GW - 94

PERMITS, RENEWALS, & MODS

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 2/29/08

or cash received on _____ in the amount of $ 1700 00

from BJ Services Company

for GW-94

Submitted by: Lawrence Romero Date: 3/5/08

Submitted to ASD by: Lawrence Romero Date: 3/5/08

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

February 28, 2008

UPS AIRBILL

New Mexico Energy, Minerals and
Natural Resources Department
Water Quality Control Commission
Oil Conservation Division

RE: Payment of Discharge Permit GW-094 UNICHEM-Hobbs

In accordance with Water Quality Control Commission (WQCC) Regulations, BJ Chemical Services, as referenced above, under the conditions specified in your letter dated January 29, 2008, has enclosed a payment of $1700.00 made payable to Water Quality Management Fund.

If you have any additional questions or concerns please do not hesitate to call me at 713-860-6850.

Sincerely,

Norman McMillian
Safety and Environmental Specialist

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

January 29, 2008

Mr. Jason Goodwin P.G.
BJ Services Company, USA
707 N. Leech St.
Hobbs, New Mexico 88241

Re: **Discharge Permit GW-094**
UNICHEM-HOBBS

Dear Mr. Goodwin:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **BJ Services Company, USA** (Owner/Operator) UNICHEM-Hobbs is located in the NW/4 NW/4 of Section 34, Township 18 south, Range 38 East, NMPM, Lea County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the Owner/Operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the Owner/Operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Edward J. Hansen of my staff at (505-476-3489) or email edwardj.hansen@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/ejh
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
UNICHEM-HOBBS Oilfield Service Company (GW-094)
DISCHARGE PERMIT APPROVAL CONDITIONS

January 29, 2008

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. However, the Owner/Operator still owes the required $1700.00 renewal permit fee for an oilfield service company.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on December 1, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the Owner/Operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The Owner/Operator shall abide by all commitments submitted in its December 28, 2006 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the Owner/Operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The Owner/Operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The Owner/Operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The Owner/Operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The Owner/Operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The Owner/Operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The Owner/Operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The Owner/Operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The Owner/Operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The Owner/Operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The Owner/Operator shall retrofit all existing tanks before discharge permit renewal. Tanks that

contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The Owner/Operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The Owner/Operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The Owner/Operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The Owner/Operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The Owner/Operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The Owner/Operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The Owner/Operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The Owner/Operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The Owner/Operator shall notify the OCD at least 72 hours prior to all testing.

12. **Underground Process/Wastewater Lines:**

A. The Owner/Operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh

water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The Owner/Operator may use other methods for testing if approved by the OCD.

B. The Owner/Operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The Owner/Operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The Owner/Operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The Owner/Operator shall notify the OCD at least 72 hours prior to all testing.

13. **Class V Wells:** The Owner/Operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. **Housekeeping:** The Owner/Operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The Owner/Operator shall maintain all records at the facility and available for OCD inspection.

15. **Spill Reporting:** The Owner/Operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The Owner/Operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. **OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. **Storm Water:** The Owner/Operator shall implement and maintain run-on and runoff plans and controls. The Owner/Operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The Owner/Operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. **Unauthorized Discharges:** The Owner/Operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. **Vadose Zone and Water Pollution:** The Owner/Operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the Owner/Operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. **Additional Site Specific Conditions:** N/A

21. **Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.
Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new Owner/Operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. **Closure:** The Owner/Operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. **Certification: BJ Services Company, USA (Owner/Operator)**, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

BJ Services Company, U.S.A.
Company Name-print name above

Jo Ann Cobb
Company Representative- print name

Jo Ann Cobb
Company Representative- Signature

Title Mgr. Environmental Services

Date: 2-21-08

Jim Brunner 2-12-08

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, March 03, 2008 4:06 PM
To: 'Norman.McMillian@bjservices.com'
Subject: RE: New Mexico Discharge Permit (GW-094)

Dear Mr. McMillian:

The New Mexico Oil Conservation Division (OCD) hereby approves the minor modification for discharge permit (GW-094) as proposed below. The OCD will place the revised facility map and correspondence in the file for discharge permit (GW-094).

P.S.: Two copies of the discharge permit renewal were sent to you ~35 days ago. According to the OCD's records, the date for your submittal to the OCD of a signed copy of the discharge permit (GW-094) was today (3-3-08). Please sign both copies and submit one copy of the signed permit to the OCD along with the $1,700.00 permit renewal fee (made payable to: "**Water Quality Management Fund**") within 5 days.

