NM2 - 12

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 19, 2007

Mr. Rodney Bailey
Environmental Specialist
MidContinent SBU
Chevron North America Exploration and Production Company
15 Smith Road
Midland, Texas 79705

RE: February 21, 2007 Inspection Summary of Centralized Landfarm
Centralized Surface Waste Management Facility Permit NM-2-0012
W/2 of Section 17, Township 24 South, Range 36 East, NMPM
Lea County, New Mexico

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) appreciates Chevron's participation and involvement in the February 21, 2007 inspection of the Chevron Centralized Landfarm Permit NM-2-012 located in the W/2 of Section 17, Township 24 South, Range 36 East, NMPM of Lea County, New Mexico. OCD determined at this inspection that the April 2005 temporary suspension of sampling and submission of treatment (vadose) zone monitoring reports was premature.

The results of the composite samples obtained from Cells 23 and 26 (see the attached results) confirm that the contaminated soils have not achieved the remediation standards specified in Condition 8 of the Landfarm Operations provisions of permit NM-2-012. Condition 8 states "soils to be left in place may be considered remediated when a laboratory measurement of total petroleum hydrocarbon (TPH) in the pervious lift is less than 500 ppm, the sum of all BTEX is less than 50 ppm, and benzene is less than 10 ppm." The attached laboratory analytical results demonstrate that THP concentrations from the February 21, 2007 composite samples of Cells 23 and 26 are 1600 ppm and 5000 ppm, respectively.

Based upon this new information, the OCD requires Chevron to immediately re-initiate quarterly vadose zone monitoring and reporting for Cells 17 through 26. Chevron must analyze composite samples of the contaminated soils from each cell (Cells 17 through 26) in order to demonstrate that the remediation standards have been achieved. Chevron shall continue quarterly vadose zone monitoring and reporting until the contaminated soils are remediated. After Chevron adequately demonstrates to the OCD that all of the remaining cells have achieved the

remediation standards, OCD will require Chevron to submit a closure plan for review and approval.

If you have any questions, regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Brad A. Jones
Environmental Engineer

BAJ/baj

Attachment - 1

cc: OCD District I Office, Hobbs
Mark Larsen, Larsen & Associates, Inc., Midland, Texas 79710

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

COVER LETTER

Friday, March 09, 2007

Brad Jones
NM Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

TEL: (505) 476-3491
FAX (505) 476-3462

RE: Chevron USA

Order No.: 0702247

Dear Brad Jones:

Hall Environmental Analysis Laboratory, Inc. received 2 sample(s) on 2/22/2007 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely.

Andy Freeman, Business Manager
Nancy McDuffie, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001

2007 MAR 12 AM 11 25

nelac

4901 Hawkins NE • Suite D • Albuquerque, NM 87109
505.345.3975 • Fax 505.345.4107
www.hallenvironmental.com

Hall Environmental Analysis Laboratory, Inc.

Date: *09-Mar-07*

CLIENT:	NM Oil Conservation Division	Client Sample ID:	Cell 23 Comp
Lab Order:	0702247	Collection Date:	2/21/2007 10:11:00 AM
Project:	Chevron USA	Date Received:	2/22/2007
Lab ID:	0702247-01	Matrix:	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/24/2007 2:15:01 AM
Benzene	ND	0.050		mg/Kg	1	2/24/2007 2:15:01 AM
Toluene	ND	0.050		mg/Kg	1	2/24/2007 2:15:01 AM
Ethylbenzene	ND	0.050		mg/Kg	1	2/24/2007 2:15:01 AM
Xylenes, Total	ND	0.10		mg/Kg	1	2/24/2007 2:15:01 AM
Surr: 4-Bromofluorobenzene	89.0	68.2-109		%REC	1	2/24/2007 2:15:01 AM
EPA METHOD 9056A: ANIONS						Analyst: **TES**
Chloride	1.1	0.30		mg/Kg	1	3/5/2007 2:33:51 PM
EPA METHOD 418.1: TPH						Analyst: **BL**
Petroleum Hydrocarbons, TR	1600	100		mg/Kg	5	2/27/2007

