

**NM1 - 19**

**INSPECTIONS &  
DATA**

GANDY MARLEY INC.

505-347-0434

505-398-4960

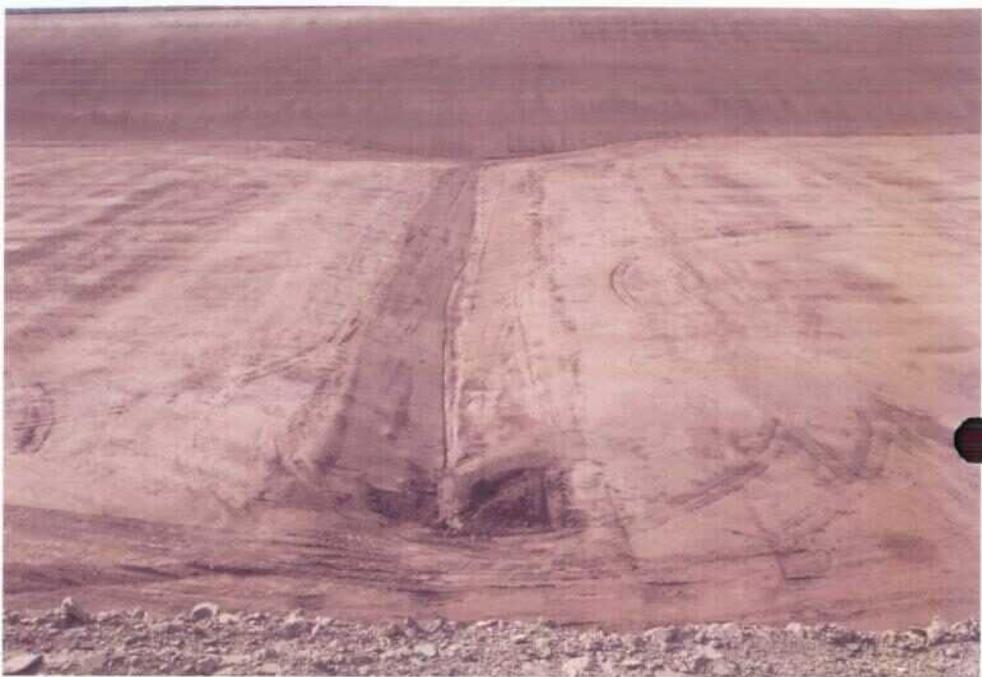
NMOCD (NM-711-1-0020)

