copy and proof of such notice will be furnished to the Division.

(b) The applicant will issue public notice in a form approved by the Division in a newspaper of general circulation in the county in which the facility is to be located. For permit modifications, the Division may require the applicant to issue public notice and give written notice as above.

(c) Any person seeking to comment or request a public hearing on such application must file comments or hearing requests with the Division within 30 days of the date of public notice. Requests for a public hearing must be in writing to the Director and shall set forth the reasons why a hearing should be held. A public hearing shall be held if the Director determines there is significant public interest.

(d) The Division will distribute notice of the filing of an application for a new facility or major modifications with the next OCD and OCC hearing docket following receipt of the application.

(3) Financial Assurance Requirements:

(a) Centralized Facilities: Upon determination by the Director that the permit can be approved, any applicant of a centralized facility shall submit acceptable financial assurance in the amount of $25,000 per facility or a statewide "blanket" financial assurance in the amount of $50,000 to cover all of that applicant's facilities in a form approved by the Director.

(b) New Commercial Facilities or major expansions or major modification of Existing Facilities: Upon determination by the Director that a permit for a commercial facility to commence operation after the effective date of this rule can be approved, or upon determination by the Director that a major modification or major expansion of an existing facility can be approved, any applicant of such a commercial facility shall submit acceptable financial assurance in the amount of the closure cost estimated in Subsection B, Paragraph (1), Subparagraph (i) above of 19.15.9.711 NMAC in a form approved by the Director according to the following schedule:

(i) within one (1) year of commencing operations or when the facility is filled to 25% of the permitted capacity, whichever comes first, the financial assurance must be increased to 25% of the estimated closure cost;

(ii) within two (2) years of commencing operations or when the facility is filled to 50% of the permitted capacity, whichever comes first, the financial assurance must be increased to 50% of the estimated closure cost;

(iii) within three (3) years of commencing operations or when the facility is filled to 75% of the permitted capacity, whichever comes first, the financial assurance must be increased to 75% of the estimated closure cost;

(iv) within four (4) years of commencing operations or when the facility is filled to 100% of the permitted capacity, whichever comes first, the financial assurance must be increased to the estimated closure cost.

(c) Existing Commercial Facilities: All permittees of commercial facilities approved for operation at the time this rule becomes effective shall have submitted financial assurance in the amount of the closure cost estimated pursuant to Subsection B, Paragraph (1), Subparagraph (i) above of 19.15.9.711 NMAC but not less than $25,000 nor more than $250,000 per facility in a form approved by the Director.

(i) within one (1) year of the effective date of Section 19.15.9.711 NMAC the financial assurance amount must be increased to 25% of the estimated closure costs or $62,500.00, whichever is less;

(ii) within two (2) years of the effective date of Section 19.15.9.711 NMAC the financial assurance amounts must be increased to 50% of the estimated closure costs or $125,000.00, whichever is less;

(iii) within three (3) years of the effective date of Section 19.15.9.711 NMAC the financial assurance amounts must be increased to 75% of the estimated closure costs or $187,000.00, whichever is less;

(iv) within four (4) years of the effective date of Section 19.15.9.711 NMAC the financial assurance amounts must be increased to the estimated closure cost or $250,000.00, whichever is less.

(d) The financial assurance required in subparagraphs (a), (b), or (c), above shall be payable to the State of New Mexico and conditioned upon compliance with statutes of the State of New Mexico and rules of the Division, and acceptable closure of the site upon cessation of operation, in accordance with Subsection B, Paragraph (1), Subparagraph (i) of 19.15.9.711 NMAC. If adequate financial assurance is posted by the applicant with a federal or state agency and the financial assurance otherwise fulfills the requirements of this rule, the Division may consider the financial assurance as satisfying the requirement of Section 19.15.9.711 NMAC. The applicant must notify the Division of any material change affecting the financial assurance within 30 days of discovery of such change.

(4) The Director may accept the following forms of financial assurance:

(a) Surety Bonds

(i) A surety bond shall be executed by the permittee and a corporate surety licensed to do business

in the State.

(ii) Surety bonds shall be noncancellable during their terms.

(b) Letter of Credit - Letter of credit shall be subject to the following conditions:

(i) The letter may be issued only by a bank organized or authorized to do business in the United States;

(ii) Letters of credit shall be irrevocable for a term of not less than five (5) years. A letter of credit used as security in areas requiring continuous financial assurance coverage shall be forfeited and shall be collected by the State of New Mexico if not replaced by other suitable financial assurance or letter of credit at least 90 days before its expiration date;

(iii) The letter of credit shall be payable to the State of New Mexico upon demand, in part or in full, upon receipt from the Director of a notice of forfeiture.

(c) Cash Accounts - Cash accounts shall be subject to the following conditions:

(i) The Director may authorize the permittee to supplement the financial assurance through the establishment of a cash account in one or more federally insured or equivalently protected accounts made payable upon demand to, or deposited directly with, the State of New Mexico.

(ii) Any interest paid on a cash account shall not be retained in the account and applied to the account unless the Director has required such action as a permit requirement.

(iii) Certificates of deposit may be substituted for a cash account with the approval of the Director.

(d) Replacement of Financial Assurances

(i) The Director may allow a permittee to replace existing financial assurances with other financial assurances that provide equivalent coverage.

(ii) The Director shall not release existing financial assurances until the permittee has submitted, and the Director has approved, acceptable replacements.

(5) A permit may be denied, revoked or additional requirements imposed by a written finding by the Director that a permittee has a history of failure to comply with Division rules and orders and state or federal environmental laws.

(6) The Director may, for protection of public health and the environment, impose additional requirements such as setbacks from an existing occupied structure.

(7) The Director may issue a permit upon a finding that an acceptable application has been filed and that the conditions of paragraphs 2 and 3 above have been met. All permits are revocable upon showing of good cause after notice and, if requested, hearing. Permits shall be reviewed a minimum of once every five (5) years for compliance with state statutes, Division rules and permit requirements and conditions.

C. Operational Requirements

(1) All surface waste management facility permittees shall file forms C-117-A, C-118, and C-120-A as required by OCD rules.

(2) Facilities permitted as treating plants will not accept sediment oil, tank bottoms and other miscellaneous hydrocarbons for processing unless accompanied by an approved Form C-117A or C-138.

(3) Facilities will only accept oilfield related wastes except as provided in Subsection C, Paragraph (4), Subparagraph (c) of 19.15.9.711 NMAC below. Wastes which are determined to be RCRA Subtitle C hazardous wastes by either listing or characteristic testing will not be accepted at a permitted facility.

(4) The permittee shall require the following documentation for accepting wastes, other than wastes returned from the wellbore in the normal course of well operations such as produced water and spent treating fluids, at commercial waste management facilities:

(a) Exempt Oilfield Wastes: As a condition to acceptance of the materials shipped, a generator, or his authorized agent, shall sign a certificate which represents and warrants that the wastes are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt wastes. The permittee shall have the option to accept on a monthly, weekly, or per load basis a load certificate in a form of its choice. While the acceptance of such exempt oilfield waste materials does not require the prior approval of the Division, both the generator and permittee shall maintain and shall make said certificates available for inspection by the Division for compliance and enforcement purposes.

(b) Non-exempt, Non-hazardous Oilfield Wastes: Prior to acceptance, a "Request For Approval To Accept Solid Waste", OCD Form C-138, accompanied by acceptable documentation to determine that the waste is non-hazardous shall be submitted to the appropriate District office. Acceptance will be on a case-by-case basis after approval from the Division's Santa Fe office.

(c) Non-oilfield Wastes: Non-hazardous, non-oilfield wastes may be accepted in an emergency if ordered by the Department of Public Safety. Prior to acceptance, a "Request To Accept Solid Waste", OCD Form C-138 accompanied by the Department of Public Safety order will be submitted to the appropriate District office and the Division's Santa Fe office.

With prior approval from the Division, other non-hazardous, non-oilfield waste may be accepted into a permitted surface waste management facility if the waste is similar in physical and chemical composition to the oilfield wastes authorized for disposal at that facility and is either: (1) exempt from the "hazardous waste" provisions of Subtitle C of the federal Resource Conservation and Recovery Act; or (2) has tested non-hazardous and is not listed as hazardous. Prior to acceptance, a "Request For Approval to Accept Solid Waste," OCD Form C-138, accompanied by acceptable documentation to characterize the waste, shall be submitted to and approved by the Division's Santa Fe office.

(5) The permittee of a commercial facility shall maintain for inspection the records for each calendar month on the generator, location, volume and type of waste, date of disposal, and hauling company that disposes of fluids or material in the facility. Records shall be maintained in appropriate books and records for a period of not less than five years, covering their operations in New Mexico.

(6) Disposal at a facility shall occur only when an attendant is on duty unless loads can be monitored or otherwise isolated for inspection before disposal. The facility shall be secured to prevent unauthorized disposal when no attendant is present.

(7) No produced water shall be received at the facility from motor vehicles unless the transporter has a valid Form C-133, Authorization to Move Produced Water, on file with the Division.

(8) To protect migratory birds, all tanks exceeding 16 feet in diameter, and exposed pits and ponds shall be screened, netted or covered. Upon written application by the permittee, an exception to screening, netting or covering of a facility may be granted by the district supervisor upon a showing that an alternative method will protect migratory birds or that the facility is not hazardous to migratory birds.

(9) All facilities will be fenced in a manner approved by the Director.

(10) A permit may not be transferred without the prior written approval of the Director. Until such transfer is approved by the Director and the required financial assurance is in place, the transferor's financial assurance will not be released.

D. Facility Closure

(1) The permittee shall notify the Division thirty (30) days prior to its intent to cease accepting wastes and close the facility. The permittee shall then begin closure operations unless an extension of time is granted by the Director. If disposal operations have ceased and there has been no significant activity at the facility for six (6) months and the permittee has not responded to written notice as defined in Subsection D, Paragraph (2), Subparagraph (a) of 19.15.9.711 NMAC, then the facility shall be considered abandoned and shall be closed utilizing the financial assurance pledged to the facility. Closure shall be in accordance with the approved closure plan and any modifications or additional requirements imposed by the Director to protect public health and the environment. At all times the permittee must maintain the facility to protect public health and the environment. Prior to release of the financial assurance covering the facility, the Division will inspect the site to determine that closure is complete.

(2) If a permittee refuses or is unable to conduct operations at the facility in a manner that protects public health or the environment or refuses or is unable to conduct or complete the closure plan, the terms of the permit are not met, or the permittee defaults on the conditions under which the financial assurance was accepted, the Director shall take the following actions to forfeit all or part of the financial assurance:

(a) Send written notice by certified mail, return receipt requested, to the permittee and the surety informing them of the decision to close the facility and to forfeit all or part of the financial assurance, including the reasons for the forfeiture and the amount to be forfeited and notifying the permittee and surety that a hearing request must be made within ten (10) days of receipt of the notice.

(b) Advise the permittee and surety of the conditions under which the forfeiture may be avoided. Such conditions may include but are not limited to:

(i) An agreement by the permittee or another party to perform closure operations in accordance with the conditions of the permit, the closure plan and these Rules, and that such party has the ability to satisfy the conditions.

(ii) The Director may allow a surety to complete closure if the surety can demonstrate an ability to complete the closure in accordance with the approved plan. No surety liability shall be released until successful completion of closure.

(c) In the event forfeiture of the financial assurance is required by this rule, the Director shall proceed to collect the forfeited amount and use the funds collected from the forfeiture to complete the closure. In the event the amount forfeited is insufficient for closure, the permittee shall be liable for the deficiency. The Director may complete or authorize completion of closure and may recover from the permittee all reasonably incurred costs of closure and forfeiture in excess of the amount forfeited. In the event the amount forfeited was more than the amount necessary to complete closure and all costs of forfeiture, the excess shall be returned to the party from whom it was collected.

(d) Upon showing of good cause, the Director may order immediate cessation of operations of the facility when it appears that such cessation is necessary to protect public health or the environment, or to assure compliance with

Division rules and orders.

(e) In the event the permittee cannot fulfill the conditions and obligations of the permit, the State of New Mexico, its agencies, officers, employees, agents, contractors and other entities designated by the State shall have all rights of entry into, over and upon the facility property, including all necessary and convenient rights of ingress and egress with all materials and equipment to conduct operation, termination and closure of the facility, including but not limited to the temporary storage of equipment and materials, the right to borrow or dispose of materials, and all other rights necessary for operation, termination and closure of the facility in accordance with the permit.

E. Waste management facilities in operation at the time Section 19.15.9.711 NMAC becomes effective shall:

(1) within one (1) year after the effective date permitted facilities submit the information required in Subsection B, Paragraph (1), Subparagraphs (a, h, i and l) of 19.15.9.711 NMAC not already on file with the Division;

(2) within one (1) year after the effective date unpermitted facilities submit the information required in Subsection B, Paragraph (1), Subparagraphs (a) through (j) and Subsection B, Paragraph (1), Subparagraph (l) of 19.15.9.711 NMAC;

(3) comply with Subsections C and D of 19.15.9.711 NMAC unless the Director grants an exemption from a requirement in these sections based upon a demonstration by the operator that such requirement is not necessary to protect public health and the environment.

[6-6-88...2-1-96; 19.15.9.711 NMAC - Rn, 19 NMAC 15.I.711, 11-30-00; A, 4-15-03]

19.15.9.712. DISPOSAL OF CERTAIN NON-DOMESTIC WASTE AT SOLID WASTE FACILITIES.

A. General - Certain non-domestic waste arising from the exploration, development, production or storage of crude oil or natural gas, certain nondomestic waste arising from the oil field service industry, and certain non-domestic waste arising from the transportation, treatment or refinement of crude oil or natural gas, may be disposed of at a solid waste facility.

B. Definitions - The following words and phrases have particular meanings for purposes of this section:

(1) "BTEX." The acronym "BTEX" in this section refers to benzene, toluene, ethelbenzene and xylene.

(2) "Discharge Plan." A "discharge plan" is a plan submitted and approved by the Division pursuant to NMSA 1978, Section 70-2-12(B)(22) (2000 Cum.Supp.) and rules and regulations of the Water Quality Control Commission.

(3) "EPA." The acronym "EPA" refers to the United States Environmental Protection Agency.

(4) "EPA Clean." The phrase "EPA Clean" refers to cleanliness standards established by the EPA in 40 C.F.R. Part 261, Section 261.7(b).

(5) "NESHAP." The acronym "NESHAP" refers to the National Emission Standards for Hazardous Air Pollutants of the EPA, 40 C.F.R. Part 61.

(6) "NORM." The acronym "NORM" refers to naturally occurring radioactive materials regulated by 20 NMAC 3.1, Subpart 14.

(7) "Section." "Section" or "this section" refers to Section 19.15.9.712.

(8) "Solid Waste Facility." A "solid waste facility" is a facility permitted or authorized as a solid waste facility by the New Mexico Environment Department pursuant to the Solid Waste Act, NMSA 1978, Sections 74-9-1 et seq. and rules and regulations of the Environmental Improvement Board, to accept industrial solid waste or other special waste.

(9) "TCLP" The acronym "TCLP" in this section refers to the testing protocol established by the EPA in 40 C.F.R. Part 261, entitled "Toxicity Characteristic Leaching Procedure" or an alternative

[4-3-53; 7-3-58...2-1-82; 2-1-96; 19.15.3.112 NMAC - Rn, 19 NMAC 15.C.112-A and 112-B, 11-15-01]

19.15.3.113 SHOOTING AND CHEMICAL TREATMENT OF WELLS:

If injury results to the producing formation, injection interval, casing or casing seat from shooting, fracturing, or treating a well and which injury may create underground waste or contamination of fresh water, the operator shall give written notice to the Division within five (5) working days and proceed with diligence to use the appropriate method and means for rectifying such damage. If shooting, fracturing, or chemical treating results in irreparable injury to the well the Division may require the operator to properly plug and abandon the well.

[1-1-50...2-1-96; 19.15.3.113 NMAC - Rn, 19 NMAC 15.C.113, 11-15-01]

19.15.3.114 SAFETY REGULATIONS

A. All oil wells shall be cleaned into a pit or tank, not less than 40 feet from the derrick floor and 150 feet from any fire hazard. All flowing oil wells must be produced through an oil and gas separator of ample capacity and in good working order. No boiler or portable electric lighting generator shall be placed or remain nearer than 150 feet to any producing well or oil tank. Any rubbish or debris that might constitute a fire hazard shall be removed to a distance of at least 150 feet from the vicinity of wells and tanks. All waste shall be burned or disposed of in such manner as to avoid creating a fire hazard.

B. When coming out of the hole with drill pipe, drilling fluid shall be circulated until equalized and subsequently drilling fluid level shall be maintained at a height sufficient to control subsurface pressures. During course of drilling blowout preventers shall be tested at least once each 24-hour period.

[1-1-50...2-1-96; 19.15.3.114 NMAC - Rn, 19 NMAC 15.C.114, 11-15-01]

19.15.3.115 WELL AND LEASE EQUIPMENT

A. Christmas tree fittings or wellhead connections shall be installed and maintained in first class condition so that all necessary pressure tests may easily be made on flowing wells. On oil wells the Christmas tree fittings shall have a test pressure rating at least equivalent to the calculated or known pressure in the reservoir from which production is expected. On gas wells the Christmas tree fittings shall have a test pressure equivalent to at least 150 percent of the calculated or known pressure in the reservoir from which production is expected.

B. Valves shall be installed and maintained in good working order to permit pressures to be obtained on both casing and tubing. Each flowing well shall be equipped to control properly the flowing of each well, and in case of an oil well, shall be produced into an oil and gas separator of a type generally used in the industry.

[1-1-50...2-1-96; 19.15.3.115 NMAC - Rn, 19 NMAC 15.C.115, 11-15-01]

19.15.3.116 RELEASE NOTIFICATION AND CORRECTIVE ACTION

A. Notification

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of Section 116 of 19.15.3 NMAC.

(2) The Division shall be notified in accordance with Section 116 of 19.15.3 NMAC with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in Section 19, Subsection B, Paragraphs (1) and (2) or (3) of 19.15.1 NMAC.

B. Reporting Requirements. Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements:

(1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Subsection C, Paragraphs (1) and (2) of 19.15.3.116 NMAC. A Major Release is:

(a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;

(b) an unauthorized release of any volume which:

(i) results in a fire;

(ii) will reach a water course;

(iii) may with reasonable probability endanger public health; or

(iv) results in substantial damage to property or the environment;

(c) an unauthorized release of natural gases in excess of 500 mcf; or

(d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in Section 19, Subsection B, Paragraphs (1) and (2) or (3) of 19.15.1 NMAC.

(2) A Minor Release shall be reported by giving timely written notice pursuant to Subsection C, Paragraph (2) of

19.15.3.116 NMAC. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases.

C. Contents Of Notification

(1) Immediate verbal notification required pursuant to Subsection B of 19.15.3.116 NMAC shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subsection B, Paragraph (1), Subparagraph (d) of 19.15.3.116 NMAC shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141.

(2) Timely written notification is required to be reported pursuant to Subsection B of 19.15.3.116 NMAC within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subsection B, Paragraph (1), Subparagraph (d) of 19.15.3.116 NMAC shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification.

D. Corrective Action. The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Section 19 of 19.15.1 NMAC.
[1-1-50...5-22-73...2-1-96; A, 3-15-97; 19.15.3.116 NMAC - Rn, 19 NMAC 15.C.116, 11-15-01]

19.15.3.117 WELL LOG, COMPLETION AND WORKOVER REPORTS:
Within 20 days after the completion of a well drilled for oil or gas, or the recompletion of a well into a different common source of supply, a completion report shall be filed with the Division on Form C-105. For the purpose of Section 117 of 19.15.3 NMAC, any hole drilled or cored below fresh water or which penetrates oil- or gas-bearing formations or which is drilled by an "owner" as defined herein shall be presumed to be a well drilled for oil or gas.
[1-1-50...2-1-96; 19.15.3.117 NMAC - Rn, 19 NMAC 15.C.117, 11-15-01]

19.15.3.118 HYDROGEN SULFIDE GAS (HYDROGEN SULFIDE)

A. Applicability. This section applies to any person, operator or facility subject to the jurisdiction of the Division, including, but not limited to, any person, operator or facility engaged in drilling, stimulating, injecting into, completing, working over or producing any oil, natural gas or carbon dioxide well or any person, operator or facility engaged in gathering, transporting, storing, processing or refining of crude oil, natural gas or carbon dioxide (referred to herein as "person, operator or facility" or "well, facility or operation"). This section shall not act to exempt or otherwise excuse surface waste management facilities permitted by the division pursuant to 19.15.9.711 NMAC from more stringent conditions on the handling of hydrogen sulfide required of such facilities by 19.15.9.711 NMAC or more stringent conditions in permits issued thereunder, nor shall such facilities be exempt or otherwise excused from the requirements set forth in this section by virtue of permitting under 19.15.9.711 NMAC.

B. Definitions (specific to this section).

(1) ANSI. The acronym "ANSI" means the american national standards institute.

(2) API. The acronym "API" means the american petroleum institute.

(3) Area of Exposure. The phrase "area of exposure" means the area within a circle constructed with a point of escape at its center and the radius of exposure as its radius.

(4) ASTM. The acronym "ASTM" means the american society for testing and materials.

(5) Dispersion Technique. A "dispersion technique" is a mathematical representation of the physical and chemical transportation characteristics, dilution characteristics and transformation characteristics of hydrogen sulfide gas in the atmosphere.

(6) Escape Rate. The "escape rate" is the maximum volume (Q) that is used to designate the possible rate of escape of a gaseous mixture containing hydrogen sulfide, as set forth herein.

(a) For existing gas facilities or operations, the escape rate shall be calculated using the maximum daily rate of the gaseous mixture produced or handled or the best estimate thereof. For an existing gas well, the escape rate shall be calculated using the current daily absolute open flow rate against atmospheric pressure or the best estimate of that rate.

(b) For new gas operations or facilities, the escape rate shall be calculated as the maximum anticipated flow rate through the system. For a new gas well, the escape rate shall be calculated using the maximum open-flow rate of offset wells in the pool or reservoir, or the pool or reservoir average of maximum open-flow rates.

(c) For existing oil wells, the escape rate shall be calculated by multiplying the producing gas/oil ratio by the maximum daily production rate or the best estimate thereof.

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 9, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 7099-3220-0000-5051-2221

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241-0388

RE: Controlled Recovery, Inc. Permit NM-01-0006
S/2 N/2 and the N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico

Dear Mr. Marsh:

The New Mexico Oil Conservation Division (OCD) has determined that the following listed waste streams may be disposed of at Controlled Recovery, Inc. (CRI) pursuant to Permit NM-01-0006 without the necessity of prior written authorization of the Division:

(a) Barrels, drums, 5-gallon buckets, 1-gallon containers so long as empty and EPA-clean.
(b) Uncontaminated brush and vegetation arising from clearing operations.
(c) Uncontaminated concrete.
(d) Uncontaminated construction debris.
(e) Detergent buckets, so long as completely empty.
(f) Fiberglass tanks so long as the tank is empty, cut up or shredded, and EPA clean.
(g) Grease buckets, so long as empty and EPA clean.
(h) Uncontaminated ferrous sulfate or elemental sulfur so long as recovery and sale as a raw material is not possible.
(i) Metal plate and metal cable.
(j) Paper and paper bags, so long as empty (paper bags).
(k) Plastic pit liners, so long as cleaned well.
(l) Soiled rags or gloves. If wet, must pass Paint Filter Test prior to disposal.
(m) Uncontaminated wood pallets.

Please be advised that approval to accept these wastes does not relieve CRI of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve CRI of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions please do not hesitate to contact Roger Anderson at (505) 476-3490.

Sincerely,

Lori Wrotenbery

Lori Wrotenbery
Director

LW/mjk

xc with attachments:
Hobbs OCD Office
Michael Feldewert, Holland & Hart LLP and Cambell, Carr, P.A.

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 6, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 7000-1670-0012-5357-7720

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241-0388

RE: **Controlled Recovery, Inc. Permit NM-01-0006, as amended herein**
S/2 N/2 and the N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico

Dear Mr. Marsh:

As you recall, the Oil Conservation Division (OCD) issued Controlled Recovery Inc. (CRI) a permit (NM-01-0006) on July 3, 2000 for operation of a commercial surface waste management facility in Lea County, New Mexico. Since the issuance of the permit, CRI expressed concerns about some of its provisions and met with OCD staff on August 8, 2000. OCD has continued to study the issue, and now issues an amended permit NM-01-0006, subject to the conditions set forth on the attachment hereto.

In preparing the amended attachment with its revised conditions of operation, OCD staff took into consideration the matters you raised on August 8, 2000, CRI's file, the Oil and Gas Act, the rules and regulations, Case Nos. 9882, 11143 and 11216, and public health and the environment. We believe the conditions set forth in the attachment hereto are amply justified by the foregoing.

CRI may request a hearing concerning the revised conditions to the OCD in writing within thirty (30) days of receipt of this permit pursuant to OCD Rule 1203 (19 NMAC 15.N.1203). The procedures in Rules 1201 to 1223 (19 NMAC 15.N.1201 to 1203) will govern hearing and pre-hearing procedures.

If you have any questions please do not hesitate to contact Roger Anderson at (505) 476-3490.

Sincerely,

Lori Wrotenbery
Director

LW/mjk

xc with attachments:
Hobbs OCD Office
Michael Feldewert, Holland & Hart LLP and Campbell, Carr, P.A.

EXHIBIT 9

ATTACHMENT TO OCD 711 PERMIT APPROVAL
PERMIT NM-01-0006
CONTROLLED RECOVERY, INC.
SURFACE WASTE MANAGEMENT FACILITY
S/2 N/2 and the N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico
(July 6, 2001)

IN GENERAL

The facility must conform to all of the requirements set forth herein and in NMAC 19.15.9.711, the New Mexico Oil and Gas Act, and all other applicable state and federal laws and regulations.

OVERALL FACILITY OPERATION

1. The facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty (50) feet and contain the following information: a) name of the facility; b) location by section, township and range; and c) emergency phone number.

2. Disposal may occur only when an attendant is on duty unless loads can be monitored or otherwise isolated for inspection before disposal. The facility must be secured to prevent unauthorized disposal when no attendant is present.

3. The facility must be maintained such that there will be no storm water runoff beyond the boundaries of the facility.

4. To prevent migration of contaminants along preferred pathways, contaminated soils may not be placed within twenty (20) feet of any pipeline crossing the facility.

5. The portion of the facility containing contaminated solids and liquids must be bermed to prevent runoff and runon.

6. All above-ground tanks located at the facility and containing materials other than fresh water must be bermed to contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

7. Below-grade sumps and below-grade tanks must be inspected weekly and fluid must be removed to prevent overflow.

8. Below-grade sumps and below-grade tanks must be cleaned and visually inspected annually. Results of the inspection must be recorded and maintained at the facility for OCD review. If sump/tank integrity has failed, OCD must be notified within 48 hours of discovery and the sump/tank must be replaced.

9. All saddle tanks and drums located at the facility and containing materials other than fresh water must be placed on an impermeable pad with curb-type containment. The containers must be labeled as to contents and hazards.

10. All empty drums must be stored on their side with the bungs horizontal.

11. Any major design changes to the surface waste management facility must be submitted to the OCD Santa Fe office for approval.

12. To protect migratory birds, all tanks exceeding 16 feet in diameter and exposed pits and ponds shall be screened, netted or covered. An exception to this condition may only be granted upon good cause shown through a written application that an alternative method will protect migratory birds or that the facility is not hazardous to migratory birds.

13. Within 24 hours of receiving notification from the OCD that an objectionable odor has been detected or reported, the facility must implement the following response procedure:

    a. log date and approximate time of notice that an odor exists;

    b. investigate source of odor and cause thereof;

    c. log investigative steps taken, including date and time, and conclusions reached;

    d. take action to alleviate the odor, including but not limited to chemical treatment, air sparging, solidification, landfarming, or other similar responses; and

    e. log actions taken to alleviate the odor.

    A copy of the log, signed and dated by the facility manager, must be maintained for OCD review.

14. The OCD must be notified prior to the installation of any pipelines or wells or other construction within the boundaries of the facility.

POND AND PIT OPERATION

1. No produced water may be received at the facility unless the transporter has a valid Form C-133, Authorization to Move Produced Water, on file with the Division.

2. All produced water must be unloaded into tanks. The produced water must reside in the tank and skim pit system long enough to allow for oil separation. Oil recovered must be stored in above-ground storage tanks.

3. All pits and ponds that contain liquids, including the evaporation pond, skim pits, and solid/liquid drying and storage pits, must have a minimum freeboard of one and a half (1 1/2) feet to prevent overtopping. A device must be installed in the ponds and pits to accurately measure freeboard and detect that capacity has been reached.

4. Free oil within the ponds and pits must be removed daily. Per Division Rule 310, oil shall not be stored or retained in earthen reservoirs or in open receptacles.

5. Pond and pit inspection and maintenance must be conducted on a daily basis or immediately following a consequential rainstorm or windstorm. If any defect is noted, repairs must be made as soon as possible. If the defect will jeopardize the integrity of the pond or pit, the OCD Santa Fe and Hobbs office must be notified within 24 hours and additional wastes may not be placed into the pond or pit until repairs have been completed. Records of such inspections must be made available to the OCD upon request.

6. Within sixty (60) days of receipt of this amended attachment, the permittee shall submit an accurate plat or map to OCD that accurately depicts the location of each all pond and pit on the premises and the contents thereof.

7. A sign or other such marker with the pit/pond number must be clearly posted at each pit/pond location.

H_2S PREVENTION & CONTINGENCY PLAN

1. In order to prevent development of harmful or dangerous concentrations of H_2S, at least 1000 gallons of an H_2S treatment chemical or an equivalent amount of chemical in concentrate form must be stored on-site at all times. H_2S treatment chemicals must be replaced periodically in accordance with the manufacturer's stated shelf life. Expired H_2S treatment chemicals may be disposed of in the evaporation ponds.

2. CRI must develop a prevention and contingency plan for ambient H_2S levels to protect public health. The H_2S prevention and contingency plan must be submitted to the OCD Santa Fe and Hobbs offices for approval within sixty (60) days of receipt of this amended attachment. The plan must contain the following elements, at a minimum:

   a. The plan must provide for ambient air monitoring of levels of H_2S at the facility in such a manner as to verify whether H_2S in concentrations of 1.0 ppm or greater leave the property.

   b. The plan must provide that if H_2S of 1.0 ppm or greater leaves the property;

      i. the operator must notify the Hobbs office of the OCD immediately;

ii. the operator must begin operations or treatment that will mitigate the source.

c. The plan must provide that if H_2S of 10.0 ppm or greater leaves the property:

i. the operator must immediately notify the Hobbs office of the OCD and the following public safety agencies:

New Mexico State Police;
Lea County Sheriff; and
Lea County Fire Marshall;

ii. the operator must notify all persons residing within one-half (1/2) mile of the fence line and assist public safety officials with evacuation as requested; and

iii. the operator must begin operations or treatment that will mitigate the source.

GROUND WATER MONITORING

1. The following ground water wells and bore-holes must be maintained and made available for periodic sampling by the OCD:

Well	Location Number
#1	20.32.27.424443
#2	20.32.27.422221
#3	20.32.27.234210
#4	20.32.27.412333
former stock	20.32.27.322331
#5	20.32.27.144133
#6	20.32.27.132121
#7	20.32.27.314122
#1a	20.32.28.222224
#3a	20.32.28.243123

(wells identified in CRI's permit proposal dated February 1990)

TREATING PLANT OPERATION

1. The treating plant area must be inspected daily for tank, piping, sump, and berm integrity. If any defect is noted, repairs must be made as soon as possible. If the defect will jeopardize the integrity of the treating plant, the OCD Hobbs office must be notified within 24 hours and the treating plant may not be operated until repairs have been completed. Records of such inspections must be made available to the OCD upon request.

2. The treating plant may use diesel and gasoline from underground storage tanks that are to be pulled, repaired or replaced. This material may only be used in the treating plant as a product to aid in the chemical treatment and blending of crude oil. A Form C-117 must be filed and a permit received for each load.

3. Within sixty (60) days of receipt of this amended attachment, the permittee shall submit an accurate functional diagram or engineering schematic to OCD that depicts the functioning of the treating plant as a whole and each element thereof.

LANDFILL OPERATION

1. The solid waste disposal pit may only be filled to within one and a half (1 1/2) feet of the original pit rim. When the pit has been filled to this level CRI must submit a closure plan to the OCD Santa Fe and Hobbs offices for review and approval. The closure plan must include the cap design and construction plan and post closure care plan for the landfill.

2. The solid waste disposal pit may not contain any free liquid. Any ponding of precipitation must be removed within 24 hours of discovery.

3. Any trash accepted into the facility containing paper, paper bags or other trash that has the potential for blowing away or being transported by other vectors must be covered with soil on the day of delivery and disposal.

4. The facility must be inspected on a regular basis for litter that may have blown out of the landfill. Stray litter including trapped litter in vegetation or fencing must be picked up and returned to the landfill cell.

5. Landfill inspection and maintenance must be conducted on at least a daily basis and immediately following each consequential rainstorm or windstorm. If any defect is noted, repairs must be made as soon as possible. If the defect will jeopardize the integrity of the landfill, the OCD Hobbs office must be notified within 24 hours and the landfill may not be operated until repairs have been completed. Records of such inspections must be made available to the OCD upon request.

6. Within sixty (60) day of receipt of this amended attachment, a plat for the landfill must be submitted to the OCD Santa Fe and Hobbs offices that shows all current and past burial operations at the facility. CRI must submit an updated plat for approval prior to excavation of a new disposal cell or when planning on expanding the dimensions of a disposal cell. This update must be submitted to the OCD prior to commencing disposal cell excavations or enlargements.

WASTE ACCEPTANCE CRITERIA

1. The facility is authorized to accept only:

   a. Oilfield wastes that are exempt from RCRA Subtitle C regulations and that do not contain Naturally Occurring Radioactive Material regulated pursuant to 20 NMAC 3.1 Subpart 1403 (NORM). All loads of these wastes other than wastes returned from the well bore in the normal course of well operations such as produced water and spent treating fluids received at the facility shall be accompanied by a "Generator Certificate of Waste Status" signed by the generator.

   b. Non-hazardous non-exempt oilfield wastes that do not contain NORM. These wastes may be accepted on a case-by-case basis after a hazardous waste determination is made. Samples, if required, must be obtained from the wastes prior to removal from the generator's facility and without dilution in accordance with EPA SW-846 sampling procedures. All "non-hazardous" non-exempt wastes received at the facility must be accompanied by:

      i. An approved OCD Form C-138 "Request For Approval To Accept Solid Waste."

      ii. A "Generator Certificate of Waste Status" signed by the generator.

      iii. A verification of waste status issued by the appropriate agency, for wastes generated outside OCD jurisdiction. The agency verification is based on specific information on the subject waste submitted by the generator and demonstrating the exempt or non-hazardous classification of the waste.

   c. Non-oilfield wastes that are non-hazardous if ordered by the Department of Public Safety in a public health emergency. OCD approval must be obtained prior to accepting the wastes.

2. At no time may any OCD-permitted surface waste management facility accept wastes that are hazardous by either listing or characteristic testing.

3. Waste containing mercaptans (Thiols) must be treated to eliminate odor prior to receipt into the facility.

4. No free liquids or waste with free liquids may be accepted into the landfill portion of the facility. Materials that may be accepted into the landfill facility must pass a paint filter test by EPA Method 9095A prior to disposal.

5. The transporter of any wastes to the facility must supply a certification that wastes delivered are those wastes received from the generator and that no additional materials have been added.

6. No waste will be accepted at the treating plant unless it is accompanied by an approved Form C-117-A.

7. No produced water may be received at the facility unless the transporter has a valid Form C-133, Authorization to Move Produced Water, on file with the Division.

REPORTING AND RECORD KEEPING

1. The Treating Plant Operator's Monthly Report (Form C-118 sheet 1 and 1-A), which details the oil recovered and sold during the preceding month, must be submitted to the OCD Hobbs office according to the directions contained on Form 118.

2. The Tank Cleaning, Sediment Oil Removal, Transportation of Miscellaneous Hydrocarbons and Disposal Permit (Form C-117) must be submitted to the OCD Hobbs office according to form directions.

3. The Monthly Water Disposal Report (Form C-120), which details the water disposed during the preceding month, must be submitted to the according to form directions.

4. CRI must notify the OCD Santa Fe and Hobbs offices within 24 hours of any fire, break, leak, spill, blowout or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

5. Records of facility inspections and records of any maintenance must be kept and maintained for OCD review.

6. Records of H_2S and wind direction measurements must be kept and maintained for OCD review.

7. Comprehensive records of all material disposed of at the facility must be maintained at the facility. The records for each load will include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification of waste status as exempt or non-exempt with any necessary supporting documentation to certify non-hazardous status for non-exempt waste; 6) NORM status declaration; 7) transporter; 8) cell/pit number where the waste was received; and 9) any additions to the waste such as H_2S treatment chemicals *etc.*

FINANCIAL ASSURANCE

1. Financial assurance in the amount of **$250,000** must be deposited with the OCD in the form of a surety or cash bond or a letter of credit (in form approved by OCD) to assure closure of the commercial surface waste management facility. The financial assurance shall be deposited according to the following schedule:

   By August 5, 2001 Controlled Recovery, Inc. must submit 50% of the financial assurance in the amount of **$125,000.**

   By August 5, 2002 Controlled Recovery, Inc. must submit 75% of the financial assurance in the amount of **$187,500.**

   By August 5, 2003 Controlled Recovery, Inc. must submit 100% of the financial assurance in the amount of **$250,000.**

2. The facility is subject to periodic inspections by the OCD. The conditions of this permit and the facility will be reviewed no later than five (5) years from the date of this approval. In addition, the closure cost estimate will be reviewed according to prices and remedial work estimates at the time of review. The financial assurance may be adjusted to incorporate any closure cost changes.

CLOSURE

1. The OCD Santa Fe and Hobbs offices must be notified when operation of the facility is to be discontinued for a period in excess of six (6) months or when the facility is to be dismantled. Within six (6) months after discontinuing use or within 30 days of deciding to dismantle the facility, the operator must submit a closure plan to the OCD Santa Fe office for approval. The operator must complete cleanup of constructed facilities and restoration of the facility site within six (6) months of receiving the closure plan approval, unless an extension of time is granted by the Director.

2. The closure plan to be submitted must include the following procedures:

   a. When the facility is to be closed no new material may be accepted.

   b. The evaporation ponds must be allowed to evaporate. Any water not evaporated must be hauled to an OCD-approved facility.

   c. The ponds and pits must be surveyed for NORM.

   d. All solid/liquid drying pits must be allowed to dry and must be closed according to an approved closure plan.

   e. The landfill pit must be closed according to an approved closure plan that includes a post-closure care period.

f. Contaminated soils exceeding OCD closure standards for the site must be disposed of in the facility landfill or removed to an OCD-approved facility or remediated.

g. All above and below grade tanks and steel pits must be emptied and any recyclable material must be hauled to an OCD-approved facility. The empty tanks/steel pits must be removed.

h. The area must be contoured, seeded with a native seed mix and allowed to return to its natural state. If the landowner desires to keep existing structures, berms, and fences for future alternative uses the structures may be left in place.

i. Closure must be pursuant to all OCD requirements in effect at the time of closure, and any other applicable local, state and/or federal regulations.

CERTIFICATION

Controlled Recovery, Inc., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Controlled Recovery, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, public health and the environment.

Accepted:

CONTROLLED RECOVERY, INC.

Signature _____ Title _____ Date _____

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

EMERGENCY RESPONSE PHONE NUMBERS

NMOCD-Hobbs Office:	(505) 393-6161
New Mexico State Police	(505) 392-5588
Lea County Sheriff	(505) 397-7546
Monument Fire Department	(505) 393-8690
Monty Cook (Watchman)	(505) 887-6448
Gaytha Cook (Watchman)	(505) 887-6448
Halfway Store-Employees	(505) 887-8112
Halfway Store-Customers	(505) 887-8112
CRI Plant	(505) 887-6504
CRI Office	(505) 393-1079
Callaway Safety	(505) 392-2973

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

October 23, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Sandra Martin, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
P.O. Box 26110
1190 St. Francis Drive, 87505

Dear Ms. Martin:

The New Mexico Oil Conservation Division (OCD) is at this time following up on our verbal conversations with you and your staff regarding the fire that occurred at the Controlled Recovery Inc. surface waste management facility on Saturday May 24, 2003. The Controlled Recovery Inc. facility is permitted by the OCD under Permit NM-01-0006. The permit does not allow for the facility to accept hazardous waste. The fire within a waste pit at the facility has raised a concern that the facility may have accepted a waste that was hazardous. The OCD is requesting a determination from the Hazardous Waste Bureau whether the waste that was received into CRI and caught fire was hazardous.

