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**INSPECTIONS &
DATA**



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 9, 2005

Mr. Robert G. Hall
Lea Land, Inc.
1300 W. Main St.
Oklahoma City, OK 73106

Re: Surface Waste Management Facility
NMOCD Permit NM-1-035

Dear Mr. Hall:

On February 10, 2005, I inspected the facility shown above. I found everything in order and consider the site to be very well managed.

Please extend my thanks to Mr. Kin Slaughter for his cooperation during my visit.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Engineer

cc: NMOCD, Hobbs





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

January 27, 2003

Lori Wrotenberg

Director

Oil Conservation Division

Mr. Robert G. Hall
Lea Land, Inc.
1300 West Main St.
Oklahoma City, OK 73106

**RE: Surface Waste Management Facility Inspection Report
Lea Land, Inc. Commercial Surface Waste Management Facility
Section 32, Township 20 South, Range 32 East, NMPM,
Lea County, New Mexico**

Dear Mr. Hall:

The New Mexico Oil Conservation Division (OCD) inspected the Lea Land, Inc. (Lea Land) surface waste management facility at the above location on November 21, 2002.

Overall the OCD found Lea Land to have a well maintained facility with good security. Attachment 1 lists the permit deficiencies found at Lea Land during the inspection and file review. Lea Land 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. Lea Land must respond to the permit deficiencies by February 27, 2003.

A review of Lea Land file finds that financial assurance for the full amount of \$66,447 is on file. The Letter of Credit is current and the expiration date is April 24, 2006.

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

Sincerely,

Martyne J. Kieling
Environmental Geologist

xc with attachments: Hobbs OCD Office

**ATTACHMENT TO OCD 711 PERMIT APPROVAL
PERMIT WM-01-035
LEA LAND, INC.**

**Section 32, Township 20 South, Range 32 East, NMPM, Lea County, New Mexico
(January 27, 2003)**

LANDFILL CONSTRUCTION

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) permit number; c) location by section, township and range; and c) emergency phone number.

The facility is secured with fence and locking gate and has a sign at the entrance. The sign is in good conditions and is legible from 50 feet and contains all items required in the permit (see photo 1).

2. Landfill waste cells may not be constructed within one hundred (100) feet of the boundary of the facility.

Setbacks from facility boundary have been maintained.

3. Landfill cells may not be constructed within twenty (20) feet of any pipeline crossing the facility. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility must have surface markers identifying the location of the pipelines.

Setbacks have been maintained.

4. All above-ground tanks, saddle tanks, drums, buckets or containers located at the facility and containing materials other than fresh water must be placed on an impermeable pad with curb containment. The pad and curb containment must be able to hold one and one-third the volume of the largest tank or all interconnected tanks. The tanks and containers must be labeled as to contents and hazards.

Container storage is located near the office/entrance area and is on pad and curb containment.

OVERALL FACILITY OPERATION

5. The landfill cells may not contain any free liquid. Any ponding of precipitation must be removed within 24 hours of discovery.

Some precipitation had ponded in the low end of the landfill from a recent rain

event (see Photo 2). Lea Land must remove this liquid with in 24 hours of discovery.

6. Cover material must be applied to the working face of the landfill at the end of each day to control odors, vectors, and blowing litter.

Cover material has not been necessary for the shipments of soil received thus far at the landfill (see photo 3).

7. 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.

There was no stray litter observed.

8. To prevent over-topping all ponds that contain liquids must have a minimum freeboard of one and a half (1 ½) feet. A device or mark must be installed in the ponds to accurately measure freeboard.

The pond was not inspected at this time.

9. Analytical results regarding leachate collection pond solids or liquids must be submitted to the OCD Santa Fe office, with a copy to the Hobbs District office, along with any request to remove the liquids or solids.

To date there have been no requests made for removal of the liquids or solids from the leachate collection pond.

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

The pond was not inspected at this time.

11. To protect migratory birds, all tanks exceeding 16 feet in diameter and exposed pits and ponds shall be screened, netted or covered. An exception may be granted upon showing through written application that an alternative method will protect migratory birds or that the facility is not hazardous to migratory birds. OCD application Form C-134 must be used.

The OCD does not have a Form C-134 on file for the leachate collection pond. Please find enclosed a form C-134 for your use.

12. Within 24 hours of receiving notification from the OCD that an objectionable odor has been detected or reported, the facility must implement the response procedure outlined in the permit.

To date the OCD has not received any notification regarding odors at the facility.

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

The OCD has not received any requests from Lea Land regarding any design changes or modifications.

LANDFARMING OPERATION

14. **It is the OCD's understanding that there is no landfarming currently taking place at the facility.**

REPORTING AND RECORD KEEPING

15. Lea Land 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.

There were no problems associated with Rule 116 observed at this time.

16. Records of facility, landfill cell and pond inspections and any maintenance must be kept and maintained for OCD review.

Inspection reports were not reviewed at this time. Please submit the records for the landfill and pond inspections for January 1, 2002 through December 31, 2002.

17. Records of leachate collection system inspection and any maintenance must be kept and maintained for OCD review.

Inspection reports were not reviewed at this time. Please submit the records for the leachate collection system inspections for January 1, 2002 through December 31, 2002.

18. Lea Land must submit a yearly report regarding the leachate collection system and collection pond. The report must include the volume of leachate removed from the system, dates fluid was removed, and any maintenance or repairs on the system.

The OCD files were reviewed. Lea Land has not submitted a yearly report regarding the leachate collection system or the collection pond. Please submit a report for the years 2001 and 2002.

19. Records of the landfarm soil laboratory analyses and the sampling locations must be maintained at the facility for OCD review.

Analyses were not reviewed because it is the OCD's understanding that there has

been no landfarming to date at the facility.

20. The Attachment 9, "Routine Inspection and Maintenance Plan," of the Lea Land corrected application proposal dated November 20, 2000 must be followed.

The OCD did not review the Attachment 9 documentation at this time.

21. Comprehensive records of all material disposed of at the facility must be maintained at the facility. Lea Land must 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 material in the facility. Records shall be maintained for a period of not less than five years.

Disposal records were reviewed and all was in order.



Photo 1. Facility entrance sign.

Date in camera was incorrect.



Photo 4. NMED Solid Waste Landfill in operation.



Photo 2. NMOCD Landfill looking northeast. Rain has collected in the low end of the landfill.



Photo 5. NMED Solid Waste Landfill in operation.



Photo 3. Landfill has had a few shipments of contaminated soil and other oilfield material.