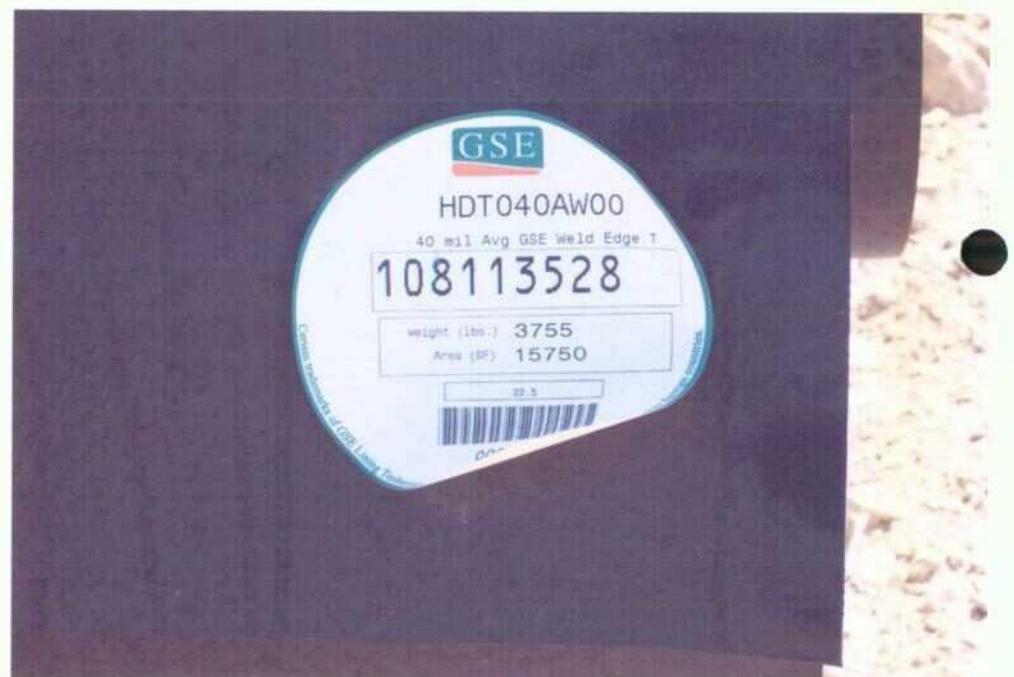
NMED DP-1041

SEC. 4.5.8.9 T11s R31E

EPA ID# NM0001002484



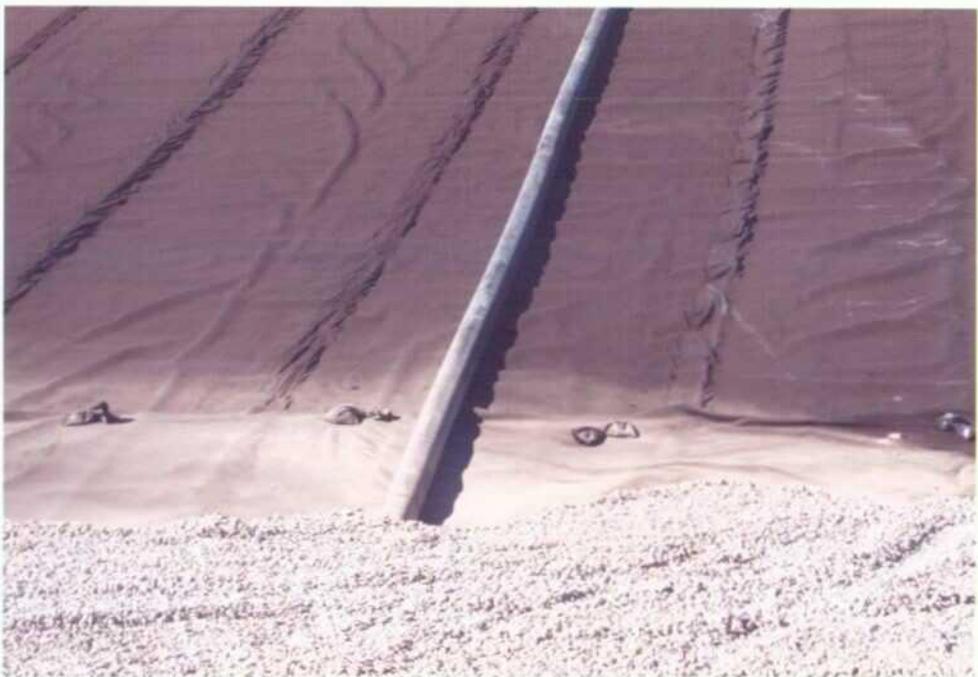














5/23/05

EVAPOTRANSPIRATION  
COVER INSTEAD  
OF

This may increase closure costs

\* Clay Cap (to guard against upward mobility)

Vadose Zone Monitoring (NEEPEP)

SOLIDIFICATION

Progressive Closure of landfill cells will be monitored.

10 FEET ABOVE GROUND CONCERN

LIST WASTES ALLOWED IN LANDFILL

INCREASE FILL DEPTH ON TOP OF CLAY CAP.

ADDITIONAL MONITOR WELLS

NEEPEP

$$SAR = \frac{Na}{\sqrt{Ca+Mg}}$$

< 3 No problem

3-6 Few Problems

6-8 increasing

8-14 High  $\delta$  Na - not recommended for plants

> 14 Probably no growth

Sampling should be done shallower

WORRIED ABOUT DEBRIS

5/24/05

ISSUE NOV OR ACO TO GANDY MARLEY FOR  
NON-SUBMISSION OF QUARTERLY AND ANNUAL SAMPLING  
REPORTS.



REVIEW ALL PERMITS FOR SAMPLING REQUIREMENTS

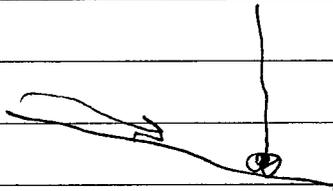
Permit  
condition

SAMPLING should be required for cover material  
for landfill

Jim Bonner (Gordon Environmental)

38+ Boreholes drilled showing that the area under the landform is not continuously characterized as clay (Dokum). This is why the Trassie Park site was located 1-1/2 miles south and west of the landform site.

Concerned about migration along the clay to fall off, possibly, into a more permeable material.  
Dokum is unpredictable under the landform.



\* QUALITY CONTROL PROVISIONS  
FOR LINER CONSTRUCTION

STATE ENGINEER REQUIREMENTS?

CAPACITY

~~HEIGHT~~ HEIGHT

WASTE SCREENING

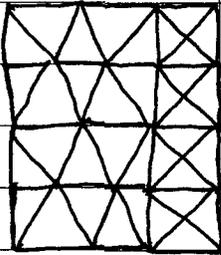
NO INCOMPATIBLE MATERIALS

NOTHING LARGE OR SHARP THAT MAY COMPROMISE LINER

PAINT FILTER TEST

EMERGENCY CONTACT INFORMATION

When precipitation is sucked up - sampling required  
Does restrictions and other post-closure  
requirements.



POSSIBLE CONFLICT BETWEEN 711 AND GUIDELINES  
AS TO WHEN ENGINEERED DRAWINGS OF  
CONSTRUCTION ARE REQUIRED?

A PLAN OR AN IDEA AS TO WHAT CELLS WILL  
BE USED AS LANDFILLS AND IN WHAT ORDER  
OTHER CELLS WILL BE CONVERTED TO LANDFILLS.

Some material required on top of liner for protection.

June ~~14<sup>TH</sup>~~  
24<sup>TH</sup>

How will public comment  
be handled.

Proposed conditions



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

March 10, 2005

Mr. Larry Gandy  
Gandy Marley, Inc.  
P.O. Box 1658  
Roswell, NM 88202

Re: Gandy Marley Commercial Landfarm  
NMOCD Permit NM-1-0019

Dear Mr. Gandy:

The New Mexico Oil Conservation Division inspected the above facility on February 14, 2005 and found it to be a very well managed and maintained waste management facility. Aside from a minimal problem with accumulated plastic material, there were no problems associated with the facility. Overall, this site is in very good condition.

Please extend my thanks to Mr. Bill Marley for his cooperation during the inspection.

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

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script, reading "Edwin E. Martin".

Edwin E. Martin  
Environmental Engineer

cc: NMOCD, Hobbs



GANDY MARLEY INC.

505-347-0434

505-398-4960

NMOC (NM-711-1-0020)

NMED DP-1041

SEC. 4.5.89 T11; R31

EPA ID# NM0001002484

2.14.2005



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

September 15, 2003

**Lori Wrotenbery**

Director

**Oil Conservation Division**

Mr. Larry Gandy  
Gandy Marley, Inc.  
P.O. Box 1658  
Roswell, NM 88202

**RE: Inspection Report: Permit NM-01-0020 / 19**  
**Gandy Marley, Inc.**  
**Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM**  
**Chaves County, New Mexico**

Dear Mr. Gandy:

The New Mexico Oil Conservation Division (OCD) inspected the Gandy Marley, Inc. (Gandy Marley) surface waste management facility at the above location on August 11, 2003. Overall the OCD found Gandy Marley to have a well maintained landfarm with good security. The OCD inspection and file review of Gandy Marley indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Gandy Marley during the inspection and file review. Attachment 2 contains photographs taken during the inspection. Tilling records and waste acceptance documents were reviewed and all were in order. Gandy Marley shall provide OCD with a detailed description of how the deficiencies will be corrected and a time as to when each of the corrections will be completed. Gandy Marley must respond to the permit deficiencies by October 15, 2003.