I have enclosed documentation regarding this matter. If you have any questions please contact Martyne Kieling at (505) 476-3488.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/mjk

Attachments
xc: Hobbs OCD Office

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 23, 2003

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241

RE: WARNING
Controlled Recovery, Inc. Permit NM-01-0006
S/2 N/2 and N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico

Dear Mr. Marsh:

The New Mexico Oil Conservation Division (OCD) was notified by Neil Gore, Battalion Chief of the Hobbs Fire Department, at 3:35 pm Saturday, May 24, 2003 of a fire at the Controlled Recovery, Inc. (CRI) surface waste management facility. The fire was located in the solid waste pit that is dedicated to Navajo Refining Co. and receives non-exempt waste. In response OCD initiated a facility and document inspection of the Controlled Recovery, Inc. facility. Because this incident and lack of signage caused confusion among the respondents and the occurrence of a fire led to questions regarding the hazardous nature of the waste, the OCD performed an investigation. This letter provides the findings of the inspection that was initiated due to the fire. In this way the OCD is able to document what occurred and what actions were performed as a result.

Item 1:

The responding Monument Fire Department did not know whom to contact in case of emergency because the sign at the east entrance gate to the CRI facility had blown down and was face down on the ground (see photo 1). Additionally, it appears that the Hobbs Fire Department was uncertain about who CRI was. The Monument and Hobbs Fire Departments did not know that CRI stood for Controlled Recovery Inc. and thus had difficulty finding the company name in the phone directory or in their records. The State Police notified CRI about the fire at 3:25 pm, Saturday, May 24, 2003 and again at 3:35 pm. The OCD emergency personnel notified CRI about the fire at 3:44 pm on Saturday, May 24, 2003. On Tuesday morning (after the Memorial Day Holiday), May 27, 2003, CRI called the OCD Hobbs district office and followed up with a written notification on May 28 and June 5, 2003. OCD Hobbs environmental personnel inspected the CRI facility on May 27, 2003 (see photos 3 and 4).

Violation 1: Failure to Maintain Signage

The sign at the east entrance to the CRI facility was not legible for the responding emergency personnel. Permit NM-01-0006, July 6, 2001, Overall Facility Operation, Item 1, Page 1, requires that "The facility must be fenced and have a sign at the entrance. The sign must be legible from at least (50) feet..."

The OCD Environmental Bureau personnel inspected the CRI Facility on June 12, 2003 and found that CRI had repaired the sign and it was legible (see photo 2).

Violation 2: Failure to Notify the OCD Within 24 Hours

In accordance with Rule 116.C.1, Permit NM-01-0006, July 6, 2001, Page 7, Reporting and Record Keeping, Item 4, states "CRI must notify the OCD Santa Fe and Hobbs offices within 24 hours of any fire,..." The OCD has reviewed the timeline as to who was notified at what time and has found that CRI knew that the OCD had been notified by the Fire Department on Saturday, May 24, 2003; it did not follow up with its own notification to the OCD Hobbs District office until Tuesday morning, June 27, 2003, approximately 80 hours after the fire was first reported.

CRI must adhere to the permit notification requirement and must not rely on a third party report.

Item 2:

The OCD performed an in-house document review of all C-138's "Request(s) for Approval to Accept Solid Waste" on file in the OCD Santa Fe office and approved from January 1998 through May 2003 covering deliveries of waste into the CRI facility. On June 11, 2003 the OCD inspected the waste manifests at Navajo Refining Co. that documented waste deliveries from the refinery into the CRI facility. The OCD only had enough time to review waste manifests that were dated from September 26, 2002 to June 9, 2003. On June 12 and 13, 2003 the OCD inspected the CRI waste acceptance documents and manifests covering deliveries from Navajo Refining into the CRI facility from September 26, 2002 to June 9, 2003, and the approved C-138's on file with CRI.

After reviewing the approved C-138's on file in the OCD office in Santa Fe, the manifested waste streams at the Navajo Artesia Office and the manifested waste streams and C-138's on file at CRI, the OCD has found the following items to be in compliance: (See Attached Table)

1. There was an approved C-138 dated November 5, 2002 for two (2) shipments of contaminated soil that covered waste shipped on November 21, 2002.
2. There was an approved C-138 dated June 4, 2002 for four (4) shipments of hydroblast soil that was shipped on June 9, 2002.
3. There were 45 shipments of concrete that did not have an approved C-138. However, uncontaminated concrete was approved by letter dated May 9, 2001.

Violation 3: Failure to Complete Proper Documentation

CRI has violated Rule 711.C. 4.b, Non-exempt, Non-hazardous Oilfield Wastes, which provides that "prior to acceptance, a "Request For Approval To Accept Solid Waste," OCD Form C-138, accompanied by acceptable documentation to determine that the waste is non-hazardous, shall be submitted to the appropriate District office. Acceptance will be on a case-by-case basis after approval from the Division's Santa Fe office." The requirement of this rule is reflected in Permit NM-01-0006, July 6, 2001, Page 5, Waste Acceptance Documentation, Item 1.b.i.

The OCD will begin quarterly reviews of waste acceptance documentation, manifests and Form C-138's regarding wastes received into the CRI facility. Quarterly reviews will be performed by the OCD for a minimum of one year from the date of this letter.

If the violations noted herein are repeated in the future, the Division will take further enforcement action that may include filing application for a compliance order and civil penalties. In addition, the OCD has referred this matter to New Mexico Environment Department, Hazardous Waste Bureau. The OCD reserves the right to re-open this case based upon investigation results from the New Mexico Environment Department.

If you have any questions please contact Martyne Kieling at (505) 476-3488.

Sincerely,

Gail MacQuesten
Assistant General Counsel

GM/mjk

Attachments
xc: Hobbs OCD Office
Sandra Martin, NMED HWB Acting Bureau Chief

4. There were 39 shipments of trash and debris that did not have a current C-138. However, trash and uncontaminated debris waste was approved by a letter dated May 9, 2001.
5. There were 76 shipments of fluoride precipitate that were last approved by a C-138 dated December 7, 1999, which covered 360 barrels a week. There was no expiration date on the approval. However, the OCD requires new analytical on waste streams every two years and will be requiring new documentation on this waste stream.

The OCD has found that the following list of items are not properly documented: (See Attached Table)

1. There were 129 shipments of DAF that did not have a current C-138. This type of waste was last approved by a C-138 dated October 3, 2000, which covered only 30 super sacks.
2. There were 54 shipments of contaminated soil that did not have a current C-138. This type of waste was last approved by a C-138 dated March 18, 2002, which expired December 31, 2002.
3. There were 23 shipments of FCC cat fines that did not have a current C-138. This type of waste was last approved by a C-138 dated October 10, 2000, which covered only 30 super sacks.
4. There were 10 shipments of asphalt sample cans that did not have a current C-138. This type of waste was last approved by a C-138 dated August 10, 2000, which covered only 10 drums.
5. There were seven (7) shipments of filters or pipeline filters that did not have a current C-138. This type of waste was last approved by a C-138 dated February 24, 2000 (pipeline filters) and November 5, 1999 (injection well filters), which covered only 20 cubic yards and 10 cubic yards respectively.
6. There were six (6) shipments of blast sand that did not have a current C-138. This type of waste was last approved by a C-138 dated October 24, 2000 and March 18, 2000 both of these were from specific product tanks, which covered 30-55 gallon drums and 15-55 gallon drums respectively.
7. There were six (6) shipments of chloride guard that did not have a current C-138. This type of waste was last approved by a C-138 dated August 10, 1998, which covered only 15 cubic yards.
8. There were four (4) shipments of asphalt from Tank 433 that did not have a current C-138. This type of waste has not been previously approved.
9. There were two (2) shipments of asphalt that did not have a current C-138. This type of waste was last approved by a C-138 dated July 2, 2001, which expired December 31, 2001.
10. There were two (2) shipments of D-342 catalyst that did not have a current C-138. This type of waste has not been previously approved.
11. There was one (1) shipment of D-370/D371 mole sieve that did not have a current C-138. This type of waste has not been previously approved.

Photo 1: CRI east entrance sign on Tuesday morning, May 27, 2003

Photo 2: CRI east entrance sign on June 12, 2003.

Photo 3: CRI's Navajo waste pit looking west. Tuesday Morning, May 27, 2003.

Photo 4: CRI's Navajo waste pit looking east. Tuesday Morning, May 27, 2003.

Navajo Records Reviewd on June 11, 2003					CRI Acceptance No.	Last OCD approved C-138 of Similar Waste Stream		
Waste Shipment Date	Transporter	Volume cubic yards	Waste Type	Navajo Manifest Number	Information Provided by CRI on 8-14-03	Last OCD approved C-138 of Similar Waste Stream	Corresponding CRI Tracking Number on the C-138	Estimated Volume On C-138
10/16/02	D&J	8	DAF	2684306	43159	10/3/00	09-004	30 super sacks
3/13/03	CRI	10	02-028A	2687968	45181	3/18/02	02-28-02A	450 cy monthly for the remainder of 2002
4/11/03	D&J	8	Asphalt	2687985	45490	7/2/01	06.03.01	15 cy/mo for rest of 2001
4/24/03	D&J	8	Asphalt	2688096	45931	7/2/01	06.03.01	15 cy/mo for rest of 2001
3/12/03	D&J	10	Asphalt-TK 433	2688127	45198			
11/12/02	D&J	10	Blast sand	2684369	43511	10/24/00 5/18/00	10-006 5-001	30 - 55 gal drums, 15 - 55 gal drums
11/7/02	D&J	10	Blast sand	2684377	43508	10/24/00 5/18/00	10-006 5-001	30 - 55 gal drums, 15 - 55 gal drums
9/26/02	D&J	10	Blast sand and trash and debris	2785175	42885	10/24/00 5/18/00 7/02/01	10-006 5-001 06.04.01	30 - 55 gal drums 15 - 55 gal drums 10 cy/mo rest of 2001
4/7/03	D&J	10	CCR trash, debris	2687974	45427	1/22/02 7/02/01	01.10.02A 06.04.01	10 cy 10 cy/mo rest of 2001
9/27/02	D&J	10	Chloride Guard	2684332	42901	8/10/98	none	15 cy
5/22/03	D&J	10	Chloride Guard	3077580		8/10/98	none	15 cy
5/22/03	D&J	10	Chloride Guard	3077581		8/10/98	none	15 cy
11/11/02	D&J	10	Concrete	2684372	43509	none		
11/27/02	Sweatt	15	Concrete	2684568	43863	none		
11/27/02	Sweatt	15	Concrete	2684569	43862	none		
4/24/03	D&J	10	Concrete	2688090	45929	none		
4/23/03	D&J	10	Concrete	2688091	45902	none		
4/23/03	D&J	10	Concrete	2688092	45901	none		
4/23/03	D&J	10	Concrete	2688093	45905	none		
4/24/03	D&J	10	Concrete	2688134	45963	none		
4/30/03	D&J	10	Concrete	2688135	45986	none		
5/1/03	D&J	10	Concrete	2688136	46007	none		
5/5/03	D&J	10	Concrete	2688137	46041	none		
4/28/03	D&J	10	Concrete	2688138	45955	none		
4/28/03	D&J	10	Concrete	2688139	45950	none		
4/25/03	D&J	10	Concrete	2688140	45949	none		
6/5/03	D&J	10	Concrete	3076826		none		
5/28/03	D&J	10	Concrete	3076831		none		

5/22/03	D&J	10	Concrete	3077572		none		
5/19/03	D&J	10	Concrete	3077573		none		
5/21/03	D&J	10	Concrete	3077574		none		
5/15/03	D&J	10	Concrete	3077587		none		
5/15/03	D&J	10	Concrete	3077588		none		
5/13/03	D&J	8	Concrete	3077606		none		
5/21/03	D&J	8	Concrete	3077607		none		
5/12/03	D&J	8	Concrete	3077608		none		
5/6/03	D&J	8	Concrete	3077609	46064	none		
5/6/03	D&J	8	Concrete	3077610	46065	none		
5/8/03	D&J	8	Concrete	3077611	46117	none		
5/12/03	D&J	8	Concrete	3077612		none		
5/5/03	D&J	8	Concrete	3077613	46040	none		
5/5/03	D&J	8	Concrete	3077614	46036	none		
5/20/03	D&J	8	Concrete	3077615		none		
5/20/03	D&J	8	Concrete	3077616		none		
5/14/03	D&J	8	Concrete	3077617		none		
5/16/03	D&J	8	Concrete	3077618		none		
5/6/03	D&J	8	Concrete	3077619	46063	none		
5/7/03	D&J	8	Concrete	3077620	46087	none		
5/7/03	D&J	8	Concrete	3077621	46106	none		
6/3/03	D&J	10	Concrete	3086806		none		
6/2/03	D&J	10	Concrete	3086810		none		
6/2/03	D&J	10	Concrete	3086811		none		
6/4/03	D&J	10	Concrete	3086825		none		
6/3/03	D&J	8	Concrete, flouride precipitator solids	3086803		12/7/99	11-003	360 bbls/week
5/14/03	D&J	10	Concrete, pipe	3077592		none		
5/19/03	D&J	10	Concrete, pipe	3077596		none		
5/14/03	D&J	10	Concrete, pipe	3077597		none		
4/24/03	D&J	10	Concrete, trash, debris	2688094	45930	none 7/02/01	06.04.01	10 cy/mo rest of 2001
11/21/02	D&J	10	Contaminated soil	2684559	43988	approved on 11/05/02	10.24.02A	20 cy
4/24/03	D&J	10	Contaminated soil	2688089	45918	3/18/02	02.28.02A	450 cy/mo rest of 02
3/11/03	CRI	10	Contaminated soil	2688122	45201	3/18/02	02.28.02A	450 cy/mo rest of 02
3/12/03	CRI	10	Contaminated soil	2688123	45203	3/18/02	02.28.02A	450 cy/mo rest of 02
3/12/03	CRI	10	Contaminated soil	2688124	45204	3/18/02	02.28.02A	450 cy/mo rest of 02
3/12/03	CRI	10	Contaminated soil	2688125	45205	3/18/02	02.28.02A	450 cy/mo rest of 02
4/24/03	D&J	10	Contaminated soil	2688141	45920	3/18/02	02.28.02A	450 cy/mo rest of 02
4/24/03	D&J	10	Contaminated soil	2688142	45919	3/18/02	02.28.02A	450 cy/mo rest of 02

3/13/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687969	45182	10/24/00 3/18/02	10-007 02-28 02A	450 cy monthly for the remainder of 2002
3/13/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687970	45214	10/24/00 3/18/02	10-007 02-28 02A	450 cy monthly for the remainder of 2002
3/14/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687971	45235	10/24/00 3/18/02	10-007 02-28 02A	450 cy monthly for the remainder of 2002
11/23/02	D&J	10		2684585	43926	none		
4/28/03	D&J	10		2688110	45956	none		
1/30/03	D&J	8	D-363 Chloride Guard	2685062	44787	8/10/98	none	15 cy
1/31/03	D&J	10	D-363 Chloride Guard	2685064	44803	8/10/98	none	15 cy
	D&J	10	D-363 Chloride Guard	2785192	44806	8/10/98	none	15 cy
10/16/02	D&J	8	DAF	2684307	43030	10/3/00	09-004	30 super sacks
10/16/02	D&J	8	DAF	2684309	43185	10/3/00	09-004	30 super sacks
10/9/02	D&J	8	DAF	2684310	43029	10/3/00	09-004	30 super sacks
10/2/02	BES	8	DAF	2684360	42934	10/3/00	09-004	30 super sacks
10/2/02	BES	8	DAF	2684361	42926	10/3/00	09-004	30 super sacks
10/2/02	CRI	15	DAF	2684362	42940	10/3/00	09-004	30 super sacks
11/11/02	D&J	8	DAF	2684371	43510	10/3/00	09-004	30 super sacks
11/11/02	D&J	8	DAF	2684373	43542	10/3/00	09-004	30 super sacks
11/7/02	D&J	8	DAF	2684374	43440	10/3/00	09-004	30 super sacks
2/19/03	D&J	8	DAF	2684381	44998	10/3/00	09-004	30 super sacks
11/7/02	D&J		DAF	2684382	44999	10/3/00	09-004	30 super sacks
11/7/02	D&J	8	DAF	2684383	43559	10/3/00	09-004	30 super sacks
11/13/02	D&J	8	DAF	2684388	43546	10/3/00	09-004	30 super sacks
2/26/03	D&J	8	DAF	2684395	45029	10/3/00	09-004	30 super sacks
2/18/03	D&J		DAF	2684401	44951	10/3/00	09-004	30 super sacks
12/31/02	CRI	8	DAF	2684415	44191	10/3/00	09-004	30 super sacks
1/2/03	D&J	8	DAF	2684416	44238	10/3/00	09-004	30 super sacks
1/2/03	D&J	8	DAF	2684417	44237	10/3/00	09-004	30 super sacks
12/30/02	D&J	8	DAF	2684422	44173	10/3/00	09-004	30 super sacks
10/24/02	D&J	8	DAF	2684457	43265	10/3/00	09-004	30 super sacks
12/9/02	D&J	8	DAF	2684524	43882	10/3/00	09-004	30 super sacks
12/3/02	D&J	8	DAF	2684528	43881	10/3/00	09-004	30 super sacks
12/4/02	D&J	8	DAF	2684532	43923	10/3/00	09-004	30 super sacks
12/5/02	D&J	8	DAF	2684533	43928	10/3/00	09-004	30 super sacks
10/31/02	D&J	8	DAF	2684540	43361	10/3/00	09-004	30 super sacks
10/31/02	D&J	8	DAF	2684541	43359	10/3/00	09-004	30 super sacks

10/4/02	D&J	8	DAF	2684544	43406	10/3/00	09-004	30 super sacks
10/4/02	D&J	8	DAF	2684545	43345	10/3/00	09-004	30 super sacks
10/16/02	D&J	8	DAF	2684546	43179	10/3/00	09-004	30 super sacks
10/22/02	D&J	8	DAF	2684548	43246	10/3/00	09-004	30 super sacks
10/23/02	D&J	8	DAF	2684549	43263	10/3/00	09-004	30 super sacks
10/23/02	D&J	8	DAF	2684550	43262	10/3/00	09-004	30 super sacks
11/5/02	D&J	8	DAF	2684565	43407	10/3/00	09-004	30 super sacks
12/2/02	D&J	8	DAF	2684566	43873	10/3/00	09-004	30 super sacks
11/27/02	D&J	8	DAF	2684570	43834	10/3/00	09-004	30 super sacks
11/27/02	D&J	8	DAF	2684571	43835	10/3/00	09-004	30 super sacks
11/20/02	D&J	8	DAF	2684575	43662	10/3/00	09-004	30 super sacks
11/21/02	D&J	8	DAF	2684579	43692	10/3/00	09-004	30 super sacks
11/21/02	D&J	8	DAF	2684580	43674	10/3/00	09-004	30 super sacks
11/23/02	D&J	8	DAF	2684581	43734	10/3/00	09-004	30 super sacks
11/23/02	D&J	8	DAF	2684589	43400	10/3/00	09-004	30 super sacks
11/6/02	D&J	8	DAF	2684591	43401	10/3/00	09-004	30 super sacks
11/19/02	D&J	8	DAF	2684592	43635	10/3/00	09-004	30 super sacks
11/19/02	D&J	8	DAF	2684593	43663	10/3/00	09-004	30 super sacks
11/19/02	D&J	8	DAF	2684596	43975	10/3/00	09-004	30 super sacks
12/10/02	D&J	8	DAF	2684597	43976	10/3/00	09-004	30 super sacks
12/11/02	D&J	8	DAF	2684598	43986	10/3/00	09-004	30 super sacks
12/11/02	D&J	8	DAF	2684599	43988	10/3/00	09-004	30 super sacks
12/11/02	D&J	8	DAF	2684602	44140	10/3/00	09-004	30 super sacks
12/27/02	D&J	8	DAF	2685027	44127	10/3/00	09-004	30 super sacks
12/13/02	D&J	8	DAF	2685028	44111	10/3/00	09-004	30 super sacks
12/23/02	D&J	8	DAF	2685029	44109	10/3/00	09-004	30 super sacks
12/18/02	D&J	8	DAF	2685034	44042	10/3/00	09-004	30 super sacks
12/17/02	D&J	8	DAF	2685035	44041	10/3/00	09-004	30 super sacks
12/12/02	CRI	8	DAF	2685039	43997	10/3/00	09-004	30 super sacks
3/3/03	D&J	8	DAF	2685042	45089	10/3/00	09-004	30 super sacks
2/12/03	D&J		DAF	2685045	44892	10/3/00	09-004	30 super sacks
2/12/03	D&J		DAF	2685046	44893	10/3/00	09-004	30 super sacks
2/11/03	D&J	8	DAF	2685047	44878	10/3/00	09-004	30 super sacks
2/4/03	D&J	8	DAF	2685055	44824	10/3/00	09-004	30 super sacks
1/30/03	D&J	8	DAF	2685063	44786	10/3/00	09-004	30 super sacks
1/28/03	D&J	8	DAF	2685068	44756	10/3/00	09-004	30 super sacks
4/4/03	D&J		DAF	2687555	45749	10/3/00	09-004	30 super sacks
4/1/03	D&J	8	DAF	2687556	45720	10/3/00	09-004	30 super sacks
4/26/02	D&J	8	DAF	2687563	45631	10/3/00	09-004	30 super sacks
3/25/03	D&J	8	DAF	2687565	45357	10/3/00	09-004	30 super sacks
4/4/03	D&J		DAF	2687979	45416	10/3/00	09-004	30 super sacks
4/29/03	D&J	8	DAF	2687982	45965	10/3/00	09-004	30 super sacks
4/10/03	D&J	8	DAF	2687989	45472	10/3/00	09-004	30 super sacks

4/8/03	D&J	8	DAF	2687990	45438	10/3/00	09-004	30 super sacks
4/9/03	D&J	8	DAF	2687991	45461	10/3/00	09-004	30 super sacks
4/15/03	D&J	10	DAF	2687995	45526	10/3/00	09-004	30 super sacks
4/15/03	D&J	8	DAF	2688006	45523	10/3/00	09-004	30 super sacks
4/15/03	D&J	8	DAF	2688008	45541	10/3/00	09-004	30 super sacks
4/23/03	D&J	8	DAF	2688095	45903	10/3/00	09-004	30 super sacks
5/13/03	D&J	8	DAF	2688102	46169	10/3/00	09-004	30 super sacks
5/13/03	D&J	8	DAF	2688103	46171	10/3/00	09-004	30 super sacks
5/6/03	D&J	8	DAF	2688114	46066	10/3/00	09-004	30 super sacks
4/22/03	D&J	8	DAF	2688115	45817	10/3/00	09-004	30 super sacks
3/12/03	D&J	8	DAF	2688128	45196	10/3/00	09-004	30 super sacks
3/12/03	D&J		DAF	2688129	45197	10/3/00	09-004	30 super sacks
3/11/03	D&J	8	DAF	2688130	45172	10/3/00	09-004	30 super sacks
10/15/02	CRI	8	DAF	2785170	43164	10/3/00	09-004	30 super sacks
10/29/02	D&J	8	DAF	2785173	43344	10/3/00	09-004	30 super sacks
9/26/02	D&J	8	DAF	2785174	42886	10/3/00	09-004	30 super sacks
10/17/02	D&J	8	DAF	2785211	43199	10/3/00	09-004	30 super sacks
10/17/02	D&J	8	DAF	2785212	43235	10/3/00	09-004	30 super sacks
10/17/02	D&J	Unknown	DAF	2785213	43360	10/3/00	09-004	30 super sacks
3/19/03	D&J	8	DAF	2785235	45295	10/3/00	09-004	30 super sacks
2/5/03	D&J	10	DAF	2785236	44835	10/3/00	09-004	30 super sacks
1/8/03	D&J	8	DAF	2785237	44351	10/3/00	09-004	30 super sacks
1/9/03	D&J	10	DAF	2785238	44352	10/3/00	09-004	30 super sacks
1/7/03	D&J	10	DAF	2785240	44338	10/3/00	09-004	30 super sacks
11/25/02	D&J	10	DAF	2785243	43772	10/3/00	09-004	30 super sacks
3/18/03	D&J	10	DAF	2785256	45280	10/3/00	09-004	30 super sacks
1/29/03	D&J	8	DAF	2785271	44780	10/3/00	09-004	30 super sacks
1/29/03	D&J	8	DAF	2785272	44778	10/3/00	09-004	30 super sacks
1/14/03	D&J	10	DAF	2785279	44525	10/3/00	09-004	30 super sacks
1/14/03	D&J	10	DAF	2785280	44521	10/3/00	09-004	30 super sacks
1/15/03	D&J	8	DAF	2785281	44516	10/3/00	09-004	30 super sacks
1/16/03	D&J	8	DAF	2785291	44581	10/3/00	09-004	30 super sacks
1/21/03	D&J	8	DAF	2785295	44629	10/3/00	09-004	30 super sacks
1/21/03	D&J	8	DAF	2785297	44633	10/3/00	09-004	30 super sacks
5/28/03	D&J	8	DAF	3076571		10/3/00	09-004	30 super sacks
5/28/03	D&J	8	DAF	3076830		10/3/00	09-004	30 super sacks
5/20/03	D&J	8	DAF	3077569		10/3/00	09-004	30 super sacks
5/15/03	D&J	8	DAF	3077589		10/3/00	09-004	30 super sacks
5/14/03	D&J	8	DAF	3077593		10/3/00	09-004	30 super sacks
4/30/03	D&J	8	DAF	3077598	45991	10/3/00	09-004	30 super sacks
5/7/03	D&J	8	DAF	3077622	46089	10/3/00	09-004	30 super sacks
5/21/03	D&J	8	DAF	3077630		10/3/00	09-004	30 super sacks
6/5/03	D&J	8	DAF	3086980		10/3/00	09-004	30 super sacks

6/4/03	D&J	8	DAF	3086986		10/3/00	09-004	30 super sacks	
4/2/03	D&J	8	DAF	Obliterated		10/3/00	09-004	30 super sacks	
1/3/03	D&J	8	DAF and flouride precipitate	2684420	44239	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
12/18/02	D&J	10	DAF and flouride precipitate	2685033	44061	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
5/8/03	D&J	8	DAF and flouride precipitate	3077626	46120	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
10/8/02	D&J	8	DAF, flouride precipitator solids	2684368	43013	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
2/27/03	D&J	8	DAF, flouride precipitator solids	2684398	45059	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
2/18/03	D&J		DAF, flouride precipitator solids	2684403	44954	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
3/31/03	D&J	8	DAF, flouride precipitator solids	2687557	45702	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
4/9/03	D&J	8	DAF, flouride precipitator solids	2687560	45460	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
4/8/03	D&J	8	DAF, flouride precipitator solids	2687976	45435	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
4/17/03	D&J	8	DAF, flouride precipitator solids	2688009	45570	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
4/28/03	D&J	8	DAF, flouride precipitator solids	2688107	45957	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
3/11/03	D&J	8	DAF, flouride precipitator solids	2688131	45173	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
4/21/03	D&J	8	DAF, flouride precipitator solids	2688118	45563	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
5/1/03	D&J	8	DAF, flouride precipitator solids	3077601	46008	10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
6/2/03	D&J	8	DAF, flouride precipitator solids	3086813		10/3/2000 12/7/1999	09-004 11-003	30 super sacks bbls/week	360
10/3/02	CRI	8	FCC cat fines	2684363	42942	8/10/00	08-0004	30 supersacks	
10/7/02	D&J	10	FCC cat fines	2684366	42978	8/10/00	08-0004	30 supersacks	
11/13/02	D&J	10	FCC cat fines	2684385	43544	8/10/00	08-0004	30 supersacks	
2/4/03	D&J	8	FCC cat fines	2685056	44818	8/10/00	08-0004	30 supersacks	
4/15/03	D&J	10	FCC Cat fines	2687994	45525	8/10/00	08-0004	30 supersacks	
1/15/03	D&J	10	FCC cat fines and contaminated soil	2785282	44517	8/10/2000 3/18/02	08-0004 02.28.02A	30 supersacks cy/mo rest of 02	450
4/15/03	D&J	10	FCC Cat fines, asphalt sample cans	2687993	45527	8/10/2000 8/10/2000	08-0004 08-005	30 supersacks, 10 drums	

1/14/03	D&J	10	FCC cat fines, trash and debris, asphalt sample cans	2785283	44522	8/10/2000 7/02/2001 8/10/2000	08-0004 06.04.01 08-005	30 supersacks, 10 cy/mo rest of 01, 10 drums
1/14/03	D&J	10	FCC cat fines, trash and debris, asphalt sample cans	2785284	44523	8/10/2000 7/02/2001 8/10/2000	08-0004 06.04.01 08-005	30 supersacks, 10 cy/mo rest of 01, 10 drums
10/8/02	D&J	8	Filters	2684367	43013	2/24/2000 11/5/1999	02-012 10-003	20 cy, 10 cy injection well
9/30/02	D&J	8	Flouride precipitate	2684308	42921	12/7/99	11-003 10-003	360 bbls/week
10/21/02	D&J	12	Flouride precipitate	2684333	43236	12/7/99	11-003	360 bbls/week
10/21/02	D&J	8	Flouride precipitate	2684344	42976	12/7/99	11-003	360 bbls/week
11/7/02	D&J	8	Flouride precipitate	2684376	43483	12/7/99	11-003	360 bbls/week
11/7/02	D&J	8	Flouride precipitate	2684384	43560	12/7/99	11-003	360 bbls/week
2/21/03	D&J	8	Flouride precipitate	2684389	44995	12/7/99	11-003	360 bbls/week
2/21/03	D&J		Flouride precipitate	2684390	45018	12/7/99	11-003	360 bbls/week
2/18/03	D&J	8	Flouride precipitate	2684409	44174	12/7/99	11-003	360 bbls/week
12/26/02	D&J	8	Flouride precipitate	2684410	44128	12/7/99	11-003	360 bbls/week
1/3/03	D&J	8	Flouride precipitate	2684432	44241	12/7/99	11-003	360 bbls/week
1/6/03	CRI	8	Flouride precipitate	2684433	44317	12/7/99	11-003	360 bbls/week
3/4/03	D&J	8	Flouride precipitate	2684434	45115	12/7/99	11-003	360 bbls/week
12/9/02	D&J	8	Flouride precipitate	2684523		12/7/99	11-003	360 bbls/week
12/3/02	D&J	8	Flouride precipitate	2684529	43924	12/7/99	11-003	360 bbls/week
11/1/02	D&J	8	Flouride precipitate	2684542	43375	12/7/99	11-003	360 bbls/week
11/4/02	D&J	8	Flouride precipitate	2684543	43402	12/7/99	11-003	360 bbls/week
10/16/02	D&J	8	Flouride precipitate	2684547	43247	12/7/99	11-003	360 bbls/week
11/27/02	D&J	8	Flouride precipitate	2684572	43804	12/7/99	11-003	360 bbls/week
11/24/02	D&J	8	Flouride precipitate	2684577	43733	12/7/99	11-003	360 bbls/week
11/22/02	D&J	8	Flouride precipitate	2684578	43731	12/7/99	11-003	360 bbls/week
11/19/02	D&J	8	Flouride precipitate	2684594	43871	12/7/99	11-003	360 bbls/week
12/27/02	D&J	8	Flouride precipitate	2684603	44139	12/7/99	11-003	360 bbls/week
12/18/02	D&J	8	Flouride precipitate	2685032	44062	12/7/99	11-003	360 bbls/week
12/17/02	D&J	8	Flouride precipitate	2685036	44060	12/7/99	11-003	360 bbls/week
12/16/02	D&J	8	Flouride precipitate	2685037	44019	12/7/99	11-003	360 bbls/week
12/12/02	CRI	8	Flouride precipitate	2685038	43998	12/7/99	11-003	360 bbls/week
2/14/03	D&J		Flouride precipitate	2685044	44931	12/7/99	11-003	360 bbls/week
2/10/03	D&J		Flouride precipitate	2685049	44873	12/7/99	11-003	360 bbls/week
2/10/03	D&J		Flouride precipitate	2685052	44853	12/7/99	11-003	360 bbls/week
2/7/03	D&J		Flouride precipitate	2685053	44852	12/7/99	11-003	360 bbls/week
2/4/03	D&J	8	Flouride precipitate	2685054	44819	12/7/99	11-003	360 bbls/week
1/28/03	D&J	8	Flouride precipitate	2685065	44758	12/7/99	11-003	360 bbls/week
1/27/03	D&J	8	Flouride precipitate	2685069	44754	12/7/99	11-003	360 bbls/week
3/10/03	D&J	10	Flouride precipitate	2685080	45168	12/7/99	11-003	360 bbls/week

2/17/03	D&J		Flouride precipitate	2685401	44934	12/7/99	11-003	360 bbls/week
3/17/03	D&J	8	Flouride precipitate	2687956	45247	12/7/99	11-003	360 bbls/week
3/17/03	D&J	8	Flouride precipitate	2687957	45246	12/7/99	11-003	360 bbls/week
4/7/03	D&J	8	Flouride precipitate	2687978	45428	12/7/99	11-003	360 bbls/week
4/10/03	D&J	8	Flouride precipitate	2687987	45469	12/7/99	11-003	360 bbls/week
4/24/03	D&J	8	Flouride precipitate	2688005	45932	12/7/99	11-003	360 bbls/week
3/12/03	D&J	8	Flouride precipitate	2688126	45199	12/7/99	11-003	360 bbls/week
10/28/02	D&J	8	Flouride precipitate	2785208	43308	12/7/99	11-003	360 bbls/week
10/14/02	D&J	8	Flouride precipitate	2785215	43158	12/7/99	11-003	360 bbls/week
9/26/02	D&J		Flouride precipitate	2785216	42887	12/7/99	11-003	360 bbls/week
3/24/03	D&J	8	Flouride precipitate	2785233	45342	12/7/99	11-003	360 bbls/week
1/13/03	D&J	10	Flouride precipitate	2785273	44414	12/7/99	11-003	360 bbls/week
1/10/03	D&J	8	Flouride precipitate	2785274	44380	12/7/99	11-003	360 bbls/week
1/15/03	D&J	8	Flouride precipitate	2785287	44519	12/7/99	11-003	360 bbls/week
1/16/03	D&J	8	Flouride precipitate	2785289	44582	12/7/99	11-003	360 bbls/week
1/21/03	D&J	8	Flouride precipitate	2785294	44630	12/7/99	11-003	360 bbls/week
1/21/03	D&J	8	Flouride precipitate	2785296	44632	12/7/99	11-003	360 bbls/week
1/23/03	D&J	8	Flouride precipitate	2785303	44678	12/7/99	11-003	360 bbls/week
	D&J	8	Flouride precipitate	2785304	44683	12/7/99	11-003	360 bbls/week
5/19/03	D&J	8	Flouride precipitate	3077578		12/7/99	11-003	360 bbls/week
5/22/03	D&J	8	Flouride precipitate	3077579		12/7/99	11-003	360 bbls/week
5/15/03	D&J	8	Flouride precipitate	3077585		12/7/99	11-003	360 bbls/week
5/16/03	D&J	8	Flouride precipitate	3077594		12/7/99	11-003	360 bbls/week
5/5/03	D&J	8	Flouride precipitate	3077623	46044	12/7/99	11-003	360 bbls/week
5/12/03	D&J	8	Flouride precipitate	3077631		12/7/99	11-003	360 bbls/week
3/5/03	D&J	8	Flouride precipitate, DAF	2685074	45126	10/3/20001 2/7/1999	09-004 11-003	30 super sacks, 360 bbls/week
3/5/03	D&J	8	Flouride precipitate, DAF	2685075	45125	10/3/20001 2/7/1999	09-004 11-003	30 super sacks, 360 bbls/week
3/6/03	D&J	8	Flouride precipitate, DAF	2685077	45142	10/3/20001 2/7/1999	09-004 11-003	30 super sacks, 360 bbls/week
4/29/03	D&J	10	Gas/oil hydrotreater soil	2688112	45967	3/18/02	02.28.02A	450 cy/mo rest of 02
11/12/02	CRI	10	HC Contaminated Soil	2684435	43507	approved on 11/05/02	10.24.02A	20 cy
10/24/02	D&J	10	HC Contaminated Soil	2684466	Shipped to Artesia Aeration			
4/28/03	D&J	10	HC Contaminated Soil	2687640	Shipped to Artesia Aeration			
6/9/03	D&J	10	HC Contaminated Soil	2687695	Shipped to Artesia Aeration			

4/23/03	D&J	10	HC Contaminated Soil	2687732	Shipped to Artesia Aeration			
4/15/03	D&J	10	HC Contaminated Soil	2687996	45515	3/18/02	02.28.02A	450 cy/mo rest of 02
4/15/03	D&J	10	HC Contaminated Soil	2687997	45517	3/18/02	02.28.02A	450 cy/mo rest of 02
4/15/03	D&J	10	HC Contaminated Soil	2687998	45529	3/18/02	02.28.02A	450 cy/mo rest of 02
4/15/03	D&J	10	HC Contaminated Soil	2687999	45543	3/18/02	02.28.02A	450 cy/mo rest of 02
4/15/03	D&J	10	HC Contaminated Soil	2688000	45544	3/18/02	02.28.02A	450 cy/mo rest of 02
4/15/03	D&J	10	HC Contaminated Soil	2688001	45542	3/18/02	02.28.02A	450 cy/mo rest of 02
4/17/03	D&J		HC Contaminated Soil	2688003	45569	3/18/02	02.28.02A	450 cy/mo rest of 02
5/2/03	D&J	10	HC Contaminated Soil	2688068	46018	3/18/02	02.28.02A	450 cy/mo rest of 02
5/2/03	D&J	10	HC Contaminated Soil	2688069	46019	3/18/02	02.28.02A	450 cy/mo rest of 02
4/30/03	D&J	10	HC Contaminated Soil	2688113	45993	3/18/02	02.28.02A	450 cy/mo rest of 02
4/17/03	D&J	10	HC Contaminated Soil	2785162	45560	3/18/02	02.28.02A	450 cy/mo rest of 02
4/21/03	D&J	10	HC Contaminated Soil	2785163	45607	3/18/02	02.28.02A	450 cy/mo rest of 02
4/21/03	D&J	10	HC Contaminated Soil	2785164	45562	3/18/02	02.28.02A	450 cy/mo rest of 02
4/22/03	D&J	10	HC Contaminated Soil	2785165	45819	3/18/02	02.28.02A	450 cy/mo rest of 02
3/21/03	D&J	10	HC Contaminated Soil	2785166	45323	3/18/02	02.28.02A	450 cy/mo rest of 02
4/15/03	D&J	10	HC Contaminated Soil	2785176	45546	3/18/02	02.28.02A	450 cy/mo rest of 02
4/16/03	D&J	10	HC Contaminated Soil	2785251	45545	3/18/02	02.28.02A	450 cy/mo rest of 02
4/11/03	D&J	10	HC Contaminated Soil	2785252	45491	3/18/02	02.28.02A	450 cy/mo rest of 02
4/11/03	D&J	10	HC Contaminated Soil	2785253	45489	3/18/02	02.28.02A	450 cy/mo rest of 02
4/10/03	D&J	10	HC Contaminated Soil	2785254	45470	3/18/02	02.28.02A	450 cy/mo rest of 02