Thank you for your cooperation in this matter.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

From: Norman.McMillian@bjservices.com [mailto:Norman.McMillian@bjservices.com]
Sent: Monday, February 25, 2008 10:44 AM
To: Hansen, Edward J., EMNRD
Subject: RE: New Mexico Discharge Permit (GW-094)

Edward,

Attached is a copy of the property map next to our facility at 707 N. Leech St., Hobbs, New Mexico. The outdoor truck wash pad will be sealed up and will not be used.

The property will be used to park trucks and store equipment only. Chemicals will not be stored on the property at this time. If BJ Chemical Services decides to begin storing chemicals we will provide the necessary documentation to OCD before beginning.

This submittal is a minor modification to our Discharge Permit (GW-094). We would appreciate your approval.

If you need any additional information please do not hesitate to contact me. Thanks

Norman McMillian
BJ Chemical Services, U.S.A. Houston, TX
Safety and Environmental Specialist
Cell: 713-594-1344

Office: 713-860-6850

"Hansen, Edward J., EMNRD"
<edwardj.hansen@state.nm.us>

To <Norman.McMillian@bjservices.com>

cc

02/14/2008 06:27 PM

Subject RE: New Mexico Discharge Permit (GW-094)

Norman,

Please submit a map indicating the additional acre in relationship to the existing site and the proposed use for that acre. (It would be a good idea to state that it will not be use for chemical storage.)

Also, please indicate that this submittal is a minor modification to your Discharge Permit (GW-094).

Thank you for you cooperation in this matter. Let me know if you have any questions.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

P.S.: Be sure to mail back your signed discharge permit and renewal fee by end of this month.

From: Norman.McMillian@bjservices.com [mailto:Norman.McMillian@bjservices.com]
Sent: Thursday, February 14, 2008 12:48 PM
To: Hansen, Edward J., EMNRD
Subject: New Mexico Discharge Permit

Edward,

We have recently renewed our Discharge Plan Permit for our facility at 707 N. Leech St., Hobbs, New Mexico. We have leased an adjacent 1 acre lot next to this existing lot. This lot is going to be used to

park vehicles on and other equipment. We will not be storing any chemicals or any thing in that nature. I need to know what we need to do to include this 1-acre lot to satisfy your needs.

Norman McMillian
BJ Services, U.S.A. - Tomball, Texas
Associate District Safety Training Supervisor
Cell: 713-858-4071
Office: 713-860-6850