A review of the file shows that verbal notification was received on March 3, 2003 regarding an accidental dumping within the landfarm of pigging/scrubber vessel liquids and wash water from the El Paso Roswell station on February 27, 2003. To date the OCD has not received a follow-up report regarding the volume of the waste and how the spill was handled and the results from the sampling that was performed. This report must be received by October 15, 2003. Any future spills or accidental dumpings must be reported within 24 hours. Please review Permit NM-01-0020, Reporting, page 5, Item 6 of the Permit conditions.

A review of the financial assurance records finds that the OCD has the full amount of \$82,917 on file.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

A handwritten signature in black ink, appearing to read "Martyne J. Kieling". The signature is fluid and cursive, with a large initial "M".

Martyne J. Kieling  
Environmental Geologist

Attachments

xc: Hobbs OCD Office

ATTACHMENT 1  
INSPECTION REPORT  
PERMIT NM-01-0020  
GANDY MARLEY, INC.

(Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM  
Chavez County, New Mexico  
(September 15, 2003)

1. Fencing and Signs: The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information: a) name of facility, b) location by section, township and range, and c) emergency phone number.

**Facility is secured with fence and locking gate and has a sign at the entrance (Photos 1 and 2)**

2. Berming: An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.

**Cell berms are in good shape and well maintained (Photos 3, 4, 5 and 6).**

3. Setbacks: All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within twenty (20) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

**The facility set backs are maintained. There are no pipelines at this facility**

4. Soil Spreading, Disking and Lift Thickness: All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

**At the time of inspection, soils in each cell had been spread and disked accordingly.**

5. Free Liquids: No free liquids or soils with free liquids will be accepted at the facility.

**No free liquids were observed within the landfarm. Solidification of tank bottoms is permitted under Permit NM-01-0020 dated October 22, 1999.**

6. Trash and Potentially Hazardous Materials: All trash and potentially hazardous materials should be properly disposed of.

**No plastic or trash was observed in the cells.**

7. 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 pad within the berm so that leaks can be identified.

**Above ground tanks are bermed to contain a sufficient volume and are on an impermeable 20 mil HDPE liner.**

8. Sumps and Valve Catchments: All sumps and catchments must be kept empty so that leaks can be identified and to prevent overflow onto the ground.

**Valve catchment contained some oil and fluid (see photo 8). The catchment should be emptied each time a truck unloads. Soils surrounding the catchment were stained from spills and/or overflows. The soil must be picked up and removed to a landfarm cell for remediation.**

9. Concrete Mixing Impoundment: Adequate freeboard must be maintained to prevent any overtopping or slop-over of material. Material received at the impoundment must be mixed and stabilized immediately.

**Liquids and sludge were being solidified at the time of the inspection. Minimal slop-over had occurred.**

10. 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 and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

**N/A There are no drums located at this facility.**

All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

11. 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.

**N/A There are no saddle tanks located at this facility.**

12. Tank Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

**Weathering has damaged some of the signs on the tanks. The tanks require new labels (see photo 7).**

13. Migratory Bird Protection: All tanks exceeding 16 feet in diameter and exposed pits, ponds or lagoons must be screened, netted, covered or otherwise rendered not hazardous to migratory birds.

**The open top tank net was not attached to one side. The net must be reattached or repaired (see photo 9).**

14. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 to the appropriate OCD District Office.

**At the time of inspection, there were no spills evident at this facility**

15. Regular Facility Inspections: Cells must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants. Facility inspections and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm.

**Records check indicate all diskings and facility inspections are being performed as required. All of 2002 and 2003 records were reviewed.**

16. H<sub>2</sub>S Screening: H<sub>2</sub>S screening must be recorded and maintained.

**Records for H<sub>2</sub>S screening were not reviewed at this time.**

17. Waste Acceptance and Disposal Documentation: The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification; 6) NORM status declaration; 7) transporter; 8) exact cell location; and 9) any addition of microbes moisture, fertilizers, etc.

**Summary reports of waste received indicate all waste acceptance and disposal records are being kept and maintained as required.**



Photo 1: Entrance sign to landfarm. Looking west.



Photo 4: Cells tilled, berms in good condition. Looking north.



Photo 2: From entrance looking west-southwest - Fence, locking gate, office and workshop.



Photo 5: Cell receiving contaminated soil. Looking north.

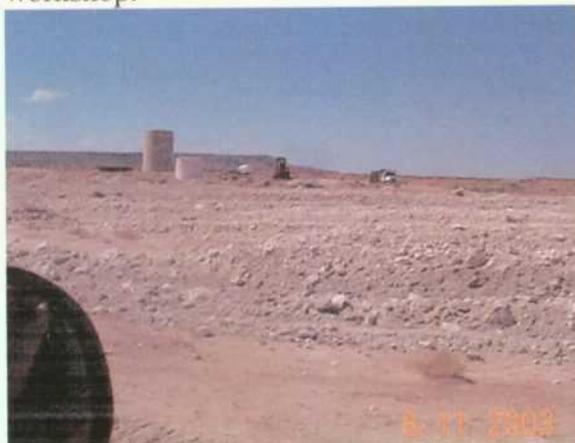


Photo 3: Landfarm cell north of tank receiving area. Looking south.



Photo 6: Cell receiving contaminated soil. Looking northwest.

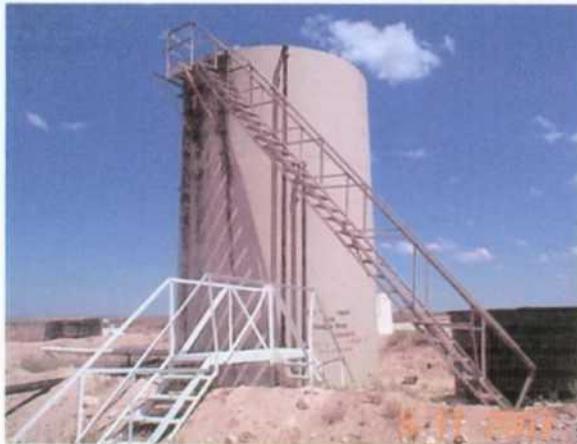


Photo 7: 750 bbl tank requires new labels regarding contents and hazards including H<sub>2</sub>S warnings.



Photo 8: Drips and spills must be picked up and removed to a landfarm cell for remediation.