4/10/03	D&J	10	HC Contaminated Soil	2785257	45468	3/18/02	02.28.02A	450 cy/mo rest of 02
4/10/03	D&J	10	HC Contaminated Soil	2785258	45467	3/18/02	02.28.02A	450 cy/mo rest of 02
4/9/03	D&J	10	HC Contaminated Soil	2785259	45459	3/18/02	02.28.02A	450 cy/mo rest of 02
4/22/03	D&J	10	HC Contaminated Soil	2785266	45819	3/18/02	02.28.02A	450 cy/mo rest of 02
4/22/03	D&J	10	HC Contaminated Soil	2785268	45774	3/18/02	02.28.02A	450 cy/mo rest of 02
4/22/03	D&J	10	HC Contaminated Soil	2785269	45522	3/18/02	02.28.02A	450 cy/mo rest of 02
4/14/93	D&J	10	HC Contaminated Soil	2785270	45511	3/18/02	02.28.02A	450 cy/mo rest of 02
3/21/03	D&J	10	HC Contaminated Soil	2875255		3/18/02	02.28.02A	450 cy/mo rest of 02
6/9/03	D&J	10	HC Contaminated Soil	3076982		3/18/02	02.28.02A	450 cy/mo rest of 02
6/9/03	D&J	10	HC Contaminated Soil	3076983		3/18/02	02.28.02A	450 cy/mo rest of 02
5/21/03	D&J	10	HC Contaminated Soil	3077562		3/18/02	02.28.02A	450 cy/mo rest of 02
5/28/03	D&J	10	HC Contaminated Soil	3077563		3/18/02	02.28.02A	450 cy/mo rest of 02
5/27/03	D&J	10	HC Contaminated Soil	3077564		3/18/02	02.28.02A	450 cy/mo rest of 02
5/8/03	D&J	10	HC Contaminated Soil	3077627	46119	3/18/02	02.28.02A	450 cy/mo rest of 02
5/8/03	D&J	10	HC Contaminated Soil	3077628	46121	3/18/02	02.28.02A	450 cy/mo rest of 02
6/2/03	D&J	10	HC Contaminated Soil	3086807		3/18/02	02.28.02A	450 cy/mo rest of 02
6/3/03	D&J	10	HC Contaminated Soil	3086824		3/18/02	02.28.02A	450 cy/mo rest of 02
6/4/03	D&J	10	HC Contaminated Soil	3086988		3/18/02	02.28.02A	450 cy/mo rest of 02
6/9/03	CRI	12	Hydroblast Soil	3076909		approved on 06/04/03	05.02.03	70 cy
6/9/03	CRI	12	Hydroblast Soil	3076910		approved on 06/04/03	05.02.03	70 cy

6/9/03	CRI	12	Hydroblast Soil	3076911		approved on 06/04/03	05.02.03	70 cy
6/9/03	CRI	12	Hydroblast Soil	3076912		approved on 06/04/03	05.02.03	70 cy
4/10/03	D&J	10		2687986	45486	none		
5/14/03	D&J	10	Non-haz trash from non-haz pad	3077595		7/2/01	06.04.01	10 cy/mo rest of 01
4/17/03	D&J	10	Non-haz trash from non-haz pad, asphalt, filters	2688119	45565	7/2/01	06.04.01	10 cy/mo rest of 01
2/24/03	D&J	10	Non-haz waste from behind pipeline, trash and debris	2684393		7/2/01	06.04.01	10 cy/mo rest of 01
11/11/02	D&J	10	Pipeline filters	2684370	43486	2/24/00	02-012	20 cy
4/28/03	D&J	10	Pipeline filters	2688106	45954	2/24/00	02-012	20 cy
3/10/03	D&J	10	Pipeline filters, trash and debris	2688132	45170	2/24/2000 7/02/2001	02-012 06.04.01	20 cy, 10 cy/mo rest of 01
1/22/03	D&J	10	Pipeline filters, trash, debris	2785298	44634	2/24/2000 7/02/2001	02-012 06.04.01	20 cy, 10 cy/mo rest of 01
5/19/03	D&J	10	Pipeline trash and debris and filters	3077584		2/24/2000 7/02/2001	02-012 06.04.01	20 cy, 10 cy/mo rest of 01
11/23/02	D&J	10	Sand, trash and debris	2684590	43399	10/24/00	10-006	approval for a specific tank
3/17/03	D&J	10	TK-433 asphalt	2687958	45249	none		
3/17/03	D&J	10	TK-433 asphalt	2687959	45248	none		
3/14/03	D&J	10	TK-433 asphalt	2687960	45227	none		
10/4/02	D&J		Trash and blast sand	2684455	42945	7/02/2001 10/24/00	06.04.01 10-006	10 cy/mo rest of 01, approval for a specific tank
10/4/02	D&J	10	Trash and blast sand	2684544	43406	7/02/2001 10/24/00	06.04.01 10-006	10 cy/mo rest of 01, approval for a specific tank
2/24/03	D&J	8	Trash non-haz pad	2684392	45019	7/2/01	06.04.01	10 cy/mo rest of 01
3/4/03	D&J	10	Trash, debris non-haz pad	2685073	45114	7/2/01	06.04.01	10 cy/mo rest of 01
3/21/03	D&J	10	Trash, debris non-haz pad	2685076	45319	7/2/01	06.04.01	10 cy/mo rest of 01
3/6/03	D&J	10	Trash, debris non-haz pad	2685078	45141	7/2/01	06.04.01	10 cy/mo rest of 01

4/3/03	D&J	10	Trash, debris non-haz pad	2687550	45748	7/2/01	06.04.01	10 cy/mo rest of 01
3/25/03	D&J	10	Trash, debris non-haz pad	2687562	45358	7/2/01	06.04.01	10 cy/mo rest of 01
3/25/03	D&J	10	Trash, debris non-haz pad	2687564	45356	7/2/01	06.04.01	10 cy/mo rest of 01
3/14/03	D&J	10	Trash, debris non-haz pad	2687963	45218	7/2/01	06.04.01	10 cy/mo rest of 01
3/17/03	D&J	10	Trash, debris non-haz pad	2687981	45245	7/2/01	06.04.01	10 cy/mo rest of 01
3/21/03	D&J	10	Trash, debris non-haz pad	2785234	45318	7/2/01	06.04.01	10 cy/mo rest of 01
2/3/03	D&J	10	Trash, debris, asphalt	2685060	44810	7/2/01	06.04.01	10 cy/mo rest of 01
4/15/03	D&J	10	Trash, debris, asphalt sample cans, cat fines	2687992	45524	7/2/2001 8/10/2000 10/6/2000	06.04.01 08-005 10-002	10 cy/mo rest of 01, 10 drums, 30 super sacks
12/26/02	D&J	10	Trash, debris, cat fines	2684411	44805	7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
1/22/03	D&J		Trash, debris, cat fines, asphalt sample cans	2785300	44682	7/2/2001 8/10/2000 10/6/2000	06.04.01 08-005 10-002	10 cy/mo rest of 01, 10 drums, 30 super sacks
1/24/03	D&J	10	Trash, debris, cat fines, asphalt sample cans	2785301	44681	7/2/2001 8/10/2000 10/6/2000	06.04.01 08-005 10-002	10 cy/mo rest of 01, 10 drums, 30 super sacks
4/8/03	D&J	10	Trash, debris, FCC cat fines	2687972	45436	7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
4/8/03	D&J	10	Trash, debris, FCC cat fines	2687973	45437	7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
5/28/03	D&J	10	Trash, debris, FCC cat fines	3076828	46349	7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
6/9/03	D&J	10	Trash, debris, FCC cat fines	3077559		7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
3/10/03	D&J	10	Trash, debris, FCC cat fines non-haz pad	2688133	45171	7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
4/14/03	D&J	10	Trash, debris, FCC cat fines, asphalt sample cans	2688004	45518	7/2/2001 8/10/2000 10/6/2000	06.04.01 08-005 10-002	10 cy/mo rest of 01, 10 drums, 30 super sacks
5/23/03	D&J	10	Trash, debris, FCC cat fines, asphalt sample cans	3077582		7/2/2001 8/10/2000 10/6/2000	06.04.01 08-005 10-002	10 cy/mo rest of 01, 10 drums, 30 super sacks

6/2/03	D&J	1	Trash, debris, FCC cat fines, asphalt sample cans	3086809		7/2/2001 8/10/2000 10/6/2000	06.04.01 08-005 10-002	10 cy/mo rest of 01, 10 drums, 30 super sacks
6/2/03	D&J	10	Trash, debris, FCC cat fines, concrete	3086812		7/2/2001 10/6/2000	06.04.01 10-002	10 cy/mo rest of 01, 30 super sacks
1/15/03	D&J	8	Trash, debris, FCC cat fines, contaminated soil	2785286	44518	7/2/2001 10/6/2000 3/18/2002	06.04.01 10-002 02.28.02A	10 cy/mo rest of 01, 30 super sacks, 450 cy/mo rest of 02
4/14/03	D&J	10	Trash, debris, non-haz	2688002	45514	7/2/01	06.04.01	10 cy/mo rest of 01
1/31/03	D&J	10	Trash, debris, pipeline filters	2684429	44804	7/2/2001 2/24/2000	06.04.01 02-012	10 cy/mo rest of 01, 20 cy
2/25/03	D&J			2684391	45026			

April 17, 2003

CERTIFIED MAIL
RETURN RECEIPT NO. 5357 7133

Mr. Darrell Moore
Environmental Manager for Water and Waste
Navajo Refining Company L.P.
P.O. Box 159
Artesia, New Mexico 88211-0159

RE: Discharge Permit GW-028
Artesia Refinery
Eddy County, New Mexico

Dear Mr. Moore:

The groundwater discharge permit renewal, GW-028, for the Navajo Refining Company L.P. (Navajo) Artesia Refinery located in the SE/4 of Section 1, E/2 of Section 8, W/2 of Section 9, N/2 of Section 12, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. 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.**

The original discharge permit was approved on October 21, 1991 with an expiration date of October 21, 1996. The discharge permit renewal application dated June 20, 2001 including attachments, and subsequent information dated March 15, 2002, discharge permit addendum dated May 31, 2002 submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge permit is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the permit. Please be advised that approval of this permit does not relieve Navajo Refining Company L.P. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Navajo Refining Company L.P. of its responsibility to comply with any other governmental authority's rules and regulations. Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to Section 3107.C., Navajo Refining Company L.P. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire October 21, 2006** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, 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.

The discharge permit application for the Navajo Refining Company L.P., Artesia Refinery is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge permit will be assessed a fee equal to the filing fee of $100.00 plus flat fee of $8400.00 for Oil Refineries. The OCD has not received the $8400.00 flat fee.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail WPRICE@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,

Roger C. Anderson
Environmental Bureau Chief
RCA/lwp
Attachment-1
xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PERMIT GW-028 APPROVAL
Navajo Refining Company L.P., Artesia Refinery
DISCHARGE PERMIT APPROVAL CONDITIONS
April 17, 2003

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received by the OCD. There is a required flat fee of $8400.00 for Oil Refineries. The fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. OCD recommends that Navajo pay the required flat fee 30 days after permit approval. If Navajo chooses to make annual payments then OCD will require documentation of payment to be included in the annual report.

2. Commitments: Navajo Refining Company L.P. will abide by all commitments submitted in the discharge permit renewal application dated June 20, 2001 including attachments, subsequent information dated March 15, 2002, discharge permit addendum dated May 31, 2002 and these conditions for approval.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite. OCD will allow master plans to be used that identifies all tanks, location, size and contents with a numbering system marked on the tanks which corresponds to plot plans contained in the plan.

8. Below Grade Tanks/Sumps/Pits/Ponds: All below grade tanks, sumps, pits and ponds must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All below grade tanks, sumps and pits must be tested annually or as specified below (Additional Conditions), except systems that have secondary containment with leak detection. These systems with leak detection shall have a monthly inspection of the leak detection to determine if the primary containment is leaking. Results of tests and inspections shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Any system found to be leaking shall be reported pursuant to Item # 12. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

   API Separators: A closure plan for OCD approval shall be filed by February 28, 2004 for the Old API separator (South Plant), the North and South Plant current API Separators and the Wastewater Plant Separator.

   New Wastewater (Total Plant) API Separator: Navajo must conform to permit condition Item #8. above.

   Additional Conditions: Navajo shall develop a spreadsheet that contains all underground tanks/sumps/pits. Each device or system shall have an identification number, drawing reference, date installed, test dates, test method, pass/fail/repair information with signature, and investigation results if applicable. Navajo shall test at a minimum 20% of the total below grade devices each year.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines including the effluent pipeline between the main refinery complex and the disposal wells, must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

   Additional Conditions: Navajo shall develop a spreadsheet that contains all underground process and wastewater lines. Each line shall have an identification number, drawing reference, date installed, test dates, test method, pass/fail/repair information with signature, and investigation results if applicable. Navajo shall test at a minimum 20% of the underground process/wastewater pipelines each year.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which 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.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected monthly to ensure proper operation and to prevent over topping or system failure. All open to atmosphere spill collection devices will be emptied of fluids, other than rainwater, within 48 hours of discovery. Enclosed secondary containment devices shall be emptied of all fluids within 48 hours to ensure that the primary device is not leaking. A record of inspection will be retained on site for a period of five years.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Artesia District Office.

13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis.

OCD is attaching a copy of the Non-Hazardous Material Flow Diagram supplied in the discharge plan addendum dated May 31, 2002.

Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge permit, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division. The following waste is hereby approved: Solid Waste (Trash/Refuse).

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water Plan: Navajo Refining Company L.P. shall maintain stormwater runoff controls. As a result of operations if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off then Navajo shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Navajo shall also take immediate corrective actions pursuant to Item 12 of these conditions.

    Unlined Stormwater Retention Basins: These basins shall be lined, monitored, and records maintained pursuant to Item #8 of these conditions of approval or Navajo may propose an alternate method subject to OCD approval.

16. Reverse Osmosis Reject Water:

    A. The discharge of reject water from the reverse osmosis treatment facility to Navajo Farms shall not exceed the following standards: ***Discharge to Eagle Draw is prohibited.***

Constituent	Concentration	Unit
Aluminum	87	ug/l
Arsenic	100	ug/l
Beryllium	18	ug/l
Barium	1000	ug/l
Boron	750	ug/l

Cadmium	10	ug/l
Chlordane	0.015	ug/l
Chlorine	30	ug/l
Chromium	50	ug/l
Cobalt	50	ug/l
Copper	1000	ug/l
Cyanide	18	ug/l
Fluoride	2500 *	ug/l
Iron	1000	ug/l
Manganese	200	ug/l
Lead	6	ug/l
Mercury	0.042	ug/l
Nickel	200	ug/l
NH3 as N	0.07	ug/l
Radium 226+228	30	pCi/l
Selenium	12	ug/l
Silver	0.4	ug/l
Vanadium	282	ug/l
Zinc	10	mg/l
Sulfate	2661	mg/l
Chloride	275	mg/l
Total Dissolved Solids	4555	mg/l
Chemical Oxygen Demand	125	mg/l

pH	6.6 to 8.6	S.U.
Bod	< 30	mg/l
TSS	<.5	mg/l
Fecal Coloform Bacteria	<500 organisms	Per/ 100 ml

*Amended June 29, 1993

B. Constituents not listed in A. above for which there are standards established pursuant to WQCC Regulation 3103 will not exceed the set numerical standard in that regulation.

C. No toxic pollutant listed in WQCC regulation 1101 TT. will be present in the discharge.

D. SAMPLING: samples of the discharge will be taken and analyzed on the following schedule:

i. Major cations/anions and heavy metals will be sampled at a minimum of semi-annually.

ii. All other constituents will be sampled annually, including the constituents in the above table and Volatile, Semi-Volatile Organic Compounds including Pesticides using EPA methods 624,625 and 608 respectively.

iii. Analysis for all parameters will be pursuant to EPA approved methods.

iv. Sampling and analytical QA/QC records will be retained for all sampling events.

v. All samples will be "grab" samples.

vi. Discharge flow will be monitored and recorded on a daily basis.

vii. Sampling frequency can be reduced, on a parameter-by-parameter basis, upon application and OCD approval provided all analytical data in the previous year was no greater than seventy-five (75) percent of the effluent limit.

viii. All samples collected in a monitoring period will be reported.

ix. Sampling and flow measurement will be representative of the volume and nature of the discharge.

x. ***Any constituent that exceeds the standards listed above shall be cause for Navajo to stop discharging to the farm area and provide OCD immediate notification. Navajo may not resume discharging until the problem has been corrected.***

xi. Sample data, analytical results and flow measurements shall be reported to the OCD in the annual report.

17. Vadose Zone and Water Pollution: The previously submitted investigation(s) and remediation permits were submitted pursuant to the discharge permit and all future discoveries of contamination will be addressed through the discharge permit process.

Ground Water and Treatment System Monitoring:

A. Navajo shall collect perimeter groundwater samples on a semi-annual basis from monitoring wells MW-52, KWB-2R, KWB-13, KWB-9, KWB-3A, KWB-11A, KWB-7, NP-1, NP-2, KWB-45, and MW-18. The samples shall be analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX), and methyl tertiary butyl ether (MTBE) pursuant to EPA approved methods.

B. Navajo shall collect groundwater samples on an annual basis from monitoring wells KWB-1A, KWB-1C, KWB-2R, KWB-3A, KWB-4, KWB-5, KWB-6, KWB-8, KWB-9, KWB-10, MW- 18, MW-28, MW-29, MW-45, MW-48, MW-49 and from the following recovery trenches that do not have measurable phase-separated hydrocarbons (PSH's); RW-1 through RW-15, and Bolton Road # 1-4. These samples shall be analyzed for Volatiles, Semi-Volatiles, WQCC Metals, General Chemistry including Major Anions and Cations, nitrate/nitrite, dissolved oxygen and oxidation-reduction potential (ORP) all pursuant to EPA approved methods.

C. All Recovery Trenches and all wells (including North Colony Landfarm and Tetra-ethyl-lead wells) with phase-separated hydrocarbons (PSH's) shall be checked at a minimum of once per month and recorded on a spreadsheet. The sheet shall be in table form containing all of the recovery wells, date inspected, product thickness measured to .01 inch, amount of product/water recovered. If product is observed then

appropriate steps will be taken to recover product as reasonably possible using the best available technology.

D. Navajo shall collect groundwater samples from the following irrigation wells at the beginning and end of the irrigation season; RA 313, RA 314, RA3723, RA3156, RA 3353, RA 1331, RA 4196, RA 4798 and Larue well. The samples shall be analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX), methyl tertiary butyl ether (MTBE), Volitale Organic Compounds (VOC's), Semi-Volatile Compounds, WQCC Metals, General Chemistry including Major Anions and Cations all pursuant to EPA approved methods.

E. Evaporation Ponds near Pecos River (Out-of-Service): Navajo shall collect perimeter groundwater samples on a bi-annual basis with at least one half of these wells being analyzed each year. The samples shall be analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX), and methyl tertiary butyl ether (MTBE), Semi-Volatiles, WQCC Metals and General Chemistry including anions and cations pursuant to EPA approved methods. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report.

F. RCRA Solid Waste Management Units (SMUS) or AREAS OF CONCERN:

Navajo shall collect groundwater samples on a quarterly basis from monitoring wells NCL-32, 33, 34, 44, 49, TEL-1, 2, 3, 4, and from the following monitor wells MW-53, 54A, 55. These samples shall be analyzed for Volatiles, Semi-Volatiles, WQCC Metals, General Chemistry including Major Anions and Cations, nitrate/nitrite, dissolved oxygen and oxidation-reduction potential (ORP) all pursuant to EPA approved methods. Navajo shall incorporate these findings into a summary table with all other monitor points on-site. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report.

G. ANNUAL REPORT: An annual report will be submitted to the OCD by February 28 of each year. The annual reports will contain:

i. A description of the monitoring and remediation activities which occurred during the year including conclusions and recommendations.

ii. Summary tables listing past and present laboratory analytic results of all water quality sampling for each monitoring point and plots of concentration vs. time for contaminants of concern from each monitoring point. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report. Copies of the most recent years

laboratory analytical data sheets will also be submitted

iii. An annual water table potentiometric elevation map using the water table elevation of the ground water in all refinery monitor wells. A corrected water table elevation shall be determined for all wells containing phase-separated hydrocarbons. This map shall show well locations, pertinent site features, and the direction and magnitude of the hydraulic gradient.

iv. Plots of water table elevation vs. time for each ground water monitoring point.

v. A annual product thickness map based on the thickness of free phase product on ground water in all refinery monitor wells. This map shall include isopleth lines for products and contaminants of concern.

vi. The volume of product recovered in the remediation/treatment system during each quarter and the total recovered to date.

vii. The volume of total fluids pumped from all recovery wells and trenches during each quarter and the total volume recovered to date.

viii. Electronic filing: OCD would like to encourage Navajo to file this report in an acceptable electronic format.

H. Additional Requirements:

i. Up-date all on-site and off-site maps, showing the current status of all recovery/monitor/ domestic, irrigation wells and pertinent features including the stormwater basins.

ii. Navajo shall investigate the area between monitor well KWB-2R and the refinery to determine if a new remediation recovery trench system is required in this area. The results of this investigation shall be submitted to the OCD by July 15, 2003.

iii. Replace MW-1 at the evaporation ponds.

iv. If phase separated hydrocarbons are found east of the Bolton Road recovery system, then a new recovery system shall be installed in this area

including down-gradient monitor wells. Any wells that reveal contaminants that exceed WQCC groundwater standards shall be reason to install addition wells to determine the extent of contamination. All new wells shall be added to the maps and included in the annual report.

v. Bolton Road recovery trench #1 and 2 were noted to be dry. OCD is concerned that contaminants may be flowing under and past these trenches. Please modify these trenches or install monitor wells directly east of these devices by November 15, 2003.

vi. Navajo shall investigate the area between RW-10 and RW-5 and the refinery to determine if a new remediation recovery trench system is required in this area. The results of this investigation shall be submitted to the OCD by November 15, 2003.

vii. Navajo shall install an additional monitor well northeast of MW-45. OCD is concerned about contamination migrating off of Navajo property in this area by November 15, 2003.

viii. Navajo shall notify the OCD Santa Fe and local district office at least 2 weeks in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples. For large facilities, i.e. referinies, an annual notification will suffice.

ix. Navajo shall notify the NMOCD of the discovery of separated-phase hydrocarbons or the exceedance of a WQCC standard in any down gradient monitor well where separate-phase hydrocarbons were not present or where contaminant concentrations did not exceed WQCC standards during the preceding monitoring event pursuant to NMOCD Rule 116.

18. Transfer of Discharge permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.

19. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

20. Certification: **Navajo Refining Company L.P.** by the officer whose signature appears below, accepts this and agrees to comply with all terms and conditions contained herein. **Navajo Refining Company L.P.** further acknowledges that these conditions and requirements of this may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **Navajo Refining Company L.P.**

_____
Company Representative- print name

_____Date_____
Company Representative- Sign

Title_____

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388, HOBBS, NM 88241

ROSWELL NM 883
PM
08 DEC
HOBBS NM
DEC -8 05

POSTAGE
PB344552

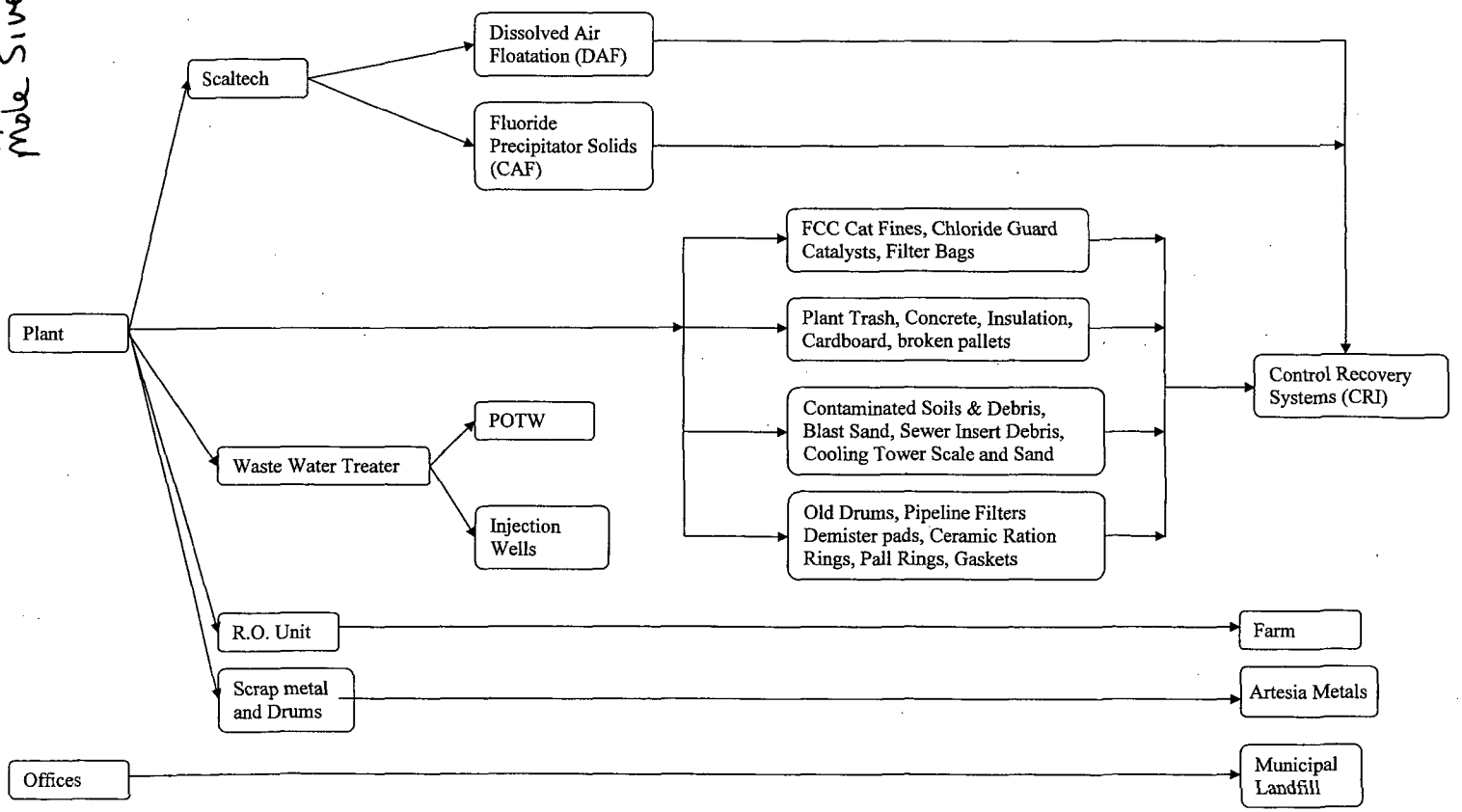
Ms Gail MacQuesten
NMOCD
1220 S. Saint Francis Dr
Santa Fe, NM 87505

Mantyre -
I got this in the mail from CRI. No letter came with it. I assume they are trying to show us they had approval for some of the things they did.

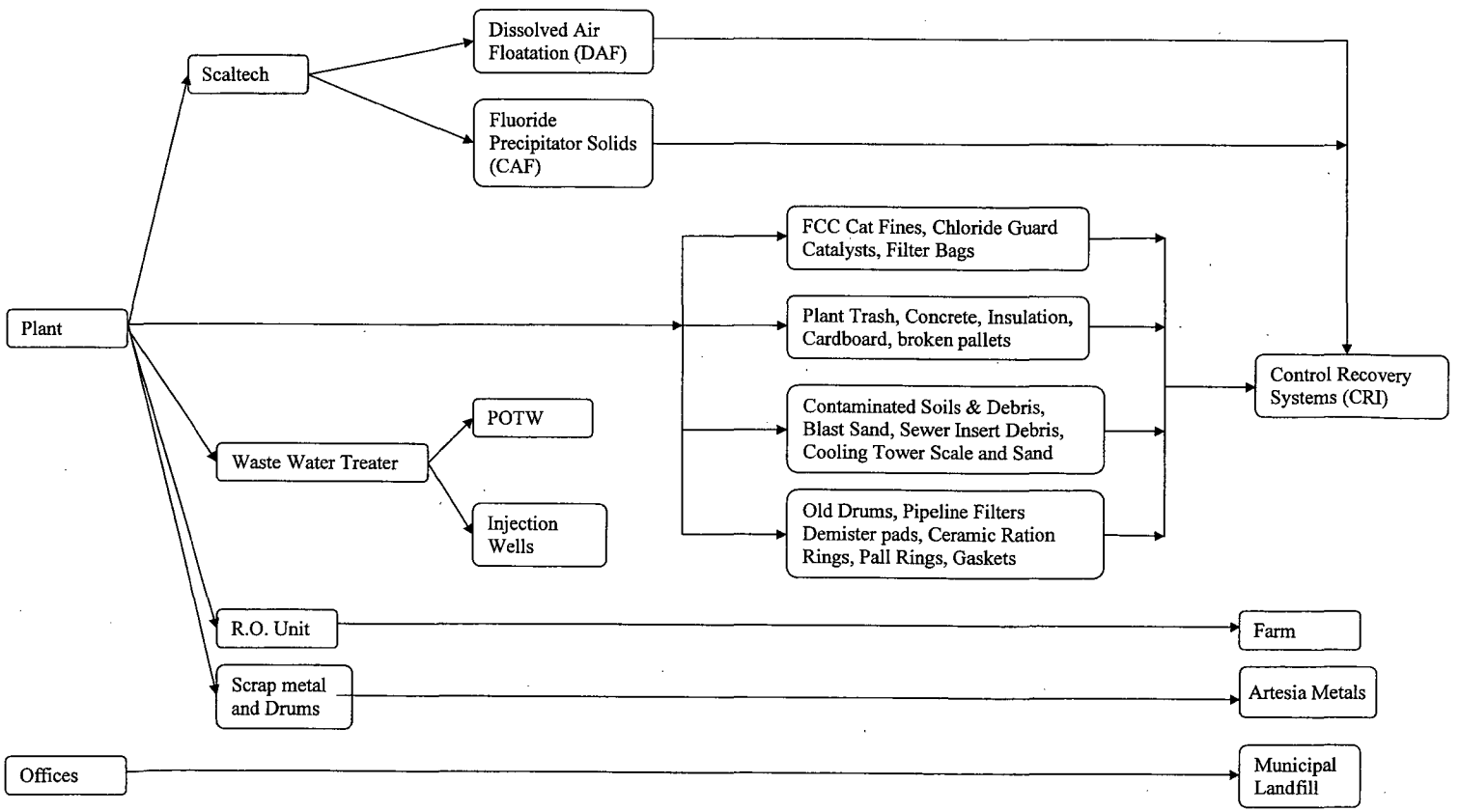
Gail

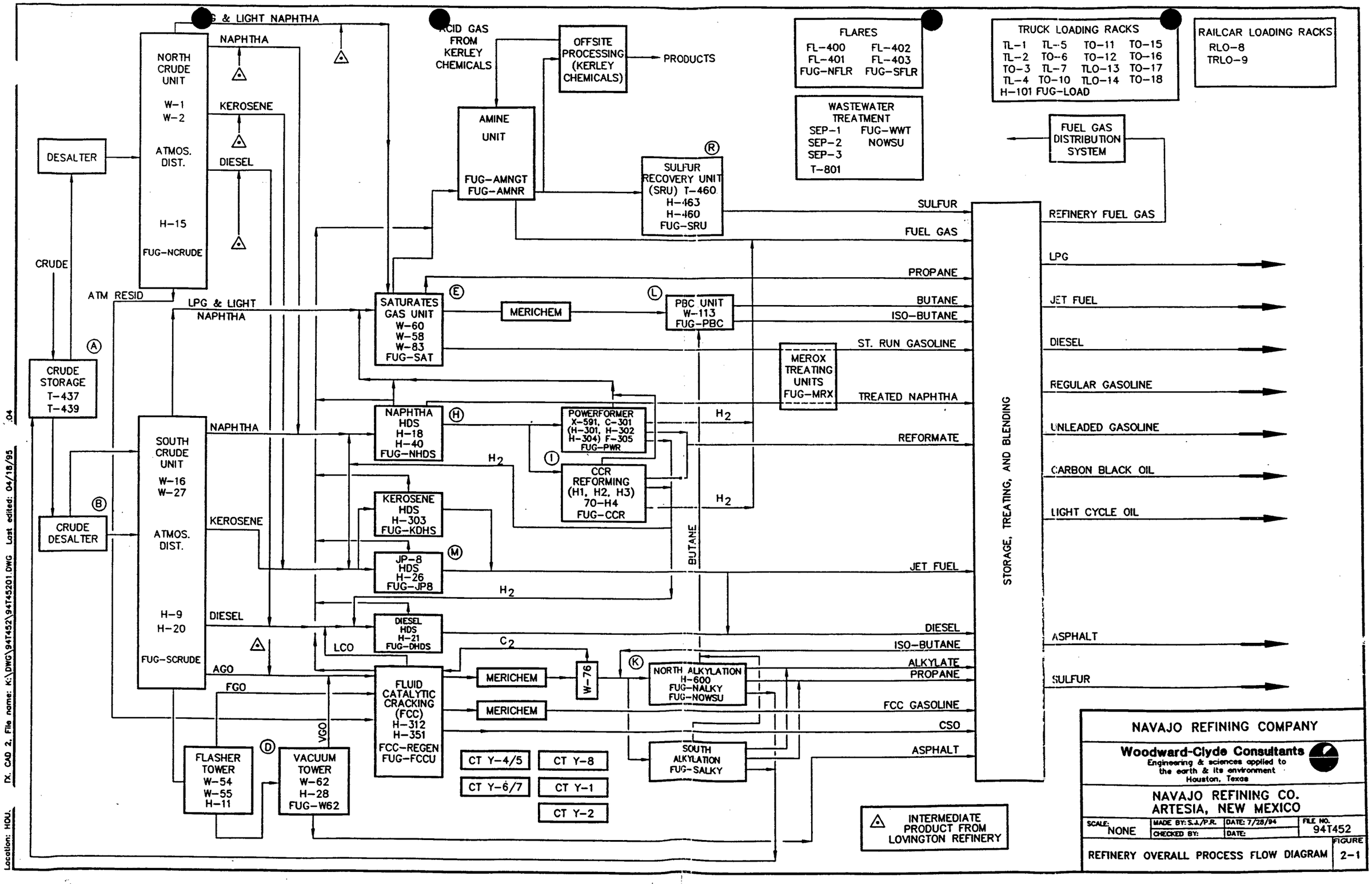
Asphalt TK433
Asphalt Sample Cans
Mole Sieve

NON-HAZARDOUS MATERIAL FLOW DIAGRAM



NON-HAZARDOUS MATERIAL FLOW DIAGRAM





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NAVAJO REFINING COMPANY

Woodward-Clyde Consultants
Engineering & sciences applied to the earth & its environment
Houston, Texas

NAVAJO REFINING CO.
ARTESIA, NEW MEXICO

SCALE: NONE	MADE BY: S.J./P.R.	DATE: 7/28/94	FILE NO. 94T452
	CHECKED BY:	DATE:	

REFINERY OVERALL PROCESS FLOW DIAGRAM — FIGURE 2-1

& LIGHT NAPHTHA
NAPHTHA
KEROSENE
DIESEL
NORTH CRUDE UNIT
W-1
W-2
ATMOS. DIST.
H-15
FUG-NCRUDE
DESALTER
CRUDE
ATM RESID
LPG & LIGHT NAPHTHA
CRUDE STORAGE T-437 T-439
CRUDE DESALTER
SOUTH CRUDE UNIT
W-16
W-27
ATMOS. DIST.
H-9
H-20
FUG-SCRUDE
NAPHTHA
KEROSENE
DIESEL
AGO
FGO
LCO
VGO
FLASHER TOWER W-54 W-55 H-11
VACUUM TOWER W-62 H-28 FUG-W62
ACID GAS FROM KERLEY CHEMICALS
OFFSITE PROCESSING (KERLEY CHEMICALS)
PRODUCTS
AMINE UNIT
FUG-AMNGT
FUG-AMNR
SULFUR RECOVERY UNIT (SRU) T-460
H-463
H-460
FUG-SRU
SATURATES GAS UNIT W-60 W-58 W-83 FUG-SAT
MERICHEM
PBC UNIT W-113 FUG-PBC
NAPHTHA HDS H-18 H-40 FUG-NHDS
POWERFORMER X-591, C-301 (H-301, H-302 H-304) F-305 FUG-PWR
CCR REFORMING (H1, H2, H3) 70-H4 FUG-CCR
KEROSENE HDS H-303 FUG-KDHS
JP-8 HDS H-26 FUG-JP8
DIESEL HDS H-21 FUG-DHDS
FLUID CATALYTIC CRACKING (FCC) H-312 H-351 FCC-REGEN FUG-FCCU
MERICHEM
MERICHEM
W-76
NORTH ALKYLATION H-600 FUG-NALKY FUG-NOWSU
SOUTH ALKYLATION FUG-SALKY
MEROX TREATING UNITS FUG-MRX
H_2
H_2
H_2
H_2
C_2
BUTANE
CT Y-4/5
CT Y-6/7
CT Y-8
CT Y-1
CT Y-2
FLARES
FL-400 FL-402
FL-401 FL-403
FUG-NFLR FUG-SFLR
WASTEWATER TREATMENT
SEP-1 FUG-WWT
SEP-2 NOWSU
SEP-3
T-801
TRUCK LOADING RACKS
TL-1 TL-5 TO-11 TO-15
TL-2 TO-6 TO-12 TO-16
TO-3 TL-7 TLO-13 TO-17
TL-4 TO-10 TLO-14 TO-18
H-101 FUG-LOAD
RAILCAR LOADING RACKS
RLO-8
TRLO-9
FUEL GAS DISTRIBUTION SYSTEM
STORAGE, TREATING, AND BLENDING
SULFUR
FUEL GAS
PROPANE
BUTANE
ISO-BUTANE
ST. RUN GASOLINE
TREATED NAPHTHA
REFORMATE
JET FUEL
DIESEL
ISO-BUTANE
ALKYLATE
PROPANE
FCC GASOLINE
CSO
ASPHALT
REFINERY FUEL GAS
LPG
JET FUEL
DIESEL
REGULAR GASOLINE
UNLEADED GASOLINE
CARBON BLACK OIL
LIGHT CYCLE OIL
ASPHALT
SULFUR
INTERMEDIATE PRODUCT FROM LOVINGTON REFINERY

NAVAJO REFINING COMPANY

Woodward-Clyde Consultants
Engineering & sciences applied to the earth & its environment
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NAVAJO REFINING CO.
ARTESIA, NEW MEXICO

SCALE: NONE	MADE BY: S.J./P.R.	DATE: 7/28/94	FILE NO. 94T452
	CHECKED BY:	DATE:	FIGURE 2-1

REFINERY OVERALL PROCESS FLOW DIAGRAM

Location: HOU. IX. CAD 2. File name: K:\DWG\94T452\94T45201.DWG Last edited: 04/18/95 .04

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
P.O. Box 13087
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N.M.D.0.4.8.9.1.8.8.1.7 | Manifest Document No.

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Navajo Refining Co.
P.O. Box 159
Artesia, NM 88210

4. Generator's Phone (505) 748-3311

A. State Manifest Document Number 3076809

B. State Generator's ID

5. Transporter 1 Company Name D+J | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CRI
Hwy 180
Carlsbad, NM 88220 | 10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone (505) 887-6504

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. Non Hazardous Waste, Contaminated Soil, Solid, N.O.S.	001	CM	10	Y	
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
Tank Bottoms / FCC Cat Fines / Asphalt Sample Cans / Filters
02-012 / 10-002 / 09-005 / 10-008

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
24 Hour Phone: (505) 748-3311

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Charlie Plymale | Signature | Month 6 Day 2 Year 05

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials | Date

Printed/Typed Name | Signature | Month 6 Day 2 Year 05

18. Transporter 2 Acknowledgement of Receipt of Materials | Date

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space
Non Haz Trash+Rebar / FCC Cat Fines / Asphalt Sample Cans / Filters

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date Month 6 Day 2 Year 05

TCEQ-0311 (Rev. 09/01/02) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
P.O. Box 13087
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NMD048918817 | Manifest Document No.

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Navajo Refining Co.
P.O. Box 159
Artesia, NM 88210

4. Generator's Phone (505) 748-3311

A. State Manifest Document Number: 3076812

B. State Generator's ID

5. Transporter 1 Company Name: D + S | 6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CRI
Hwy 180
Carlsbad, NM 88220 | 10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone: (505) 887-6504

GENERATOR

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
	a. Non Hazardous Waste, Contaminated Soil, Solid, N.O.S.	001	CM	10	Y	
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
Trash/Debris 02-012 / Plastic Pellets 10-008 / Concrete 02-012

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

24 Hour Phone: (505) 748-3311

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Charlie Plymale		6	2	03

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year
		6	2	03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year

FACILITY

19. Discrepancy Indication Space
Non Haz Trash/Debris/Plastic Pellets/Concrete

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date: Month	Day	Year
John Mills		6	2	03

TCEQ-0311 (Rev. 09/01/02)

White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

Controlled Recovery Inc.
P.O. Box 388
Hobbs, N.M. 88241-0388
Phone: (505) 393-1079
Fax: (505) 393-3615

Controlled Recovery Inc.

