

NM -

39

**GENERAL
CORRESPONDENCE**

YEAR(S):

1995

cc *Robert Anderson*

STATE OF NEW MEXICO



OIL CONSERVATION DIVISION ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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OIL CONSERVATION DIVISION

'95 AUG 14 AM 8 52 HOBBS DISTRICT OFFICE

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

August 4, 1995

Mr. Steve Pearce
Owner of Lea Fishing Tools Inc.
3324 Lovington Hwy
Hobbs, New Mexico 88240

Dear Steve,

This letter is in response to Lea Fishing Tools Inc. (LFT) request to install and operate a small landfarm to be located at the above address in order to treat waste sludge that is normally generated in the BOP cleaning area sump.

During our visit on July 6, 1995 you indicated to us that LFT anticipates an average of 2 to 3 drums of this BOP sump waste per year. You also indicated that you have accumulated approximately 8 to 10 drums of this same material and would like to utilize the new landfarm to treat this waste also.

Since this waste was determined to be RCRA non-exempt service company waste, LFT agreed to sample the waste to determine if it was RCRA hazardous waste.

It appears due to the small quantities of waste involved and the fact that your facility is classified as an oilfield service company facility, subject to the Water Quality Control Commission regulations, you will not be required to obtain a permit for the landfarm pursuant to NMOCD rule 711 (attached).

Please note however that under rule 711 A.3.b. it specifically points out in part, that in order to maintain your exemption your landfarm must not harm fresh water, public health or the environment.



Please note the NMOCD District I office has reviewed your request and also has conferred with our NMOCD Environmental Bureau Chief Mr. Roger Anderson on this issue and hereby approves your request with the following conditions:

1. Only Non-Hazardous RCRA oilfield related waste generated on site shall be treated in the landfarm.
2. LFT will provide information on the new landfarm cell when constructed; such as location in yard, security, size, design of cell, and operating plans.

Note: the design of the cell shall include as a minimum, some type of impermeable liner under the contaminated soil and a berm constructed around the cell to prevent rain run-off, with a freeboard of a minimum of one foot.

3. At least one treatment zone monitoring background sample will be taken at approximately three feet below the proposed cell. The soil sample will include at a minimum TPH and BTEX using EPA approved methods.
4. No waste with free liquids will be allowed in the cell.
5. The cell will be maintained at all times to control blowing dust, nuisance odors, and any other factors decided by the NMOCD that in its determination could be detrimental to the surrounding area that could cause harm to fresh water, public health or the environment.
6. LFT will maintain all records on site, such as type, volume and quantities of waste placed in the landfarm cell, dates, lab analysis, and bio-remediation notes, etc.
7. Final treatment/remediation levels will be pursuant to NMOCD "Guidelines for Remediation of Leaks, Spills and Releases" (attached); and the removal and final disposition of all treated waste in the landfarm cell will require approval from the NMOCD District I office.
8. Upon cessation of operations, LFT will ensure that all waste remaining in the cell has been treated or remediated down to levels per the NMOCD guidelines or is removed from the landfarm cell and disposed of in an NMOCD approved manner.

Please find enclosed for your records the on site-field report for my visit on August 1, 1995. Please note that item #1 listed under conclusions/agreements should be supplied to this office along with the above items in the condition.

Please be advised approval of this landfarm cell does not relieve LFT of liability should your operation result in actual pollution of surface waters, ground water or the environment. In addition, NMOCD approval does not relieve LFT of responsibility from compliance with any other federal, state or local laws and/or regulations.

If you have any questions please do not hesitate to call or write and good luck in your new operation.

Sincerely yours,

A handwritten signature in cursive script that reads "Wayne Price".

Wayne Price-Environmental Engineer

cc: Jerry Sexton-District I Supervisor
Roger Anderson-Environmental Bureau Chief

attachments-3

STATE OF NEW MEXICO
NMOCD District I

INTER-OFFICE MEMO

To file: Lea Fishing Tools Inc.
3324 Lovington HWY
Hobbs, NM
505-393-2415

Date: August 1, 1995

Time: 8:00 am

Telephone call: _____ Meeting: _____ Other: X ON SITE

Person called or attending:

Steve Pearce-Lea Fishing Tool (LFT)-Owner
Bob Allen-Safety & Envr. Solutions Inc. (Consultant)
Dyke Browning- "
Wayne Price-NMOCD

REFERENCE: On Site Visit-Field Inspection Report.

Subject: Solid waste sampling and future on-site landfarm operations.

Comments:

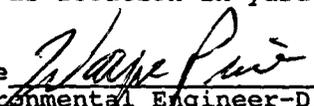
The previous composite sample taken from the waste on site indicated that it slightly exceeded the RCRA TCLP regulatory limits for benzene. Therefore LFT's consultant recommend that they re-sample each container in order to determine which one was causing the problem.