Photo 9: Netting must be repaired and reattached to the open top tank. New labels are required. Looking northeast.

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

MEMORANDUM OF MEETING OR CONVERSATION

Telephone  Personal Time 1:00 Date 3/3/03

Originating Party

Larry Gandy

Other Parties

Martynne Kiebing

Subject Landfarm - Accidental Dumping within the Landfarm  
Pigging of Scrubber vessel liquids & wash water. From  
El Paso Roswell Station 2-26 to 2-27-03

There is a concern for Arsenic in this waste stream it has been found below at  
this location.

Discussion Trucker picked up the waste and was told to put  
the liquids in to a tank at the land farm. The date  
was ~~2-28-03~~ 2-27-03 Thursday. The trucker instead  
dumped the liquids onto Landfarm Cell #14. Larry Gandy  
found out on Friday morning what had happened and went  
to the land farm to flag the area and took a 6 point  
composit sample. The area affected was approximately  
a 60' x 60' area.

Notice to OCD was a bit slow. Found on Friday 2-28-03  
and reported on Monday 3-3-03

Conclusions or Agreements Larry will follow up with a written report  
noting the events and will include the analytical.  
The OCD will review and make recommendations according to the  
permit requirements.

Distribution

Signed

Martynne Kiebing



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

April 19, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-559-573-296**

Mr. Larry Gandy  
Gandy Marley, Inc.  
P.O. Box 1658  
Roswell, NM 88202

**RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0020  
Gandy Marley, Inc.  
Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM  
Chaves County, New Mexico**

Dear Mr. Gandy:

The New Mexico Oil Conservation Division (OCD) inspected the Gandy Marley, Inc. (Gandy Marley) surface waste management facility at the above location on April 11, 2000.

Overall the OCD found Gandy Marley to have a well maintained landfarm with good security. The OCD inspection and file review of Gandy Marley indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Gandy Marley during the inspection and file review. Attachment 2 contains photographs taken during the inspection. Gandy Marley shall provide OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. Gandy Marley must respond to the permit deficiencies by May 19, 2000.

Please be advised that the financial assurance in the amount of \$25,000 currently held by the OCD will need to be increased to \$41,458 by November 22, 2000. Gandy Marley's current cash bond (bond No. OCD-523) for \$25,000 will need to be replaced using the current OCD form. If you do not have a copy of the OCD surface waste management facility financial assurance forms you may obtain them from the OCD web site <http://www.emnrd.state.nm.us/ocd/>.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kieling  
Environmental Geologist

Attachments

xc: Hobbs OCD Office

ATTACHMENT 1  
INSPECTION REPORT  
PERMIT NM-01-0020  
GANDY MARLEY, INC.

(Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM  
Chavez County, New Mexico  
(April 19, 2000)

1. Fencing and Signs: The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by section, township and range, and c) emergency phone number.

**Facility is secured with fence and locking gate and has a sign at the entrance.**

2. Berming: An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.

**Cell berms are in good shape and well maintained**

3. Setbacks: All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within twenty (20) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

**The facility set backs are maintained. There are no pipelines at this facility**

4. Soil Spreading, Disking and Lift Thickness: All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

**At the time of inspection, soils in each cell had been spread and disked accordingly.**

5. Free Liquids: No free liquids or soils with free liquids will be accepted at the facility.

**No free liquids were observed within the landfarm. Solidification of tank bottoms is permitted under Permit NM-01-0020 dated October 22, 1999. Liquids and sludges to be landfarmed are first solidified within a concrete trough underlain with a 20 mil HDPE liner (see photo 4).**

12. Tank Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

**Tanks were labeled.**

13. Migratory Bird Protection: All tanks exceeding 16 feet in diameter and exposed pits, ponds or lagoons must be screened, netted, covered or otherwise rendered not hazardous to migratory birds.

**Open top tank was netted properly (see photo 2).**

14. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 to the appropriate OCD District Office.

**At the time of inspection, there were no spills evident at this facility**

15. Regular Facility Inspections: Cells must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants. Facility inspections and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm.

**Records check indicate all disking and facility inspections are being performed as required. Records on file at facility location date back to 1995.**

16. H<sub>2</sub>S Screening: H<sub>2</sub>S screening must be recorded and maintained.

**H<sub>2</sub>S screening has not been performed according to permit.**

17. Waste Acceptance and Disposal Documentation: The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification; 6) NORM status declaration; 7) transporter; 8) exact cell location; and 9) any addition of microbes moisture, fertilizers, *etc.*

**Trip tickets and cell summary report of waste received indicate all waste acceptance and disposal records are being kept and maintained as required.**



Photo #1 4-11-00



Photo #4 4-11-00



Photo #2 4-11-00



Photo #3 4-11-00

**GANDY•MARLEY, INC.**

P.O. Box 1658  
Roswell, NM 88202  
(505) 625-9206  
Fax (505) 625-9706

No. 2631

**LEASE OPERATOR/SHIPPER/COMPANY:**

**LEASE NAME:**

**TRANSPORTER COMPANY:**

**TIME: AM/PM**

**DATE:**

**VEHICLE NO.:**

**DRIVER NO.:**

**CHARGE TO:**

**TYPE OF MATERIAL**

**OCD**

Other Material:

Contaminated soil

C-117 No.: \_\_\_\_\_

BS&W content: \_\_\_\_\_

Description: \_\_\_\_\_

**VOLUME OF MATERIAL [ ]: YARDS \_\_\_\_\_ : CELL# \_\_\_\_\_ : [ ] \_\_\_\_\_**

AS A CONDITION TO GANDY•MARLEY, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, OPERATOR/SHIPPER REPRESENTS AND WARRANTS THAT THE WASTE MATERIAL SHIPPED HERewith IS MATERIAL EXEMPT FROM THE RESOURCE, CONSERVATION AND RECOVERY ACT OF 1976, AS AMENDED FROM TIME TO TIME, 40 U.S.C. §6901, et seq., THE NM HEALTH AND SAF. CODE, §361.001, et seq. AND REGULATIONS RELATED THERETO, BY VIRTUE OF THE EXEMPTION AFFORDED CONTAMINATED SOILS AND OTHER WASTE ASSOCIATED WITH THE EXPLO- RATION, DEVELOPMENT OR PRODUCTION OF CRUDE OIL OR NATURAL GAS OR GEOTHERMAL ENERGY.

