GW - 17

ENFORCMENT

DATE:

8/27/1982

P 327 406 214

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO	Acid Engineering, Inc.
STREET AND NO.	P.O. Box 753
P.O., STATE AND ZIP CODE	Kilgore, Texas 75662
POSTAGE	$
CERTIFIED FEE	
SPECIAL DELIVERY	
RESTRICTED DELIVERY	
RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED	
RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	
RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	
RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	
TOTAL POSTAGE AND FEES	$
POSTMARK OR DATE	

CONSULT POSTMASTER FOR FEES
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PS Form 3800, Apr. 1976

HEALTH & ENVIRONMENT department

STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISIO
P.O. Box 968, Santa Fe, New Mexico 87504-0
(505) 827-5271
Russell F. Rhoades, M.P.H., Direc

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 27, 1982

Lloyd Bolding
Acid Engineering, Inc.
P.O. Box 753
Kilgore, Texas 75662

Dear Mr. Bolding:

The purpose of this letter is to remind you that Acid west of Hobbs, is in violation of Sections 3-104 and 3-106 Water Quality Control Commission Regulations, since you have been discharging without an approved plan. This letter is an attempt to get you voluntary compliance in regard to this matter. We would like to know when your discharge plan for your facility will be submitted to the Environmental Improvement Division. Include a detailed time schedule stating when the different portions of the discharge Plan will be in operation.

There are several different methods to get a discharge plan approved for your oil well acidizing facility. In Section 3-109.C., pages 24 and 25 of the Water Quality Control Commission Regulations, it states that if the other requirements of the regulations are met and if the discharge plan demonstrates that neither a hazard to public health or undue risk to property will result, then a discharge plan will be approved if it meets one of the following two conditions.

1. That the amount of effluent reaching the subsurface from a surface empoundment will not exceed 0.5 acre-feet per acre per year. The amount of leakage permitted implies that some sort of liner, either natural or artificial, must be employed to reduce the volume of seepage.

2. The person proposing the discharge demonstrates that the approval of the discharge plan will not result in concentrations in excess of standards of Section 3-103 at any place of withdrawal of water for present or reasonably foreseeable future use. As stated in the first paragraph of Section 3-103, these ground water standards are either the numerical standards of 3-103 or the background concentrations of the contaminants in the existing ground water, whichever is greater. The New Mexico WQCC Regulations allow degradation of the ground water up to the limit of the standards.

The chemical analysis of your effluent (copy enclosed) indicates that the pH is very low and the chloride concentrations are very high. These two parameters will be used to determine if and how ground water quality will be affected by your discharge. The EID has analyzed samples from your well and wells surrounding your site (copies enclosed). A comparison of the analyses of your well versus the other wells shows your well has much higher concentrations of several of the ions, most notably chloride, indicating your well has been contaminated, probably by the disposal of your effluent. If you have reason to believe your well has higher concentrations of chlorides and several other constituents for some other reason than stated above, please send us evidence supporting that contention. The contamination of your well, so that ground water standards have been exceeded, shows that you must dispose of your effluent in a different manner than currently used. If you can prove that your well has not been contaminated by your effluent, you must still dispose of your effluent in a different manner than at present. The existing concentration for chloride for you site would be 511.9 mg/l, which exceeds the numerical ground water standard of 250 mg/l and thus, you could not be allowed to increase this concentration. Several alternative methods you may want to consider to dispose of your diluted acid are:

1. Disposing of your wastes in a lined evaporation pond.

2. Disposing of your effluent into the city sewage system (this would not require a discharge plan, but rather arrangements with the City of Hobbs).

3. Have a hazardous waste disposal firm properly dispose of your wastes.

4. Construct a recycle system to reuse your waste.

For any method of disposing your wastes, except number 2 or 3 above, you must provide adaquate provision for both sampling and measuring the quantity of flow of your effluent, and submit monitoring data to the EID as required by the Director.

I hope this summary of the regulations is useful in drawing up your discharge plan. If you have any questions, please do not hesitate to contact me at the above address and telephone. We expect your reply to this letter by September 13, 1982.

Sincerely,

Joel Hubbell

Joel Hubbell
Ground Water Section

JH:dl

cc: John Guinn, EID District IV
Hobbs EID Office
Jack Ellvinger, Hazardous Wastes Section