Work on site by LFT's consultant included segregating the liquid waste from the solid waste, identifying recyclable and usable products, and sampling to determine if any of the waste is classified as hazardous.

LFT has selected an area in the southwest part of their yard for landfarming this material and preliminary excavation has begun.

Conclusions/Agreements:

1. LFT will provide the NMOCD a record of the work on site as mentioned above, including the complete analytical results and disposition of all materials.
2. LFT will provide information on the new landfarm cell when constructed; such as location in yard, size, design of cell, etc.

Wayne Price 
NMOCD Environmental Engineer-District I



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JERRY SEYFON
ROBERT ANDERSON

August 30, 1995

Mr. Wayne Price
Environmental Engineer
Oil Conservation Division
P.O. Box 1980
Hobbs, New Mexico 88240

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JOE HOBBS
OFFICE

Dear Mr. Price,

Regarding your notification of approval of Lea Fishing Tools, Inc.'s request to install and operate a small landfarm, the following report and assurances of compliance are being submitted for your consideration.

Overview

In July of 1995, Lea Fishing Tools, Inc. (Lea Fishing Tools) secured the services of Safety and Environmental Solutions, Inc. to complete all necessary sampling and testing of our on hand BOP sump waste materials. Approximately 17 drums were composited and samples analyzed by the Cardinal Laboratory facility.

Initial results of a composite sample of all of the drums was reported, finding excess levels of benzene. Two drums of liquid waste were combined, going into Waste Oil Recycling, and therefore taken out of the composite sample. Two drums were found to be hydraulic fluid, and placed into Product Storage. The drums remaining were each tested separately for benzene and are well below regulatory limits of benzene.

Waste Landfarming Plan

Per your approval contingency list, Lea Fishing Tools will:

- 1) Treat only non-hazardous RCRA oilfield waste, generated on site.
- 2) Lea Fishing Tools has attached full disclosure of the landfarm cell (See E-1 & E-3), including yard location, security, dimensions, design and operating plans (See E-2). Per instructions, cell will be lined with a 6 mil plastic, preventing contaminant migration, and a rain run-off prevention berm, with a freeboard of a minimum of one foot.
- 3) Five treatment zone monitoring background samples were composited from within the 45' X 20' cell site area (E-1). Samples included TPH and BTEX analyzed using EPA approved methods. All samples for background analyzed at well below regulatory limits.

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**JOHN HOBBS
OFFICE**

- 4) No free liquids from waste, will be allowed in the cell.
- 5) The cell will be maintained at all times, to assure it's existence will never be a public nuisance, nor harmful to public health and/or the environment.
- 6) Lea Fishing Tools will be responsible for maintaining all necessary and required records pertaining to the cell.
- 7) Lea Fishing Tools will requisition approval from the NMOCD District I office for any removal and final disposition of any and all landfarm cell treated waste, noting all final treatment/remediation levels are pursuant to NMOCD guidelines.
- 8) Should Lea Fishing Tools cease operating, we will ensure all waste materials left in cell will either be treated down to NMOCD approved levels, or will be removed under NMOCD auspices.

Enclosures - Figures and Laboratory Test Results

Please find enclosed for your records (E-1) Lea Fishing Tool Composite Sample Plan of Proposed Bioremediation Cell Site, (E-2) Operation Plans and (E-3) Lea Fishing tool Bioremediation Project Plot Plan.

Also enclosed for your records are test results from Cardinal laboratories for all tests completed. Earliest test results for TCLP volatiles, semi-volatiles, and inorganics included the aforementioned drums which were removed from the landfarm materials by recycling and reuse as product. Benzene test results are from the remaining drums to be landfarmed. TPH and BTEX results are from the background composite sample establishing baseline in the remediation pit area.

Summary

Lea Fishing Tools fully understands approval for this cell does not relieve any liability should contamination occur, and we will comply with any and all additional local, state and federal laws and/or regulations governing the project.

Thank you for your consideration and approval of our new project.

Sincerely,



Steve Pearce
Owner
Lea Fishing Tools, Inc.