ALSO AS A CONDITION TO GANDY•MARLEY, INC.'S ACCEPTANCE OF THE MATERIALS SHIPPED WITH THIS JOB TICKET, TRANSPORTER REPRESENTS AND WARRANTS THAT ONLY THE MATERIAL DELIVERED BY OPERATOR/SHIP- PER TO TRANSPORTER IS NOW DELIVERED BY TRANSPORTER TO GANDY•MARLEY, INC.'S FACILITY FOR DISPOSAL.

*THIS WILL CERTIFY that the above Transporter loaded the material represented by this Transporter Statement at the above described location, and that it was tendered by the above described shipper. This will certify that no additional materials were added to this load, and that the material was delivered without incident.*

**DRIVER:** \_\_\_\_\_

**FACILITY REPRESENTATIVE:** \_\_\_\_\_

White - GMI

Canary - Shipper

Pink - GMI

Gold - Transporter



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

CONSERVATION DIVISION  
1000 North Pacheco Street  
Albuquerque, New Mexico 87505  
(505) 827-7131

July 10, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-311**

Mr. Larry Gandy  
Gandy Marley, Inc.  
1109 East Broadway  
P.O. Box 827  
Tatum, NM 88267

**RE: Landfarm Inspection  
Gandy Marley, Inc.  
Parts of Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM  
Chaves County, New Mexico**

Dear Mr. Gandy:

The New Mexico Oil Conservation Division (OCD), inspected Gandy Marley, Inc. (Gandy Marley) landfarm located in parts of Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM, Chaves County, New Mexico, on April 4, 1997.

Overall the OCD found Gandy Marley to have a well maintained landfarm with good security. The OCD inspection and current file review of Gandy Marley indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Gandy Marley during the inspection and the new Rule 711 requirements that are not on file. Attachment 2 contains photographs taken during the inspection. Gandy Marley shall provide OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. A response is required by Gandy Marley to these deficiencies by September 10, 1997.

Pursuant to Order R-10411-B the OCD General Rule 711 has been revised. The OCD is currently in the process of re-permitting all surface waste management facilities under the new Rule 711. Gandy Marley landfarm is included under the new Rule 711. A copy of Order R-10411-B along with the new bond forms were given to you (Larry Gandy) during the OCD inspection on April 4, 1997. An additional set of these forms and the Order is included with this report. A permit application, Form C-137 (attachment 3), shall be filed with the OCD according to the instructions in Attachment 1, Section 13.

Please be advised that the bonding requirements have changed under the new Rule 711. Gandy

Mr. Larry Gandy  
July 10, 1997  
Page 2

Marley's current cash bond (bond No. OCD-523) for \$25,000 will need to be replaced. The bonded amount will be based upon the estimated closure costs that the State of New Mexico would incur if a third party contractor were to remediate the facility (see Rule 711.B.1.i). Gandy Marley must have a new bond in place for the approved estimated closure amount prior to receiving a new waste management facility permit.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,



Martyne J. Kieling  
Environmental Geologist

Attachments

xc: Hobbs OCD Office

ATTACHMENT 1  
INSPECTION REPORT

APRIL 4, 1997

GANDY MARLEY, INC. LANDFARM

(Parts of Sections 4, 5, 8, and 9, Township 11 South, Range 31 East, NMPM)

CHAVES COUNTY, NEW MEXICO

1. **Fencing and Signs:** The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by section, township and range, and c) emergency phone number.

**Facility is secured with fence and locking gate and has a sign at the entrance.**

2. **Berming :** An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.

**Cell berms are in good shape and well maintained (see pictures 5, 6, 7, 8, 9, 10, and 11).**

3. **Setbacks:** All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within fifty (50) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

**The facility has one-hundred (100) foot setbacks around the perimeter. There are no pipelines at this facility**

4. **Soil Spreading, Disking and Lift Thickness:** All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

**At the time of inspection, soils in each cell had been spread and disked accordingly (see pictures 5, 6, 7, 8, 9, 10 and 11) .**

5. **Free Liquids :** No free liquids or soils with free liquids will be accepted at the facility.

**A landfarm permit modification was approved on June 14, 1996 to allow liquid**

**solidification. Liquids and sludges to be landfarmed are first solidified within a concrete trough underlain with a 20 mil HDPE liner (see pictures 1, 3 and 4)**

6. **Trash and Potentially Hazardous Materials:** All trash and potentially hazardous materials should be properly disposed of.

**Plastic in the landfarm cells needs to be picked up and disposed of properly (see pictures 5, 7, 8, 9 and 11).**

7. **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 so that leaks can be identified.

**Above ground tanks are bermed to contain a sufficient volume and are on an impermeable 20 mil HDPE liner (see picture 2).**

8. **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 and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

**N/A There are no drums located at this facility.**

All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

9. **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.

**N/A There are no saddle tanks located at this facility.**

10. **Tank Labeling:** All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

**Tanks are not labeled as to their contents and hazard (see picture 2).**

11. **Housekeeping:** All systems designed for spill collection/prevention should be inspected frequently to ensure proper operation and to prevent overtopping or system failure.

**At the time of inspection the tank berms and solidification trough were in good condition (see pictures 1, 2, 3 and 4). These systems should be checked on a regular basis.**

12. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 to the appropriate OCD District Office.

**At the time of inspection, there were no spills evident at this facility.**

13. **Application Requirements for Permit Under the New Rule 711:** An application, Form C-137, for a permit renewal shall be filed in DUPLICATE with the Santa Fe Office of the Division and ONE COPY with the Hobbs OCD 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;

**Please submit with C-137 application.**

- (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;

**This is already on file with the OCD.**

- (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 mile of the site;

**This is already on file with the OCD.**

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

**Some of this is already on file with the OCD. Attached is a copy of the facility map that we have in the file please submit an updated facility map that reflects any changes that have been made. Please include a map that shows all of the current cells in use and or under construction, the location of the skim and receiving tanks, solidification trough, and the office.**

- (e) A plan for management of approved wastes;

**This is already on file with the OCD.**

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

**This is already on file with the OCD.**

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

**This is already on file with the OCD.**

- (h) A Hydrogen Sulfide (H<sub>2</sub>S) Prevention and Contingency Plan to protect public health;

**This is already on file with the OCD.**

- (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;

**Please submit with C-137 application.**

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

**This is already on file with the OCD.**

- (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.