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: *09-Mar-07*

CLIENT:	NM Oil Conservation Division	Client Sample ID:	Cell 26 Comp
Lab Order:	0702247	Collection Date:	2/21/2007 10:35:00 AM
Project:	Chevron USA	Date Received:	2/22/2007
Lab ID:	0702247-02	Matrix:	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**
Methyl tert-butyl ether (MTBE)	ND	0.10		mg/Kg	1	2/24/2007 2:45:07 AM
Benzene	ND	0.050		mg/Kg	1	2/24/2007 2:45:07 AM
Toluene	ND	0.050		mg/Kg	1	2/24/2007 2:45:07 AM
Ethylbenzene	ND	0.050		mg/Kg	1	2/24/2007 2:45:07 AM
Xylenes, Total	ND	0.10		mg/Kg	1	2/24/2007 2:45:07 AM
Surr: 4-Bromofluorobenzene	88.8	68.2-109		%REC	1	2/24/2007 2:45:07 AM
EPA METHOD 9056A: ANIONS						Analyst: **TES**
Chloride	ND	1.5		mg/Kg	5	3/5/2007 2:51:15 PM
EPA METHOD 418.1: TPH						Analyst: **BL**
Petroleum Hydrocarbons, TR	5000	200		mg/Kg	10	2/27/2007

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- H Holding times for preparation or analysis exceeded
- J Analyte detected below quantitation limits
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- RL Reporting Limit
- S Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: NM Oil Conservation Division
Project: Chevron USA
Work Order: 0702247

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: SW9056A									
Sample ID: MB-12430		*MBLK*			Batch ID: **12430**		Analysis Date:		3/5/2007 12:14:36 PM
Chloride	ND	mg/Kg	0.30						
Sample ID: LCS-12430		*LCS*			Batch ID: **12430**		Analysis Date:		3/5/2007 12:32:01 PM
Chloride	15.17	mg/Kg	0.30	101	90	110			
Method: E418.1									
Sample ID: MBLK-12399		*MBLK*			Batch ID: **12399**		Analysis Date:		2/27/2007
Petroleum Hydrocarbons, TR	ND	mg/Kg	20						
Sample ID: LCS-12399		*LCS*			Batch ID: **12399**		Analysis Date:		2/27/2007
Petroleum Hydrocarbons, TR	109.6	mg/Kg	20	110	82	114			
Sample ID: LCSD-12399		*LCSD*			Batch ID: **12399**		Analysis Date:		2/27/2007
Petroleum Hydrocarbons, TR	107.1	mg/Kg	20	107	82	114	2.25	20	
Method: SW8021									
Sample ID: MB-12374		*MBLK*			Batch ID: **12374**		Analysis Date:		2/26/2007 3:12:43 PM
Methyl tert-butyl ether (MTBE)	ND	mg/Kg	0.10						
Benzene	ND	mg/Kg	0.050						
Toluene	ND	mg/Kg	0.050						
Ethylbenzene	ND	mg/Kg	0.050						
Xylenes, Total	ND	mg/Kg	0.10						
Sample ID: LCS-12374		*LCS*			Batch ID: **12374**		Analysis Date:		2/24/2007 1:15:01 AM
Methyl tert-butyl ether (MTBE)	0.3747	mg/Kg	0.10	93.7	67.9	135			
Benzene	0.2740	mg/Kg	0.050	91.3	62.7	114			
Toluene	1.865	mg/Kg	0.050	124	68.2	121			S
Ethylbenzene	0.3780	mg/Kg	0.050	94.5	71.4	115			
Xylenes, Total	2.195	mg/Kg	0.10	110	65	135			
Sample ID: LCSD-12374		*LCSD*			Batch ID: **12374**		Analysis Date:		2/24/2007 1:45:04 AM
Methyl tert-butyl ether (MTBE)	0.3887	mg/Kg	0.10	97.2	67.9	135	3.67	28	
Benzene	0.2787	mg/Kg	0.050	92.9	62.7	114	1.70	27	
Toluene	1.931	mg/Kg	0.050	129	68.2	121	3.47	19	S
Ethylbenzene	0.3843	mg/Kg	0.050	96.1	71.4	115	1.65	10	
Xylenes, Total	2.237	mg/Kg	0.10	112	65	135	1.89	13	

Qualifiers:

- E Value above quantitation range
- H Holding times for preparation or analysis exceeded
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name NMOCD SF — Date and Time Received: 2/22/2007

Work Order Number 0702247 — Received by AT

Checklist completed by Signature — Date 2/22/07

Matrix — Carrier name Client drop-off

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☐	Not Shipped ☑
Custody seals intact on sample bottles?	Yes ☑	No ☐	N/A ☐	
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☑	No ☐		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		
Water - VOA vials have zero headspace?	No VOA vials submitted ☑	Yes ☐	No ☐	
Water - Preservation labels on bottle and cap match?	Yes ☐	No ☐	N/A ☑	
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	
Container/Temp Blank temperature?	1°	4° C ± 2 Acceptable If given sufficient time to cool.		