Fax

To:	Martyne Keiling	From:	David Parsons
Fax:	505-476-3462	Pages:	4,including cover
Phone:		Date:	6/10/2003
Re:		CC:	

Urgent ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

RECEIVED
JUN 10 2003
Environmental Bureau
Oil Conservation Division

Oil Commission Division
1625 N. French Dr
Hobbs, NM 88240

Hobbs District Office

RE: Smoldering Debris in Pit at Disposal Facility.

CRI was contacted at 3:25 P.M. Saturday, May 24, 2003, by Joanna with the State Police Department of a possible fire at our disposal facility located at Halfway, NM. Two subsequent calls were logged t 3:35 P.M. from Sgt Rios with the State Police and at 3:44 P.M. from Buddy with O.C.D.

CRI employee arrived on site shortly after 4:00 P.M. and met with Hobbs Fire Department, Monument Fire Department and State Police. Inspection by employee found smoldering debris located in one disposal pit. Employee informed State Police he would cover it with soil and all emergency personnel left. Exact cause is unknown. CRI will keep debris covered with soil to prevent future occurrence.

The facility was closed and secured by locked gates. A sign with emergency phone numbers is located just inside entrance gates and is visible from the gate.

If any other reporting is necessary please contact me immediately.

Sincerely,

David Parsons

David Parsons

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

RECEIVED
JUN 10 2003
Environmental Bureau
Oil Conservation Division

June 5, 2003

Oil Conservation Division
Hobbs District Office
1625 N French Dr
Hobbs, NM 88240

RE: Follow up report on smoldering debris at Disposal Facility.

Since my previous report I have learned that Monument Fire Department responded to our facility sometime after midnight Saturday, May 24th. Our facility sign located just inside the gate had sustained wind damage within the last few days and had blown down in front of the post that held it up. All necessary information is on the sign, however it was laying face down and we had not flipped it over to be easily read. We have since put up new plywood and reattached the sign.

Hobbs Fire Department, not knowing CRI stood for Controlled Recovery, Inc., could not find any information in their emergency manual. Emergency response phone numbers were given to David Hooten's office (City of Hobbs emergency response) and are probably under Controlled Recovery as well.

After CRI was notified of the fire, the Fire Department notified Navajo Lea Refinery in Lovington. Steve Terry was notified and he in turn called the Artesia facility with the call then being forwarded to Jeff Byrd in their Environmental Department. Jeff contacted Phil Youngblood and they visited the site late Saturday afternoon. Darrell Moore and Charlie Plymale with the Environmental Division of Navajo were notified Tuesday morning.

Cause of the fire remains unknown. A site inspection was done Thursday, May 29th by Darrell Moore and Charlie Plymale, (Navajo) and David Parsons and Lary Parker of CRI. The catalyst in question was located on the south side of the pit and does not appear to have burned. Evidence that would indicate as large a fire as was reported was not found. There were very little ashes and very little smoke stain to the walls of the pit. Card board, plastic, wooden pallets and other debris that could have burned are still in the pit. The fire seemed to have been mostly in the Southeast corner of the pit in approximately 50' square area.

CRI was first notified at 3:25 P.M. Saturday, May 24th. CRI employee Jason Null traveled to location. Upon arrival he called plant manager John Phillips and reported to

him that some smoke was coming from the pit. John told him (Jason) to cover with soil. He also attempted to notify me (David Parsons), when he could not get me he called Lary Parker.

Hobbs Fire Department had asked if EPA had been notified and Jason Null relayed the message to Lary Parker. Lary told him that EPA did not have jurisdiction over CRI, and that OCD is the regulatory agency. Jason relayed this message to Hobbs Fire Department. This was also relayed to Buddy Hill with OCD with some misunderstanding that Jason was referring to OCD instead of EPA.

I was out of town Saturday, May 24th and when I checked my voice mail at approximately 11:30 P.M. I had messages from Lary Parker (CRI) and Gary Wink (OCD). I talked to Jason Null and Lary Parker at that time and they told me about the fire and what had been done. I determined that OCD had been notified and Buddy Hill had visited the site.

Sincerely,

David Parsons

David Parsons

CRI ticket #

NAVAJO

DATE	TRANSPORTER	VOLUME CUBIC YARDS	WASTE TYPE	MANIFEST NUMBER	
10/21/2002	D & J	12	FLOURIDE PRECIPITATE	2684333	✓ 43236
10/24/2002	D & J	10	HC CONTAMINATED SOIL	2684466	✓ dated 11/5/02 – Aeration
12/9/2002	D & J	8	FLOURIDE PRECIPITATE	2684523	✓ dated 10/29/02 — cont. soil
10/4/2002	D & J	8	DAF	2684544	✓ dated 11/05/02 43406
2/17/2003	D & J		FLOURIDE PRECIPITATE	2685401	← 5041 44934
4/14/2003	D & J	10	TRASH,DEBRIS,NON-HAZ	2686002	8002 45514
4/28/2003	D & J	10	HC CONTAMINATED SOIL	2687640	Aeration
6/9/2003	D & J	10	HC CONTAMINATED SOIL	2687695	← Aeration
4/23/2003	D & J	10	HC CONTAMINATED SOIL	2687732	Aeration
5/13/2003	D & J	8	DAF	2688102	✓ 46169
5/13/2003	D & J	8	DAF	2688103	✓ 46171
4/21/2003	D & J	8	PRECIPITATOR SOLIDS	2688188	? 45563 → ? 2688118

8118

RECEIVED

AUG 14 2003

Environmental Bureau
Oil Conservation Division

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	Manifests in CRI records not examined at Navajo: CRI Acceptance No.	
10/16/02	D&J	8	DAF	2684306	43159			
10/16/02	D&J	8	DAF	2684307	43030			
9/30/02	D&J	8	Flouride precipitate	2684308	42921			
10/16/02	D&J	8	DAF	2684309	43185			
10/9/02	D&J	8	DAF	2684310	43025			
9/27/02	D&J	10	Chloride Guard	2684332	42901		10-7	
10/21/02	D&J	12	Flouride precipitate	2684333	43236	2684334	42976	Fl. Prec.
10/21/02	D&J	8	Flouride precipitate	2684344				
10/2/02	BES	8	DAF	2684360	42934			
10/2/02	BES	8	DAF	2684361	42926			
10/2/02	CRI	15	DAF	2684362	42940			
10/3/02	CRI	8	FCC cat fines	2684363	42942			
10/7/02	D&J	10	FCC cat fines	2684366	42978			
10/8/02	D&J	8	Filters	2684367	43013			
10/8/02	D&J	8	DAF, flouride precipitator solids	2684368	43013			
11/12/02	D&J	10	Blast sand	2684369	43511			
11/11/02	D&J	10	Pipeline filters	2684370	43486			
11/11/02	D&J	8	DAF	2684371	43510			
11/11/02	D&J	10	Concrete	2684372	43509			
11/11/02	D&J	8	DAF	2684373	43542			
11/7/02	D&J	8	DAF	2684374	43440			
11/7/02	D&J	8	Flouride precipitate	2684376	43483			Asphalt & cat fines Trash
11/7/02	D&J	10	Blast sand	2684377	43508	2684379	44990	
2/19/03	D&J	8	DAF	2684381	44998	2684380	44991	Trash/ Cat Fines 2-19-03
11/7/02	D&J		DAF	2684382	44999			
11/7/02	D&J	8	DAF	2684383	43559			
11/7/02	D&J	8	Flouride precipitate	2684384	43560			
11/13/02	D&J	10	FCC cat fines	2684385	43544			
11/13/02	D&J	8	DAF	2684388	43546			
2/21/03	D&J	8	Flouride precipitate	2684389	44995			
2/21/03	D&J		Flouride precipitate	2684390	45018			
2/25/03	D&J		DAF	2684391	45026			
2/24/03	D&J	8	Trash non-haz pad	2684392	45019			
2/24/03	D&J	10	Non-haz waste from behind pipeline, trash and debris	2684393				
2/26/03	D&J	8	DAF	2684395	45029			
2/27/03	D&J	8	DAF, flouride precipitator solids	2684398	45059			
2/18/03	D&J		DAF	2684401	44951			
2/18/03	D&J		DAF, flouride precipitator solids	2684403	44954			
2/18/03	D&J	8	Flouride precipitate	2684409	44174			
12/26/02	D&J	8	Flouride precipitate	2684410	44128			
12/26/02	D&J	10	Trash, debris, cat fines	2684411	44805			
12/31/02	CRI	8	DAF	2684415	44191			
1/2/03	D&J	8	DAF	2684416	44238			
1/2/03	D&J	8	DAF	2684417	44237			

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	Manifests in CRI records not examined at Navajo: CRI Acceptance No.
1/3/03	D&J	8	DAF and flouride precipitate	2684420	44239	2684421	43801
12/30/02	D&J	8	DAF	2684422	44173	2684423	43872 43972
1/31/03	D&J	10	Trash, debris, pipeline filters	2684429	44804	2684427	43057
1/3/03	D&J	8	Flouride precipitate	2684432	44241		
1/6/03	CRI	8	Flouride precipitate	2684433	44317		
3/4/03	D&J	8	Flouride precipitate	2684434	45115		42858 Soil
11/12/02	CRI	10	HC Contaminated Soil	2684435	43507	2684443	42857 Soil 9/24
10/4/02	D&J		Trash and blast sand	2684455	42545	2684444	42860 Soil
10/24/02	D&J	8	DAF	2684457	43265	2684453	42840 Soil
10/24/02	D&J	10	HC Contaminated Soil	2684466	AA	2684456	42855 Soil
12/9/02	D&J	8	Flouride precipitate	2684523	AA	2684462	42837 Soil
12/9/02	D&J	8	DAF	2684524	43882	2684498	42546 Trans L + Blast Sand
12/3/02	D&J	8	DAF	2684528	43881	2684554 10-4	
12/3/02	D&J	8	Flouride precipitate	2684529	43924		
12/4/02	D&J	8	DAF	2684532	43923		
12/5/02	D&J	8	DAF	2684533	43928		
11/8/02	D&J	10	Contaminated soil	2684535	A-A		
10/31/02	D&J	10	Contaminated soil	2684536			
10/30/02	D&J	10	Contaminated soil	2684537			
10/30/02	D&J	10	Contaminated soil	2684538			
10/30/02	D&J	10	Contaminated soil	2684539			
10/31/02	D&J	8	DAF	2684540	43361		
10/31/02	D&J	8	DAF	2684541	43359		
11/1/02	D&J	8	Flouride precipitate	2684542	43375		
11/4/02	D&J	8	Flouride precipitate	2684543	43402		
10/4/02	D&J	10	Trash and blast sand	2684544	43406		
10/4/02	D&J	8	DAF	2684544	43406		
10/4/02	D&J	8	DAF	2684545	43345		
10/16/02	D&J	8	DAF	2684546	43179		
10/16/02	D&J	8	Flouride precipitate	2684547	43247		
10/22/02	D&J	8	DAF	2684548	43246		
10/23/02	D&J	8	DAF	2684549	43263		
10/23/02	D&J	8	DAF	2684550	43262		
11/14/02	D&J	10	Contaminated soil	2684551	A-A		
11/14/02	D&J	10	Contaminated soil	2684552			
11/14/02	D&J	10	Contaminated soil	2684553			
11/14/02	D&J	10	Contaminated soil	2684554			
11/14/02	D&J	10	Contaminated soil	2684555			
11/20/02	D&J	10	Contaminated soil	2684556			
11/20/02	D&J	10	Contaminated soil	2684557			
11/20/02	D&J	10	Contaminated soil	2684558			
11/21/02	D&J	10	Contaminated soil	2684559	43988		
11/21/02	D&J	10	Contaminated soil	2684560	AA		
11/21/02	D&J	10	Contaminated soil	2684561			
11/21/02	D&J	10	Contaminated soil	2684562			
11/21/02	D&J	10	Contaminated soil	2684563			
11/21/02	D&J	10	Contaminated soil	2684564			
11/5/02	D&J	8	DAF	2684565	43407		
12/2/02	D&J	8	DAF	2684566	43873	2684567	43866

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	Manifests in CRI records not examined at Navajo: CRI Acceptance No.	
11/27/02	Sweatt	15	Concrete	2684568	43863	2684567	43866	
11/27/02	Sweatt	15	Concrete	2684569	43862			
11/27/02	D&J	8	DAF	2684570	43834			
11/27/02	D&J	8	DAF	2684571	43835			
11/27/02	D&J	8	Flouride precipitate	2684572	43804			
11/20/02	D&J	8	DAF	2684575	43662			
11/24/02	D&J	8	Flouride precipitate	2684577	43733			
11/22/02	D&J	8	Flouride precipitate	2684578	43731			
11/21/02	D&J	8	DAF	2684579	43692			
11/21/02	D&J	8	DAF	2684580	43674			
11/23/02	D&J	8	DAF	2684581	43734	2684582 - 43732 Trash+debris		
11/23/02	D&J	10	D-342 Catalyst	2684585	43926			
11/23/02	D&J	8	DAF	2684589	43400			
11/23/02	D&J	10	Sand, trash and debris	2684590	43399			
11/6/02	D&J	8	DAF	2684591	43401			
11/19/02	D&J	8	DAF	2684592	43635			
11/19/02	D&J	8	DAF	2684593	43663			
11/19/02	D&J	8	Flouride precipitate	2684594	43871			
11/19/02	D&J	8	DAF	2684596	43975			
12/10/02	D&J	8	DAF	2684597	43976			
12/11/02	D&J	8	DAF	2684598	43986			
12/11/02	D&J	8	DAF	2684599	43988			
12/11/02	D&J	8	DAF	2684602	44140			
12/27/02	D&J	8	Flouride precipitate	2684603	44139			
12/27/02	D&J	8	DAF	2685027	44127			
12/13/02	D&J	8	DAF	2685028	44111			
12/23/02	D&J	8	DAF	2685029	44109			
12/18/02	D&J	8	Flouride precipitate	2685032	44062	2685030	44086	
12/18/02	D&J	10	DAF and flouride precipitate	2685033	44061			
12/18/02	D&J	8	DAF	2685034	44042			
12/17/02	D&J	8	DAF	2685035	44041			
12/17/02	D&J	8	Flouride precipitate	2685036	44060			
12/16/02	D&J	8	Flouride precipitate	2685037	44019			
12/12/02	CRI	8	Flouride precipitate	2685038	43998			
12/12/02	CRI	8	DAF	2685039	43997			
3/3/03	D&J	8	DAF	2685042	45089	2685041	44934	2-17-03 FI Proof
2/14/03	D&J		Flouride precipitate	2685044	44931			
2/12/03	D&J		DAF	2685045	44892			
2/12/03	D&J		DAF	2685046	44893			
2/11/03	D&J	8	DAF	2685047	44878			
2/10/03	D&J		Flouride precipitate	2685049	44873			
2/10/03	D&J		Flouride precipitate	2685052	44853			
2/7/03	D&J		Flouride precipitate	2685053	44852			
2/4/03	D&J	8	Flouride precipitate	2685054	44819			
2/4/03	D&J	8	DAF	2685055	44824			
2/4/03	D&J	8	FCC cat fines	2685056	44818			
2/3/03	D&J	10	Trash, debris, asphalt	2685060	44810			
1/30/03	D&J	8	D-363 Chloride Guard	2685062	44787			
1/30/03	D&J	8	DAF	2685063	44786			

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	Manifests in CRI records not examined at Navajo: CRI Acceptance No.
1/31/03	D&J	10	D-363 Chloride Guard	2685064	44803		
1/28/03	D&J	8	Flouride precipitate	2685065	44758		
1/28/03	D&J	8	DAF	2685068	44756		
1/27/03	D&J	8	Flouride precipitate	2685069	44754		
3/4/03	D&J	10	Trash, debris non-haz pad ~~Flouride precipitate~~	2685073	45114		
3/5/03	D&J	8	~~DAF~~	2685074	45126		
3/5/03	D&J	8	Flouride precipitate, DAF	2685075	45125		
3/21/03	D&J	10	Trash, debris non-haz pad	2685076	45319		
3/6/03	D&J	8	Flouride precipitate, DAF	2685077	45142		
3/6/03	D&J	10	Trash, debris non-haz pad	2685078	45141		
3/10/03	D&J	10	Flouride precipitate	2685080	45168		
2/17/03	D&J		Flouride precipitate	2685401	~~45930~~ 44934		
4/14/03	D&J	10	Trash, debris, non-haz	2686002	2688002 — 45514		
4/3/03	D&J	10	Trash, debris non-haz pad	2687550	45748		
4/4/03	D&J		DAF	2687555	45749	2687552	45737
4/1/03	D&J	8	DAF	2687556	45720		
3/31/03	D&J	8	DAF, flouride precipitator solids	2687557	45702		
4/9/03	D&J	8	DAF, flouride precipitator solids	2687560	45460		
3/25/03	D&J	10	Trash, debris non-haz pad	2687562	45358		
4/26/02	D&J	8	DAF	2687563	45631		
3/25/03	D&J	10	~~Trash, debris non-haz~~ pad	2687564	45356		
3/25/03	D&J	8	DAF	2687565	45357		
4/28/03	D&J	10	HC Contaminated Soil	2687640	AA		
6/9/03	D&J	10	HC Contaminated Soil	2687695	AA		
4/23/03	D&J	10	HC Contaminated Soil	2687732	AA		
3/17/03	D&J	8	Flouride precipitate	2687956	45247		
3/17/03	D&J	8	Flouride precipitate	2687957	45246		
3/17/03	D&J	10	TK-433 asphalt	2687958	45249		
3/17/03	D&J	10	TK-433 asphalt	2687959	45248		
3/14/03	D&J	10	TK-433 asphalt	2687960	45227		
3/14/03	D&J	10	Trash, debris non-haz pad	2687963	45218		
3/13/03	CRI	10	02-028A	2687968	45181		
3/13/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687969	45182		
3/13/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687970	45214		

DAF 4-2-03

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	Manifests in CRI records not examined at Navajo: CRI Acceptance No.
3/14/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687971	45235		
4/8/03	D&J	10	Trash, debris, FCC cat fines	2687972	45436		
4/8/03	D&J	10	Trash, debris, FCC cat fines	2687973	45437		
4/7/03	D&J	10	CCR trash, debris	2687974	45427		
4/8/03	D&J	8	~~DAF, flouride~~ precipitator solids	2687976	45435		
4/7/03	D&J	8	Flouride precipitate	2687978	45428		
4/4/03	D&J		DAF	2687979	45416		
3/17/03	D&J	10	Trash, debris non-haz pad	2687981	45245		
4/29/03	D&J	8	DAF	2687982	45965		
4/11/03	D&J	8	Asphalt	2687985	45490		
4/10/03	D&J	10	Mole sieve (D-370/D-371)	2687986	45486		
4/10/03	D&J	8	Flouride precipitate	2687987	45469		
4/10/03	D&J	8	DAF	2687989	45472		
4/8/03	D&J	8	DAF	2687990	45438		
4/9/03	D&J	8	DAF	2687991	45461		
4/15/03	D&J	10	Trash, debris, asphalt sample cans, cat fines	2687992	45524		
4/15/03	D&J	10	FCC Cat fines, asphalt sample cans	2687993	45527		
4/15/03	D&J	10	FCC Cat fines	2687994	45525		
4/15/03	D&J	10	DAF	2687995	45526		
4/15/03	D&J	10	HC Contaminated Soil	2687996	45515		
4/15/03	D&J	10	HC Contaminated Soil	2687997	45517		
4/15/03	D&J	10	HC Contaminated Soil	2687998	45529		
4/15/03	D&J	10	HC Contaminated Soil	2687999	45543		
4/15/03	D&J	10	HC Contaminated Soil	2688000	45544		
4/15/03	D&J	10	HC Contaminated Soil	2688001	45542		
4/17/03	D&J		HC Contaminated Soil	2688003	45569		
4/14/03	D&J	10	Trash, debris, FCC cat fines, asphalt sample cans	2688004	45518		
4/24/03	D&J	8	Flouride precipitate	2688005	45932		
4/15/03	D&J	8	DAF	2688006	45523		
4/15/03	D&J	8	DAF	2688008	45541		
4/17/03	D&J	8	DAF, flouride precipitator solids	2688009	45570		
5/2/03	D&J	10	HC Contaminated Soil	2688068	46018	2688057	45236
5/2/03	D&J	10	HC Contaminated Soil	2688069	46019		
4/24/03	D&J	10	Contaminated soil	2688089	45918		
4/24/03	D&J	10	Concrete	2688090	45929		
4/23/03	D&J	10	Concrete	2688091	45902		
4/23/03	D&J	10	Concrete	2688092	45901		
4/23/03	D&J	10	Concrete	2688093	45905		

Cont Soil 3-14-03

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	Manifests in CRI records not examined at Navajo: CRI Acceptance No.
4/24/03	D&J	10	Concrete, trash, debris	2688094	45930		
4/23/03	D&J	8	DAF	2688095	45903		
4/24/03	D&J	8	Asphalt	2688096	45931		
5/13/03	D&J	8	DAF	2688102	46169		
5/13/03	D&J	8	DAF	2688103	46171		
4/28/03	D&J	10	Pipeline filters	2688106	45954		
4/28/03	D&J	8	DAF, flouride precipitator solids	2688107	45957		
4/28/03	D&J	10	D-342 Catalyst	2688110	45956		
4/29/03	D&J	10	Gas/oil hydrotreater soil	2688112	45967		
4/30/03	D&J	10	HC Contaminated Soil	2688113	45993		
5/6/03	D&J	8	DAF	2688114	46066		
4/22/03	D&J	8	DAF	2688115	45817		
4/17/03	D&J	10	Non-haz trash from non-haz pad, asphalt, filters	2688119	45565	2688118	45563
3/11/03	CRI	10	Contaminated soil	2688122	45201		
3/12/03	CRI	10	Contaminated soil	2688123	45203		
3/12/03	CRI	10	Contaminated soil	2688124	45204		
3/12/03	CRI	10	Contaminated soil	2688125	45205		
3/12/03	D&J	8	Flouride precipitate	2688126	45199		
3/12/03	D&J	10	Asphalt-TK 433	2688127	45198		
3/12/03	D&J	8	DAF	2688128	45196		
3/12/03	D&J		DAF	2688129	45197		
3/11/03	D&J	8	DAF	2688130	45172		
3/11/03	D&J	8	DAF, flouride precipitator solids	2688131	45173		
3/10/03	D&J	10	Pipeline filters, trash and debris	2688132	45170		
3/10/03	D&J	10	Trash, debris, FCC cat fines non-haz pad	2688133	45171		
4/24/03	D&J	10	Concrete	2688134	45963		
4/30/03	D&J	10	Concrete	2688135	45986		
5/1/03	D&J	10	Concrete	2688136	46007		
5/5/03	D&J	10	Concrete	2688137	46041		
4/28/03	D&J	10	Concrete	2688138	45955		
4/28/03	D&J	10	Concrete	2688139	45950		
4/25/03	D&J	10	Concrete	2688140	45949		
4/24/03	D&J	10	Contaminated soil	2688141	45920		
4/24/03	D&J	10	Contaminated soil	2688142	45919	2785104	44353
4/21/03	D&J	8	DAF, flouride precipitator solids	2688188	2688118 45563	2785105	44354
4/17/03	D&J	10	HC Contaminated Soil	2785162	45560	2785108	45665
4/21/03	D&J	10	HC Contaminated Soil	2785163	45607		
4/21/03	D&J	10	HC Contaminated Soil	2785164	45562		
4/22/03	D&J	10	HC Contaminated Soil	2785165	45819		
3/21/03	D&J	10	HC Contaminated Soil	2785166	45323		
10/15/02	CRI	8	DAF	2785170	43164		
10/29/02	D&J	8	DAF	2785173	43344		

DAF Flprcip 4-21-03

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.	Manifests in CRI records not examined at Navajo: Manifest Number	CRI Acceptance No.
9/26/02	D&J	8	DAF	2785174	42886		
9/26/02	D&J	10	Blast sand and trash and debris	2785175	42885		
4/15/03	D&J	10	HC Contaminated Soil	2785176	45546		
	D&J	10	D-363 Chloride Guard	2785192	44806		
10/28/02	D&J	8	Flouride precipitate	2785208	43308		
10/17/02	D&J	8	DAF	2785211	43199		
10/17/02	D&J	8	DAF	2785212	43235		
10/17/02	D&J	Unknown	DAF	2785213	43360		
10/14/02	D&J	8	Flouride precipitate	2785215	43158		
9/26/02	D&J		Flouride precipitate	2785216	42887		
3/24/03	D&J	8	Flouride precipitate	2785233	45342		
3/21/03	D&J	10	~~Trash, debris non-haz~~ pad	2785234	45318		
3/19/03	D&J	8	DAF	2785235	45295		
2/5/03	D&J	10	DAF	2785236	44835		
1/8/03	D&J	8	DAF	2785237	44351		
1/9/03	D&J	10	DAF	2785238	44352		
					9-17		
1/7/03	D&J	10	DAF	2785240	44338		
11/25/02	D&J	10	DAF	2785243	43772		
4/16/03	D&J	10	HC Contaminated Soil	2785251	45545		
					9-13		
4/11/03	D&J	10	HC Contaminated Soil	2785252	45491		
4/11/03	D&J	10	HC Contaminated Soil	2785253	45489		
4/10/03	D&J	10	HC Contaminated Soil	2785254	45470		
3/18/03	D&J	10	DAF	2785256	45280	2785255	45321
4/10/03	D&J	10	HC Contaminated Soil	2785257	45468		
4/10/03	D&J	10	HC Contaminated Soil	2785258	45467		
4/9/03	D&J	10	HC Contaminated Soil	2785259	45459		
4/22/03	D&J	10	HC Contaminated Soil	2785266	45819		
4/22/03	D&J	10	HC Contaminated Soil	2785268	45774		
4/22/03	D&J	10	HC Contaminated Soil	2785269	45522		

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.
4/14/93	D&J	10	HC Contaminated Soil	2785270	45511
1/29/03	D&J	8	DAF	2785271	44780
1/29/03	D&J	8	DAF	2785272	44778
1/13/03	D&J	10	Flouride precipitate	2785273	44414
1/10/03	D&J	8	Flouride precipitate	2785274	44380
1/14/03	D&J	10	DAF	2785279	44524
1/14/03	D&J	10	DAF	2785280	44521
1/15/03	D&J	8	DAF	2785281	44516
1/15/03	D&J	10	FCC cat fines and contaminated soil	2785282	44517
1/14/03	D&J	10	FCC cat fines, trash and debris, asphalt sample cans	2785283	44522
1/14/03	D&J	10	FCC cat fines, trash and debris, asphalt sample cans	2785284	44523
1/15/03	D&J	8	Trash, debris, FCC cat fines, contaminated soil	2785286	44518
1/15/03	D&J	8	Flouride precipitate	2785287	44519
1/16/03	D&J	8	Flouride precipitate	2785289	44582
1/16/03	D&J	8	DAF	2785291	44581
1/21/03	D&J	8	Flouride precipitate	2785294	44630
1/21/03	D&J	8	DAF	2785295	44629
1/21/03	D&J	8	Flouride precipitate	2785296	44632
1/21/03	D&J	8	DAF	2785297	44633
1/22/03	D&J	10	Pipeline filters, trash, debris	2785298	44634
1/22/03	D&J		Trash, debris, cat fines, asphalt sample cans	2785300	44682
1/24/03	D&J	10	Trash, debris, cat fines, asphalt sample cans	2785301	44681
1/23/03	D&J	8	Flouride precipitate	2785303	44678
	D&J	8	Flouride precipitate	2785304	44683
3/21/03	D&J	10	HC Contaminated Soil	2875255	
5/28/03	D&J	8	DAF	3076571	
6/5/03	D&J	10	Concrete	3076826	
5/28/03	D&J	10	Trash, debris, FCC cat fines	3076828	46349
5/28/03	D&J	8	DAF	3076830	
5/28/03	D&J	10	Concrete	3076831	
6/9/03	CRI	12	Hydroblast Soil	3076909	
6/9/03	CRI	12	Hydroblast Soil	3076910	
6/9/03	CRI	12	Hydroblast Soil	3076911	
6/9/03	CRI	12	Hydroblast Soil	3076912	
6/9/03	D&J	10	HC Contaminated Soil	3076982	
6/9/03	D&J	10	HC Contaminated Soil	3076983	
6/9/03	D&J	10	Trash, debris, FCC cat fines	3077559	

Manifests in CRI records not examined at Navajo

Manifest Number	CRI Acceptance No.

actual # is 44525

6-20-02

2785717 - 41076	DAF
2785718 - 41085	DAF
2785330 - 41063	Floride Prec.
2785331 - 41059	Asphalt
2785321 - 41021	Asphalt
2785327 - 41020	FL. prec.
2785354 - 41015	F. liners
2785361 - 41001	DAF
2785368 - 41002	DAF
2285322 41012	DAF
2785323 - 41013	DAF
2785325 - 41018	FL. Prec. - DAF
2785324 - 41019	DAF
2785690 - 41167	DAF
2785692 - 41169	DAF
2785682 - 41183	DAF
2785681 - 41187	DAF
2783678 41184	Asphalt

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.
5/21/03	D&J	10	HC Contaminated Soil	3077562	
5/28/03	D&J	10	HC Contaminated Soil	3077563	
5/27/03	D&J	10	HC Contaminated Soil	3077564	
5/20/03	D&J	8	DAF	3077569	
5/22/03	D&J	10	Concrete	3077572	
5/19/03	D&J	10	Concrete	3077573	
5/21/03	D&J	10	Concrete	3077574	
5/19/03	D&J	8	Flouride precipitate	3077578	
5/22/03	D&J	8	Flouride precipitate	3077579	
5/22/03	D&J	10	Chloride Guard	3077580	
5/22/03	D&J	10	Chloride Guard	3077581	
5/23/03	D&J	10	Trash, debris, FCC cat fines, asphalt sample cans	3077582	
5/19/03	D&J	10	Pipeline trash and debris and filters	3077584	
5/15/03	D&J	8	Flouride precipitate	3077585	
5/15/03	D&J	10	Concrete	3077587	
5/15/03	D&J	10	Concrete	3077588	
5/15/03	D&J	8	DAF	3077589	
5/14/03	D&J	10	Concrete, pipe	3077592	
5/14/03	D&J	8	DAF	3077593	
5/16/03	D&J	8	Flouride precipitate	3077594	
5/14/03	D&J	10	Non-haz trash from non-haz pad	3077595	
5/19/03	D&J	10	Concrete, pipe	3077596	
5/14/03	D&J	10	Concrete, pipe	3077597	
4/30/03	D&J	8	DAF	3077598	45991
5/1/03	D&J	8	DAF, flouride precipitator solids	3077601	46008
5/13/03	D&J	8	Concrete	3077606	
5/21/03	D&J	8	Concrete	3077607	
5/12/03	D&J	8	Concrete	3077608	
5/6/03	D&J	8	Concrete	3077609	46064
5/6/03	D&J	8	Concrete	3077610	46065
5/8/03	D&J	8	Concrete	3077611	46117
5/12/03	D&J	8	Concrete	3077612	
5/5/03	D&J	8	Concrete	3077613	46040
5/5/03	D&J	8	Concrete	3077614	46036
5/20/03	D&J	8	Concrete	3077615	
5/20/03	D&J	8	Concrete	3077616	
5/14/03	D&J	8	Concrete	3077617	
5/16/03	D&J	8	Concrete	3077618	
5/6/03	D&J	8	Concrete	3077619	46063
5/7/03	D&J	8	Concrete	3077620	46087
5/7/03	D&J	8	Concrete	3077621	46106
5/7/03	D&J	8	DAF	3077622	46089
5/5/03	D&J	8	Flouride precipitate	3077623	46044
5/8/03	D&J	8	DAF and flouride precipitate	3077626	46120
5/8/03	D&J	10	HC Contaminated Soil	3077627	46119

Manifests in CRI records not examined at Navajo

Manifest Number	CRI Acceptance No.

Navajo Records June 11, 2003

Date	Transporter	Volume cubic yards	Waste Type	Manifest Number	CRI Acceptance No.
5/8/03	D&J	10	HC Contaminated Soil	3077628	46121
5/21/03	D&J	8	DAF	3077630	
5/12/03	D&J	8	Flouride precipitate	3077631	
6/3/03	D&J	8	Concrete, flouride precipitator solids	3086803	
6/3/03	D&J	10	Concrete	3086806	
6/2/03	D&J	10	HC Contaminated Soil	3086807	
6/2/03	D&J	1	Trash, debris, FCC cat fines, asphalt sample cans	3086809	
6/2/03	D&J	10	Concrete	3086810	
6/2/03	D&J	10	Concrete	3086811	
6/2/03	D&J	10	Trash, debris, FCC cat fines, concrete	3086812	
6/2/03	D&J	8	DAF, flouride precipitator solids	3086813	
6/3/03	D&J	10	HC Contaminated Soil	3086824	
6/4/03	D&J	10	Concrete	3086825	
6/5/03	D&J	8	DAF	3086980	
6/4/03	D&J	8	DAF	3086986	
6/4/03	D&J	10	HC Contaminated Soil	3086988	
4/2/03	D&J	8	DAF	Obliterated	

Manifests in CRI records not examined at Navajo

Manifest Number	CRI Acceptance No.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

MEMORANDUM

To:	Lori Wrotenbery, OCD Division Director
Through:	Roger Anderson, OCD Environmental Bureau Chief
From:	Martyne Kieling, OCD Environmental Geologist MJK
Subject:	Waste Documentation Inspection at Navajo Refinery and Corresponding Waste Acceptance Document Review at Controlled Recovery, Inc.
Date	June 25, 2003

Ed Martin and I conducted a waste document review at the Navajo Refinery Artesia office on June 11, 2003. The documents that were reviewed consisted of waste manifests from Navajo Artesia Refinery to Controlled Recovery Inc (CRI). The waste manifests covered the time period from September 26, 2002 through June 9, 2003.

On June 12 and 13 of 2003 a waste documentation review was conducted at the CRI office in Hobbs. The documents that were reviewed consisted of CRI waste acceptance documents that referenced the Navajo Refinery manifest numbers.

The data collected from Navajo and CRI was placed into a spreadsheet so that it could be compared to a separate spreadsheet that contains all of the Forms C-138 "Request for Approval to Accept Solid Waste" that have been approved by the OCD.

After reviewing all of the data that was collected, I have determined that the waste that was generated and shipped from the Navajo Artesia Refinery and accepted by CRI between January 1, 2003 and June 9, 2003 was not covered by an approved Form C-138. * Note*

I have also determined that except for three shipments of hydrocarbon contaminated soils shipped on November 21, 2002, November 12, 2002 and October 24, 2002 the waste generated and shipped from the Navajo Artesia Refinery and accepted by CRI between September 26, 2002 and December 12, 2002 was not covered by an approved form C-138. * Note*

Due to limited time during this inspection, records were only reviewed back to September 26, 2002.

Rule 711 "Applicable To Surface Waste Management Facilities Only" requires certain documentation and approvals for non-exempt waste. All waste generated at the Navajo Refinery is non-exempt. Please review the following Rule 711 citation:

711.C.4 The permittee shall require the following documentation for accepting wastes, other than wastes returned from the wellbore in the normal course of well operations such as produced water and spent treating fluids, at commercial waste management facilities:

(b) Non-exempt, Non-hazardous Oilfield Wastes: Prior to acceptance, a "Request For Approval To Accept Solid Waste", OCD Form C-138, accompanied by acceptable documentation to determine that the waste is non-hazardous shall be submitted to the appropriate District office. Acceptance will be on a case-by-case basis after approval from the Division's Santa Fe office.

Attached please find the data spreadsheet that lists 366 shipments of waste from Navajo to CRI. Out of 366 shipments there were 277 documented as received by CRI. Out of the 366 shipments there were 89 that were not documented at CRI as having been received. I will note that we were limited in the amount of time that we had available for the records inspection and therefore may have missed some of the corresponding CRI documentation.

After reviewing all the documentation available during the time given it is my opinion that CRI has violated Rule 711.C.4.b with regards to accepting non-exempt oilfield waste from the Navajo Refinery in Artesia from September 26, 2002 through June 9, 2003.

* Note* The waste manifests reviewed at Navajo that listed office and shop trash from roll-off bins in the refinery were not placed into the spreadsheet. I made the determination that these wastes were approved for acceptance into Controlled Recovery Inc under the approval letter dated May 9, 2001 (see attached approval letter).

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

May 9, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 7099-3220-0000-5051-2221

Mr. Ken Marsh
Controlled Recovery, Inc.
P.O. Box 388
Hobbs, NM 88241-0388

RE: Controlled Recovery, Inc. Permit NM-01-0006
S/2 N/2 and the N/2 S/2 Section 27, Township 20 South, Range 32 East, NMPM
Lea County, New Mexico

Dear Mr. Marsh:

The New Mexico Oil Conservation Division (OCD) has determined that the following listed waste streams may be disposed of at Controlled Recovery, Inc. (CRI) pursuant to Permit NM-01-0006 without the necessity of prior written authorization of the Division:

(a) Barrels, drums, 5-gallon buckets, 1-gallon containers so long as empty and EPA-clean.
(b) Uncontaminated brush and vegetation arising from clearing operations.
(c) Uncontaminated concrete.
(d) Uncontaminated construction debris.
(e) Detergent buckets, so long as completely empty.
(f) Fiberglass tanks so long as the tank is empty, cut up or shredded, and EPA clean.
(g) Grease buckets, so long as empty and EPA clean.
(h) Uncontaminated ferrous sulfate or elemental sulfur so long as recovery and sale as a raw material is not possible.
(i) Metal plate and metal cable.
(j) Paper and paper bags, so long as empty (paper bags).
(k) Plastic pit liners, so long as cleaned well.
(l) Soiled rags or gloves. If wet, must pass Paint Filter Test prior to disposal.
(m) Uncontaminated wood pallets.

Please be advised that approval to accept these wastes does not relieve CRI of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve CRI of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions please do not hesitate to contact Roger Anderson at (505) 476-3490.

Sincerely,

Lori Wrotenbery

Lori Wrotenbery
Director

LW/mjk

xc with attachments:
Hobbs OCD Office
Michael Feldewert, Holland & Hart LLP and Cambell, Carr, P.A.

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Agave Energy

Date	Agave Energy Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
01/10/03	Artesia, NM		10cy per month	used engin oil filters	CRI
04/10/01	Artesia, NM	03-009		lubercating oil filters - drained mixed with exempt waste generated through oil and gas compressor stations.	

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Banta Oilfield Service, Inc.