**Please submit with C-137 application.**



4224'

100' BUFFER ZONE

PERIMETER FENCE

3' HIGH BERM  
(TOTAL PERIMETER)

ACCESS (3 TYP)

ACCESS ROAD

1584'



127 AC. W/IN PERIMETER BERM / 31.96 AC. W/IN EACH QUADRANT  
SCALE: NONE  
4-2-96

FIGURE 3  
Site Diagram



**THE REPRODUCTION OF**

**THE**

**FOLLOWING**

**DOCUMENT (S)**

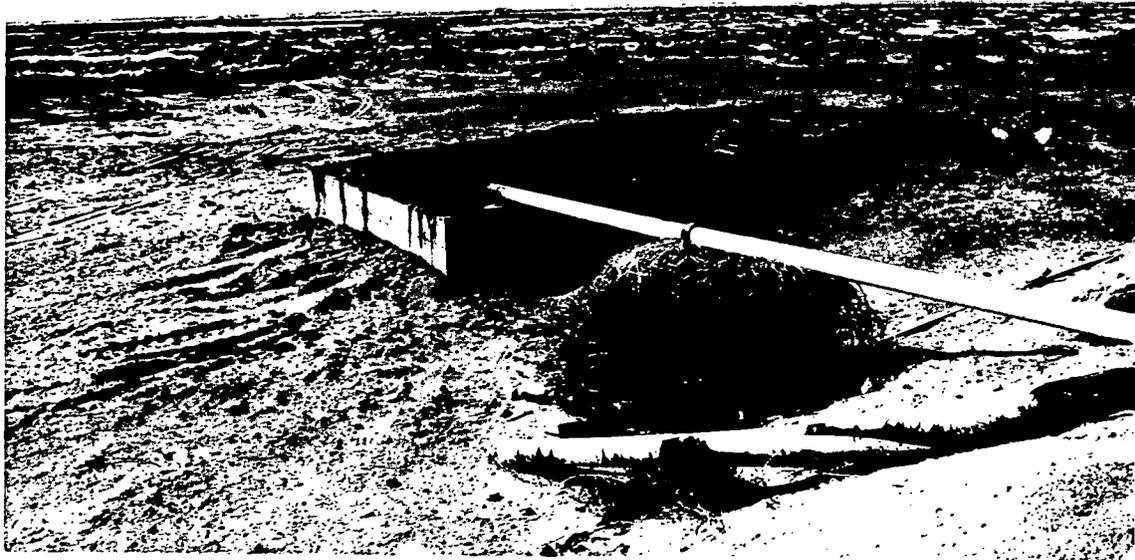
**CANNOT BE IMPROVED**

**DUE TO**

**THE CONDITION OF**

**THE ORIGINAL**

**GANDY MARLEY, INC. LANDFARM INSPECTION (PHOTOS BY OCD)**



**PHOTO NO. 1      DATE: 04/4/97**



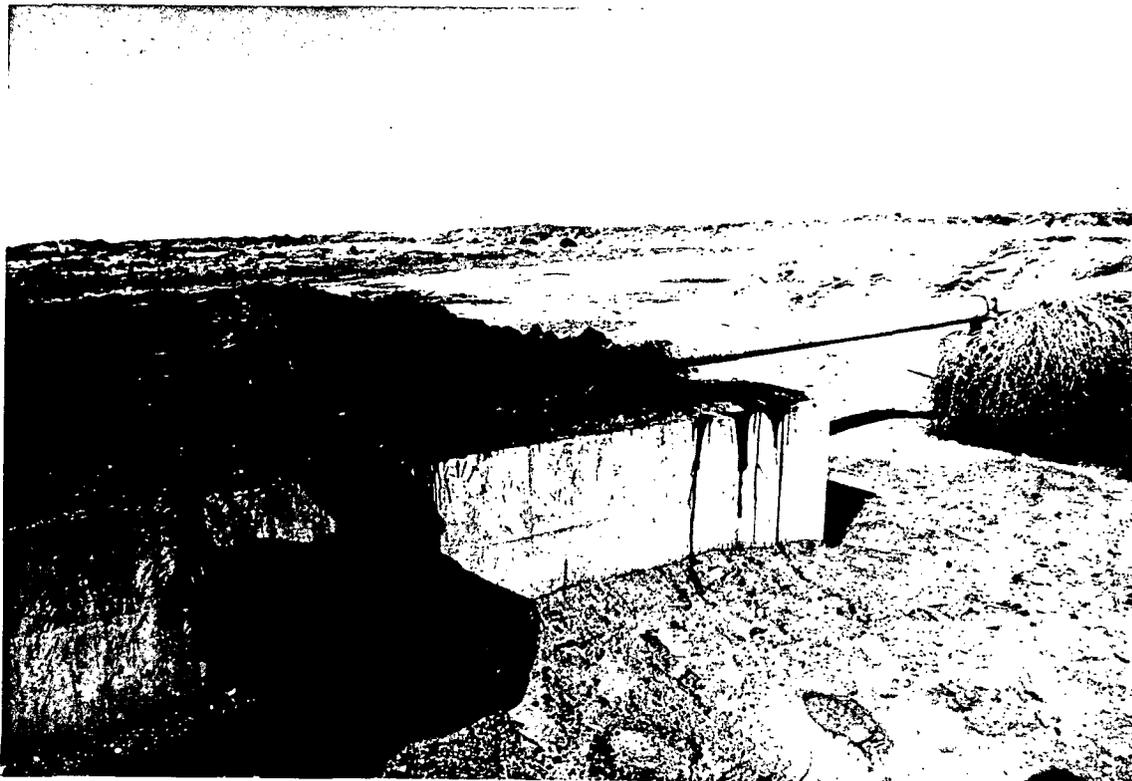
**PHOTO NO. 2      DATE: 04/4/97**

**GANDY MARLEY, INC. LANDFARM INSPECTION (PHOTOS BY OCD)**



**PHOTO NO. 3**

**DATE: 04/4/97**



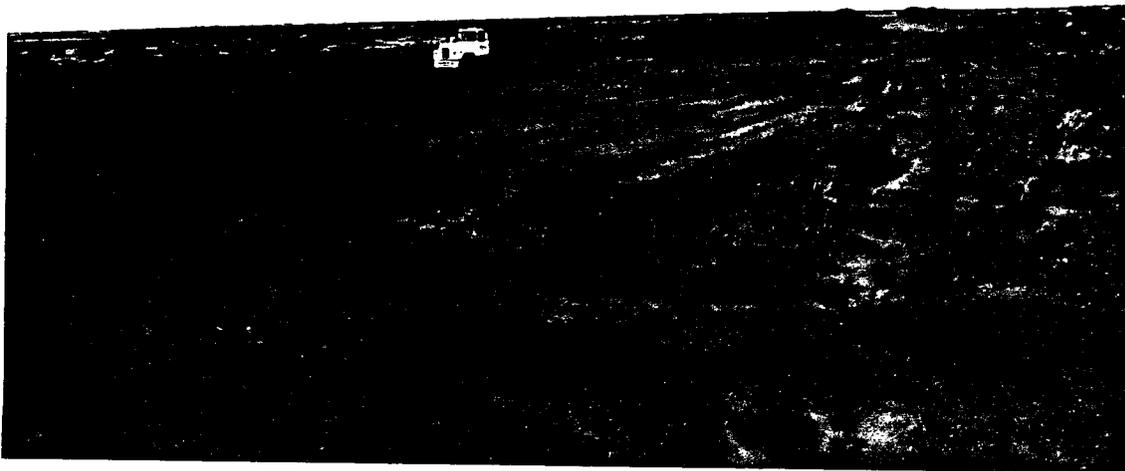
**PHOTO NO. 4**

**DATE: 04/4/97**

**GANDY MARLEY, INC. LANDFARM INSPECTION (PHOTOS BY OCD)**



**PHOTO NO. 5      DATE: 04/4/97**



**PHOTO NO. 6      DATE: 04/4/97**

GANDY MARLEY, INC. LANDFARM INSPECTION (PHOTOS BY OCD)