COMMENTS:

Client contacted — Date contacted: — Person contacted

Contacted by: — Regarding

Comments:

Corrective Action.

CHAIN-OF-CUSTODY RECORD

HALL ENVIRONMENTAL ANALYSIS LABORATORY
4901 Hawkins NE, Suite D
Albuquerque, New Mexico 87109
Tel. 505.345.3975 Fax 505.345.4107
www.hallenvironmental.com

Client: Brad Jones

Address: 1220 N. St. Francis Dr.
Santa Fe, NM

Phone #: 505-476-3487

Fax #: -3462

QA / QC Package: Std ☑ Level 4 ☐

Other:

Project Name: Chevron USA

Project #: ~~NM-12~~ cjc NM-2-12

Project Manager: Brad Jones

Sampler: Brad Jones / Carl Chávez

Sample Temperature:

ANALYSIS REQUEST

Date	Time	Matrix	Sample I.D. No.	Number/Volume	Preservative $HgCl_2$	Preservative HNO_3	Preservative	HEAL No. 0702247	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gasoline Only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	EDC (Method 8021)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F, Cl, NO_3, NO_2, PO_4, SO_4)	8081 Pesticides / PCB's (8082)	8260B (VOA)	8270 (Semi-VOA)	300.1 Cl				Air Bubbles or Headspace (Y or N)
									1			1									1				
2/21/07	10:11	Soil	Cell 23 Comp				–	-1	X			X									X				
2/21/07	10:35	Soil	Cell 26 Comp				–	-2	X			X									X				

Date	Time	Relinquished By: (Signature)	Received By: (Signature)
2/22/07	7:13	Carl J. Chávez	[signature] 2/22/07

Remarks: Land farm soils - weathered

0713

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 2/21/07 Time: 9:00 Am

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☐ Brine St. ☐ Oilfield Service Co. ☐
Surface Waste Mgt. Facility ☒ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐_____

Discharge Plan No ☒ Yes ☐ GW#_____

FACILITY NAME: Texaco / Chevron SWMF NM-2-012

PHYSICAL LOCATION: _____

Legal: QTR___ QTR W/2 Sec 17 TS 24S R 36E County Lea

OWNER/OPERATOR (NAME) Chevron USA, Inc.

Contact Person: Rodney Bailey Tele:# (432) 687-7123 Cell (432) 894-3519

MAILING ADDRESS: 15 South Road, Midland State TX ZIP 79705

Owner/Operator Rep's: Rodney Bailey / Mark Larson

OCD INSPECTORS: Brad Jones / Carl Chavez

1. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. **All empty drums will 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 will also be stored on an impermeable pad and curb type containment.**

2. 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.**

3. 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 tanks or**

existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

4. 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.

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include 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.

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee 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.

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly?
Does the facility have an EPA hazardous waste number? _____ Yes _____ No
ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES □ NO □ IF NO DETAIL

BELOW. Mark Larsen provided a copy of the last sampling [redacted] treatment (remediation) performed (2004) at the facility. Report indicated large reductions in TPH concentration in Cells 23 and 26 within a 1-2 month period.

Cell 23: 5/10/04 2,286 ppm TPH / 7/12/04 70 ppm TPH

Cell 26: 12/15/04 6616 ppm TPH · 1/10/05 28 ppm TPH

Samples (composite) were obtained from cells 23 + 26.

9. Class V Wells: 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. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☒ YES ☐ IF YES DESCRIBE BELOW ! Undetermined ☐

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

12. Does the facility have any other potential environmental concerns/issues?

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

14. ANY WATER WELLS ON SITE? NO ☑ YES ☐ IF YES, HOW IS IT BEING USED ?

15. Documents reviewed:

Miscellaneous Comments:
Recommending submittal of a closure plan

Photos taken: Yes

Documents Reviewed/Collected:

Entry Sign NM-2-012

Cell 1 of 26 – First active cell at site

Adequate vegetation

Vegetation difficult to establish in caliche

Decontamination station

Decontaminated sampling equipment

Sampling of Cell 23

Mixing composite sample of Cell 23

Composite sample – Cell 23

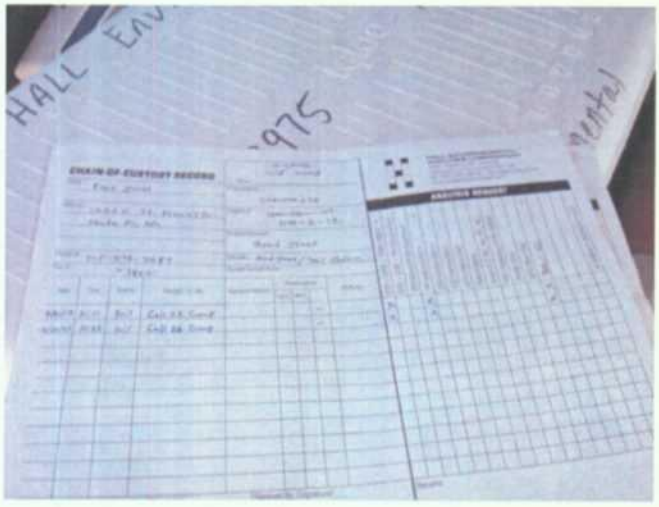
Equipment Decontamination

Sampling of Cell 26

Mixing composite sample – Cell 26

Sampling Equipment Decontamination

OCD samples on ice



OCD Chain of custody

Mark Larsen's split samples of Cell 23 & 26

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 24, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-573-307

Mr. Rodney Bailey
Texaco E&P Inc.
205 East Bender
Hobbs, NM 88240

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0012
Texaco E &P Inc.
W/2 of Section 17, Township 24 South, Range 36 East, NMPM,
Lea County, New Mexico

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) inspected the Texaco E&P Inc. (Texaco) centralized surface waste management facility at the above location on April 12, 2000. This letter is to clarify the letter issued by the OCD on April 20, 2000.

Overall the OCD found Texaco to have a well maintained landfarm with good security. The OCD inspection and file review of Texaco **indicate no permit deficiencies**. Attachment 1 lists the permit requirements reviewed during the inspection and file review. **No response is necessary to this inspection report.**

A review of Texaco's financial assurance finds that Texaco's $50,000 State wide blanket bond No. 5858777 is current and active.

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

Sincerely,

Martyne J. Kieling
Environmental Geologist

xc: Hobbs OCD Office

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 20, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-573-300

Mr. Rodney Bailey
Texaco E&P Inc.
205 East Bender
Hobbs, NM 88240

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0012
Texaco E &P Inc.
W/2 of Section 17, Township 24 South, Range 36 East, NMPM,
Lea County, New Mexico

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) inspected the Texaco E&P Inc. (Texaco) centralized surface waste management facility at the above location on April 12, 2000.

Overall the OCD found Texaco to have a well maintained landfarm with good security. The OCD inspection and file review of Texaco indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Texaco during the inspection and file review. Attachment 2 contains photographs taken during the inspection. Texaco 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. Texaco must respond to the permit deficiencies by May 22, 2000.

A review of Texaco's financial assurance finds that Texaco's $50,000 State wide blanket bond No. 5858777 is current and active.

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-01-0012
TEXACO E&P, INC.
W/2 of Section 17, Township 24 South, Range 36 East, NMPM,
Lea County, New Mexico
(April 20, 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 (see photo 1).

2. Berming: An adequate berm will be constructed and maintained to prevent runoff and runon 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. Contaminated soils may not be placed within one hundred (100) feet of the neighboring property boundary or within twenty five feet of the facility boundary. 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. Cells 1 and 2 have been filled and construction is completed on Cells 5 and 6.

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.

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

Cells were clean, no plastic or trash was evident in the landfarm cells (see photos 2 and 3).

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.

N/A There are no above ground tanks located at the facility.

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.

N/A There are no sumps or valve catchments located at the facility.

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.

N/A There are no impoundments located at the facility.

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.

N/A

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.

N/A

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 weekly 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 1999.

16. H_2S Screening: H_2S screening must be recorded and maintained.

N/A

17. Waste Acceptance and Disposal Documentation: Comprehensive records of all material disposed of at the surface waste management facility must be maintained those records may 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 for waste received indicate all waste acceptance and disposal records are being kept and maintained as required.

ATTACHMENT 1:
Texaco E&P, Inc. Permit NM-02-0012

Photo 1 04-12-00
Sign at locked gate

Photo 2 04-12-00 Looking North
From the Southeast corner of the landfarm.

Photo 3 04-12-00 Looking West
From the Southeast corner of the landfarm