Date	Banta Oilfield Service, Inc. Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/21/01	Hobbs, NM	03-010	1-2 trailers monthly	Oilfield solid waste - all empty - mud sacks, boxes, buckes, cans, crates, boards, wire,	Banta

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: BJ Services

Date	BJ Services Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
denied	Hobbs, NM	10.30.02	100 bbls	water from test tank	
04/30/02	Hobbs, NM	04.24.02	250 bbls monthly until 4/22/02	Sump Sludge generated form the washing of trucks.	CRI
02/20/02	Artesia, NM	02.12.02	360 bbls per month until 2/20/03	Wash rack sludge - from washing dirt and mud off of servicing equipment.	CRI
04/16/01	Artesia, NM	04-001	400 bbls	Wash rack sludge - from washing dirt and mud off of service equipment.	CRI
02/23/01	Artesia, NM	02-007	300 bbls	Wash rack sludge - from washing dirt and mud off of service equipment.	CRI
02/13/01	Hobbs, NM	02-003	300 bbls	wash bay waste water - from washing trucks	CRI

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Brininstool Equipment

Date	Brininstool Equipment Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/21/01	Carlsbad;NM	03-012	1800 cy yearly through 2001	Oilfield solid waste - all empty - mud sacks, boxes, buckes, cans, crates, boards, wire, g	BES

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Compressor Components

Date	Compressor Components Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/14/03	Odessa, TX	03.01.03	3 - 55 gal drums	Oil based LAP - used in overhauling oil field compressors.	CRI

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Computalog

Date	Computalog Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/14/03	Hobbs, NM	03.02.03	2000 bbls	Waste water from wash bay - washing of tools and vehicles.	CRI

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Conoco Phillips

Date	Conoco Phillips Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
05/28/03	CR 4000 South SJ32-7 #222		.5 cy	Oil stained road dirt of an unknown source.	TBA
02/05/03	Maljamar gas plant	02.02.03	3 drums	waste air drier desiccant	Conoco/Phillips
06/10/02	Zia Gas Plant	06.03.02	4 cy	Non-exempt and exempt oil contaminated dirt - from oil spill.	
05/03/02	Hobbs, NM	05.20.02	18 cy	Oil spill - from engin compressor and plant operations.	
03/25/02	Zia Gas Plant	3.14.2002	650 bbls	Spent Caustic solution neutralized with acid generated through the natrual gas processing facility.	
11/05/01	Zia Compressor	10.22-01Z	750 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Pure Gold Compressor	10.22-01Y	1000 gal through 10/31/02	Used lube oil - from engine and compressor operations.	Hughes/Steve Ca
11/19/03	Anderson Ranch compressor	10.22-01X	250 gal throught 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plant	
11/19/01	NE Carlsbad Compressor	10.22.01W	1000 gal through 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plant	Hughes/Steve Ca
11/19/01	Cotton Draw Compressor	10.22.01V	500 gal through 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plant	Hughes/Steve Ca
11/19/01	Kemnitz Compressor	10.22-01U	1000 gal through 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plant	Hughes/Steve Ca
11/05/01	Ramsey Compressor	10.22-01T	500 gal through 10/31/02	Used lube oil - from engine and compressor operations.	Hughes/Steve Ca
11/19/01	Calmon CVRU Compressor	10.22.01S	50 gal through 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plantH	Hughes/Steve Ca
11/05/01	Malaga	10.22-01R	350 gal through 10/31/02	Used lube oil - from engine and compressor operations.	Hughes/Steve Ca
11/19/01	Calmon Compressor	10.22.01Q	1000 gal through 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plantH	Hughes/Steve Ca
11/19/01	Cabin Lake	10.22.01P	500 gal through 10/31/02	Used Lube oil - from engine and compressor operations for recycling at treating plantH	Hughes/Steve Ca
11/05/01	Ramsey Compressor	10.22-01O	1000 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Read & Stevens Compressor	10.22-01N	500 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Apex Compressor	10.22-01M	3000 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Lusk Compressor	10.22-01L	750 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Skelly Compressor	10.22-01K	1500 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	West Turkey Track I	10.22-01J	1000 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	West Turkey Track II	10.22-01I	1500 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Chavez Compressor	10.22-01H	750 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Gramma Ridge #1	10.22-01G	400 gal through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Gramma Ridge #2	10.22-01F	300 bbls through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Turkey Track (TT)	10.22-01E	300 bbls through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca

11/05/01	Pardue	10.22-01D	300 bbls through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Red Lake	10.22-01C	300 bbls through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Cedar Canyon	10.22-01B	300 bbls through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
11/05/01	Cedar Lake	10.22-01A	300 bbls through 10/31/02	Waste water - from engine wash water, rain water runoff, and lube oil leaked from compressor.	Hughes/Steve Ca
05/23/01	Maljamar Plant	05-001	400 bbls	Sump water - from compressors	
03/08/01	Warren#1	03-005	100 cy monthly through 2001	Oilfield solid waste - all empty- mud sacks, boxes, bucktes, cans, crates, boards, wire, gloves, gags, to	Hobbs Rental
02/23/01	Maljamar Plant	02-011	400 bbls	Mix for transport- exempt amine waste with - non-exempt sump water approved on 02/06/01 CRI#02-02	
02/19/01	1001Conoco R	02-002	300 bbls	Sump water - from compressors	
02/13/01	Maljamar Plant	02-001		Mix for transport - exempt dry waste and non exempt dry waste approved on a C-138 conversation 01-18-01.	
01/29/01	Maljamar Plant	01-010	40 cy	concrete	Gandy
02/05/01	Maljamar Plant	01-005	10 cy	lube oi soaked dirt - from spill at gas plant.	Kenemore

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Dowell Schlumberger

Date	Dowell Schlumberger Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
02/17/03	Hobbs, NM	01.05.03	20 cy per month for 2003	Wash bay sludge generated from the washing of trucks	Waste Management
02/17/03	Artesia, NM	01.04.03	10 cy per month for 2003	Wash bay sludge generated from the washing of trucks	Waste Management
06/24/02	Hobbs, NM	06.13.02A	4000 gal monthly until 6/30/03	Waste water - from testing pumping equipment.	
01/23/02	Artesia, NM	01.16.02B	10 per month for 2002	Wash bay sludge generated from the washing of trucks	Waste Management
01/23/02	Hobbs, NM	01.16.02A	20 cy per month for 2002	Wash bay sludge generated from the washing of trucks	Waste Management
03/23/01	Hobbs, NM	03-015	30 cy weekly for 2001	Oilfield solid waste - paper sacks, wood, empty buckets	Waste Management
03/08/01	Hobbs, NM	03-004	300 bbls through 2001	Truck wash bay - washing trucks and oilfield equipment.	
03/08/01	Artesia, NM	03-003	300 bbls through 2001	Truck wash bay - washing trucks and oilfield equipment.	
01/29/01	Artesia, NM	01-007	300 bbls	Truck wash bay - washing trucks and oilfield equipment.	
01/29/01	Hobbs, NM	01-006	300 bbls	Truck wash bay - washing trucks and oilfield equipment.	

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Duke Energy Field Services

Date	Duke Energy Field Services Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
02/17/03	Artesia Plant	02.03.03	120 bbls	Cooling tower sludge	Gandy, Inc.
11/25/02	Lee Plant -Buckeye	11.14.02	36 drums	Eemolition concreet mixed with cooling tower sludge.	
10/09/02	Loving Plant	09.23.02A	100 bbls every 90 days until 10/1/2003	Waste water- from sumps/rain water.	CRI
10/19/02	Carlsbad Field booster Sites	09.23.02	21 cy	Contaminated soil - from the clean up around engine and compressor sites.	B&H
01/29/01	Midland, TX	01-009	20 cy	Cooling tower boards and plastic - from repairs	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: El Paso Natrual Gas

Date	El Paso Natrual Gas Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
09/03/02	Washington Ranch	08.26.02	270 cy	Contaminated soil - from pit closure	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: EOTT

Date	EOTT Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
08/19/02	Lynch Station	08.16.02	2000 cy	Oil contaminated soil - from a pipeline leak	EPI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: ESP, Inc

Date	ESP, Inc Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
09/14/01	Midland, TX	08.28.01B	48 cy	Filter sand - froom washout submergable pumps.	Petroplex Pipe
03/19/01	Midland, TX	03-006	24 cy	Filter sand - froom washout submergable pumps.	Petroplex Pipe

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Equilon Pipeline

Date	Equilon Pipeline Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
06/22/01	Jal -Basin Station	06.06.01	20 cy ,120cy, 1dump truck	Blast grit, gunite, tank mastic and tank show with non-friable asbestos seal fabric - from crude oil above grour	CRI
02/13/01	Houston, TX	02-004	300 cy	Soil contaminated with crude oil - from a pipeline spill	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Forklift Enetrprises

Date	Forklift Enterprises Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/27/01	Hobbs, NM	03-007	50 bbls	Wash bya sludge - from washing oilfield trucks and equipment.	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Hobbs Rental Corp.

Date	*Hobbs Rental Corp.* **Location**	*CRI* **ID Number**	*Estimated Volume*	*Waste Description*	*Transporter*
05/010/01	Hobbs, NM	04-004	100 cy monthly through 2001	Oilfield soild waste - non hazardous. Approval letter 05/10/01.	Hobbs Rental Corp.

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Halliburton

Date	Halliburton Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
04/21/03	Artesia, NM	04.01.03	150 bbls	Wash water sump and waste water.	CRI
04/21/03	Brownfield, TX	04.02.03	300 bbls	Wash water sump and waste water.	CRI
05/12/03	Artesia, NM	05.01.03	6 cy	Sodium silicate residue - solid /dried out Flo-chek from discontinued use of storage tank.	CRI
11/15/02	Brownfield, TX	11.05.02	300 bbls	Wash rack grit - from wahing of oil field equipment.	
08/12/02	Hobbs, NM	07.29.02	300 to 350 gallons	Waste Injectrol G - during mixing of Injectrol G, the flash set was unable to pump. This material never we	CRI
07/23/02	Hobbs, NM	07.17.02	50 bbls per month until 7/20/03	Neutralized PAD acid residue - an emulsified mixture of HCL acid and xylene bottoms. Small amounts of unused residual materi	
06/24/02	Marathon Oil Co.	06.17.02	12 cy	Contaminated soil with spilled frac fluid generated from performing frac job and equipment failure.	
02/25/02	Artesia, NM	02.19.02	40 cy	Set up waste cement at bulk plant and construction debris generated from tanks on bulk equipment clea	Halliburton
01/15/02	Hobbs, NM	01.07.02	1300 gal	Neutralized HCL acid and snow runoff from spill.	Halliburton
11/14/01	Old Acid Facility	09.07.01A	180 cy	Composite samples generated by construction work on acid plant repair drive on slab, containmemt & P	CRI
05/23/01	Hobbs, NM	05-002	172 gal	contaminated soil - spill from Halliburton Energy Service truck.	
03/08/01	Artesia, NM	02-010	120 cy monthly through 2001	Oilfield solid waste - all empty- mud sacks, boxes, bucktes, cans, crates, boards, wire, gloves, gags, towels and other non hazar	
02/23/01	Hobbs, NM	02-009	320 cy monthly through 2001	Oilfield solid waste - all empty- mud sacks, boxes, bucktes, cans, crates, boards, wire, gloves, gags, towels and other non hazar	
01/29/01	Hobbs, NM	01-008	32-35 cy	contaminated soil with diesel, sodium hydroxide, and a chlorous acid, sodium salt solution - vehicle accid	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Kelly's Pipe Service

Date	Kelly's Pipe Service Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
10/02/01	Odessa, TX	09.20.01	50 cy	Soil and pipe scale generated by cleaning operations on pipe used in oil and gas operations	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Keystone Plant Services

Date	Keystone Plant Services Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
02/17/03	2606 E. Pearl St, Odessa TZ	01.07.03	60 cy	Various filters picke up from compressor station including amine, glycol & engine filters. Drain	Keystone Plant Services

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Key Energy Services

Date	Key Energy Services Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
01/10/03	Carlsbad Facility	12-18-02 (12-004)	1000 annually	Wash Bay Fluids	Key
08/12/02	Carlsbad Facility	07.31.02	100 bbls. Annually until 8/03	Sump Water - from wash bay fluids.	Key

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Knight Oil Tools

Date	Knight Oil Tools Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
05/30/02	Odessa, TX	05.29.02	240 bbls yearly until 5/30/03	Sump sludge generated from pressure washing down hole tools.	

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Lone Star Distribution

Date	Lone Star Distribution Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/21/01	Hobbs, NM	03-014	40 cy monthly through 2001	Oilfield solid waste - all empty - mud sacks, boxes, buckes, cans, crates, boards, wire, gloves, rags, towels, and oth	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Marathon Oil Company

Date	Marathon Oil Company Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
02/16/01	Indian Basin Gas Plant	02-005	100 cy monthly through 2001	Oilfield solid waste - all empty - mud sacks, boxes, buckes, cans, crates, boards, wire, gloves, rags, towels, and oth	
01/29/01	Midland, TX	01-003		calcium silicate insulation - from Indian Basin Gas Plant	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Mesquite Services Inc.

Date	Mesquite Services Inc. Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/21/01	Carlsbad, NM	03-007	100 cy monthly for 2001	Oilfield solid waste - all empty - mud sacks, boxes, buckes, cans, crates, boards, wire, gloves, rags	Mesquite Services

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: MI Drilling Fluid (Mud)

Date	MI Drilling Fluid (Mud) Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
12/12/02	4417 Lovington Hwy, Hobbs, NM		1750 bbls	Unused drilling mud, fresh and brine water	Maclaskey

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Midland Roustabout Service, Inc.

Date	Midland Roustabout Service, Inc. Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/05/01	Kerr McGee Indian Basin	02-013	2-6 cy monthly through 2001	Oilfield solid waste - all empty - mud sacks, boxes, buckes, cans, crates, boards, wire, gloves, rags, towels,	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: NMOCD

Date	NMOCD Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
06/22/01	Goodwin Treating Plant,	06.05.01	unknown	Redwood, tanks, debris, pipeing, drums, and micellaneous trash - from site cleanup.	CRI & Various

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Ocean Energy

Date	Ocean Energy Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
02/05/01	Harrod St. 9 #2	01-004	400 cy	Diesel contaminated soil generated form oil spill	

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Disposal Facility : Controlled Recovery Inc.

Generator: Permian Rod Operations

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Date	**Permian Rod Operations Location**	**CRI ID Number**	**Estimated Volume**	**Waste Description**	**Transporter**
denied	Odessa, TX	2/18/2002	300 gal per month through 2002	Sludge and dirty kerosene generated form cleaning paraffin from sucker rods.	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: PNM

Date	PNM Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
01/10/03	Chaparral Compressor Station		1500 bbls	Hydrostatic Test Water	CRI/Maclaskey

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Pool Company Texas, Ltd.

Date	Pool Company Texas, Ltd. Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
01/18/01	FM Road 300	01-002	500 cy	hydrocarbon contaminated soil - from yard cleanup	McNabb Services

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Quail Tools

Date	Quail Tools Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
04/11/02	Odessa, TX	05.28.02B	30 cy yearly through 2003	Sump sludge - from steam cleaning oilfield tools.	
denied	Odessa, TX	05.28.02A	10 cy yearly through 2003	Caustic vat sludge generated from empting spent fluids/solids from caustic vat.	
10/12/01	Odessa, TX	09.27.01	50 cy yearly to 9/27/02	pipe scale - from the flaking off of the pipe durring the rattling process	Malco Trucking
09/13/01	Odessa, TX	08.28.01A	30 cy yearly through 2001	Sump sludge- from steam cleaning oilfield tools.	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: R & R Service Company

Date	R & R Service Company Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
denied	Hobbs, NM	04.04.03	2 bbls	Abanonded waste pit.	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Rio Tanks, Inc.

Date	Rio Tanks, Inc. Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
03/21/01	Carlsbad, NM	03-013	100 cy monthly through 2001	Oilfield solid waste - all empty- mud sacks, boxes, bucktes, cans, crates, boards, wire, gloves, gags, towels and other n	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Schlumberger Wireline and Testing

Date	Schlumberger Wireline and Testing Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
12/02/02	Hobbs, NM	11.22.02A	400 bbls annually until November 30, 2003	Wash bay sump sludge generated from truck, equipment, and tool washing.	CRI
12/02/02	Hobbs, NM	11.22.02B	400 bbls annually until November 30, 2003	Wash bay sump sludge generated from equipment, and tool washing.	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Shell Pipeline Company

Date	Shell Pipeline Company Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
05/21/02	Flannigan Station	05.16.02	50 cy	Tank bottoms, scale, paraffin, dirt - from tank cleanning.	CRI

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Smith Services

Date	Smith Services Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
10/22/02	1000 W. County Rd.	09.27.02A	20 cy	Sump Sludge - from steam cleaning and washing oilfield tools.	CRI
10/22/02	1000 W. County Rd.	09.27.02B	200 bbls	Wash water - from steam cleaning oilfield tools.	CRI

C-138 on file with OCD Santa Fe Office Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Star Tool

Date	Star Tool Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
08/14/01	Hobbs, NM	07.11.01A	600 bbls through 2001	Wash water - from steam cleaning washing oilfield tools.	CRI
08/14/01	Hobbs, NM	07.11.01B	80 cy throught 2001	Sludge - from steam cleaning washing oilfield tools.	CRI
05/01/01	Hobbs, NM	04-002	300 bbl	Wash water - from steam cleaning washing oilfield tools.	CRI
05/01/01	Hobbs, NM	04-003	20 cy	Sludge - from steam cleaning washing oilfield tools.	CRI
02/23/01	Hobbs, NM	02-008	8 lbs	Oilfield solid waste - all empty- mud sacks, boxes, bucktes, cans, crates, boards, wire, gloves, gags, towels and other non	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Transwestern Pipeline Company

Date	Transwestern Pipeline Company Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
denied	Roswell compressor station	12.03.02	1200 bbls annually until 12/30/03	oily waste water - from compressor and engine washing.	CRI
12/12/02	WT-1		2500 cy	Oily contaminated soil - excavation of former pit areas	Gandy
09/03/02	Station 8	08.23.02B	30,000 cy annually until 9/10/03	Waste water - from cleaning /rain water accumulated from gathering system.	CRI
09/03/02	Station 5	08.23.02A	30,000 cy annually until 9/10/03	Oily waste water - from auxiliary and engine room.	Maclaskey
06/24/02	Leupp, AZ	06.13.02B	5000 gal monthly until 6/30/03	Oily water generated from accumulation of exces fluids from engine room operations	
03/12/02	Roswell Facility	03.01.02	300 cy	Plant debris - from old pit area used to dump plant debris	Gandy

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Westinghouse TRU Solutions, LLC

Date	Westinghouse TRU Solutions, LLC Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
denied	WIPP	03-002	55 gal drum	salt, hydraulic oil and magnesium oxide pellets generated through a spill.	
denied	WIPP	03-001	20 & 30 gal drum	mineral oil mixed with salt generated through a spill.	

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Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Weatherford

Date	Weatherford Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
08/12/02	Hobbs, NM	07.26.02	1500 cy yearly until August 2002	Sump sludge - from the washing & steam cleaning of oilfield tools.	CRI
02/25/02	Odessa, TX	02.20.02	80 cy	Pipe scale generated from rattling fo oilfield pipe with mechanical wire brush.	
08/14/01	Hobbs, NM	07.26.01A	48 cy through 2001	Contaminated soil containing hydraulic oil generated from cleanup.	CRI
04/03/01	Midland, TX	03-008	124 cy	Oil field and plant waste generated through oilfield and plant operations.	Waste Management
03/27/01	Hobbs, NM	03-016	300 bbls	Sump sludge - from washing downhole oilfield pumps and equipment.	CRI
denied	Hobbs, NM	02-006	300 bbls	Sump sludge - from washing downhole oilfield pumps and equipment.	CRI

C-138 on file with OCD Santa Fe Office
Disposal Facility : Controlled Recovery Inc.
Generator: Navajo Refining Company

Table Prepared by New Mexico Oil Conservation Division on 06/04/03
C-138 confirmed at CRI on 6/13/03
C-138 was not on file with CRI on 6/13/03 will copy and send to CRI
C-138 was on file with CRI but not with OCD made copies of cover for OCD file

Date	Navajo Location	CRI	Estimated Volume	Waste Description	Transporter
		ID Number			
06/04/03	Artesia, NM	05.02.03	70 cy	Hydroblast soil near TK433	CRI
02/05/03	El Paso Terminal	01.03.03	30 cy	concrete, trash, insulation, styrofoam, basic trash and debris	CRI
02/17/03	Pecos Station	01.06.03	200 cy	crude oil spill. Approval letter 6-14-2000 in reference to crude analysis	I&W
11/05/02	Artesia, NM	10.24.02A	20 cy	Contaminated soil generated from removal for building of a concrete foundation for new sws tank.	CRI
denied	Artesia, NM	10.24.02B	20 cy	Soda ash that has only been in contact with water (no analytical no MSDS)	CRI
10/17/02	El Paso, TX	10.14.02	30 cy	Monitor well cuttings generated from clay and soil from drilling of monitor wells	CRI
08/05/02	Artesia, NM	07.25.02	20 cy	D-463 catalyst - used to spread the flow through alky unit and is neutralized before taken out of service.	D&J
07/16/02	El Paso, TX	06.28.02	60 cy	Rust and scale generated from cleaning tanks for maintenance and inspection.	BES or CRI
06/24/02	Lovington, NM	06.11.02	600 cy annually until 6-20-03	Asphalt/gas oil generated from cleanout of 1215 TK	D&J
06/10/02	Lovington, NM	02.28.02B	450 cy monthly for the remainder of 2002	Hydrocarbon contaminated soil generated from cleanups around refinery and excavation of gas oil hydrotreater unit.	D&J
04/08/02	NGSA Line	03.29.02	100 cy	Contaminated soil and crude oil generated from external corrosion of pipeline. Approval 06/13/01letter.	
03/26/02	Denver City, TX	03.22.02	15 cy	Contaminated soil generated from the Denver City location. Approval 06/13/01letter.	CRI
03/18/02	Artesia, NM	02.28.02A	450 cy monthly for the remainder of 2002	Hydrocarbon contaminated soil generated from cleanups around refinery and excavation of gas oil hydrotreater unit.	D&J
03/04/02	Riley Station	02.22.02	80 cy	Crude contaminated foam insulation generated from tank seal leaked onto foam insulation. Tank located on pipeline gathering system. Per Darrel Moore 3.4.02 Approval letter 6/13.01	CRI
01/22/02	Artesia, NM	01.10.02A	10 cy	CCR Cat Fine Bags - cloth bags used to filter catalyst fines.	Champion
01/22/02	Artesia, NM	01.10.02B	20 cy	D350 catalyst - from FCC reactor that cracks oil into light gasses and slurry oil	Champion
01/22/02	Artesia, NM	01.10.02C	20 cy	W-311 scale - from cleaning of fractionator tower.	Champion
01/22/02	Artesia, NM	01.10.02D	10 cy	Ceramic Ration Rings - Ration rings used to keep even flow of product through units	Champion
01/09/02	Artesia, NM	12.31.01	2 supersacks	FCC Demister Pads - Catch water mist that is in the towers and have fine particles of FCC Cat Fines on them	Champion
11/05/01	Artesia and El Paso	10.24.01	20 cy	Pipeline filters used to separate solids from finished products being transferred in pipelines the El Paso terminal.	BES
08/14/01	Artesia, NM	07.26.01B	20 cy	D370 / 371 Catalyst - generated in drying the air used by instrumentation	CRI
08/13/01	Hobbs, NM	06.27.01A	1500 cy	Crude oil spill - from pipeline. Approval 06/13/01letter.	
07/02/01	Artesia & Lovington, NM	06.01.01	30 cy/month for each facility for the rest of 2001	Hydrocarbon contaminated soil - generated during the cleanup of small spills around Artesia and Lovington Plants	Champion
07/02/01	Artesia & Lovington, NM	06.02.01	10 cy/month for each facility for the rest of 2001	Cooling tower sludge and debris - from cleaning out the bottom of the cooling tower and debris from the changing out of boards in and on the cooling tower.	Champion

07/02/01	Artesia & Lovington, NM	06.03.01	15 cy/month for each facility for the rest of 2001	Asphalt collected from a clean-up of an asphalt spill at Artesia and Lovington facilities	Champion
07/02/01	Artesia & Lovington, NM	06.04.01	each facility for the rest of 2001	Plant solid waste - generated through plant operations at both Artesia and Lovington facilities.	Champion
03/05/01	Artesia, NM	02-012	10 cy to extend through 2001	Plant solid waste - generated through plant operations	Champion
12/21/00	Artesia, NM	12-003	15 cy	Asphalt - Collected from a clean-up of an asphalt spill	Champion
12/14/00	Artesia, NM	12-002	20 cy	Filters - used to separate solid and other impurities from amine in the amine unit and sour water in the tail gas unit.	BES or Champion
10/24/00	Artesia, NM	10-008	20 cy	Filters - used to separate solid and other impurities from amine in the amine unit and sour water in the tail gas unit.	BES
10/24/00	Artesia, NM	10-007	150 cy	Hydrocarbon contaminated soil - from clean-up of small spills at the Artesia facility.	BES
10/24/00	Artesia, NM	10-006	30 - 55 gal drums	Blast sand - from sandblasting of the inside of a gasoline tank before repairing	BES
10/11/00	Artesia, NM	10-001	20 cy	D-342 catalyst - strips hydrogen chloride from reformate in the CCR unit.	BES
10/11/00	Artesia, NM	10-003	15 cy	Asphalt - from an asphalt spill cleanup	BES
10/06/00	Artesia, NM	10-002	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during Regeneration process.	BES
10/03/00	501 E. Main	09-004	20 cy weekly	(DAF) Dissolved Aid Flotation - Generated from the separation of solids from water during the treatment of wastewater. .	BES Rental
08/10/00	Artesia, NM	08-004	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during Regeneration process.	BES
08/10/00	Artesia, NM	08-005	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	BES
08/10/00	Artesia, NM	08-006	15 - 55 gal drums	Solids and debris caught in sewer inserts. Solids and debris are caught in the inserts before they enter the sewer system.	BES
07/10/00	Artesia, NM	06-008	40 cy	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	BES
07/10/00	Artesia, NM	06-009	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	BES
07/10/00	Artesia, NM	06-007	30 cy	D-342 catalyst - strips hydrogen chloride from reformate in the CCR unit.	BES
07/10/00	Artesia, NM	06-006	10 cy	Filters - used to separate solid and other impurities before waste water is sent to the injection wells.	BES
07/10/00	Artesia, NM	06-005	25 drums and 2 super sacks	D-280 281Mole Sieve - Strips water from Clean Hydrogen That is used the Isom Unit.	BES
06/14/00	Pecos River Crossing Terminal	06-003	120 cy	Crude oil contaminated soil - from over fill of tank at Navajo's Pecos River Crossing Terminal. Approval Letter 06/02/00.	I&W
05/18/00	Artesia, NM	05-004	20 - 55 gal drums	Solids and debris caught in sewer inserts. Solids and debris are caught in the inserts before they enter the sewer system.	BES
05/18/00	Lovington, NM	05-001	15 - 55 gal drums	Blast sand - from sandblasting of the inside of a asphalt storage tank before repairing	BES
05/18/00	Artesia, NM	05-002	30 cy	3-363 Catalyst - catalyst strips hydrogen chloride from reformate in the continuous catalytic regeneration CCR Reformer unit.	BES
05/18/00	Artesia, NM	05-003	150 cy	Hydrocarbon contaminated soil - from clean-up of small spills at the Artesia facility.	BES
04/10/00	Artesia, NM	04-001	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	Lea Land Inc
04/10/00	Artesia, NM	04-002	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
03/08/00	Artesia, NM	03-001	40 cy	D-490 D-491 Mole sieve - Used to dry diesel before it is sent to storage.	Lea Land Inc
03/08/00	Artesia, NM	02-014	40 cy	Blast sand - from sandblasting the inside of a gasoline tank before repairing.	Lea Land Inc
02/24/00	Artesia, NM	02-013	300 cy	Hydrocarbon contaminated soil - from clean-up of a gas oil spill plus other spill cleanups around the plant.	Lea Land Inc

02/24/00	Artesia, NM	02-011	10 cy	Injection well filters - used to separate solid and other impurities before waste water is sent to the injection wells.	Lea Land Inc
02/24/00	Artesia, NM	02-012	20 cy	Pipeline filters - used to separate solids from finished products being transferred in pipelines to the El Paso Terminal.	Lea Land Inc
02/24/00	Artesia, NM	02-010	10 cy	Filters - used to separate solids and other impurities from amine in the amine unit and sour water in our tail gas unit.	Lea Land Inc
02/24/00	Artesia, NM	02-009	10 cy	Charcoal filters - Pellets used to absorb any hydrocarbons during amine regeneration.	Lea Land Inc
01/24/00	Monument Station	1.2003	40 cy	Crude oil contaminated soil - from pipeline spill. Approval letter 05/9/1996.	Smith & Son
01/11/00	Artesia, NM	1.2001	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
01/11/00	Artesia, NM		30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	Lea Land Inc
12/20/99	Artesia, NM	12-007	6 - 55 gal drums	Sludge - generated form cleaning out the crude tower T-101.	Lea Land Inc
12/20/99	Artesia, NM	12-008	30 cy	Hydrocarbon contaminated soil and debris - various spill cleanups.	Lea Land Inc
12/07/99	Artesia, NM	11-003	360 bbls a week	Fluoride precipitator solids generated from the mixing of hydrofluoric acid from alkylation unit with calcium chloride to remove fluorides.	CRI
12/03/99	Artesia, NM	11-002	500 bbls. Sludge 10 cy debris	Cooling tower sludge and debris - generated from the cleaning out of the bottom of the cooling tower, and the debris from changing out of boards in and on the cooling tower.	CRI and Lea Land Inc
11/05/99	Lovington, NM	10-004	10 cy	Cooling Tower Sludge - dirt and scale accumulated in the bottom of the cooling tower during normal operation.	Lea Land Inc
11/05/99	Lovington, NM	10-006	30 cy	Coke and steel trays removed form the vacuum tower (T-501)	Lea Land Inc
11/05/99	Artesia, NM	10-003	10 cy	Injection well filters. Filters are used to separate solids and other impurities before waste water is sent to injection wells.	Lea Land Inc
11/05/99	Lovington, NM	10-005	10 cy	Blast media - Heater (h-101) was sandblasted.	Lea Land Inc
10/04/99	Artesia, NM	09-004	30 cy	D-363 catalyst - strips hydrogen chloride from reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
10/04/99	Artesia, NM	09-005	25 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
10/04/99	Artesia, NM	09-006	30 cy	Filters - used to separate solids and other impurities from amine in our amine unit and sour water in our tail gas unit.	Lea Land Inc
10/04/99	Artesia, NM	09-007	10 cy	TK 116 bottoms - generated by the cleaning out of Isobutane tank Tk116 in order to retrofit it with new valves.	Lea Land Inc
10/04/99	Artesia, NM	09-008	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
09/20/99	Artesia, NM	09-001	10 cy	Vacuum tower (W-62) scale and pall rings.	Lea Land Inc
08/23/99	Artesia, NM	08-002-1	350 cy	Hydrocarbon contaminated soil from various spill cleanups.	Lea Land Inc
08/23/99	Artesia, NM	08-002-2	15 cy	D-759 carbon filter catalyst - used to absorb any hydrocarbons during amine regeneration .	Lea Land Inc
08/23/99	Lovington, NM	08-003-1	80 cy	Hydrocarbon contaminated soil from various spill cleanups.	Lea Land Inc
08/23/99	Lovington, NM	08-003-2	80 cy	Blast sand - naphtha storage tank was sandblasted for repairs	Lea Land Inc
07/12/99	Artesia, NM	06-005	20 - 55 gal drums	Sewer insert solids	Lea Land Inc
07/12/99	Artesia, NM	06-006	20 cy	Pipeline filters - Approval letter 11/10/97	Lea Land Inc
07/12/99	Artesia, NM	06-007	25 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
06/03/99	New Crouch Station	05-003	600 cy	Crude oil contaminated soil -from pipeline spill. Approval letter 05/9/1996.	Key
04/15/99	Artesia, NM	04-002-1	60 cy	Hydrocarbon contaminated soil - from various spill clean-ups from around	Lea Land Inc
04/15/99	Artesia, NM	04-002-2	15 cy	D-345 catalyst - catalyst strips hydrogen chloride from reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
04/15/99	Artesia, NM	04-002-3	10 cy	D759 (carbon filter) catalyst - catalyst used to absorb any hydrocarbons during amine regeneration.	Lea Land Inc
04/15/99	Artesia, NM	04-002-4	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
03/26/99	Artesia, NM	03-005-1	drums and 15 cy	Sewer insert solids	Lea Land Inc
03/26/99	Artesia, NM	03-005-2	10 drums	Vacuum tower (W-62) scale and pall rings.	Lea Land Inc
03/26/99	Artesia, NM	03-005-3	30 supersacks	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc

01/25/99	Artesia, NM	01-002-1	20 cy	blast sand - from sandblasting the outside of the reflux drum so it could be repainted.	Lea Land Inc
01/25/99	Artesia, NM	01-002-2	40 cy	Pipeline filters - used to separate solids from finished products being transferred in pipelines to our El Paso terminal. Approval letter 11/10/97	Lea Land Inc
01/25/99	Artesia, NM	01-002-3	70 cy	D-479 catalyst from diesel HDU reactor.	Lea Land Inc
01/11/99	Artesia, NM	12-006	100 cy	crude contaminated soil and catalyst	Stevenson & Lea Land
12/21/98		1	60 cy	Hydrocarbon contaminated soil - from various spill clean-ups.	Lea Land Inc
12/21/98		2	60 cy	Contaminated soil - from underneath slurry oil tank TK62 that was removed	Lea Land Inc
12/21/98	Artesia, NM	3	60 cy	CBO soil - soil from cleanup around the CBO rack at Artesia facility	Lea Land Inc
12/21/98		4	30 cy	D-363 catalyst - catalyst strips hydrogen chloride form reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
12/21/98		5	150 cy	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
12/21/98		6	15 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
11/24/98	Artesia, NM	11-004	400 drums	Empty 55 gal drums - Triple rinsed that once held catalysts, oil and chemicals.	Lea Land Inc
10/15/98	Artesia, NM	10-005	1200 bbls and 30 cy	Trickling filter sludge - from bottom of the trickling filter aggressive biological treatment. Not F037, F038	Lea Land Inc
10/07/98	Artesia, NM	10-003	300 filters	Pipeline filters - Approval letter 11/10/1997	Lea Land Inc
10/07/98	Artesia, NM	10-002	5 drums	Asphalt	Lea Land Inc
10/07/98	Artesia, NM	10-001	25 supersacks	FCC catalyst fines -	Lea Land Inc
08/27/98	Artesia, NM	08-005	20 cy	Asphalt	Lea Land Inc
08/10/98	Artesia, NM		15 cy	Chloride Guard catalyst - strips hydrogen chloride from reformate in hydrogen chloride drum	Lea Land Inc
07/15/98	Artesia, NM	07-005	80 cy	spill cleanup material	Lea Land Inc
06/29/98	Artesia, NM	06-006		FCC catalyst fines -	Lea Land Inc
06/29/98	Lovington, NM	06-007	30 cy	Hydrocarbon contaminated soil - from a failed gasket causing the spill of gas oil to the ground.	Lea Land Inc
05/22/98	Artesia, NM	05-003	30 cy	Blast sand - from sandblasting new tanks to remove scale and rust in preparation for painting.	Lea Land Inc
04/23/98	Artesia, NM	04-008	15 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
04/23/98	Artesia, NM	04-009	drums	asphalt spill -	Lea Land Inc
04/23/98	Artesia, NM	04-007	15 cy	Hydrocarbon contaminated soil - from various spill clean-ups.	Lea Land Inc
04/10/98	Lovington, NM	03-011	100 cy	blast sand - from sandblasting crude oil tank TK-1201B.	Ramirez Trucking
04/08/98	Artesia, NM	03-018	300 cy	contaminated soil - from the tail gas unit area.	Sweatt
03/31/98	Lovington, NM	03-012	48 cy	asphalt spill -	Ramirez Trucking
03/31/98	Artesia, NM	03-014	700 bbls	Sludge - from the alkylation unit, caustic in a neutralization pit used to counter acid soluble oils that are low in p.h.	I&W
03/31/98	Artesia, NM	03-013	36 drums	D-41, D42 Sulfur guard catalyst - isom feed from the naphtha splitter, located in the naphtha hydrotreater is sent to the isom feed sulfur guard drums	Lea Land Inc
03/31/98	Artesia, NM	03-015	15 cy	D-342, Chloride guard catalyst - strips hydrogen chloride from reformate in hydrogen chloride drum	Ramirez Trucking
03/31/98	Artesia, NM	03-016	30 cy	Crude oil contaminated soil - from the Lynch crude holding station.	B&H
03/11/98	Artesia, NM	02-018	700 to 800 cy	Slurry from tank TK 62 -	Triad Trucking
02/12/98	Artesia, NM	02-010	85 cy, 15 - 55 gal drums, 15 super sacks	Polymer, slingers, sulfur guard, D-642 & D-643 desiccant, blast sand, zeolite, D-334 propane scrubber, FCC fines, chloride guard, asphalt	Triad Trucking
02/20/98	Artesia, NM	02-012	70 cy	D -64 desulferized catalyst	Triad Trucking
02/24/98	El Paso & Artesia		20 cy	Pipeline filters - Approval letter 11/10/1997	Triad Trucking
02/24/98	Artesia, NM	02-018	700 to 800 cy	Slurry from tank TK 62 -	Triad Trucking
01/21/98	Artesia, NM		20 cy	sulfur guard - used to strip sulfur out of kerosene in the kerosene HDU reactor.	Triad Trucking
01/27/98	Artesia, NM		10 cy	Hydrocarbon contaminated soil generated during a turn around	
027/98	Artesia, NM		20 cy	Vacuume tower scale - generated by removing the material from the vacuum tower.	

01/13/98	Lovington, NM	1	cy	Crude tower sludge -	Triad and I&W
01/21/98	Lovington, NM	2	1000 bbls	Deslater sludge -	Triad and I&W
01/13/98	Lovington, NM	3	15 cy	Hydrocarbon contaminated soil -	Triad and I&W
01/13/98	Lovington, NM	4	500 bbls	Flair line sludge -	Triad and I&W
01/13/98	Lovington, NM	5	10 cy	Cooling Tower sludge -	Triad and I&W

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Lea Land
3. Address of Facility Operator P.O. Box 388 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajo Refining Artesia facility. The material was generated by spill cleanups at the Navajo Artesia facility. I have included a certificate of waste and a chain of custody.

07-005

Estimated Volume 80 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo TITLE: Environ. Copliance Manager DATE: 07/15/98

Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505) 393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

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New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
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(505) 827-7131

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District Of

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining
	5. Originating Site Artesia facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Lea Land
3. Address of Facility Operator P.O. Box 388 Hobbs	6. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E Main Artesia	New Mexico

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The following analytical is from the Navajo Refining Artesia facility. The material was generated by spill cleanups at the Navajo Artesia facility. I have included a certificate of waste and a chain of custody.

07-005

JUL 1998 RECEIVED Hobbs OCD

JUL 1998 RECEIVED Hobbs OCD

Estimated Volume 80 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Billie Charo (Waste Management Facility/Authorized Agent) TITLE: Environ. Copliance Manager DATE: 07/15/98

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505) 393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: Envir Supv DATE: 7/15/98

APPROVED BY: _____ TITLE: Bureau Chief DATE: 7/15/98

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- (505) 748-1283
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esia, NM 88210
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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Stevenson & Le. Lan
3. Address of Facility Operator P. O. Box 388 Hobbs	8. State NM
7. Location of Material (Street Address or ULSTR) 510 E. Main	Artesia, NM

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from th Generator; one certificate per job.

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BRIEF DESCRIPTION OF MATERIAL:

Crude contaminated soil and catalyst. I have included waste analysis, certificate of waste and chain of custody.

12-006

called & notified Bryan 1/21/99 10:00

Estimated Volume 100 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: _____ TITLE: Manager DATE: 1-5-99
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Ken Marsh TELEPHONE NO. 505-393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: Env. Geologist DATE: 1-11-99

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Artesia, NM 88210
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2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☐	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter Lea Land, Inc.
3. Address of Facility Operator P. O. Box 388, Hobbs,	8. State NM
7. Location of Material (Street Address or ULSTR) 5-1 E Main, Artesia, NM	

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B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

Solids and debris caught in sewer inserts. See attached analytical, Certificate of Waste Status, Chain of Custody and NMED Hazardous and Radioactive Materials Bureau letter.

06-005

Estimated Volume 20 - 55 gal. drums cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Kath Harper Waste Management Facility Authorized Agent TITLE: Bookkeeper DATE: 6-30-99

TYPE OR PRINT NAME: Kath Harper TELEPHONE NO. (505) 393-1079

(This space for State Use)

APPROVED BY: Donna Williams TITLE: Environmental Eng. DATE: 7-2-99

APPROVED BY: Martyn J. Kieft TITLE: Environmental Geologist DATE: 7-12-99

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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to app
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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒ Verbal Approval Received: Yes ☐ No ☐	4. Generator Navajo Refining 5. Originating Site Artesia Facility
2. Management Facility Destination Controled Recovery, Inc.	6. Transporter Unknown
3. Address of Facility Operator P.O. Box 369 Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 East Main	Artesia, New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from t Generator; one certificate per job.

(B.) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is from the Navajor Refining Artesia facility. The petroleum refining - hydrocarbon contaminated soilwas generated by cleanup of spills to the bare ground during a turn around. I have included a certificate of waste and a chain of custody.