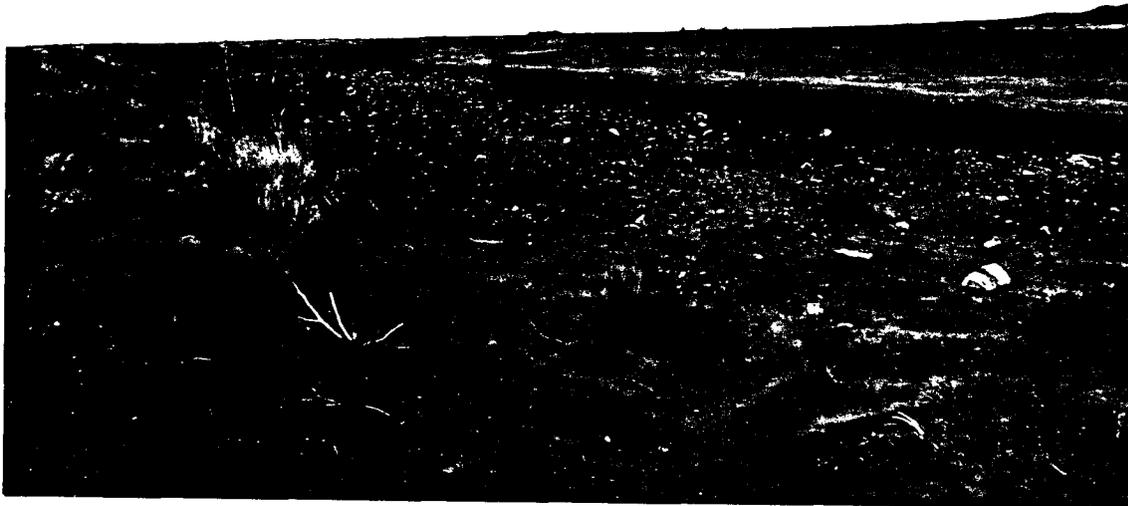


PHOTO NO. 7      DATE: 04/4/97

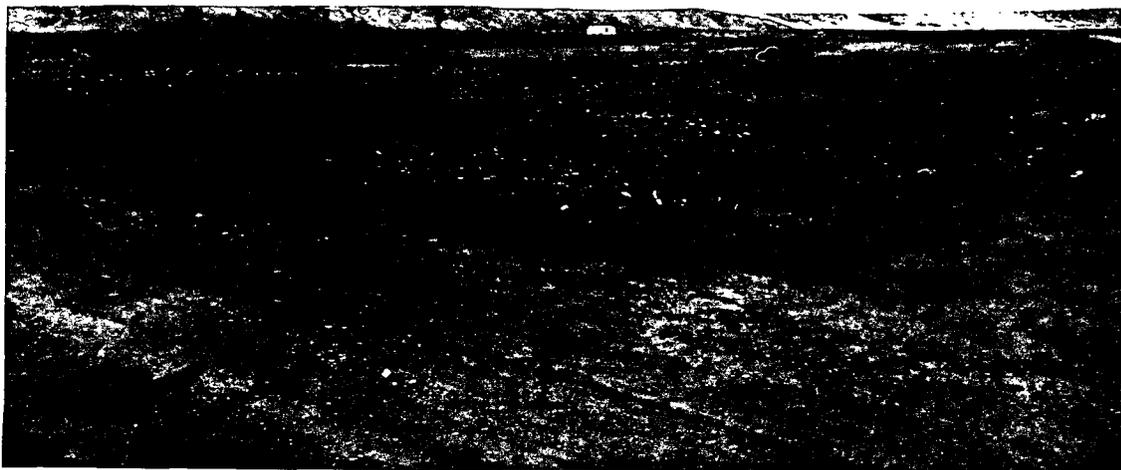
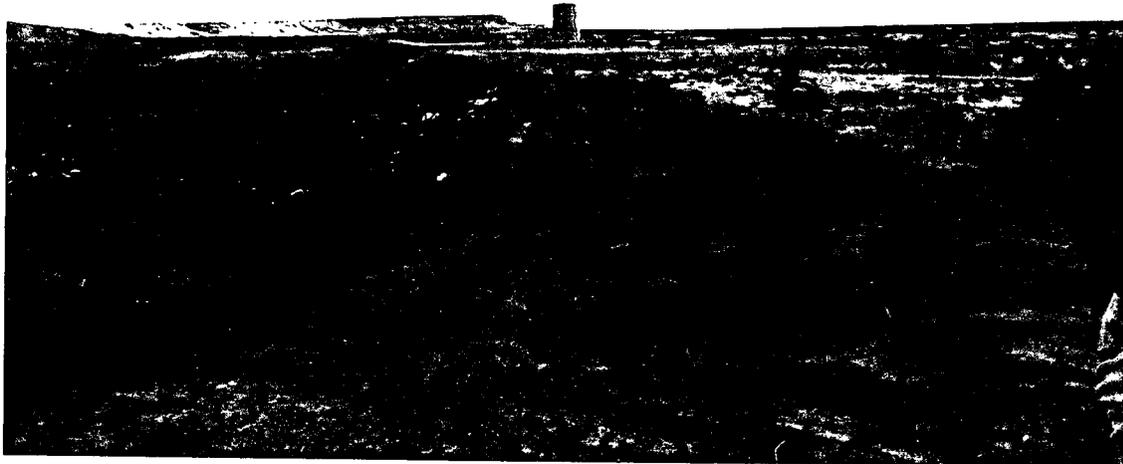


PHOTO NO. 8      DATE: 04/4/97

**GANDY MARLEY, INC. LANDFARM INSPECTION (PHOTOS BY OCD)**

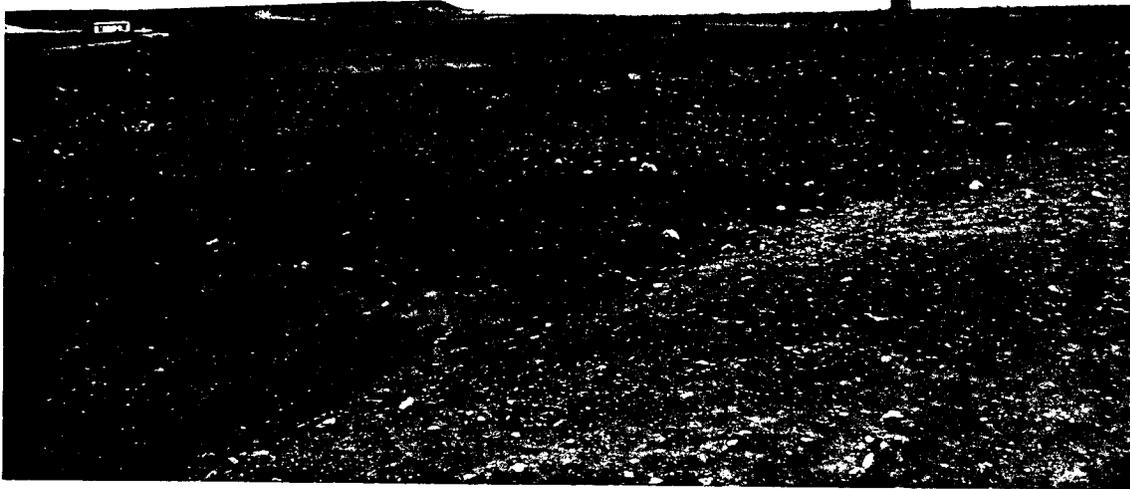


**PHOTO NO. 9      DATE: 04/4/97**



**PHOTO NO. 10      DATE: 04/4/97**

**GANDY MARLEY, INC. LANDFARM INSPECTION (PHOTOS BY OCD)**



**PHOTO NO. 11      DATE: 04/3/97**

**Chris Eustice**

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**From:** Wayne Price  
**To:** Chris Eustice  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** Gandy-Marley Landfarm Site Inspection  
**Date:** Tuesday, July 25, 1995 7:56AM  
**Priority:** High

**Ref:** Gandy-Marley Landfarm (NM-711-1-0020)

Performed initial site inspection, met with Larry Gandy, facility has only recieved approximately 300 yards of material. Presently there is two cells, both bearmed.

Took pictures of facility.

This facility is also permitted for UST soils permitted by NMED. Recommended that NMOCD side of landfarm (North) be identified with a small sign.