SP/pl
enclosures

LEA FISHING TOOL
COMPOSITE SAMPLE PLAN
OF PROPOSED BIOREMEDIATION CELL SITE

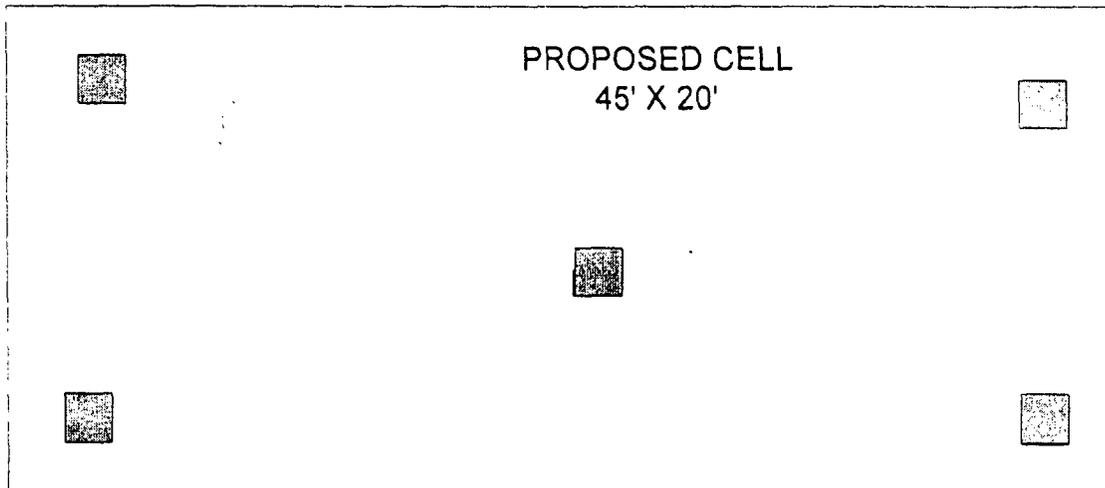
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WOOD HOBBS
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1. Samples will be collected using a soil auger at a depth of 3 feet at each sample location.
2. Samples will be composited & transported under appropriate chain of custody.
3. BTEX and TPH tests will be run on the composite sample.
4. Cell construction will begin only if test results are within acceptable regulatory limits.



1. Cell will be lined with 6 mil plastic to prevent migration of contaminants.
2. A berm will be constructed around the cell with a freeboard of at least one foot.



COMPOSITE SAMPLE POINTS

1 INCH = 8 FEET

(E-1)

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OFFICE

OPERATIONS PLAN

- (1) Landfarm will be maintained in a well-tended and odor-free state.
- (2) Periodic aeration will be provided by turnover of the landfarm material, insuring optimum conditions for naturally occurring bacterial growth and reduction of the overall TPH and BTEX levels.
- (3) Naturally occurring rainfall **may** be supplemented by watering of the site as needed to assure optimal bacterial growth.
- (4) Addition of organics (manure) or nitrogen fertilizer **may** be indicated to hasten overall reduction of TPH levels. If necessary, minimal amounts will be utilized and the overall aesthetic state of the landfarm will be carefully monitored.
- (5) When TPH and BTEX levels are suspected to be below regulatory limits, samples will be taken and analyzed to assure remediation is complete.
- (6) Final closure will only occur after proper documentation and ultimate disposal of the materials is correctly completed and approved by governing agencies.

CAPROCK STREET

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JOHN HOBBS
OFFICE

SOUTH FENCE

LEA FISHING TOOL
BIOREMEDIATION
PROJECT
PLOT PLAN

BIOREMEDIATION
CELL
45' X 20'

STORAGE
BUILDING

54' X 26'

EXISTING WEST FENCE
PROPOSED WEST FENCE

HIGHWAY 18

N

1 INCH = 20 FEET

(E-3)

PREPARED BY

SAFETY & ENVIRONMENTAL SOLUTIONS, INC.



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: SES, Inc.
Address: P.O. Box 1613
City, State: Hobbs, NM 88240

Date: 7/19/95
Lab #: H2089

Project Name: not given
Location: not given
Sampled by: DB
Sample Type: Sludge
Sample ID: Drums (10 EPA SW 846)

Date: 7/10/95
Sample Condition: Intact

Units: ppm

TCLP SEMIVOLATILES

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Pyridine	<0.08	5.0
1,4-Dichlorobenzene	<0.08	7.5
0-Cresol	<0.212	200
m,p-Cresol	<0.938	200
Hexachloroethane	<0.08	3.0
Nitrobenzene	<0.08	2.0
Hexachloro-1,3-butadiene	<0.08	.5
2,4,6-Trichlorophenol	<0.08	2.0
2,4,5-Trichlorophenol	<0.08	400
2,4-Dinitrotoluene	<0.08	0.13
Hexachlorobenzene	<0.08	0.13
Pentachlorophenol	<0.08	100

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METHOD: TCLP SEMIVOLATILES - EPA SW-846;1311/8270


Larry L. Bailey

7/19/95
Date



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LABORATORIES**

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: SES, Inc.
Address: P.O. Box 1613
City, State: Hobbs, NM 88240