JAN 1998 Received Hobbs OCD

JAN 1998 Received Hobbs OCD

Estimated Volume 10yards cy Known Volume (to be entered by the operator at the end of the haul) ______

SIGNATURE: Billie Charo TITLE: Office Manager DATE: 01/13/98
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Billie Charo TELEPHONE NO. (505)393-1079

(This space for State Use)

APPROVED BY: [signature] TITLE: Envir Engr DATE: 1/16/98

APPROVED BY: Martyne J Kieling TITLE: Env Geologist DATE: 1/27/98

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

Form C-138
Revised March 17, 1999

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District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: X ☐Verbal Approval Received: Yes ☐ No X	4. Generator Navajo Refining Co. 5. Originating Site El Paso Facility
2. Management Facility Destination Controlled Recovery Inc.	6. Transporter BES or CRI
3. Address of Facility Operator P.O. Box 388, Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 1000 East Side Dr. El Paso	Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved

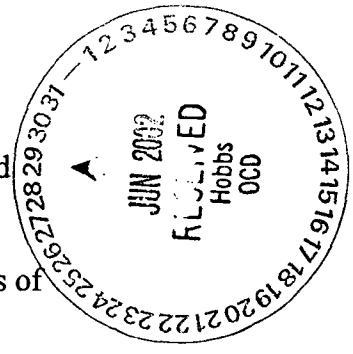
All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

06-28-02

Rust/Scale generated from cleaning tanks for maintenance and inspection. Rust and scale is from inside the tanks.

Enclosed is certificate of waste status, analytical data, chain of custody, and process of knowledge letter. This waste stream has been approved in the past.



Estimated Volume appx. 60 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE Carmella Van Maanen TITLE: Bookkeeper DATE: 06-28-02
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Carmella Van Maanen TELEPHONE NO: (505) 393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

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

Form C-138
Revised March 17, 1999

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to Appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: X Verbal Approval Received: Yes ☐ No X	4. Generator Navajo Refining Co.
	5. Originating Site El Paso Facility
2. Management Facility Destination Controlled Recovery Inc.	6. Transporter BES or CRI
3. Address of Facility Operator P.O. Box 388, Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 1000 East Side Dr. El Paso	Texas

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL

06-28-02

Rust/Scale generated from cleaning tanks for maintenance and inspection. Rust and scale is from inside the tanks.

Enclosed is certificate of waste status, analytical data, chain of custody, and process of knowledge letter. This waste stream has been approved in the past.

Estimated Volume approx. 60 yards cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Carmella Van Mason TITLE: Bookkeeper DATE: 06-28-02
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Carmella Van Mason TELEPHONE NO: (505) 393-1079

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: 6/28/02

APPROVED BY: _____ TITLE: Environmental Geologist DATE: 7/16/02

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Oil Conservation Division

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REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: ☐ Non-Exempt: ☒	4. Generator Navajo Refining
Verbal Approval Received: Yes ☐ No ☒	5. Originating Site Artesia Facility
2. Management Facility Destination Controlled Recovery, Inc.	6. Transporter BES
3. Address of Facility Operator P.O. Box 388, Hobbs	8. State New Mexico
7. Location of Material (Street Address or ULSTR) 501 E.Main, Artesia	New Mexico

9. Circle One:

A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from t Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

08-004

FCC Catalyst Fines.
These are fine particles from catalyst collected in the cyclones at the FCC Unit during the regeneration process.

I am enclosing Certificate of Waste status and copy of previous C-138.
This waste has been approved in the past.

Estimated Volume 30 Supersacks cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: Carmella Van Maanen Waste Management Facility Authorized Agent TITLE: Bookkeeper DATE: 08-03-00

TYPE OR PRINT NAME: Carmella Van Maanen TELEPHONE NO. (505) 393-1079

(This space for State Use)

APPROVED BY: Donna Williams TITLE: Environ. Eng. Specialist DATE: 8-8-00

APPROVED BY: _____ TITLE: Environmental Geologist DATE: 8-10-00

88

393-1079
393-3615

Navajo Pipeline
WM 6" #8" EL

10-25-02
10-26-02

Invoice Number:
012832

Invoice Date:
Nov 18, 2002

Page:
1

AJO PIPELINE
TN: MR. ALBERT REYES
.O. BOX 159
ARTESIA, NM 88211

Ship to:
NAVAJO PIPELINE
WEST MOUNUMENT 6"
HESS 8" EMOTION LINE

Customer ID	Customer PO	Payment Terms	
NA800		Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
	ED WALTON V-391&392	10/25/02	12/18/02

Quantity	Item	Description	Unit Price	Extension
14.00		CONTAMINATED SOIL PER YARD TKT #43290		
14.00		CONTAMINATED SOIL PER YARD TKT #43291		
14.00		CONTAMINATED SOIL PER YARD TKT #43296		
14.00		CONTAMINATED SOIL PER YARD TKT #43297		
14.00		CONTAMINATED SOIL PER YARD TKT #43298		
1.00		CALL OUT TKT #43298		
14.00		CONTAMINATED SOIL PER YARD TKT #43299		
14.00		CONTAMINATED SOIL PER YARD TKT #43300		
14.00		CONTAMINATED SOIL PER YARD TKT #43301		
14.00		CONTAMINATED SOIL PER YARD TKT #43302		

Check No:

Total Invoi
Paymen

Inc.
88

393-1079
393-3615

Invoice

Invoice Number:
012832

Invoice Date:
Nov 18, 2002

Page:
2

AJO PIPELINE
TN: MR. ALBERT REYES
O. BOX 159
RTESIA, NM 88211

Ship to:
NAVAJO PIPELINE
WEST MOUNUMENT 6"
HESS 8" EMOTION LINE

Customer ID	Customer PO	Payment Terms	
NA800		Net 30 Days	
Sales Rep ID	**Shipping Method**	**Ship Date**	**Due Date**
	ED WALTON V-391&392	10/25/02	12/18/02

Quantity	Item	Description	Unit Price	Extension
1.00		CALL OUT		
		TKT #43302		
14.00		CONTAMINATED SOIL PER YARD		
		TKT #43303		
14.00		CONTAMINATED SOIL PER YARD		
		TKT #43306		
14.00		CONTAMINATED SOIL PER YARD		
		TKT #43307		

Check No:

Total
Pa

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

October 25, 2002

Navajo Pipeline Co.
P.O. Box 159
Artesia, NM 88211

RE: Breakdown for Monument Gathering System
Trucking by CRI

Date	Tkt #	Yards
10-09-02	43038	20
10-09-02	43041	20
10-09-02	43042	20
10-09-02	43045	20
10-10-02	43052	20
10-10-02	43065	20
10-10-02	43066	20
10-10-02	43067	20
10-10-02	43068	20
10-10-02	43069	20
10-10-02	43098	20
10-10-02	43101	20
10-11-02	43105	20
10-11-02	43106	20
10-11-02	43110	20
10-11-02	43116	20
10-11-02	43120	20
10-11-02	43127	20
10-14-02	43133	20
10-14-02	43136	20
10-14-02	43137	20
10-14-02	43152	20

CRI
CONTROLLED RECOVERY INC.
P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

October 25, 2002

Navajo Pipeline Co.
P.O. Box 159
Artesia, NM 88211

RE: Breakdown for Monument Gathering System

Date	Tkt #	Yards
10-07-02	42962	22
10-07-02	42963	22
10-07-02	42964	22
10-07-02	42965	22
10-07-02	42966	20
10-07-02	42967	22
10-07-02	42968	22
10-07-02	42969	22
10-07-02	42970	20
10-07-02	42971	20
10-07-02	42972	20
10-07-02	42973	20
10-07-02	42990	20
10-07-02	42991	20
10-07-02	42992	20
10-07-02	42993	20
10-07-02	42994	20
10-07-02	42995	20
10-08-02	43000	20
10-08-02	43001	20
10-08-02	43002	20
10-08-02	43003	20
10-08-02	43004	20

10-08-02	43005	20
10-08-02	43010	20
10-08-02	43011	20
10-08-02	43012	20
10-08-02	43015	20
10-08-02	43016	20
10-08-02	43017	20
10-08-02	43018	20
10-08-02	43019	20
10-08-02	43021	20
10-08-02	43022	20
10-09-02	43023	20
10-09-02	43033	20
10-09-02	43034	20
10-09-02	43037	20
10-09-02	43039	20
10-09-02	43040	20
10-09-02	43043	20
10-09-02	43044	20
10-09-02	43048	20
10-09-02	43049	20
10-09-02	43050	20
10-09-02	43051	20
10-10-02	43059	20
10-10-02	43060	20
10-10-02	43061	20
10-10-02	43062	20
10-10-02	43063	20
10-10-02	43064	20
10-10-02	43089	20
10-10-02	43092	20
10-10-02	43093	20
10-10-02	43094	20
10-10-02	43099	20
10-10-02	43102	20
10-11-02	43107	20
10-11-02	43108	20
10-11-02	43109	20
10-11-02	43111	20
10-11-02	43112	20

10-11-02	43117	20
10-11-02	43118	20
10-11-02	43119	20
10-11-02	43122	20
10-11-02	43121	20
10-11-02	43123	20
10-11-02	43124	20
10-11-02	43125	20
10-11-02	43126	20
10-11-02	43129	20
10-14-02	43134	20
10-14-02	43135	20
10-14-02	43138	20
10-14-02	43139	20
10-14-02	43140	20
10-14-02	43141	20
10-14-02	43142	20
10-14-02	43143	20
10-14-02	43145	20
10-14-02	43146	20
10-14-02	43148	20
10-14-02	43150	20
10-17-02	43144	20
10-17-02	43147	20
10-17-02	43149	20
10-17-02	43151	20
10-17-02	43154	20
10-17-02	43157	20
10-18-02	43196	20
10-18-02	43204	20
10-18-02	43205	20
10-18-02	43206	20
Total Yards		**1,914**

10-14-02	43153	20
10-14-02	43155	20
10-14-02	43156	20
Total Yards		**500**

January 2002 Blanket Approval Non Exempt
Fore pipeline leaks

June 13, 2001
Good till
~~June~~ 2005
Dec 31,

NAVAJO PIPELINE
MONUMENT GATHERING SYSTEM

TRUCKING CO.	TICKET NO.	Y/ YARDS
CHAPARRAL	44302	12
EDW	44303	12
CHAPARRAL	44304	12
CHAPARRAL	44305	12
EDW	44306	12
CHAPARRAL	44307	12
CHAPARRAL	44309	12
EDW	44310	12
CHAPARRAL	44311	12
CHAPARRAL	44312	12
EDW	44313	12
CHAPARRAL	44314	12
CHAPARRAL	44319	12
EDW	44320	12
CHAPARRAL	44321	12
EDW	44324	12
CHAPARRAL	44325	12
EDW	44326	12
CHAPARRAL	44327	12
CHAPARRAL	44328	12
EDW	44329	12
CHAPARRAL	44330	12
CHAPARRAL	44331	12
EDW	44332	12
CHAPARRAL	44333	12
CHAPARRAL	44334	12
EDW	44335	12
EDW	44336	12
CHAPARRAL	44337	12
EDW	44344	12
		360

Navajo Records June 11, 2003					CRI Acceptance No.	Manifests in CRI records not examined at Navajo	
Date	Transporter	Volume cubic yards	Waste Type	Manifest Number		Manifest Number	CRI Acceptance No.
10/16/02	D&J	8	DAF	2684306	43159		
10/16/02	D&J	8	DAF	2684307			
9/30/02	D&J	8	Flouride precipitate	2684308			
10/16/02	D&J	8	DAF	2684309			
10/9/02	D&J	8	DAF	2684310			
9/27/02	D&J	10	Chloride Guard	2684332	42901		
10/21/02	D&J	12	Flouride precipitate	2684333	43236		
10/21/02	D&J	8	Flouride precipitate	2684344			
10/2/02	BES	8	DAF	2684360			
10/2/02	BES	8	DAF	2684361			
10/2/02	CRI	15	DAF	2684362			
10/3/02	CRI	8	FCC cat fines	2684363			
10/7/02	D&J	10	FCC cat fines	2684366			
10/8/02	D&J	8	Filters	2684367			
10/8/02	D&J	8	DAF, flouride precipitator solids	2684368			
11/12/02	D&J	10	Blast sand	2684369	43511		
11/11/02	D&J	10	Pipeline filters	2684370	43486		
11/11/02	D&J	8	DAF	2684371	43510		
11/11/02	D&J	10	Concrete	2684372	43509		
11/11/02	D&J	8	DAF	2684373	43542		
11/7/02	D&J	8	DAF	2684374	43440		
11/7/02	D&J	8	Flouride precipitate	2684376	43483		
11/7/02	D&J	10	Blast sand	2684377	43508	2684379	44990
2/19/03	D&J	8	DAF	2684381	44998	2684380	44991
11/7/02	D&J		DAF	2684382	44999		
11/7/02	D&J	8	DAF	2684383	43559		
11/7/02	D&J	8	Flouride precipitate	2684384	43560		
11/13/02	D&J	10	FCC cat fines	2684385	43544		
11/13/02	D&J	8	DAF	2684388	43546		
2/21/03	D&J	8	Flouride precipitate	2684389	44995		
2/21/03	D&J		Flouride precipitate	2684390	45018		
2/25/03	D&J			2684391	45026		
2/24/03	D&J	8	Trash non-haz pad	2684392	45019		
2/24/03	D&J	10	Non-haz waste from behind pipeline, trash and debris	2684393			
2/26/03	D&J	8	DAF	2684395	45029		
2/27/03	D&J	8	DAF, flouride precipitator solids	2684398	45059		
2/18/03	D&J		DAF	2684401	44951		
2/18/03	D&J		DAF, flouride precipitator solids	2684403	44954		
2/18/03	D&J	8	Flouride precipitate	2684409	44174		
12/26/02	D&J	8	Flouride precipitate	2684410	44128		
12/26/02	D&J	10	Trash, debris, cat fines	2684411	44805		
12/31/02	CRI	8	DAF	2684415	44191		
1/2/03	D&J	8	DAF	2684416	44238		
1/2/03	D&J	8	DAF	2684417	44237		

1/3/03	D&J	8	DAF and flouride precipitate	2684420	44239		
12/30/02	D&J	8	DAF	2684422	44173	2684423	43872
1/31/03	D&J	10	Trash, debris, pipeline filters	2684429	44804	2684427	43057
1/3/03	D&J	8	Flouride precipitate	2684432	44241		
1/6/03	CRI	8	Flouride precipitate	2684433	44317		
3/4/03	D&J	8	Flouride precipitate	2684434	45115		
11/12/02	CRI	10	HC Contaminated Soil	2684435	43507		
10/4/02	D&J		Trash and blast sand	2684455			
10/24/02	D&J	8	DAF	2684457	43265		
10/24/02	D&J	10	HC Contaminated Soil	2684466			
12/9/02	D&J	8	Flouride precipitate	2684523			
12/9/02	D&J	8	DAF	2684524	43882		
12/3/02	D&J	8	DAF	2684528	43881		
12/3/02	D&J	8	Flouride precipitate	2684529	43924		
12/4/02	D&J	8	DAF	2684532	43923		
12/5/02	D&J	8	DAF	2684533			
11/8/02	D&J	10	Contaminated soil	2684535	Artesia Aeriation		
10/31/02	D&J	10	Contaminated soil	2684536	Artesia Aeriation		
10/30/02	D&J	10	Contaminated soil	2684537	Artesia Aeriation		
10/30/02	D&J	10	Contaminated soil	2684538	Artesia Aeriation		
10/30/02	D&J	10	Contaminated soil	2684539	Artesia Aeriation		
10/31/02	D&J	8	DAF	2684540	43361		
10/31/02	D&J	8	DAF	2684541	43359		
11/1/02	D&J	8	Flouride precipitate	2684542	43375		
11/4/02	D&J	8	Flouride precipitate	2684543	43402		
10/4/02	D&J	10	Trash and blast sand	2684544	43406		
10/4/02	D&J	8	DAF	2684544			
10/4/02	D&J	8	DAF	2684545	43345		
10/16/02	D&J	8	DAF	2684546			
10/16/02	D&J	8	Flouride precipitate	2684547	43247		
10/22/02	D&J	8	DAF	2684548	43246		
10/23/02	D&J	8	DAF	2684549	43263		
10/23/02	D&J	8	DAF	2684550	43262		
11/14/02	D&J	10	Contaminated soil	2684551	Artesia Aeriation		
11/14/02	D&J	10	Contaminated soil	2684552	Artesia Aeriation		
11/14/02	D&J	10	Contaminated soil	2684553	Artesia Aeriation		
11/14/02	D&J	10	Contaminated soil	2684554	Artesia Aeriation		
11/14/02	D&J	10	Contaminated soil	2684555	Artesia Aeriation		
11/20/02	D&J	10	Contaminated soil	2684556	Artesia Aeriation		
11/20/02	D&J	10	Contaminated soil	2684557	Artesia Aeriation		
11/20/02	D&J	10	Contaminated soil	2684558	Artesia Aeriation		
11/21/02	D&J	10	Contaminated soil	2684559	43988		
11/21/02	D&J	10	Contaminated soil	2684560	Artesia Aeriation		
11/21/02	D&J	10	Contaminated soil	2684561	Artesia Aeriation		
11/21/02	D&J	10	Contaminated soil	2684562	Artesia Aeriation		
11/21/02	D&J	10	Contaminated soil	2684563	Artesia Aeriation		
11/21/02	D&J	10	Contaminated soil	2684564	Artesia Aeriation		
11/5/02	D&J	8	DAF	2684565	43407		
12/2/02	D&J	8	DAF	2684566	43873	2684567	43866
11/27/02	Sweatt	15	Concrete	2684568	43863		
11/27/02	Sweatt	15	Concrete	2684569	43862		
11/27/02	D&J	8	DAF	2684570	43834		
11/27/02	D&J	8	DAF	2684571	43835		
11/27/02	D&J	8	Flouride precipitate	2684572	43804		
11/20/02	D&J	8	DAF	2684575	43662		
11/24/02	D&J	8	Flouride precipitate	2684577	43733		

11/22/02	D&J	8	Flouride precipitate	2684578	43731		
11/21/02	D&J	8	DAF	2684579	43692		
11/21/02	D&J	8	DAF	2684580	43674		
11/23/02	D&J	8	DAF	2684581	43734		
11/23/02	D&J	10	D-342 Catalyst	2684585	43926		
11/23/02	D&J	8	DAF	2684589	43400		
11/23/02	D&J	10	Sand, trash and debris	2684590			
11/6/02	D&J	8	DAF	2684591	43401		
11/19/02	D&J	8	DAF	2684592	43635		
11/19/02	D&J	8	DAF	2684593	43663		
11/19/02	D&J	8	Flouride precipitate	2684594	43871		
11/19/02	D&J	8	DAF	2684596	43975		
12/10/02	D&J	8	DAF	2684597			
12/11/02	D&J	8	DAF	2684598	43986		
12/11/02	D&J	8	DAF	2684599	43988		
12/11/02	D&J	8	DAF	2684602	44140		
12/27/02	D&J	8	Flouride precipitate	2684603	44139		
12/27/02	D&J	8	DAF	2685027	44127		
12/13/02	D&J	8	DAF	2685028	44111		
12/23/02	D&J	8	DAF	2685029	44109		
12/18/02	D&J	8	Flouride precipitate	2685032	44062	2685030	44086
12/18/02	D&J	10	DAF and flouride precipitate	2685033	44061		
12/18/02	D&J	8	DAF	2685034	44042		
12/17/02	D&J	8	DAF	2685035	44041		
12/17/02	D&J	8	Flouride precipitate	2685036	44060		
12/16/02	D&J	8	Flouride precipitate	2685037	44019		
12/12/02	CRI	8	Flouride precipitate	2685038	43998		
12/12/02	CRI	8	DAF	2685039	43997		
3/3/03	D&J	8	DAF	2685042	45089	2685041	44934
2/14/03	D&J		Flouride precipitate	2685044	44931		
2/12/03	D&J		DAF	2685045	44892		
2/12/03	D&J		DAF	2685046	44893		
2/11/03	D&J	8	DAF	2685047	44878		
2/10/03	D&J		Flouride precipitate	2685049	44873		
2/10/03	D&J		Flouride precipitate	2685052	44853		
2/7/03	D&J		Flouride precipitate	2685053	44852		
2/4/03	D&J	8	Flouride precipitate	2685054	44819		
2/4/03	D&J	8	DAF	2685055	44824		
2/4/03	D&J	8	FCC cat fines	2685056	44818		
2/3/03	D&J	10	Trash, debris, asphalt	2685060	44810		
1/30/03	D&J	8	D-363 Chloride Guard	2685062	44787		
1/30/03	D&J	8	DAF	2685063	44786		
1/31/03	D&J	10	D-363 Chloride Guard	2685064	44803		
1/28/03	D&J	8	Flouride precipitate	2685065	44758		
1/28/03	D&J	8	DAF	2685068	44756		
1/27/03	D&J	8	Flouride precipitate	2685069	44754		
3/4/03	D&J	10	Trash, debris non-haz pad	2685073	45114		
3/5/03	D&J	8	Flouride precipitate, DAF	2685074	45126		
3/5/03	D&J	8	Flouride precipitate, DAF	2685075	45125		
3/21/03	D&J	10	Trash, debris non-haz pad	2685076	45319		
3/6/03	D&J	8	Flouride precipitate, DAF	2685077	45142		

3/6/03	D&J	10	Trash, debris non-haz pad	2685078	45141		
3/10/03	D&J	10	Flouride precipitate	2685080	45168		
2/17/03	D&J		Flouride precipitate	2685401			
4/14/03	D&J	10	Trash, debris, non-haz	2686002			
4/3/03	D&J	10	Trash, debris non-haz pad	2687550	45748		
4/4/03	D&J		DAF	2687555	45749	2687552	45737
4/1/03	D&J	8	DAF	2687556	45720		
3/31/03	D&J	8	DAF, flouride precipitator solids	2687557	45702		
4/9/03	D&J	8	DAF, flouride precipitator solids	2687560	45460		
3/25/03	D&J	10	Trash, debris non-haz pad	2687562	45358		
4/26/02	D&J	8	DAF	2687563	45631		
3/25/03	D&J	10	Trash, debris non-haz pad	2687564	45356		
3/25/03	D&J	8	DAF	2687565	45357		
4/28/03	D&J	10	HC Contaminated Soil	2687640			
6/9/03	D&J	10	HC Contaminated Soil	2687695			
4/23/03	D&J	10	HC Contaminated Soil	2687732			
3/17/03	D&J	8	Flouride precipitate	2687956	45247		
3/17/03	D&J	8	Flouride precipitate	2687957	45246		
3/17/03	D&J	10	TK-433 asphalt	2687958	45249		
3/17/03	D&J	10	TK-433 asphalt	2687959	45248		
3/14/03	D&J	10	TK-433 asphalt	2687960	45227		
3/14/03	D&J	10	Trash, debris non-haz pad	2687963	45218		
3/13/03	CRI	10	02-028A	2687968	45181		
3/13/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687969	45182		
3/13/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687970	45214		
3/14/03	CRI	10	Contaminated soil, hydroblast (10-007, 02-028A)	2687971	45235		
4/8/03	D&J	10	Trash, debris, FCC cat fines	2687972	45436		
4/8/03	D&J	10	Trash, debris, FCC cat fines	2687973	45437		
4/7/03	D&J	10	CCR trash, debris	2687974			
4/8/03	D&J	8	DAF, flouride precipitator solids	2687976	45435		
4/7/03	D&J	8	Flouride precipitate	2687978	45428		
4/4/03	D&J		DAF	2687979	45416		
3/17/03	D&J	10	Trash, debris non-haz pad	2687981	45245		
4/29/03	D&J	8	DAF	2687982	45965		
4/11/03	D&J	8	Asphalt	2687985	45490		
4/10/03	D&J	10	Mole sieve (D-370/D-371)	2687986	45486		
4/10/03	D&J	8	Flouride precipitate	2687987	45469		
4/10/03	D&J	8	DAF	2687989	45472		
4/8/03	D&J	8	DAF	2687990	45438		
4/9/03	D&J	8	DAF	2687991	45461		

4/15/03	D&J	10	Trash, debris, asphalt sample cans, cat fines	2687992	45524		
4/15/03	D&J	10	FCC Cat fines, asphalt sample cans	2687993	45527		
4/15/03	D&J	10	FCC Cat fines	2687994	45525		
4/15/03	D&J	10	DAF	2687995	45526		
4/15/03	D&J	10	HC Contaminated Soil	2687996	45515		
4/15/03	D&J	10	HC Contaminated Soil	2687997	45517		
4/15/03	D&J	10	HC Contaminated Soil	2687998	45529		
4/15/03	D&J	10	HC Contaminated Soil	2687999	45543		
4/15/03	D&J	10	HC Contaminated Soil	2688000	45544		
4/15/03	D&J	10	HC Contaminated Soil	2688001	45542		
4/17/03	D&J		HC Contaminated Soil	2688003	45569		
4/14/03	D&J	10	Trash, debris, FCC cat fines, asphalt sample cans	2688004	45518		
4/24/03	D&J	8	Flouride precipitate	2688005	45932		
4/15/03	D&J	8	DAF	2688006	45523		
4/15/03	D&J	8	DAF	2688008	45541		
4/17/03	D&J	8	DAF, flouride precipitator solids	2688009	45570		
5/2/03	D&J	10	HC Contaminated Soil	2688068	46018	2688057	45236
5/2/03	D&J	10	HC Contaminated Soil	2688069	46019		
4/24/03	D&J	10	Contaminated soil	2688089	45918		
4/24/03	D&J	10	Concrete	2688090	45929		
4/23/03	D&J	10	Concrete	2688091	45902		
4/23/03	D&J	10	Concrete	2688092	45901		
4/23/03	D&J	10	Concrete	2688093	45905		
4/24/03	D&J	10	Concrete, trash, debris	2688094	45930		
4/23/03	D&J	8	DAF	2688095	45903		
4/24/03	D&J	8	Asphalt	2688096	45931		
5/13/03	D&J	8	DAF	2688102			
5/13/03	D&J	8	DAF	2688103			
4/28/03	D&J	10	Pipeline filters	2688106	45954		
4/28/03	D&J	8	DAF, flouride precipitator solids	2688107	45957		
4/28/03	D&J	10	D-342 Catalyst	2688110	45956		
4/29/03	D&J	10	Gas/oil hydrotreater soil	2688112	45967		
4/30/03	D&J	10	HC Contaminated Soil	2688113	45993		
5/6/03	D&J	8	DAF	2688114	46066		
4/22/03	D&J	8	DAF	2688115	45817		
4/17/03	D&J	10	Non-haz trash from non-haz pad, asphalt, filters	2688119	45565	2688118	45563
3/11/03	CRI	10	Contaminated soil	2688122	45201		
3/12/03	CRI	10	Contaminated soil	2688123	45203		
3/12/03	CRI	10	Contaminated soil	2688124	45204		
3/12/03	CRI	10	Contaminated soil	2688125	45205		
3/12/03	D&J	8	Flouride precipitate	2688126	45199		
3/12/03	D&J	10	Asphalt-TK 433	2688127	45198		
3/12/03	D&J	8	DAF	2688128	45196		
3/12/03	D&J		DAF	2688129	45197		
3/11/03	D&J	8	DAF	2688130	45172		
3/11/03	D&J	8	DAF, flouride precipitator solids	2688131	45173		

3/10/03	D&J	10	Pipeline filters, trash and debris	2688132	45170		
3/10/03	D&J	10	Trash, debris, FCC cat fines non-haz pad	2688133	45171		
4/24/03	D&J	10	Concrete	2688134	45963		
4/30/03	D&J	10	Concrete	2688135	45986		
5/1/03	D&J	10	Concrete	2688136	46007		
5/5/03	D&J	10	Concrete	2688137	46041		
4/28/03	D&J	10	Concrete	2688138	45955		
4/28/03	D&J	10	Concrete	2688139	45950		
4/25/03	D&J	10	Concrete	2688140	45949		
4/24/03	D&J	10	Contaminated soil	2688141	45920		
4/24/03	D&J	10	Contaminated soil	2688142	45919	2785104	44353
4/21/03	D&J	8	DAF, flouride precipitator solids	2688188		2785105	44354
4/17/03	D&J	10	HC Contaminated Soil	2785162	45560	2785108	45665
4/21/03	D&J	10	HC Contaminated Soil	2785163	45607		
4/21/03	D&J	10	HC Contaminated Soil	2785164	45562		
4/22/03	D&J	10	HC Contaminated Soil	2785165	45819		
3/21/03	D&J	10	HC Contaminated Soil	2785166	45323		
10/15/02	CRI	8	DAF	2785170	43164		
10/29/02	D&J	8	DAF	2785173	43344		
9/26/02	D&J	8	DAF	2785174	42886		
9/26/02	D&J	10	Blast sand and trash and debris	2785175	42885		
4/15/03	D&J	10	HC Contaminated Soil	2785176	45546		
	D&J	10	D-363 Chloride Guard	2785192	44806		
10/28/02	D&J	8	Flouride precipitate	2785208	43308		
10/17/02	D&J	8	DAF	2785211	43199		
10/17/02	D&J	8	DAF	2785212	43235		
10/17/02	D&J	Unknown	DAF	2785213	43360		
10/14/02	D&J	8	Flouride precipitate	2785215	43158		
9/26/02	D&J		Flouride precipitate	2785216	42887		
3/24/03	D&J	8	Flouride precipitate	2785233	45342		
3/21/03	D&J	10	Trash, debris non-haz pad	2785234	45318		
3/19/03	D&J	8	DAF	2785235	45295		
2/5/03	D&J	10	DAF	2785236	44835		
1/8/03	D&J	8	DAF	2785237	44351		44737
1/9/03	D&J	10	DAF	2785238	44352		44749
1/7/03	D&J	10	DAF	2785240	44338		44755
11/25/02	D&J	10	DAF	2785243	43772		44764

4/16/03	D&J	10	HC Contaminated Soil	2785251	45545		44771
4/11/03	D&J	10	HC Contaminated Soil	2785252	45491		44772
4/11/03	D&J	10	HC Contaminated Soil	2785253	45489		
4/10/03	D&J	10	HC Contaminated Soil	2785254	45470		
3/18/03	D&J	10	DAF	2785256	45280	2785255	45321
4/10/03	D&J	10	HC Contaminated Soil	2785257	45468		
4/10/03	D&J	10	HC Contaminated Soil	2785258	45467		
4/9/03	D&J	10	HC Contaminated Soil	2785259	45459		
4/22/03	D&J	10	HC Contaminated Soil	2785266	45819		
4/22/03	D&J	10	HC Contaminated Soil	2785268	45774		
4/22/03	D&J	10	HC Contaminated Soil	2785269	45522		
4/14/93	D&J	10	HC Contaminated Soil	2785270	45511		
1/29/03	D&J	8	DAF	2785271	44780		
1/29/03	D&J	8	DAF	2785272	44778		
1/13/03	D&J	10	Flouride precipitate	2785273	44414		
1/10/03	D&J	8	Flouride precipitate	2785274	44380		
1/14/03	D&J	10	DAF	2785279	44524		
1/14/03	D&J	10	DAF	2785280	44521		
1/15/03	D&J	8	DAF	2785281	44516		
1/15/03	D&J	10	FCC cat fines and contaminated soil	2785282	44517		
1/14/03	D&J	10	FCC cat fines, trash and debris, asphalt sample cans	2785283	44522		
1/14/03	D&J	10	FCC cat fines, trash and debris, asphalt sample cans	2785284	44523		
1/15/03	D&J	8	Trash, debris, FCC cat fines, contaminated soil	2785286	44518		
1/15/03	D&J	8	Flouride precipitate	2785287	44519		
1/16/03	D&J	8	Flouride precipitate	2785289	44582		
1/16/03	D&J	8	DAF	2785291	44581		
1/21/03	D&J	8	Flouride precipitate	2785294	44630		
1/21/03	D&J	8	DAF	2785295	44629		
1/21/03	D&J	8	Flouride precipitate	2785296	44632		
1/21/03	D&J	8	DAF	2785297	44633		
1/22/03	D&J	10	Pipeline filters, trash, debris	2785298	44634		
1/22/03	D&J		Trash, debris, cat fines, asphalt sample cans	2785300	44682		
1/24/03	D&J	10	Trash, debris, cat fines, asphalt sample cans	2785301	44681		
1/23/03	D&J	8	Flouride precipitate	2785303	44678		
	D&J	8	Flouride precipitate	2785304	44683		
3/21/03	D&J	10	HC Contaminated Soil	2875255			
5/28/03	D&J	8	DAF	3076571			
6/5/03	D&J	10	Concrete	3076826			

5/28/03	D&J	10	Trash, debris, FCC cat fines	3076828	46349		
5/28/03	D&J	8	DAF	3076830			
5/28/03	D&J	10	Concrete	3076831			
6/9/03	CRI	12	Hydroblast Soil	3076909			
6/9/03	CRI	12	Hydroblast Soil	3076910			
6/9/03	CRI	12	Hydroblast Soil	3076911			
6/9/03	CRI	12	Hydroblast Soil	3076912			
6/9/03	D&J	10	HC Contaminated Soil	3076982			
6/9/03	D&J	10	HC Contaminated Soil	3076983			
6/9/03	D&J	10	Trash, debris, FCC cat fines	3077559			
5/21/03	D&J	10	HC Contaminated Soil	3077562			
5/28/03	D&J	10	HC Contaminated Soil	3077563			
5/27/03	D&J	10	HC Contaminated Soil	3077564			
5/20/03	D&J	8	DAF	3077569			
5/22/03	D&J	10	Concrete	3077572			
5/19/03	D&J	10	Concrete	3077573			
5/21/03	D&J	10	Concrete	3077574			
5/19/03	D&J	8	Flouride precipitate	3077578			
5/22/03	D&J	8	Flouride precipitate	3077579			
5/22/03	D&J	10	Chloride Guard	3077580			
5/22/03	D&J	10	Chloride Guard	3077581			
5/23/03	D&J	10	Trash, debris, FCC cat fines, asphalt sample cans	3077582			
5/19/03	D&J	10	Pipeline trash and debris and filters	3077584			
5/15/03	D&J	8	Flouride precipitate	3077585			
5/15/03	D&J	10	Concrete	3077587			
5/15/03	D&J	10	Concrete	3077588			
5/15/03	D&J	8	DAF	3077589			
5/14/03	D&J	10	Concrete, pipe	3077592			
5/14/03	D&J	8	DAF	3077593			
5/16/03	D&J	8	Flouride precipitate	3077594			
5/14/03	D&J	10	Non-haz trash from non-haz pad	3077595			
5/19/03	D&J	10	Concrete, pipe	3077596			
5/14/03	D&J	10	Concrete, pipe	3077597			
4/30/03	D&J	8	DAF	3077598	45991		
5/1/03	D&J	8	DAF, flouride precipitator solids	3077601	46008		
5/13/03	D&J	8	Concrete	3077606			
5/21/03	D&J	8	Concrete	3077607			
5/12/03	D&J	8	Concrete	3077608			
5/6/03	D&J	8	Concrete	3077609	46064		
5/6/03	D&J	8	Concrete	3077610	46065		
5/8/03	D&J	8	Concrete	3077611	46117		
5/12/03	D&J	8	Concrete	3077612			
5/5/03	D&J	8	Concrete	3077613	46040		
5/5/03	D&J	8	Concrete	3077614	46036		
5/20/03	D&J	8	Concrete	3077615			
5/20/03	D&J	8	Concrete	3077616			
5/14/03	D&J	8	Concrete	3077617			
5/16/03	D&J	8	Concrete	3077618			
5/6/03	D&J	8	Concrete	3077619	46063		
5/7/03	D&J	8	Concrete	3077620	46087		
5/7/03	D&J	8	Concrete	3077621	46106		

5/7/03	D&J	8	DAF	3077622	46089		
5/5/03	D&J	8	Flouride precipitate	3077623	46044		
5/8/03	D&J	8	DAF and flouride precipitate	3077626	46120		
5/8/03	D&J	10	HC Contaminated Soil	3077627	46119		
5/8/03	D&J	10	HC Contaminated Soil	3077628	46121		
5/21/03	D&J	8	DAF	3077630			
5/12/03	D&J	8	Flouride precipitate	3077631			
6/3/03	D&J	8	Concrete, flouride precipitator solids	3086803			
6/3/03	D&J	10	Concrete	3086806			
6/2/03	D&J	10	HC Contaminated Soil	3086807			
6/2/03	D&J	1	Trash, debris, FCC cat fines, asphalt sample cans	3086809			
6/2/03	D&J	10	Concrete	3086810			
6/2/03	D&J	10	Concrete	3086811			
6/2/03	D&J	10	Trash, debris, FCC cat fines, concrete	3086812			
6/2/03	D&J	8	DAF, flouride precipitator solids	3086813			
6/3/03	D&J	10	HC Contaminated Soil	3086824			
6/4/03	D&J	10	Concrete	3086825			
6/5/03	D&J	8	DAF	3086980			
6/4/03	D&J	8	DAF	3086986			
6/4/03	D&J	10	HC Contaminated Soil	3086988			
4/2/03	D&J	8	DAF	Obliterated			

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C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Navajo Refining Company

Date	Navajo Location	CRI ID Number	Estimated Volume	Waste Description	Transporter
06/04/03	Artesia, NM	05.02.03	70 cy	Hydroblast soil near TK433	CRI
02/05/03	El Paso Terminal	01.03.03	30 cy	concrete, trash, insulation, styrofoam, basic trash and debris	CRI
02/17/03	Pecos Station	01.06.03	200 cy	crude oil spill. Approval letter 6-14-2000 in reference to crude analysis	I&W
11/05/02	Artesia, NM	10.24.02A	20 cy	Contaminated soil generated from removal for building of a concrete foundation for new sws tank.	CRI
denied	Artesia, NM	10.24.02B	20 cy	Soda ash that has only been in contact with water (no analytical no MSDS)	CRI
10/17/02	El Paso, TX	10.14.02	30 cy	Monitor well cuttings generated from clay and soil from drilling of monitor wells	CRI
08/05/02	Artesia, NM	07.25.02	20 cy	D-463 catalyst - used to spread the flow through alky unit and is neutralized before taken out of service.	D&J
06/24/02	Lovington, NM	06.11.02	600 cy annually until 6-20-03	Asphalt/gas oil generated from cleanout of 1215 TK	D&J
06/10/02	Lovington, NM	02.28.02B	450 cy monthly for the remainder of 2002	Hydrocarbon contaminated soil generated from cleanups around refinery and excavation of gas oil hydrotreater unit.	D&J
04/08/02	NGSA Line	03.29.02	100 cy	Contaminated soil and crude oil generated from external corrosion of pipeline. Approval 06/13/01letter.	
03/26/02	Denver City, TX	03.22.02	15 cy	Contaminated soil generated from the Denver City location. Approval 06/13/01letter.	CRI
03/18/02	Artesia, NM	02.28.02A	450 cy monthly for the remainder of 2002	Hydrocarbon contaminated soil generated from cleanups around refinery and excavation of gas oil hydrotreater unit.	D&J
03/04/02	Riley Station	02.22.02	80 cy	Crude contaminated foam insulation generated from tank seal leaked onto foam insulation. Tank located on pipeline gathering system. Per Dar	CRI
01/22/02	Artesia, NM	01.10.02A	10 cy	CCR Cat Fine Bags - cloth bags used to filter catalyst fines.	Champion
01/22/02	Artesia, NM	01.10.02B	20 cy	D350 catalyst - from FCC reactor that cracks oil into light gasses and slurry oil	Champion
01/22/02	Artesia, NM	01.10.02C	20 cy	W-311 scale - from cleaning of fractionator tower.	Champion
01/22/02	Artesia, NM	01.10.02D	10 cy	Ceramic Ration Rings - Ration rings used to keep even flow of product through units	Champion
01/09/02	Artesia, NM	12.31.01	2 supersacks	FCC Demister Pads - Catch water mist that is in the towers and have fine particles of FCC Cat Fines on them	Champion
11/05/01	Artesia and El Paso	10.24.01	20 cy	Pipeline filters used to separate solids from finished products being transferred in pipelines the El Paso terminal.	BES
08/14/01	Artesia, NM	07.26.01B	20 cy	D370 / 371 Catalyst - generated in drying the air used by instrumentation Mole Sive	CRI
08/13/01	Hobbs, NM	06.27.01A	1500 cy	Crude oil spill - from pipeline. Approval 06/13/01letter.	
07/02/01	Artesia & Lovington, NM	06.01.01	30 cy/month for each facility for the rest of 2001	Hydrocarbon contaminated soil - generated during the cleanup of small spills around Artesia and Lovington Plants	Champion
07/02/01	Artesia & Lovington, NM	06.02.01	10 cy/month for each facility for the rest of 2001	Cooling tower sludge and debris - from cleaning out the bottom of the cooling tower and debris from the changing out of boards in and on the c	Champion
07/02/01	Artesia & Lovington, NM	06.03.01	15 cy/month for each facility for the rest of 2001	Asphalt collected from a clean-up of an asphalt spill at Artesia and Lovington facilities	Champion
07/02/01	Artesia & Lovington, NM	06.04.01	10 cy/month for each facility for the rest of 2001	Plant solid waste - generated through plant operations at both Artesia and Lovington facilities.	Champion
03/05/01	Artesia, NM	02-012	10 cy	Plant solid waste - generated through plant operations	Champion
12/21/00	Artesia, NM	12-003	15 cy	Asphalt - Collected from a clean-up of an asphalt spill	Champion
12/14/00	Artesia, NM	12-002	20 cy	Filters - used to separate solid and other impurities from amine in the amine unit and sour water in the tail gas unit.	BES or Champion
10/24/00	Artesia, NM	10-008	20 cy	Filters - used to separate solid and other impurities from amine in the amine unit and sour water in the tail gas unit.	BES