Reviewed NMOCD District I file; The background sample information does not include the general chemistry information, will check with Larry Gandy.



MEMORANDUM OF MEETING OR CONVERSATION

OR  
CONSERVATION  
DIVISION

Telephone

Personal

Time 8:00 AM

Date 7-25-95

Originating Party

Other Parties

WAYNE PRICE - OGD HOBBS

CHRIS EUSTICE

Subject GANDY - MARLEY LANDFARM

Discussion

Wayne went to inspect the facility.

He noted a few minor problems:

- (1) Background analytical was not taken in the middle of the landfarm
- (2) Gen chemistry was not run.

Conclusions or Agreements

I told Wayne I was not aware of these problems because I have not received the background analytical

I told Wayne I'll call Gandy

Signature

Signed

*[Handwritten Signature]*



Gandy Marley Land Farm

4-4-97



Gandy Marley Land Farm

4-4-97



Gandy Marley Land Farm

4-4-97



Gandy Marley Land Farm

4-4-97



Gandy Morley

Land Farm

4-4-97

Cell 1



Gandy Marley Land Farm

cell 4

4-4-97



Gandy Marley LAND FARM

Cell 3

4-4-97



Gandy Marley Land Farm

Cell 1

4-4-97



Gandy Marley Land Farm

Cell 1

4-4-97



Gandy Marley Land Farm

Cell 2

4-4-97



Gandy Mathey

LAND FARM

Cell 1

41-4-97