Date: 7/19/95
Lab #: H2089

Project Name: not given
Location: not given
Sampled by: DB
Sample Type: Sludge

Date: 7/10/95
Sample Condition: Intact

Sample ID: Drums (10 EPA SW 846)

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Silver	<0.1	5	ppm
Arsenic	<0.1	5	ppm
Barium	0.63	100	ppm
Cadmium	<0.1	1	ppm
Chromium	<0.1	5	ppm
Mercury	<0.0002	0.2	ppm
Lead	0.26	5	ppm
Selenium	<0.1	1	ppm

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METHODS: TCLP INORGANICS (Leachate) - EPA SW-846,1311
- EPA 600/4-91/010;200.7,245.1


Larry L. Bailey

7/19/95
Date



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BTEX ANALYSIS REPORT

Company: SES, Inc.
Address: P.O. Box 1613
City, State: Hobbs, NM

Date: 7/21/95
Lab #: H2089

Project Name: not given
Location: not given
Sampled by: DB
Analyzed by: MG
Sample Type: Sludge

Date: 7/10/95 Time: 3:50pm
Date: 7/21/95 Time: am
Sample Condition: Intact Units: ppm

Samp #	Field Code	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES
1	Drums (10 EPA SW 846)	62.4	309.8	219.2	334.6

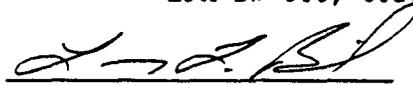
QC Recovery	0.094	0.114	0.111	0.340
QC Spike	0.100	0.100	0.100	0.300
Accuracy	94%	114%	111%	300%

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Methods - GAS CHROMATOGRAPHY
- EPA SW-846; 8020


Larry L. Bailey

7/21/95
Date



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: SES, Inc.
Address: P.O. Box 1613
City, State: Hobbs, NM 88240

Date: 7/28/95
Lab #: H2089

Project Name: not given
Location: not given
Sampled by: DB
Sample Type: Sludge
Sample ID: Drums (10 EPA SW 846)

Date: 7/10/95
Sample Condition: Intact
Units: ppm

TCLP VOLATILES

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Benzene	0.695	0.50
Carbon tetrachloride	<0.02	0.50
Chlorobenzene	<0.02	100.0
Chloroform	<0.02	6.00
1,2-Dichloroethane	<0.02	0.50
1,1-Dichloroethylene	<0.02	0.70
Methyl ethyl ketone	<0.02	200.0
Tetrachloroethylene	<0.02	0.70
Trichloroethylene	<0.02	0.50
Vinyl chloride	<0.02	0.20
1,4-Dichlorobenzene	<0.02	7.50

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METHOD: TCLP VOLATILES - EPA SW-846-8260,1311

Manuel Garbalena

7/28/95
Date



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BTEX ANALYSIS REPORT

Company: SES, Inc.
Address: P.O. Box 1613
City, State: Hobbs, NM 88241

Date: 8/4/95
Lab #: H2116

Project Name: Lea
Location: not given
Sampled by: DB
Analyzed by: BC
Sample Type: Sludge

Date: 8/1/95 Time: a.m.
Date: 8/2/95 Time: p.m.
Sample Condition: Intact Units: ppb

Samp #	Field Code	BENZENE
1	003	120
2	017	<10
3	001	87
4	002	120
5	012	34
6	014	<10
7	015	26
8	010	<10
9	004	240
10	016	119
11	009	<10
12	008	83
13	007	29
14	013	47

QC Recovery	107
QC Spike	100
Accuracy	107 %
Air Blank	<0.001

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Methods - GAS CHROMATOGRAPHY
- EPA SW-846-8260, 5030, GC/MS

Manuel Garbalena

8/4/95
Date



**ARDINAL
LABORATORIES**

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TPH/BTEX ANALYSIS REPORT

Company: SES, Inc.
Address: P.O. Box 1613
City, State: Hobbs, NM 88241

Date: 8/22/95
Lab #: H2147

Project Name: Remediation Background
Location: Lea Fishing Tools

Sampled by: DB Date: 8/18/95 Time: 12:40
Analyzed by: MG/BC Date: 8/21/95 Time: 4:10
Sample Type: Soil Sample Condition: Intact

Units: ppm

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES
1	Remediation Pit	129.5	0.003	0.002	0.001	0.010

QC Recovery	437.0	109	95.2	99.5	330
QC Spike	430.0	100	100.0	100.0	300
Accuracy	102.0%	109 %	95.2%	99.5%	110%
Air Blank	***	<0.001	<0.001	<0.001	<0.001

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Methods - GAS CHROMATOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3540, 3510, OR 3550

Manuel Garbalena
Manuel Garbalena

8/22/95
Date