10/24/00	Artesia, NM	10-007	150 cy	Hydrocarbon contaminated soil - from clean-up of small spills at the Artesia facility.	BES
10/24/00	Artesia, NM	10-006	30 - 55 gal drums	Blast sand - from sandblasting of the inside of a gasoline tank before repairing	BES
10/11/00	Artesia, NM	10-001	20 cy	D-342 catalyst - strips hydrogen chloride from reformate in the CCR unit.	BES
10/11/00	Artesia, NM	10-003	15 cy	Asphalt - from an asphalt spill cleanup	BES
10/06/00	Artesia, NM	10-002	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during Regeneration process.	BES
10/03/00	501 E. Main	09-004	20 cy weekly	(DAF) Dissolved Aid Flotation - Generated from the separation of solids from water during the treatment of wastewater. .	BES Rental
08/10/00	Artesia, NM	08-005	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	BES
08/10/00	Artesia, NM	08-006	15 - 55 gal drums	Solids and debris caught in sewer inserts. Solids and debris are caught in the inserts before they enter the sewer system.	BES
07/10/00	Artesia, NM	06-008	40 cy	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	BES
07/10/00	Artesia, NM	06-009	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	BES
07/10/00	Artesia, NM	06-007	30 cy	D-342 catalyst - strips hydrogen chloride from reformate in the CCR unit.	BES
07/10/00	Artesia, NM	06-006	10 cy	Filters - used to separate solid and other impurities before waste water is sent to the injection wells.	BES
07/10/00	Artesia, NM	06-005	25 drums and 2 super sacks	D-280 281Mole Sieve - Strips water from Clean Hydrogen That is used the Isom Unit.	BES
06/14/00	Pecos River Crossing Tern	06-003	120 cy	Crude oil contaminated soil - from over fill of tank at Navajo's Pecos River Crossing Terminal. Approval Letter 06/02/00.	I&W
05/18/00	Artesia, NM	05-004	20 - 55 gal drums	Solids and debris caught in sewer inserts. Solids and debris are caught in the inserts before they enter the sewer system.	BES
05/18/00	Lovington, NM	05-001	15 - 55 gal drums	Blast sand - from sandblasting of the inside of a asphalt storage tank before repairing	BES
05/18/00	Artesia, NM	05-002	30 cy	D-363 Catalyst - catalyst strips hydrogen chloride from reformate in the continuous catalytic regeneration CCR Reformer unit.	BES
05/18/00	Artesia, NM	05-003	150 cy	Hydrocarbon contaminated soil - from clean-up of small spills at the Artesia facility.	BES
04/10/00	Artesia, NM	04-001	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	Lea Land Inc
04/10/00	Artesia, NM	04-002	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
03/08/00	Artesia, NM	03-001	40 cy	D-490 D-491 Mole sieve - Used to dry diesel before it is sent to storage.	Lea Land Inc
03/08/00	Artesia, NM	02-014	40 cy	Blast sand - from sandblasting the inside of a gasoline tank before repairing.	Lea Land Inc
02/24/00	Artesia, NM	02-013	300 cy	Hydrocarbon contaminated soil - from clean-up of a gas oil spill plus other spill cleanups around the plant.	Lea Land Inc
02/24/00	Artesia, NM	02-011	10 cy	Injection well filters - used to separate solid and other impurities before waste water is sent to the injection wells.	Lea Land Inc
02/24/00	Artesia, NM	02-012	20 cy	Pipeline filters - used to separate solids from finished products being transferred in pipelines to the El Paso Terminal.	Lea Land Inc
02/24/00	Artesia, NM	02-010	10 cy	Filters - used to separate solids and other impurities from amine in the amine unit and sour water in our tail gas unit.	Lea Land Inc
02/24/00	Artesia, NM	02-009	10 cy	Charcoal filters - Pellets used to absorb any hydrocarbons during amine regeneration.	Lea Land Inc
01/24/00	Monument Station	1.2003	40 cy	Crude oil contaminated soil - from pipeline spill. Approval letter 05/9/1996.	Smith & Son
01/11/00	Artesia, NM	1.2001	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
01/11/00	Artesia, NM		30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	Lea Land Inc
12/20/99	Artesia, NM	12-007	6 - 55 gal drums	Sludge - generated form cleaning out the crude tower T-101.	Lea Land Inc
12/20/99	Artesia, NM	12-008	30 cy	Hydrocarbon contaminated soil and debris - various spill cleanups.	Lea Land Inc
12/07/99	Artesia, NM	11-003	360 bbls a week	Fluoride precipitator solids generated from the mixing of hydrofluoric acid from alkylation unit with calcium chloride to remove fluorides.	CRI
12/03/99	Artesia, NM	11-002	500 bbls. Sludge 10 cy debris	Cooling tower sludge and debris - generated from the cleaning out of the bottom of the cooling tower, and the debris from changing out of boar	CRI and Lea Land I
11/05/99	Lovington, NM	10-004	10 cy	Cooling Tower Sludge - dirt and scale accumulated in the bottom of the cooling tower during normal operation.	Lea Land Inc
11/05/99	Lovington, NM	10-006	30 cy	Coke and steel trays removed form the vacuum tower (T-501)	Lea Land Inc

11/05/99	Artesia, NM	10-003	10 cy	Injection well filters. Filters are used to separate solids and other impurities before waste water is sent to injection wells.	Lea Land Inc
11/05/99	Lovington, NM	10-005	10 cy	Blast media - Heater (h-101) was sandblasted.	Lea Land Inc
10/04/99	Artesia, NM	09-004	30 cy	D-363 catalyst - strips hydrogen chloride from reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
10/04/99	Artesia, NM	09-005	25 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
10/04/99	Artesia, NM	09-006	30 cy	Filters - used to separate solids and other impurities from amine in our amine unit and sour water in our tail gas unit.	Lea Land Inc
10/04/99	Artesia, NM	09-007	10 cy	TK 116 bottoms - generated by the cleaning out of Isobutane tank Tk116 in order to retrofit it with new valves.	Lea Land Inc
10/04/99	Artesia, NM	09-008	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
09/20/99	Artesia, NM	09-001	10 cy	Vacuum tower (W-62) scale and pall rings.	Lea Land Inc
08/23/99	Artesia, NM	08-002-1	350 cy	Hydrocarbon contaminated soil from various spill cleanups.	Lea Land Inc
08/23/99	Artesia, NM	08-002-2	15 cy	D-759 carbon filter catalyst - used to absorb any hydrocarbons during amine regeneration .	Lea Land Inc
08/23/99	Lovington, NM	08-003-1	80 cy	Hydrocarbon contaminated soil from various spill cleanups.	Lea Land Inc
08/23/99	Lovington, NM	08-003-2	80 cy	Blast sand - naphtha storage tank was sandblasted for repairs	Lea Land Inc
07/12/99	Artesia, NM	06-006	20 cy	Pipeline filters - Approval letter 11/10/97	Lea Land Inc
07/12/99	Artesia, NM	06-007	25 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
06/03/99	New Crouch Station	05-003	600 cy	Crude oil contaminated soil -from pipeline spill. Approval letter 05/9/1996.	Key
04/15/99	Artesia, NM	04-002-1	60 cy	Hydrocarbon contaminated soil - from various spill clean-ups from around	Lea Land Inc
04/15/99	Artesia, NM	04-002-2	15 cy	D-345 catalyst - catalyst strips hydrogen chloride from reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
04/15/99	Artesia, NM	04-002-3	10 cy	D759 (carbon filter) catalyst - catalyst used to absorb any hydrocarbons during amine regeneration.	Lea Land Inc
04/15/99	Artesia, NM	04-002-4	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
03/26/99	Artesia, NM	03-005-1	40 - 55 gal drums and 15 cy	Sewer insert solids	Lea Land Inc
03/26/99	Artesia, NM	03-005-2	10 drums	Vacuum tower (W-62) scale and pall rings.	Lea Land Inc
03/26/99	Artesia, NM	03-005-3	30 supersacks	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
01/25/99	Artesia, NM	01-002-1	20 cy	blast sand - from sandblasting the outside of the reflux drum so it could be repainted.	Lea Land Inc
01/25/99	Artesia, NM	01-002-2	40 cy	Pipeline filters - used to separate solids from finished products being transferred in pipelines to our El Paso terminal. Approval letter 11/10/97	Lea Land Inc
01/25/99	Artesia, NM	01-002-3	70 cy	D-479 catalyst from diesel HDU reactor.	Lea Land Inc
12/21/98		1	60 cy	Hydrocarbon contaminated soil - from various spill clean-ups.	Lea Land Inc
12/21/98		2	60 cy	Contaminated soil - from underneath slurry oil tank TK62 that was removed	Lea Land Inc
12/21/98	Artesia, NM	3	60 cy	CBO soil - soil from cleanup around the CBO rack at Artesia facility	Lea Land Inc
12/21/98		4	30 cy	D-363 catalyst - catalyst strips hydrogen chloride form reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
12/21/98		5	150 cy	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
12/21/98		6	15 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
11/24/98	Artesia, NM	11-004	400 drums	Empty 55 gal drums - Triple rinsed that once held catalysts, oil and chemicals.	Lea Land Inc
10/15/98	Artesia, NM	10-005	1200 bbls and 30 cy	Trickling filter sludge - from bottom of the trickling filter aggressive biological treatment. Not F037, F038	Lea Land Inc
10/07/98	Artesia, NM	10-003	300 filters	Pipeline filters - Approval letter 11/10/1997	Lea Land Inc
10/07/98	Artesia, NM	10-002	5 drums	Asphalt	Lea Land Inc
10/07/98	Artesia, NM	10-001	25 supersacks	FCC catalyst fines -	Lea Land Inc

08/27/98	Artesia, NM	08-005	20 cy	Asphalt	Lea Land Inc
08/10/98	Artesia, NM		15 cy	Chloride Guard catalyst - strips hydrogen chloride from reformate in hydrogen chloride drum	Lea Land Inc
06/29/98	Artesia, NM	06-006		FCC catalyst fines -	Lea Land Inc
06/29/98	Lovington, NM	06-007	30 cy	Hydrocarbon contaminated soil - from a failed gasket causing the spill of gas oil to the ground.	Lea Land Inc
05/22/98	Artesia, NM	05-003	30 cy	Blast sand - from sandblasting new tanks to remove scale and rust in preparation for painting.	Lea Land Inc
04/23/98	Artesia, NM	04-008	15 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
04/23/98	Artesia, NM	04-009	15 - 55 gal drums	asphalt spill -	Lea Land Inc
04/23/98	Artesia, NM	04-007	15 cy	Hydrocarbon contaminated soil - from various spill clean-ups.	Lea Land Inc
04/10/98	Lovington, NM	03-011	100 cy	blast sand - from sandblasting crude oil tank TK-1201B.	Ramirez Trucking
04/08/98	Artesia, NM	03-018	1000 cy	contaminated soil - from the tail gas unit area.	Sweatt
03/31/98	Lovington, NM	03-012	48 cy	asphalt spill -	Ramirez Trucking
03/31/98	Artesia, NM	03-014	700 bbls	Sludge - from the alkylation unit, caustic in a neutralization pit used to counter acid soluble oils that are low in p.h.	I&W
03/31/98	Artesia, NM	03-013	36 drums	D-41, D42 Sulfur guard catalyst - isom feed from the naphtha splitter, located in the naphtha hydrotreater is sent to the isom feed sulfur guard c	Lea Land Inc
03/31/98	Artesia, NM	03-015	15 cy	D-342, Chloride guard catalyst - strips hydrogen chloride from reformate in hydrogen chloride drum	Ramirez Trucking
03/31/98	Artesia, NM	03-016	30 cy	Crude oil contaminated soil - from the Lynch crude holding station.	B&H
03/11/98	Artesia, NM	02-018	700 to 800 cy	Slurry from tank TK 62 -	Triad Trucking
02/12/98	Artesia, NM	02-010	85 cy, 15 - 55 gal drums, 15 super sacks	Polymer, slingers, sulfur guard, D-642 & D-643 desiccant, blast sand, zeolite, D-334 propane scrubber, FCC fines, chloride guard, asphalt	Triad Trucking
02/20/98	Artesia, NM	02-012	70 cy	D -64 desulferized catalyst	Triad Trucking
02/24/98	El Paso & Artesia		20 cy	Pipeline filters - Approval letter 11/10/1997	Triad Trucking
02/24/98	Artesia, NM	02-018	700 to 800 cy	Slurry from tank TK 62 -	Triad Trucking
01/21/98	Artesia, NM		20 cy	sulfur guard - used to strip sulfur out of kerosene in the kerosene HDU reactor.	Triad Trucking
027/98	Artesia, NM		20 cy	Vacuume tower scale - generated by removing the material from the vacuum tower.	
01/13/98	Lovington, NM	1	10 cy	Crude tower sludge -	Triad and I&W
01/21/98	Lovington, NM	2	1000 bbls	Deslater sludge -	Triad and I&W
01/13/98	Lovington, NM	3	15 cy	Hydrocarbon contaminated soil -	Triad and I&W
01/13/98	Lovington, NM	4	500 bbls	Flair line sludge -	Triad and I&W
01/13/98	Lovington, NM	5	10 cy	Cooling Tower sludge -	Triad and I&W

C-138 on file with OCD Santa Fe Office

Table Prepared by New Mexico Oil Conservation Division on 06/04/03

Disposal Facility : Controlled Recovery Inc.

Generator: Navajo Refining Company

Date	Navajo Location	CRI	Estimated Volume	Waste Description	Transporter
		ID Number			
06/04/03	Artesia, NM	05.02.03	70 cy	Hydroblast soil near TK433	CRI
02/05/03	El Paso Terminal	01.03.03	30 cy	concrete, trash, insulation, styrofoam, basic trash and debris	CRI
02/17/03	Pecos Station	01.06.03	200 cy	crude oil spill. Approval letter 6-14-2000 in reference to crude analysis	I&W
11/05/02	Artesia, NM	10.24.02A	20 cy	Contaminated soil generated from removal for building of a concrete foundation for new sws tank.	CRI
denied	Artesia, NM	10.24.02B	20 cy	Soda ash that has only been in contact with water (no analytical no MSDS)	CRI
10/17/02	El Paso, TX	10.14.02	30 cy	Monitor well cuttings generated from clay and soil from drilling of monitor wells	CRI
08/05/02	Artesia, NM	07.25.02	20 cy	D-463 catalyst - used to spread the flow through alky unit and is neutralized before taken out of service.	D&J
06/24/02	Lovington, NM	06.11.02	600 cy annually until 6-20-03	Asphalt/gas oil generated from cleanout of 1215 TK	D&J
06/10/02	Lovington, NM	02.28.02B	450 cy monthly for the remainder of 2002	Hydrocarbon contaminated soil generated from cleanups around refinery and excavation of gas oil hydrotreater unit.	D&J
04/08/02	NGSA Line	03.29.02	100 cy	Contaminated soil and crude oil generated from external corrosion of pipeline. Approval 06/13/01letter.	
03/26/02	Denver City, TX	03.22.02	15 cy	Contaminated soil generated from the Denver City location. Approval 06/13/01letter.	CRI
03/18/02	Artesia, NM	02.28.02A	450 cy monthly for the remainder of 2002	Hydrocarbon contaminated soil generated from cleanups around refinery and excavation of gas oil hydrotreater unit.	D&J
03/04/02	Riley Station	02.22.02	80 cy	Crude contaminated foam insulation generated from tank seal leaked onto foam insulation. Tank located on pipeline gathering system. Per Dat	CRI
01/22/02	Artesia, NM	01.10.02A	10 cy	CCR Cat Fine Bags - cloth bags used to filter catalyst fines.	Champion
01/22/02	Artesia, NM	01.10.02B	20 cy	D350 catalyst - from FCC reactor that cracks oil into light gasses and slurry oil	Champion
01/22/02	Artesia, NM	01.10.02C	20 cy	W-311 scale - from cleaning of fractionator tower.	Champion
01/22/02	Artesia, NM	01.10.02D	10 cy	Ceramic Ration Rings - Ration rings used to keep even flow of product through units	Champion
01/09/02	Artesia, NM	12.31.01	2 supersacks	FCC Demister Pads - Catch water mist that is in the towers and have fine particles of FCC Cat Fines on them	Champion
11/05/01	Artesia and El Paso	10.24.01	20 cy	Pipeline filters used to separate solids from finished products being transferred in pipelines the El Paso terminal.	BES
08/14/01	Artesia, NM	07.26.01B	20 cy	D370 / 371 Catalyst - generated in drying the air used by instrumentation	CRI
08/13/01	Hobbs, NM	06.27.01A	1500 cy	Crude oil spill - from pipeline. Approval 06/13/01letter.	
07/02/01	Artesia & Lovington, NM	06.01.01	30 cy/month for each facility for the rest of 2001	Hydrocarbon contaminated soil - generated during the cleanup of small spills around Artesia and Lovington Plants	Champion
07/02/01	Artesia & Lovington, NM	06.02.01	10 cy/month for each facility for the rest of 2001	Cooling tower sludge and debris - from cleaning out the bottom of the cooling tower and debris from the changing out of boards in and on the c	Champion
07/02/01	Artesia & Lovington, NM	06.03.01	15 cy/month for each facility for the rest of 2001	Asphalt collected from a clean-up of an asphalt spill at Artesia and Lovington facilities	Champion
07/02/01	Artesia & Lovington, NM	06.04.01	10 cy/month for each facility for the rest of 2001	Plant solid waste - generated through plant operations at both Artesia and Lovington facilities.	Champion
03/05/01	Artesia, NM	02-012	10 cy to extend through 2001	Plant solid waste - generated through plant operations	Champion
		~~06-04~~	~~10 cy/month~~		
12/21/00	Artesia, NM	12-003	15 cy	Asphalt - Collected from a clean-up of an asphalt spill	Champion
12/14/00	Artesia, NM	12-002	20 cy	Filters - used to separate solid and other impurities from amine in the amine unit and sour water in the tail gas unit.	BES or Champion
10/24/00	Artesia, NM	10-008	20 cy	Filters - used to separate solid and other impurities from amine in the amine unit and sour water in the tail gas unit.	BES

10/24/00	Artesia, NM	10-007	150 cy	Hydrocarbon contaminated soil - from clean-up of small spills at the Artesia facility.	BES
10/24/00	Artesia, NM	10-006	30 - 55 gal drums	Blast sand - from sandblasting of the inside of a gasoline tank before repairing	BES
10/11/00	Artesia, NM	10-001	20 cy	D-342 catalyst - strips hydrogen chloride from reformate in the CCR unit.	BES
10/11/00	Artesia, NM	10-003	15 cy	Asphalt - from an asphalt spill cleanup	BES
10/06/00	Artesia, NM	10-002	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during Regeneration process.	BES
10/03/00	501 E. Main	09-004	20 cy weekly	(DAF) Dissolved Aid Flotation - Generated from the separation of solids from water during the treatment of wastewater. .	BES Rental
08/10/00	Artesia, NM	08-005	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	BES
08/10/00	Artesia, NM	08-006	15 - 55 gal drums	Solids and debris caught in sewer inserts. Solids and debris are caught in the inserts before they enter the sewer system.	BES
07/10/00	Artesia, NM	06-008	40 cy	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	BES
07/10/00	Artesia, NM	06-009	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	BES
07/10/00	Artesia, NM	06-007	30 cy	D-342 catalyst - strips hydrogen chloride from reformate in the CCR unit.	BES
07/10/00	Artesia, NM	06-006	10 cy	Filters - used to separate solid and other impurities before waste water is sent to the injection wells.	BES
07/10/00	Artesia, NM	06-005	25 drums and 2 super sacks	D-280 281Mole Sieve - Strips water from Clean Hydrogen That is used the Isom Unit.	BES
06/14/00	Pecos River Crossing Tern	06-003	120 cy	Crude oil contaminated soil - from over fill of tank at Navajo's Pecos River Crossing Terminal. Approval Letter 06/02/00.	I&W
05/18/00	Artesia, NM	05-004	20 - 55 gal drums	Solids and debris caught in sewer inserts. Solids and debris are caught in the inserts before they enter the sewer system.	BES
05/18/00	Lovington, NM	05-001	15 - 55 gal drums	Blast sand - from sandblasting of the inside of a asphalt storage tank before repairing	BES
05/18/00	Artesia, NM	05-002	30 cy	3-363 Catalyst - catalyst strips hydrogen chloride from reformate in the continuous catalytic regeneration CCR Reformer unit.	BES
05/18/00	Artesia, NM	05-003	150 cy	Hydrocarbon contaminated soil - from clean-up of small spills at the Artesia facility.	BES
04/10/00	Artesia, NM	04-001	30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	Lea Land Inc
04/10/00	Artesia, NM	04-002	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
03/08/00	Artesia, NM	03-001	40 cy	D-490 D-491 Mole sieve - Used to dry diesel before it is sent to storage.	Lea Land Inc
03/08/00	Artesia, NM	02-014	40 cy	Blast sand - from sandblasting the inside of a gasoline tank before repairing.	Lea Land Inc
02/24/00	Artesia, NM	02-013	300 cy	Hydrocarbon contaminated soil - from clean-up of a gas oil spill plus other spill cleanups around the plant.	Lea Land Inc
02/24/00	Artesia, NM	02-011	10 cy	Injection well filters - used to separate solid and other impurities before waste water is sent to the injection wells.	Lea Land Inc
02/24/00	Artesia, NM	02-012	20 cy	Pipeline filters - used to separate solids from finished products being transferred in pipelines to the El Paso Terminal.	Lea Land Inc
02/24/00	Artesia, NM	02-010	10 cy	Filters - used to separate solids and other impurities from amine in the amine unit and sour water in our tail gas unit.	Lea Land Inc
02/24/00	Artesia, NM	02-009	10 cy	Charcoal filters - Pellets used to absorb any hydrocarbons during amine regeneration.	Lea Land Inc
01/24/00	Monument Station	1.2003	40 cy	Crude oil contaminated soil - from pipeline spill. Approval letter 05/9/1996.	Smith & Son
01/11/00	Artesia, NM	1.2001	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
01/11/00	Artesia, NM		30 supersacks	FCC Catalyst Fines - These are fine particles from catalyst collected in the cyclones at the FCC Unit during regeneration process.	Lea Land Inc
12/20/99	Artesia, NM	12-007	6 - 55 gal drums	Sludge - generated form cleaning out the crude tower T-101.	Lea Land Inc
12/20/99	Artesia, NM	12-008	30 cy	Hydrocarbon contaminated soil and debris - various spill cleanups.	Lea Land Inc
12/07/99	Artesia, NM	11-003	360 bbls a week	Fluoride precipitator solids generated from the mixing of hydrofluoric acid from alkylation unit with calcium chloride to remove fluorides.	CRI
12/03/99	Artesia, NM	11-002	500 bbls. Sludge 10 cy debris	Cooling tower sludge and debris - generated from the cleaning out of the bottom of the cooling tower, and the debris from changing out of boar	CRI and Lea Land
11/05/99	Lovington, NM	10-004	10 cy	Cooling Tower Sludge - dirt and scale accumulated in the bottom of the cooling tower during normal operation.	Lea Land Inc
11/05/99	Lovington, NM	10-006	30 cy	Coke and steel trays removed form the vacuum tower (T-501)	Lea Land Inc

11/05/99	Artesia, NM	10-003	10 cy	Injection well filters. Filters are used to separate solids and other impurities before waste water is sent to injection wells.	Lea Land Inc
11/05/99	Lovington, NM	10-005	10 cy	Blast media - Heater (h-101) was sandblasted.	Lea Land Inc
10/04/99	Artesia, NM	09-004	30 cy	D-363 catalyst - strips hydrogen chloride from reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
10/04/99	Artesia, NM	09-005	25 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
10/04/99	Artesia, NM	09-006	30 cy	Filters - used to separate solids and other impurities from amine in our amine unit and sour water in our tail gas unit.	Lea Land Inc
10/04/99	Artesia, NM	09-007	10 cy	TK 116 bottoms - generated by the cleaning out of Isobutane tank Tk116 in order to retrofit it with new valves.	Lea Land Inc
10/04/99	Artesia, NM	09-008	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
09/20/99	Artesia, NM	09-001	10 cy	Vacuum tower (W-62) scale and pall rings.	Lea Land Inc
08/23/99	Artesia, NM	08-002-1	350 cy	Hydrocarbon contaminated soil from various spill cleanups.	Lea Land Inc
08/23/99	Artesia, NM	08-002-2	15 cy	D-759 carbon filter catalyst - used to absorb any hydrocarbons during amine regeneration .	Lea Land Inc
08/23/99	Lovington, NM	08-003-1	80 cy	Hydrocarbon contaminated soil from various spill cleanups.	Lea Land Inc
08/23/99	Lovington, NM	08-003-2	80 cy	Blast sand - naphtha storage tank was sandblasted for repairs	Lea Land Inc
07/12/99	Artesia, NM	06-006	20 cy	Pipeline filters - Approval letter 11/10/97	Lea Land Inc
07/12/99	Artesia, NM	06-007	25 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
06/03/99	New Crouch Station	05-003	600 cy	Crude oil contaminated soil -from pipeline spill. Approval letter 05/9/1996.	Key
04/15/99	Artesia, NM	04-002-1	60 cy	Hydrocarbon contaminated soil - from various spill clean-ups from around	Lea Land Inc
04/15/99	Artesia, NM	04-002-2	15 cy	D-345 catalyst - catalyst strips hydrogen chloride from reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
04/15/99	Artesia, NM	04-002-3	10 cy	D759 (carbon filter) catalyst - catalyst used to absorb any hydrocarbons during amine regeneration.	Lea Land Inc
04/15/99	Artesia, NM	04-002-4	10 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
03/26/99	Artesia, NM	03-005-1	40 - 55 gal drums and 15 cy	Sewer insert solids	Lea Land Inc
03/26/99	Artesia, NM	03-005-2	10 drums	Vacuum tower (W-62) scale and pall rings.	Lea Land Inc
03/26/99	Artesia, NM	03-005-3	30 supersacks	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
01/25/99	Artesia, NM	01-002-1	20 cy	blast sand - from sandblasting the outside of the reflux drum so it could be repainted.	Lea Land Inc
01/25/99	Artesia, NM	01-002-2	40 cy	Pipeline filters - used to separate solids from finished products being transferred in pipelines to our El Paso terminal. Approval letter 11/10/97	Lea Land Inc
01/25/99	Artesia, NM	01-002-3	70 cy	D-479 catalyst from diesel HDU reactor.	Lea Land Inc
12/21/98		1	60 cy	Hydrocarbon contaminated soil - from various spill clean-ups.	Lea Land Inc
12/21/98		2	60 cy	Contaminated soil - from underneath slurry oil tank TK62 that was removed	Lea Land Inc
12/21/98	Artesia, NM	3	60 cy	CBO soil - soil from cleanup around the CBO rack at Artesia facility	Lea Land Inc
12/21/98		4	30 cy	D-363 catalyst - catalyst strips hydrogen chloride form reformate in the continuous catalytic regeneration (CCR) reformer unit.	Lea Land Inc
12/21/98		5	150 cy	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
12/21/98		6	15 drums	Asphalt sample cans - samples from each can are taken and the cans are held until approved for disposal	Lea Land Inc
11/24/98	Artesia, NM	11-004	400 drums	Empty 55 gal drums - Triple rinsed that once held catalysts, oil and chemicals.	Lea Land Inc
10/15/98	Artesia, NM	10-005	1200 bbls and 30 cy	Trickling filter sludge - from bottom of the trickling filter aggressive biological treatment. Not F037, F038	Lea Land Inc
10/07/98	Artesia, NM	10-003	300 filters	Pipeline filters - Approval letter 11/10/1997	Lea Land Inc
10/07/98	Artesia, NM	10-002	5 drums	Asphalt	Lea Land Inc
10/07/98	Artesia, NM	10-001	25 supersacks	FCC catalyst fines -	Lea Land Inc

08/27/98	Artesia, NM	08-005 ✓	20 cy	Asphalt	Lea Land Inc
08/10/98	Artesia, NM	✓	15 cy	Chloride Guard catalyst - strips hydrogen chloride from reformate in hydrogen chloride drum	Lea Land Inc
06/29/98	Artesia, NM	06-006 ✓		FCC catalyst fines -	Lea Land Inc
06/29/98	Lovington, NM	06-007 ✓	30 cy	Hydrocarbon contaminated soil - from a failed gasket causing the spill of gas oil to the ground.	Lea Land Inc
05/22/98	Artesia, NM	05-003 ✓	30 cy	Blast sand - from sandblasting new tanks to remove scale and rust in preparation for painting.	Lea Land Inc
04/23/98	Artesia, NM	04-008 ✓	15 supersack	FCC catalyst fines - fine particles from catalyst collected in the cyclones at the FCC unit during the regeneration process	Lea Land Inc
04/23/98	Artesia, NM	04-009	15 - 55 gal drums	asphalt spill -	Lea Land Inc
04/23/98	Artesia, NM	04-007 ✓	15 cy	Hydrocarbon contaminated soil - from various spill clean-ups.	Lea Land Inc
04/10/98	Lovington, NM	03-011 ✓	100 cy	blast sand - from sandblasting crude oil tank TK-1201B.	Ramirez Trucking
04/08/98	Artesia, NM	03-018 ✓	~~1000~~ cy 300 cy	contaminated soil - from the tail gas unit area.	Sweatt
03/31/98	Lovington, NM	03-012	48 cy	asphalt spill -	Ramirez Trucking
03/31/98	Artesia, NM	03-014 ✓	700 bbls	Sludge - from the alkylation unit, caustic in a neutralization pit used to counter acid soluble oils that are low in p.h.	I&W
03/31/98	Artesia, NM	03-013 ✓	36 drums	D-41, D42 Sulfur guard catalyst - isom feed from the naphtha splitter, located in the naphtha hydrotreater is sent to the isom feed sulfur guard c	Lea Land Inc
03/31/98	Artesia, NM	03-015	15 cy	D-342, Chloride guard catalyst - strips hydrogen chloride from reformate in hydrogen chloride drum	Ramirez Trucking
03/31/98	Artesia, NM	03-016 ✓	30 cy	Crude oil contaminated soil - from the Lynch crude holding station.	B&H
03/11/98	Artesia, NM	02-018	700 to 800 cy	Slurry from tank TK 62 -	Triad Trucking
02/12/98	Artesia, NM	02-010 ✓	85 cy, 15 - 55 gal drums, 15 super sacks	Polymer, slingers, sulfur guard, D-642 & D-643 desiccant, blast sand, zeolite, D-334 propane scrubber, FCC fines, chloride guard, asphalt	Triad Trucking
02/20/98	Artesia, NM	02-012 ✓	70 cy	D -64 desulferized catalyst	Triad Trucking
02/24/98	El Paso & Artesia		20 cy	Pipeline filters - Approval letter 11/10/1997	Triad Trucking
02/24/98	Artesia, NM	02-018	700 to 800 cy	Slurry from tank TK 62 -	Triad Trucking
01/21/98	Artesia, NM		20 cy	sulfur guard - used to strip sulfur out of kerosene in the kerosene HDU reactor.	
027/98	Artesia, NM		20 cy	Vacuume tower scale - generated by removing the material from the vacuum tower.	Triad and I&W
01/13/98	Lovington, NM	1	10 cy	Crude tower sludge -	Triad and I&W
01/21/98	Lovington, NM	2	1000 bbls	Deslater sludge -	Triad and I&W
01/13/98	Lovington, NM	3	15 cy	Hydrocarbon contaminated soil -	Triad and I&W
01/13/98	Lovington, NM	4	500 bbls	Flair line sludge -	Triad and I&W
01/13/98	Lovington, NM	5	10 cy	Cooling Tower sludge -	

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

June 5, 2003

Oil Conservation Division
Hobbs District Office
1625 N French Dr
Hobbs, NM 88240

RE: Follow up report on smoldering debris at Disposal Facility.

Since my previous report I have learned that Monument Fire Department responded to our facility sometime after midnight Saturday, May 24th. Our facility sign located just inside the gate had sustained wind damage within the last few days and had blown down in front of the post that held it up. All necessary information is on the sign, however it was laying face down and we had not flipped it over to be easily read. We have since put up new plywood and reattached the sign.

Hobbs Fire Department, not knowing CRI stood for Controlled Recovery, Inc., could not find any information in their emergency manual. Emergency response phone numbers were given to David Hooten's office (City of Hobbs emergency response) and are probably under Controlled Recovery as well.

After CRI was notified of the fire, the Fire Department notified Navajo Lea Refinery in Lovington. Steve Terry was notified and he in turn called the Artesia facility with the call then being forwarded to Jeff Byrd in their Environmental Department. Jeff contacted Phil Youngblood and they visited the site late Saturday afternoon. Darrell Moore and Charlie Plymale with the Environmental Division of Navajo were notified Tuesday morning.

Cause of the fire remains unknown. A site inspection was done Thursday, May 29th by Darrell Moore and Charlie Plymale, (Navajo) and David Parsons and Lary Parker of CRI. The catalyst in question was located on the south side of the pit and does not appear to have burned. Evidence that would indicate as large a fire as was reported was not found. There were very little ashes and very little smoke stain to the walls of the pit. Card board, plastic, wooden pallets and other debris that could have burned are still in the pit. The fire seemed to have been mostly in the Southeast corner of the pit in approximately 50' square area.

CRI was first notified at 3:25 P.M. Saturday, May 24th. CRI employee Jason Null traveled to location. Upon arrival he called plant manager John Phillips and reported to

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

Oil Commission Division
1625 N. French Dr
Hobbs, NM 88240

Hobbs District Office

RE: Smoldering Debris in Pit at Disposal Facility.

CRI was contacted at 3:25 P.M. Saturday, May 24, 2003, by Joanna with the State Police Department of a possible fire at our disposal facility located at Halfway, NM. Two subsequent calls were logged t 3:35 P.M. from Sgt Rios with the State Police and at 3:44 P.M. from Buddy with O.C.D.

CRI employee arrived on site shortly after 4:00 P.M. and met with Hobbs Fire Department, Monument Fire Department and State Police. Inspection by employee found smoldering debris located in one disposal pit. Employee informed State Police he would cover it with soil and all emergency personnel left. Exact cause is unknown. CRI will keep debris covered with soil to prevent future occurrence.

The facility was closed and secured by locked gates. A sign with emergency phone numbers is located just inside entrance gates and is visible from the gate.

If any other reporting is necessary please contact me immediately.

Sincerely,

David Parsons

Hand delivery
5-28-03
2:30pm
By David Parsons

him that some smoke was coming from the pit. John told him (Jason) to cover with soil. He also attempted to notify me (David Parsons), when he could not get me he called Lary Parker.

Hobbs Fire Department had asked if EPA had been notified and Jason Null relayed the message to Lary Parker. Lary told him that EPA did not have jurisdiction over CRI, and that OCD is the regulatory agency. Jason relayed this message to Hobbs Fire Department. This was also relayed to Buddy Hill with OCD with some misunderstanding that Jason was referring to OCD instead of EPA.

I was out of town Saturday, May 24th and when I checked my voice mail at approximately 11:30 P.M. I had messages from Lary Parker (CRI) and Gary Wink (OCD). I talked to Jason Null and Lary Parker at that time and they told me about the fire and what had been done. I determined that OCD had been notified and Buddy Hill had visited the site.

Sincerely,

David Parsons

RESPONSE TO INCIDENT INVESTIGATION

PERMIT NM 01-0006 RULE 711 AND RULE 116 ISSUES

1.) Please see narrative of David Parsons; please see photos in past OCD reports showing signs at both entrances. CRI will install a 2nd sign with phone numbers at each entrance.

2.) Please see David Parsons narrative. Ken Marsh (CRI) notified Paul Sheeley (OCD Hobbs) by voice mail (393-6161) @ 9:00 a.m. Tuesday, May 27, 2003 (Monday May 26 was Memorial Day Holiday and all OCD offices were closed).

3.) The statement is incorrect CRI does not agree with this allegation.

Waste Acceptance Criteria:

1. b i. Is the only statement in this section that is correct. Please see Rule 711 attached. Please compare the language in the Rule to the language in the incident investigation draft.

4.) The cause of the fire has not been determined.

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

MEMORANDUM OF MEETING OR CONVERSATION

____ Telephone ✓ Personal Time 4:30pm → 3:00pm → Date 6-2-03 @ 6-3-03

Originating Party: Martyne Kieling

Other Parties: Roger Anderson

Wayne Price was also Present During the Conversation on 6-2-03

Subject Navajo Had Requested that they be able to Continue to Ship waste to CRI while getting New Analysis on all of the waste Streams that go to CRI. Knowing that if Something comes back Hazardous Navajo will Have to Remove it

Discussion Roger Said this would be fine. The old Analytical Can be used untill the New Analysis comes Back. But, CRI must Document these waste Streams and volumes on New C-138's.

I will call Navajo and CRI to let them Know of the Decision Roger Made [redacted]

Conclusions or Agreements Left messages with ~~Mary~~ Navajo & CRI at 3:15 pm 6-3-03

Distribution

Signed Martyne Kieling

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

MEMORANDUM OF MEETING OR CONVERSATION

✓ Telephone ____ Personal   Time ~~$~~ 3:15   Date ~~3:15~~ 6-2-03

Originating Party: Charlie Plymel   Other Parties: Martyne Kieling

Subject: CRI Fire and Draft Incedent Investigation Notes.

Discussion: Notification: Saturdy 5-24-03 Navajo Lovington Refinery was Notified by the State Police ~~Than~~ The Refinery Then Notified Steve terry who Notified King Kelly who notified Jeff Byrd who then Called Phil Youngblood. Jeff was called at 2:15 pm ~~And~~ He and Phil youngblood were out at CRI By 3:30 pm Darrel Moore & Charlie Plymel Did Not get notified untill Tuesday Morning 5-27-03.

: Iron Sulfide: The Sulfa Guard ~~would~~ may only Have Minute Amounts of Iron Sulfide There is No Iron Sulfide in the Sulfa Guard but Some may Have been absorbed by the Catalyst From The Iron pipe or Equipment.

: Fire: Driver that Delivers to CRI Said Pit is Still Smoldering..

Conclusions or Agreements: Waste Can Continue to Go to CRI with old Analytical and Appropriate C-138 From CRI only if Analytical is Less than 2 years old any waste Stream with Older than 2 year Anlytical Must Be Sampled + new Analyticals Ran. MK

Distribution

Signed [signature]

Oil Conservation Division
Attn: Martine Keiling
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Shipments of Non Hazardous Waste

Dear Martine,

We have two chloride guards that we ship to (CRI) Control Recovery Inc. These chloride guards that are used to strip chlorides in our CCR Unit are D-363 and D-342. D-363 is a vapor filled drum with a mol siv silica alumina catalyst bed. When D-363 is prepared for a media change out, the drum is hot nitrogen purged for two days to eliminate any hydrocarbons that may remain in the drum. Then the drum is opened and dumped into open top roll off boxes. These roll off boxes are then hauled to CRI. D-342 is a liquid filled drum with a mol siv silica alumina catalyst bed. When D-342 is prepared for a media change out, the drum us drained to storage then hot nitrogen purged for two days to eliminate any hydrocarbons that may remain in the drum. Then the drum is opened and dumped into open top roll off boxes. Previous analysis has always shown this catalyst as being non-hazardous.

In the past six months we have sent a total of 301 roll off boxes to CRI. The list below will show the type of material shipped and C-138 numbers that have been provided to me by CRI for the Artesia refinery.