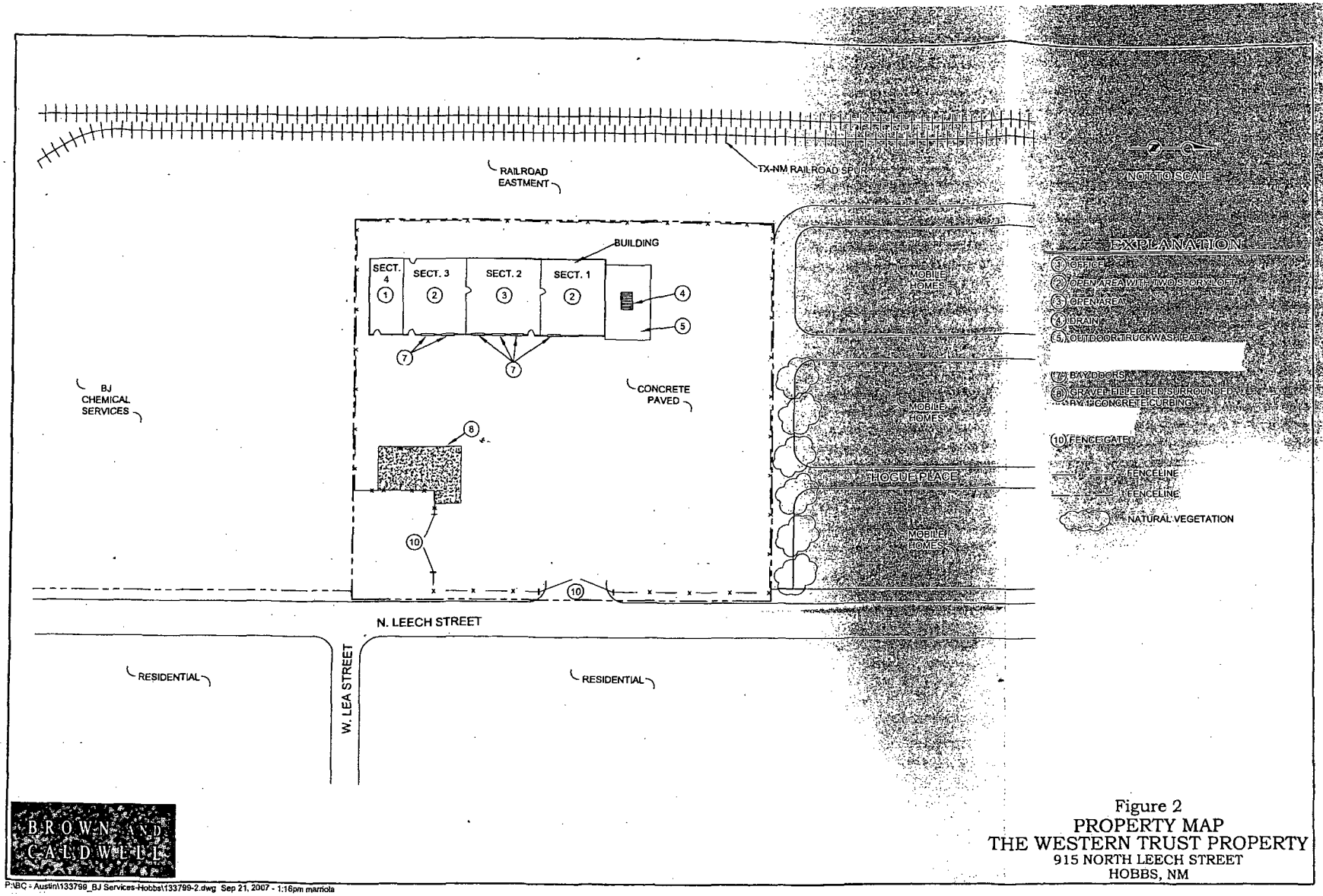

Figure 2
PROPERTY MAP
THE WESTERN TRUST PROPERTY
915 NORTH LEECH STREET
HOBBS, NM

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

January 29, 2008

Mr. Jason Goodwin P.G.
BJ Services Company, USA
707 N. Leech St.
Hobbs, New Mexico 88241

Re: **Discharge Permit GW-094**
UNICHEM-HOBBS

Dear Mr. Goodwin:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **BJ Services Company, USA** (Owner/Operator) UNICHEM-Hobbs is located in the NW/4 NW/4 of Section 34, Township 18 south, Range 38 East, NMPM, Lea County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the Owner/Operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the Owner/Operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Edward J. Hansen of my staff at (505-476-3489) or email edwardj.hansen@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/ejh
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
UNICHEM-HOBBS Oilfield Service Company (GW-094)
DISCHARGE PERMIT APPROVAL CONDITIONS

January 29, 2008

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

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contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

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15. Spill Reporting: The Owner/Operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The Owner/Operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The Owner/Operator shall implement and maintain run-on and runoff plans and controls. The Owner/Operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The Owner/Operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The Owner/Operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The Owner/Operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the Owner/Operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.
Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new Owner/Operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure: The Owner/Operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: BJ Services Company, USA (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, January 29, 2008 4:11 PM
To: 'Jason_Goodwin@bjservices.com'
Subject: RE: Renewal of Discharge Permit GW-094

Jason,
Since the OCD has not received any public comments to date regarding the renewal of your discharge permit, I will send you two copies today via U.S. Mail – please sign both copies and return one (with the permit renewal fee) to the OCD (the cover letter and permit will provide additional details).
Let me know if you have any questions.

From: Jason_Goodwin@bjservices.com [mailto:Jason_Goodwin@bjservices.com]
Sent: Tuesday, January 29, 2008 3:02 PM
To: Hansen, Edward J., EMNRD
Subject: RE: Renewal of Discharge Permit GW-094

No sir. We are still waiting on this.

"My customer is you"

Jason Goodwin P.G.
BJ Chemical Services
Division Safety Training Manager
Phone: 713-860-6851
Cell: 713-805-0284
Fax: 713-860-6880

"Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>

01/29/2008 03:56 PM

To <Jason_Goodwin@bjservices.com>
cc
Subject RE: Renewal of Discharge Permit GW-094

Jason,
Yes, the permit is for the BJ Chemical Services Facility at 707 N. Leech St. in Hobbs.

From: Jason_Goodwin@bjservices.com [mailto:Jason_Goodwin@bjservices.com]
Sent: Tuesday, January 29, 2008 2:47 PM
To: Hansen, Edward J., EMNRD
Subject: Re: Renewal of Discharge Permit GW-094

Is this for Leech Rd?

"My customer is you"

Jason Goodwin P.G.
BJ Chemical Services
Division Safety Training Manager
Phone: 713-860-6851
Cell: 713-805-0284
Fax: 713-860-6880

"Hansen, Edward J., EMNRD" <edwardj.hansen@state.nm.us>

01/29/2008 03:23 PM

To <Jason_Goodwin@bjservices.com>
cc
Subject Renewal of Discharge Permit GW-094

Jason,
Have you received a final copy of the Discharge Permit (GW-094) to sign and return to the OCD (with the renewal fee)?
I have taken the oversight of this permit from Carl Chaves – he was not sure if you had received such.
If you have not received the final copy, I will send two copies (both to be signed and one of the signed copies returned).