Not Unique numbers

Trash and Debris	02-012
Hydrocarbon contaminated soil	02-28-02A
DAF	09-004
Floride Prec. Solids	11-003
DAF/FL.Prec. Solids Mixed	09-004/11-003
Pipeline filters	10-008
Concrete debris	02-012
Asphalt	12-003
FCC cat fines	10-002
Asphalt sample cans	12-003
Mole Siv D-370/371	07-26-01B
Hydrocarbon contaminated soil	10-007
D-363 Chloride Guard	05-002/10-001
D-342 Chloride Guard	10-001

Please feel free to contact me at (505) 746-5241 if you have any question.

Sincerely,

Charlie Plymale
Environmental Specialist

Navajo pit 5-24-12

DRAFT

INCIDENT INVESTIGATION
CONTROLLED RECOVERY INC. (CRI)
Surface Waste Management Facility, Phone 505-393-1079

Emergency Response May 24, 2003

Saturday 12:11 am - Lea County Sheriff's Department received a call regarding a fire in a pit on Highway 62/180 at mile marker 66. The call was forwarded to the Hobbs Fire Department (F.D.). Hobbs F.D. in turn had the call transferred to the Monument F.D. (Conversation with Delana, Lea County Sheriff Department, 505-393-2515)

Saturday 12:?? am - Monument F.D. responded to the call. They cut the lock and entered from the east side of the facility off County Road C-29. The F.D. personnel did not know the owner of the location; there was no emergency phone number posted on the east entrance sign. Upon entering the facility Monument F.D. saw a fire in a pit with flames that were 10 to 15 feet high. The material in the pit was unknown it was dark and the pit was full of smoke. CRI personnel were not present. The Monument F.D. proceeded to put water on the fire until about 4:45am. (Conversation with David Campbell, Monument F.D., 505-391-0739)

Saturday 12:30 ? pm – Monument F.D. was called out again to a fire at CRI. The F.D. proceeded to put water on the fire. (Conversation with David Campbell, Monument F.D.)

Saturday 3:30 pm – Hobbs F.D. Battalion Chief, Neil Gore, received a phone call from the Lea ~~County Sheriff's Department~~, Sergeant Johnny Rivas, regarding a hazardous materials fire at CRI. Neil Gore and Johnny Rivas decided to meet at the CRI facility to determine the status of the situation. (Conversation with Neil Gore, Hobbs F.D., Battalion Chief, 505-397-9308)

· State Police →
H69-2428
Hobbs State Police
392-5580

Saturday 3:35 pm – Oil Conservation Division Emergency Responder, Buddy Hill, received a call regarding a fire at CRI from Neil Gore the Battalion Chief of the Hobbs F.D. Buddy Hill called Gary Wink with the OCD and was given the phone number for CRI. Buddy Hill called the CRI number and the answering service put him in touch with Jason Null. Jason upon hearing about a reported fire proceeded to the CRI facility. This was reportedly the first time that CRI had been notified about the fire. (Conversation with Buddy Hill, OCD Hobbs, 505-631-5282)

Juan Ontiveros
827-9054

Saturday afternoon - Neil Gore arrived at CRI after the Monument F.D. had already left. There was not an emergency number on the east entrance sign. The Hobbs F.D. Emergency Manual did not contain any information regarding this facility and a quick check of a phone book had no listing for a CRI. Neil Gore did not know at that time that CRI stood for Controlled Recovery Inc. Only Jason Null, a backhoe operator for CRI, was there. Jason Null said that this type of thing "fire" had happened before and that the pit that was smoldering at this time was dedicated to Navajo Refinery waste. Darrel Moore from Navajo Refinery was called regarding waste documentation to help determine the type of waste that was on fire and how to handle the fire. It was determined the best way to manage the fire was to smother it with dirt. The Neil Gore and Johnny Rivas had the

backhoe operator smother the fire with dirt. (Conversation with Neil Gore, Hobbs F.D., Battalion Chief, 505-397-9308)

Saturday 5:15 pm - Oil Conservation Division Emergency Responder, Buddy Hill, arrived at CRI. The only person at the facility was the backhoe operator for CRI, Jason Null. All others had left. The pit was still smoldering slightly. Jason was using a backhoe to pull up plastic trash bags and then was covering the area with dirt. Jason Null told Buddy Hill that smoldering fires happen quite often. Jason Null told Buddy Hill that he had called his boss and reported that OCD personnel were on their way. Jason's boss told him not to be concerned about OCD because they have no authority over CRI. (Conversation with Buddy Hill, OCD Hobbs personnel.)

Tuesday 7:29 am – OCD Santa Fe Permit Writer, Martyne Kieling, received a call from Hobbs personnel, Larry Johnson and Paul Sheeley, regarding a fire at CRI over the weekend. Martyne Kieling called the respondents to patch together the complete story of what had happened. OCD Hobbs personnel were asked to inspect CRI again and to take photos. (Martyne Kieling)

Tuesday 9:30 am - OCD personnel Roger Anderson, Wayne Price, and Martyne Kieling, talked to Darrel Moore with Navajo Refining. According to Darrel Moore the waste most likely to have caused the fire was a chloride guard catalyst D-342 and/or D-363. A shipment of this waste was sent from Navajo to CRI on May 21, 2003. This waste stream is regularly shipped out to CRI. This catalyst has iron sulfide caked onto it. Navajo will be preparing a letter documenting the process in which the catalyst is used and the standard procedures used when handling this waste stream. (Conversation with Darrel Moore and Charlie Plymel, Navajo Refinery)

Iron sulfide is pyrophoric (any material igniting spontaneously or burning spontaneously in air), produces sulfur dioxide (SO_2) when burning, and when water is added to a fire will produce hydrogen sulfide (H_2S) and sulfuric acid (H_2S0_4). This material will ignite in the presences of other combustibles materials such as paper or hydrocarbons .

Tuesday 10:00 am – OCD personnel Roger Anderson, Wayne Price and Martyne Kieling, talked to David Cobrain with the New Mexico Environment Department Hazardous Waste Bureau (NMED HWB). The presence of a pyrophoric material in the CRI facility caused concern that a Characteristically Hazardous Waste was accepted into the CRI Facility. The Hazardous Waste Bureau will be checking into the classification of this waste and will be getting back with us. (Conversation with David Cobrain, NMED HWB, 428-2541).

Tuesday morning - OCD personnel, Larry Johnson, inspect the CRI facility and took photos. The pit was still smoldering. (See attached photos)

PERMIT NM-01-0006, RULE 711 AND RULE 116 ISSUES

1. The East entrance sign to CRI does not contain the required emergency information (see Photo 1). This was the entrance used by all emergency responders to this incident. The permit language should be changed to clearly state that all entrances must have a sign with all the required information.

Overall Facility Operation

1. The facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty feet and contain the following information: a) name of the facility; b) location by section, township and range; and c) emergency phone number.

2. The OCD has not been contacted by CRI. It has been over 72 hours since the fire was called in. See the attached Rule 116 for reporting requirements.

Reporting and Record Keeping:

5. CRI must notify the OCD Santa Fe and Hobbs offices within 24 hours of any **fire**, break, leak, spill, blowout or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

3. The OCD has not received a C-138 "Request For Approval To Accept Solid Waste" on file for chloride guard catalyst D-342 and/or D-363 for the shipment by Navajo Refining on May 21, 2003. It also appears that there have been many shipments of non-exempt wastes to CRI from Navajo Refining that CRI has not requested approval for.

Waste Acceptance Criteria

1. The facility is authorized to accept only:
   b. "Non-hazardous" non-exempt oilfield wastes that do not contain NORM. These wastes may be accepted on a case-by-case basis after a hazardous waste determination is made. Samples, if required, must be obtained from the wastes prior to removal from the generator's facility and without dilution in accordance with EPA SW-846 sampling procedures. All "non-hazardous" non-exempt wastes received at the facility must be accompanied by:

      i. An approved OCD Form C-138 "Request For Approval To Accept Solid Waste."

      ii. A "Generator Certificate of Waste Status" signed by the generator.

      iii. A verification of waste status issued by the appropriate agency, for wastes generated outside OCD jurisdiction. The agency verification is based on specific information on the subject waste submitted by the generator and demonstrating the exempt or non-hazardous classification of the waste.

4. The Navajo plant solid waste was not covered to prevent items from blowing away. Daily cover would have prevented oxygen from reaching the catalyst and may have prevented the fire. See the attached letters dated May 9, 2001 and May 10, 2001 regarding approvals to accept plant solid waste such as cardboard boxes, pallets, paper, insulation, plastic, rags.

Landfill Operation

3. Any trash accepted into the facility containing paper, paper bags or other trash that has the potential for blowing away or being transported by other vectors must be covered with soil upon the day of delivery and disposal into the solid waste pit.

Controlled Recovery May 27, 2003
OCD Inspection Photos

Photo 1. CRI East entrance sign. Information not visible.

Photo 2. CRI west entrance sign. All information is included.

Photo 3. Bottom of Navajo pit at CRI.

Photo 4. Bottom of Navajo pit at CRI.

Photo 5. Smoldering material in the CRI Navajo pit.

Photo 6. Smoldering material in the CRI Navajo pit.

Photo 7. Smoldering material in the CRI Navajo pit.

Photo 8. Smoldering material in the CRI Navajo pit.

Oil Conservation Division
Attn: Martine Keiling
1220 South St. Francis Drive
Santa Fe, NM 87505

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DAF	09-004
Floride Prec. Solids	11-003
DAF/FL.Prec. Solids Mixed	09-004/11-003
Pipeline filters	10-008
Concrete debris	02-012
Asphalt	12-003
FCC cat fines	10-002
Asphalt sample cans	12-003
Mole Siv D-370/371	07-26-01B
Hydrocarbon contaminated soil	10-007
D-363 Chloride Guard	05-002/10-001
D-342 Chloride Guard	10-001

Please feel free to contact me at (505) 746-5241 if you have any question.

Sincerely,

Charlie Plymale
Environmental Specialist

Kieling, Martyne

From: Kieling, Martyne
Sent: Friday, May 30, 2003 3:51 PM
To: Anderson, Roger; Wrotenbery, Lori
Subject: CRi Brief update

Dave Parsons with CRI called on Friday Afternoon. Wayne Price was my backup during the conversation that was held at 3:45 pm.

CRI is putting together a report on the incident at the facility and has met with Navajo regarding getting new waste profiles on all of the waste streams that go to the facility.

This report should be ready to send to us on Monday. The quote from Jason Null, the CRI employee, regarding OCD not having authority at CRI was a misstatement the "boss" had told Jason Null that **EPA** did not have authority at the site.

Dave also mentioned how the analyticals were usually good for 1 to 2 years. I informed Dave Parsons that that had been the accepted procedure in the past, However, each shipment needed to be accompanied by a C-138 and Generator Certificate of Waste Status with the attached previous analytical or refer to a previously approved C-138 with analytical and that this could then be verified within our records. There was not much of a response from Dave Parsons regarding this accept that he said this would be difficult for loads that are received on a daily basis.

I was contacted Friday about 9:00am by Carl Will of NMED who said that he had gotten a call and a report from Sergeant Rivas regarding a CRI and wanted to know if we were the correct agency to contact regarding this facility and if we should be the ones to follow-up on the report. I updated Carl Will and told him that OCD and NMED Hazardous Waste was investigating CRI and Navajo.

I called Sergeant Johnny Rivas on Friday at 12:30 pm. Sergeant Rivas is with the New Mexico State Police. (I had miss represented his agency in my investigation report as being with the Lea County Sheriff's Department the correct phone number to reach him is 505-392-5580 Ex 103). Sergeant Rivas was not notified by the Monument Fire Department until Saturday (5-24-03) at 3:30 pm. This was after the Monument F.D. had put a reported 7 truckloads of water on the fire and had not had any success of putting out the fire only reducing it to a smoldering state. At this point the Monument F.D was asking for help. Sergeant Rivas contacted the Hobbs F.D. and spoke to Neil Gore to find out what he knew about the CRI facility and who to contact. Sergeant Rivas also contacted the NMED Emergency phone number to report the incident to allow for someone follow-up.

I will put this information into the Draft report that was made on Wednesday.

See you both on Monday!

Martyne J. Kieling
Martyne J. Kieling
Environmental Geologist

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

MEMORANDUM OF MEETING OR CONVERSATION

____ Telephone ____ Personal Time 12:30 Date 5-30-03

Originating Party: Martyne Kieling

Other Parties: Srg. Johnny Rivas 392-5580 ex 103

Subject CRI Fire on Saturday 5-24-03

This was the First time that They Had Recieved any Calls regarding a Fire. in the Past Calls Have been about odors. "Gas" Smell. or worse.

Discussion Sgt. Rivas Got the call From His Dispatch on 5-24-03 at 3:30 The Monument Fire Dept was on site and had put 7 Trucks of water on to the Fire and Had Diminished the Flames but it was Still Smoldering what Should they Do? This was the Secound time they Had Been called out But The 1st time the State Police Had been Notified.

There was no Apparent Danger When Srg. Rivas Arrived only a Smoldering pit. But the Contents were unknown and water Pucks not working. They Stoped Putting water on it and decided to Smother or Cover it.

Srg Rivas was wanting a follow? and was Glad to know

Conclusions or Agreements That OCD And ENVIRONMENT Dept was Investigating. He Has Supplied information to The Env. Dept. Carl will Hazardous Waste Bureau

Distribution

Signed Martyne Kieling

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

MEMORANDUM OF MEETING OR CONVERSATION

✓ Telephone ____ Personal Time 3:45 Date 5-30-03

Originating Party: Dave Parsons.

Other Parties: Martyne Kieling, Wayne Price

Subject: EPA Not OCD Not having Jurisdiction at the Site.

Rule 711 testing 1 or 2 years.... By

Discussion: CRI is getting together with Navajo to Get NCW Analytials on all waste Streams. And CRI will be providing a Report on the Situation on Monday.

Conclusions or Agreements:

Distribution

Signed: Mly. Gum

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

MEMORANDUM OF MEETING OR CONVERSATION

✓ Telephone ____ Personal Time ________ Date 5-27-03

Originating Party: Wayne Price, Martyne Kieling

Other Parties: Darrel Moore

Subject: Chloride Guard CatAlyst. ~~Process~~ ~~[illegible]~~

Lastweek Load went. to CRI → Flow through

Wednesday Desil Gasoline

② D-342 in CRound.

1994

~~[illegible]~~ 1-10-001 D-363

Discussion: Self Ignition

Iron Sulfide caked onto Chloride Guard Catalyst.
+ all paper trash + Hyrocarbon

Process in the Plant as How to Chloride Guard Catalyst is Produced.....And Normal operating Process as to How it's treated...

Not First time had at least one Fire
Think they will Discontinue

Conclusions or Agreements ________

Distribution

Signed ________

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

MEMORANDUM OF MEETING OR CONVERSATION

_____ Telephone _____ Personal Time 9:04 Date 5-27-03

Originating Party: Marlyse Kieling

Other Parties: Neil Gore, Battallion Chief...

Subject: Sat morning shift
Sat Afternoon Haz mat Fire CRI Johnny Sergeant Revas.

Called in as Grass Fire Monument /Sat 12:00 AM
12 to 5:00 around 1:00 Sat Afternoon Called Back...
Monument Responded till 3:00 pm.

Discussion
No contact with owners...

3:30 pm Sat Afternoon Neil & Johnny Revas
Met with worker - Navajo Refinery Checked Paper work.
DOT trucking & Haulers
Looked like Rubbish Fire at that time Talk to CRI /Boss.
This Happens all the time old wood Trash
Navajo with Non Hazardous.
Cover with Soil to Smother...

No Phone #s at ... Emergency Manual Information...
Full Name as in Phone Book

Conclusions or Agreements

Distribution

Signed

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

MEMORANDUM OF MEETING OR CONVERSATION

7:29

✓ Telephone ____ Personal Time 8:20 Date 5-27-03

Originating Party: Paul Sheeley, Larry Johnson

Other Parties: Marlyn Kielly

NonEm. 397-9308 - Hobbs F.D. Neil Gore
393-2515 Monument F.D.

Subject

Discussion Fire Began around 12 am Friday
3:00 am Sat Monument FD Responded cut locks Made Calls?
5:30 am Sat Monument F.D. Left.
12:30 pm Sat Monument F.D. Returned to the GRI
3:35pm 5:30 pm Saturday Buddy Hill Recieved Phone call From Neil Gore Hobb F.D. Battilion Chief
3:30 pm Neil Gore & Johnny Reves Sergent
At Site Talked to Navajo Refinery Person Checked paperwork

Buddy 12:15 pm
Smoke very little trash smell Fire

Buddy ..... Answering Service - Called Back Jason
Called Gary Wink. - - - Boss ..... OCD Has No authority over them.

Conclusions or Agreements

Distribution

Signed Marlyn

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

MEMORANDUM OF MEETING OR CONVERSATION

_____Telephone _____Personal Time 9:00 Am Date 5-27-08

Originating Party: Marlyn Kiclin

Other Parties: Delana

Subject: S
62/80 mm 66' - 24th 12:11 Hobbs F.D.
Delana - Lea County Sheriff Reciecal call From Hobbs FD

Discussion

Conclusions or Agreements

Distribution

Signed

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

MEMORANDUM OF MEETING OR CONVERSATION

_____Telephone _____Personal Time _____ Date 5-27-03

Originating Party

Other Parties Nothing
Lea County Sheriff Dept.
393-2515
397-4166 No Answer D.s connected.
David Cumble. 393-4339
391-0739 - Marsha... Dept. Chief.

Subject 12:00 AM Sonday,
Sheriff Dept & Midnite Sat Night Sun Morning...
4:30
Cut Locks Did Not.....
C-29. Gate

Discussion Fire in Pit Casted Bed Boxes & other Stuff....
Big Flames. 10 to 15 Feet out of Pit.....
CRI Not present.

Again The Sonday callaout. Afternoon.....
asistant Chief. State Police.... Possible Coverup?

Conclusions or Agreements

Distribution

Signed _____

Pryophoric Iron Fires

At one time or another, most refineries experience spontaneous ignition of iron sulfide either on the ground or inside equipment. When this occurs inside equipment like columns, vessels, and tanks and exchangers containing residual hydrocarbons and air, the results can be devastating. Most commonly, pyrophoric iron fires occur during shutdowns when equipment and piping are opened for inspection or maintenance. Instances of fires in crude columns during turnarounds, explosions in sulfur, crude or asphalt storage tanks, overpressures in vessels, etc., due to pyrophoric iron ignition are not uncommon.

Often the cause of such accidents is a lack of understanding of the phenomenon of pyrophoric iron fires. This article aims to explain the basics of pyrophoric iron fires and to provide ideas for developing safe practices for handing over equipment for inspection and maintenance.

What is Pyrophoric Iron Oxidation?

The word "pyrophoric" is derived from the Greek for "fire-bearing". According to Webster's dictionary, "pyrophoric material" means "any material igniting spontaneously or burning spontaneously in air when rubbed, scratched, or struck, e.g. finely divided metals".

Iron sulfide is one such pyrophoric material that oxidizes exothermically when exposed to air. It is frequently found in solid iron sulfide scales in refinery units. It makes no difference whether these pyrophoric sulfides exist as pyrite, troilite, marcasite, or pyrrhotite. It is formed by the conversion of iron oxide (rust) into iron sulfide in an oxygen-free atmosphere where hydrogen sulfide gas is present (or where the concentration of hydrogen sulfide (H_2S) exceeds that of oxygen). The individual crystals of pyrophoric iron sulfides are extremely finely divided, the result of which is that they have an enormous surface area-to-volume ratio.

When the iron sulfide crystal is subsequently exposed to air, it is oxidized back to iron oxide and either free sulfur or sulfur dioxide gas is formed. This reaction between iron sulfide and oxygen is accompanied by the generation of a considerable amount of heat. In fact, so much heat is released that individual particles of iron sulfide become incandescent. ***This rapid exothermic oxidation with incandescence is known as pyrophoric oxidation*** and it can ignite nearby flammable hydrocarbon-air mixtures.

Basic chemical reactions : Iron sulfide is one of the most common substances found in refinery distillation columns, pressure vessels, etc. It is formed by the reaction of rust or corrosion deposits with hydrogen sulfide as shown below:

$$Fe_2O_3 \text{ (rust)} + 3H_2S \longrightarrow 2FeS + 3H_2O + S$$

There is a greater likelihood of this reaction occurring when the process involves a feedstock with high sulfur content. This pyrophoric iron sulfide (PIS) lays dormant in the equipment until the equipment is shutdown and opened for service, exposing the PIS to air, allowing the exothermic process of rapid oxidation of the sulfides to oxides to occur, as shown in the equations below:

$$4FeS + 3O_2 \longrightarrow 2Fe_2O_3 + 4S + \text{heat}$$
$$4FeS + 7O_2 \longrightarrow 2Fe_2O_3 + 4SO_2 + \text{heat}$$

The heat usually dissipates quickly unless there is an additional source of combustible material to sustain combustion. The white smoke of SO_2 gas, commonly associated with pyrophoric fires, is often mistaken for steam.

Pyrophoric iron oxidation in Distillation Columns

In petroleum refineries, the equipment most prone to pyrophoric combustion induced fires is the distillation columns in crude and vacuum distillation units. Deposits of iron sulfide are formed from corrosion products that most readily accumulate at the trays, pump around zones, and structured packing. If these pyrophoric iron sulfide (PIS) deposits are not removed properly before the columns are opened up, there is a greater likelihood of PIS spontaneous ignition. The trapped combustible hydrocarbons, coke, etc. that do not get adequately removed during steaming/washing often get ignited, leading to fires and explosions inside the equipment. These fires not only result in equipment damage but can also prove fatal for the personnel who are performing inspection and maintenance work inside the columns.

The accidents due to pyrophoric iron oxidations are entirely avoidable if safe procedures for column handover are followed. The targets of these procedures should be twofold:

- First, to remove all the combustibles
- Second, to remove or neutralize pyrophoric iron sulfide deposits

The basic distillation column oil-cleanup procedure is discussed in steps below.

Distillation Column Oil Cleanup Procedure

1. **Steaming:** The steaming is done after all liquid hydrocarbons have been drained from the column and associated piping. The objective of steaming is to make the column and associated piping free of residual hydrocarbons. The column vent and pump strainers in the side draw piping are de-blinded and steaming is started from utility connections at the bottom of the column. Generally, steaming is continued for about 20 to 24 hrs, ensuring the column top temperature remains more than 100 °C throughout the operation.

2. **Hot Water Washing:** When clear steam is observed exiting the column vents, water washing of the column should be started. With steam still in commission, water is sent to the column, usually via reflux lines, and it is drained from the column bottom, associated pump strainers, etc. The water flow rate should be adjusted so that steam still comes from the vent (i.e. water should not result in condensing of all steam before it reaches the column top). Water flow should be stopped for 2-3 hrs and then resumed. This cycle of steaming and washing should be repeated several times for a total of about 15 to 20 hours. Injection of a turpene-based detergent into the steam can also be considered. The condensate-soap solution can be collected and circulated through the various side cuts.

3. **Blinding:** When clear water is observed at side draw pump strainers, etc., associated piping should be isolated by installing blinds wherever isolation is possible.

4. **Cold Water Washing:** The hot water wash should be followed by a cold water wash (i.e. steam should be fully closed). The cold water washing is done for about 20-24 hrs.

5. **Chemical Injection for Removal and Neutralization of PIS Deposits:** During the cold-water wash or after washing is over, chemical injection for removal of pyrophoric sulfides should be considered. The various options for chemical treatment are discussed below:

- Acid cleaning - This procedure involves pumping in an acid with some corrosion inhibitor. The acid dissolves sulfide scale and releases hydrogen sulfide gas. It is effective and inexpensive, however, disposal of hydrogen sulfide gas can be a problem, as can corrosion (when the system contains more than one alloy). Dilute hydrochloric acid solutions may also be used. The resulting iron chloride turns bright yellow, acting as an indicator for removal of the iron sulfide.

- Acid plus hydrogen sulfide suppressant - Additional chemicals can be added to the acid solution to convert or scrub the hydrogen sulfide gas.

- Chelating solutions - Specially formulated, high pH, chelating solutions are quite effective in dissolving the sulfide deposits without emitting hydrogen sulfide, but this is an expensive application.

- Oxidizing chemicals - Oxidizing chemicals convert sulfide to oxide. Potassium permanganate ($KMnO_4$) has been used commonly in the past to oxidize pyrophoric sulfide. Generally the potassium permanganate is added to the tower during the cold water washing as a 1% solution. At various intervals, samples are taken and checked for color. The colors of the fresh $KMnO_4$ and the spent MnO_2 are purple and brown respectively. If the color of the solution becomes brown, additional $KMnO_4$ is needed. The reaction is judged complete when the solution color remains purple. It takes approximately 12 hours to complete the job.

  In recent times, the use of potassium permanganate as an oxidizer has raised serious safety and health concerns.

  - Potassium permanganate has the potential problem of very dangerous exotherms when even 2 % concentrations are exposed to many light hydrocarbons and alcohols. It has been reported that numerous people have been harmed due to explosions especially during mixing, but also with foaming and exotherms during initial injection inside vessels.

  - $KMnO_4$ also creates large volumes of sludge waste and many customers are reporting damage to catalyst systems from MnO_2 residual. MnO_2 is also hard on biological waste water systems. Removing the MnO_2 normally involves acidizing the equipment followed by neutralization. Acidizing $KMnO_4$ itself involves extremely dangerous and explosive vapors.

  Thus, despite excellent oxidizing properties of $KMnO_4$, many people are turning away from the drawbacks and inherent dangers in its application. Alternative oxidation technologies are being developed with a focus on

  - increasing safety in application
  - saving water
  - eliminating odor problems
  - minimizing wastewater problems
  - reducing wastes

The table below gives a brief overview of the various oxidizing chemicals with respect to their use, dangers, limitations and advantages.

A Synopsis of Oxidizers for Industrial Oxidation Use, Dangers, Limitations, Advantages						
Oxidizer	Potassium Permangnate KMnO4	Bleach	Zyme-Flow	Zyme-Ox	Hydrogen Peroxide	Common Sulfide Absorbers
Dangerous Exotherm Possible ?	Yes	Yes	No	No	Yes	Not Normally
Dangerous Gas Emission Possible ?	Yes	Yes	No	No	Yes	Yes
Dangerous Residue Possible ?	Yes	Yes	No	No	No	Yes
Safe with Light Hydrocarbons ?	No	No	Yes	Yes	No	Not Always
Liquid Application ?	Yes	Yes	Yes	Yes	Yes	Yes
Steam Application ?	No	No	Yes	No	No	No
pH Restrictions ?	Yes	Yes	Yes	No	No	Yes
Create Additional or Hazardous Sludge ?	Yes	Yes	No	No	No	Sometimes
Penetration Ability	Moderate	Moderate	Excellent	Very good	Poor	Good
Secondary Waste Treatment Required ?	Yes	Yes	No	No	No	Yes
Corrosive ?	Yes	Yes	No	No	Yes	Yes
Long Shelf Life ?	No	Yes	Yes	No	No	Yes
Safe to Handle ?	No	No	Yes	Yes	No	No

The oxidizers Zyme-Flow and Zyme-Ox are proprietary products from United Laboratories International, LLC for most refinery and petrochemical decontamination applications. For more information on Zyme-Flow^{SM} Process Technology, the readers can visit www.zymeflow.com or contact Mr. Bevan Collins at bevan.collins@kvaerner.com or Bcollins@ZymeFlow.com.

Case Studies: Pyrophoric Iron Fires

The history of refining is replete with cases of fires and explosions due to pyrophoric iron ignitions. A few of these cases are discussed below (details like the location and date of the incidents are not included), to give the reader an idea of the nature of pyrophoric iron fires and the lessons learned.

Pyrophoric fire/explosion inside a Vacuum column in a Crude Unit

During a turnaround in the Crude Unit the vacuum column was being prepared for handover to maintenance. The oil was removed from the column and the column was steam purged. A water washing connection was made in the light vacuum gas oil (LVGO) reflux pump suction. Meanwhile, instruction was given for removal of a 40-inch spool piece in the column overhead line to facilitate overhead exchanger blinding. Air ingress occurred from this open flange, leading to auto-ignition of pyrophoric iron sulfide inside. An explosion took place causing damage to the internals. White smoke (SO_2) was also observed at the open end. Nitrogen injection and water washing were immediately begun to quench the heat and halt the oxidation reaction inside the column.

Lessons learned:

Before carrying out any maintenance activity on overhead exchangers, proper water washing and blinding must be completed. Full-face blinds should be provided wherever spool pieces are dropped.

Pyrophoric Fire inside the floating head cover of a Naphtha Stabilizer Reboiler

During a maintenance and inspection (M&I) shutdown, after steaming of the reboiler loop, the floating head cover of the naphtha stabilizer reboiler (S&T exchanger) was opened so the bundle could be pulled for cleaning. The head cover was left in the open position. After about 2 days, fire and smoke was observed from the head cover. It was determined that the fire occurred because of the PIS ignition of residual hydrocarbons. The fire was immediately extinguished with water. The cover was thoroughly flushed with water and kept wet.

Lesson learned: Whenever exchangers in naphtha service (containing sulfur) are opened for maintenance, the exchanger areas must be properly water washed for PIS removal. No amount of steaming can ensure full removal of PIS or residual hydrocarbons.

Pyrophoric Fire inside a Naphtha Tank

A naphtha tank (floating head type) was emptied out for maintenance. It was left unattended for one month. One day, flames and smoke were observed coming from the tank. Upon investigation, it was found that PIS had ignited leading to combustion of residual naphtha in the tank.

Lessons learned: Tanks in high-sulfur hydrocarbon service, such as naphtha, crude, etc., must be properly emptied and washed before allowing them to remain idle for maintenance. Also, such tanks should be kept under adequate nitrogen blanketing.

Pyrophoric Fire inside a Hydrotreater Reactor

During a maintenance shutdown, a naphtha Hydrotreater reactor feed/effluent heat exchanger was to be opened. The reactor gas loop was thoroughly nitrogen purged. During deblinding of the exchanger air ingress occurred to the reactor causing excessive heat build up in the reactor due to a pyrophoric iron fire. The temperatures went as high as 500 °C. Heavy smoke was observed from the open flanges and the reactor platform area became hot. The heat was immediately quenched by purging with nitrogen.

Lessons learned: Whenever piping associated with a naphtha Hydrotreater reactor has to be opened, purging N_2 must be kept opened during blinding and deblinding of the upstream and downstream flanges in exchangers.

General Precautions to Avoid Pyrophoric Iron Fires

1. The scraps and debris collected from cleaning of filters in naphtha / crude service must be kept wet and disposed of underground.
2. Tanks, reactors, columns, and exchangers in high-sulfur feed service must be kept properly blanketed with N_2 during idle periods.
3. All equipment and structured packing must be properly water washed and kept wet when exposed to the atmosphere.
4. In processes where catalyst handling is required (such as in Hydrotreating and fluid catalytic cracking) caution must be taken during catalyst recharge or disposal. When unloading any spent coked catalyst, the possibility exists for iron sulfide fires. If the spent catalyst is warm and contacts oxygen, iron sulfide will ignite spontaneously and the ensuing reaction may generate enough heat to ignite carbon deposited on the catalyst. Therefore catalyst must be stripped of all hydrocarbons,

cooled to about 50 ° C and wetted with water to prevent it from igniting vapors. Once cooled, the used catalyst may be emptied into drums for later shipment to a regenerator or a disposal site. As the catalyst may be highly pyrophoric (containing iron sulfide, etc.), it should be dumped into drums containing an internal liner for shipment. The drum and liner should first be filled with inert gas, which is then displaced by the catalyst. The liner should be tied off and a small chunk of dry ice placed inside the drum before sealing. These precautions should protect against catalyst auto ignition.

References

"Pyrophoric Materials Handbook, Flammable Metals and Materials", By Charles R. Schmitt, P.E., C.H.C.M., Edited By Jeff Schmitt

"Pyrophoric Fires and Column Shutdown", Refineries Quarterly Safety Bulletin, April-June 1997.

"Methods for Removal of Iron sulphide", Mr. Fu Huang, Chinese American Association of Corrosion & Materials Engineers

"Formation and Oxidation of Sulfides on Pure Iron and Iron Oxides", Masatoshi Watanabe1, Minoru Sakuma, Takeshi Inaba, and Yasutaka Iguchi, Department of Metallurgy, Graduate School of Engineering, Tohoku University, Sendai 980-8579, Japan

"Basic Technology of Zyme-Flow Process", Bevan Collins, International Technical Director, United Laboratories, LLC , www.zymeflow.com

TECHNICAL BULLETIN: Safe Handling of CRITERION Hydrotreating Catalysts

www.worlfuels.com, NPRA Q&A Minutes, 1999 Session I

NIOSH Pocket Guide to Chemical Hazards

Sulfur dioxide	**CAS** 7446-09-5
SO_2	**RTECS** WS4550000
Synonyms & Trade Names Sulfurous acid anhydride, Sulfurous oxide, Sulfur oxide	**DOT ID & Guide** 1079 125

Exposure Limits	NIOSH REL: TWA 2 ppm (5 mg/m^3) ST 5 ppm (13 mg/m^3)
	OSHA PEL†: TWA 5 ppm (13 mg/m^3)

IDLH 100 ppm See: 7446095	**Conversion** 1 ppm = 2.62 mg/m^3

Physical Description
Colorless gas with a characteristic, irritating, pungent odor. [Note: A liquid below 14°F. Shipped as a liquefied compressed gas.]

MW: 64.1	BP: 14°F	FRZ: -104°F	Sol: 10%
VP: 3.2 atm	IP: 12.30 eV	RGasD: 2.26	
Fl.P: NA	UEL: NA	LEL: NA	

Nonflammable Gas

Incompatibilities & Reactivities
Powdered alkali metals (such as sodium & potassium), water, ammonia, zinc, aluminum, brass, copper [Note: Reacts with water to form sulfurous acid (H_2SO_3).]

Measurement Methods
NIOSH 6004; OSHA ID104, ID200
See: NMAM or OSHA Methods

Personal Protection & Sanitation Skin: Frostbite Eyes: Frostbite Wash skin: No recommendation Remove: When wet or contaminated (liquid) Change: No recommendation Provide: Frostbite	**First Aid** (See procedures) Eye: Frostbite Skin: Frostbite Breathing: Respiratory support

Important additional information about respirator selection
Respirator Recommendations NIOSH
Up to 20 ppm: (APF = 10) Any chemical cartridge respirator with cartridge(s) providing protection against the compound of concern*/(APF = 10) Any supplied-air respirator*
Up to 50 ppm: (APF = 25) Any supplied-air respirator operated in a continuous-flow mode*/(APF = 25) Any powered, air-purifying respirator with cartridge(s) providing protection against the compound of concern*
Up to 100 ppm: (APF = 50) Any chemical cartridge respirator with a full facepiece and cartridge(s) providing protection against the compound of concern/(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister providing protection against the compound of concern/(APF = 50) Any powered, air-purifying respirator with a tight-fitting facepiece and cartridge(s) providing protection against the compound of concern*/(APF = 50) Any supplied-air respirator that has a tight-fitting facepiece and is operated in a continuous-flow mode*/(APF = 50) Any self-contained breathing apparatus with a full facepiece/(APF = 50) Any supplied-air respirator with a full facepiece
Emergency or planned entry into unknown concentrations or IDLH conditions: (APF = 10,000) Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode/(APF = 10,000) Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus
Escape: (APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister providing protection against the compound of concern/Any appropriate escape-type, self-contained breathing apparatus

Exposure Routes inhalation, skin and/or eye contact

Symptoms Irritation eyes, nose, throat; rhinorrhea (discharge of thin mucus); choking, cough; reflex bronchoconstriction; liquid: frostbite

Target Organs Eyes, skin, respiratory system

See also: INTRODUCTION See ICSC CARD: 0074 See MEDICAL TESTS: 0215

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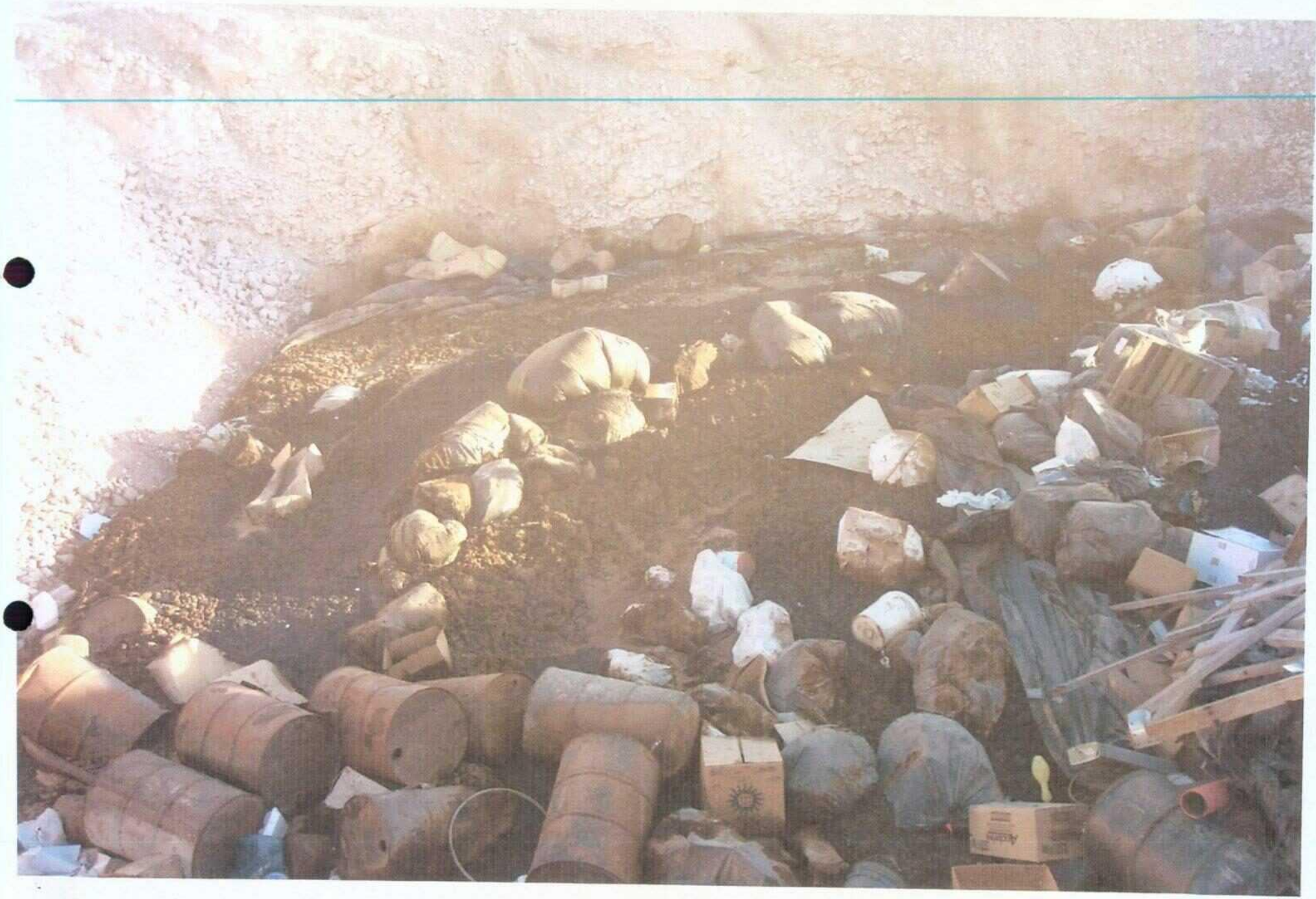
Navajo pit
Jan 23 - 2003



CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

Oil Commission Division
1625 N. French Dr
Hobbs, NM 88240

Hobbs District Office

RE: Smoldering Debris in Pit at Disposal Facility.

CRI was contacted at 3:25 P.M. Saturday, May 24, 2003, by Joanna with the State Police Department of a possible fire at our disposal facility located at Halfway, NM. Two subsequent calls were logged t 3:35 P.M. from Sgt Rios with the State Police and at 3:44 P.M. from Buddy with O.C.D.

CRI employee arrived on site shortly after 4:00 P.M. and met with Hobbs Fire Department, Monument Fire Department and State Police. Inspection by employee found smoldering debris located in one disposal pit. Employee informed State Police he would cover it with soil and all emergency personnel left. Exact cause is unknown. CRI will keep debris covered with soil to prevent future occurrence.

The facility was closed and secured by locked gates. A sign with emergency phone numbers is located just inside entrance gates and is visible from the gate.

If any other reporting is necessary please contact me immediately.

Sincerely,

David Parsons

Hand delivery
5-28-03
2:30pm
By David Parsons