Thanks for your cooperation.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 16, 2007

Mr. Jason Goodwin P.G.
BJ Services Company, USA
707 N. Leech St.
Hobbs, New Mexico 88241

Re: **Discharge Permit GW-094**
UNICHEM-HOBBS

Dear Mr. Goodwin:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **BJ Services Company, USA** (Owner/Operator) UNICHEM-Hobbs is located in the NW/4 NW/4 of Section 34, Township 18 south, Range 38 East, NMPM, Lea County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the Owner/Operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the Owner/Operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Carl Chavez of my staff at (505-476-3491) or E-mail carlj.chavez@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/cc
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
UNICHEM-HOBBS Oilfield Service Company (GW-094)
DISCHARGE PERMIT APPROVAL CONDITIONS

August 16, 2007

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. However, the Owner/Operator still owes the required $1700.00 renewal permit fee for an oilfield service company.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on December 1, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the Owner/Operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The Owner/Operator shall abide by all commitments submitted in its December 28, 2006 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the Owner/Operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The Owner/Operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The Owner/Operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The Owner/Operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The Owner/Operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The Owner/Operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The Owner/Operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The Owner/Operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The Owner/Operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The Owner/Operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The Owner/Operator shall retrofit all existing tanks before discharge permit renewal. Tanks that

contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The Owner/Operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The Owner/Operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The Owner/Operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The Owner/Operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The Owner/Operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The Owner/Operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The Owner/Operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The Owner/Operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The Owner/Operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The Owner/Operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh

water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The Owner/Operator may use other methods for testing if approved by the OCD.

B. The Owner/Operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The Owner/Operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The Owner/Operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The Owner/Operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The Owner/Operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The Owner/Operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The Owner/Operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The Owner/Operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The Owner/Operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The Owner/Operator shall implement and maintain run-on and runoff plans and controls. The Owner/Operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The Owner/Operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The Owner/Operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The Owner/Operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the Owner/Operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.
Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new Owner/Operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure: The Owner/Operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: BJ Services Company, USA (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC); the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-094) BJ Services Company, USA, Mr. Jason Goodwin, Division Safety & Training, 707 North Leech Street, Hobbs, New Mexico 88241, has submitted a renewal application for the previously approved discharge plan for the UNICHEM-Hobbs Oilfield Service Company located in the NW/4, NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/L is disposed of after test to the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 52 feet below the ground surface with a total dissolved solids concentration of approximately 800 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the applications listed above are administratively complete and has prepared draft permits. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of August 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 16, 2007

Mr. Jason Goodwin
UNICHEM- Hobbs
BJ Services Company, USA
707 North Leech Street
Hobbs, New Mexico 88241

Re: Discharge Plan Renewal Permit (GW-094)
UNICHEM-HOBBS
BJ Services Company, USA Oilfield Service Company
Lea County, New Mexico

Dear Mr. Goodwin:

The New Mexico Oil Conservation Division (NMOCD) has received BJ Services Company, USA's request and initial fee, dated July 27, 2007, to renew GW-094 for the BJ Services Company, USA Oilfield Service Company located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3491 or carlj.chavez@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Carl J. Chávez
Environmental Engineer

CJC/cjc

xc: OCD District Office

THE SANTA FE
NEW MEXICAN
Founded 1849

NM ENERGY MINERAL NA
OFFICE OF SECRETARY A
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56673
AD NUMBER: 00227517 ACCOUNT: 00002202
LEGAL NO: 81493 P.O. #: 52100-00000075

309 LINES 1 TIME(S)	173.04
AFFIDAVIT:	6.00
TAX:	14.10
TOTAL:	193.14

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, T. Valencia, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 81493 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/22/2007 and 08/22/2007 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 22nd day of August, 2007 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ _____
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 22nd day of August, 2007

Notary Pamela Anne Beach

Commission Expires: May 31, 2011

OFFICIAL SEAL
Pamela Anne Beach
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 5-31-11

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC); the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espan_ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of August 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire,
Director
Legal#81493
Pub.August 22, 2007

Advertising Receipt

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Fax: (505) 397-0610

CARL CHAVEZ
NEW MEXICO ENERGY, MINERALS AND
NATURAL RESOURCES DEPARTMENT
1220 SOUTH ST. FRANCIS DR.
SANTA FE, NM 87505

Cust#: 01106077-000
Ad#: 02595601
Phone: (505)476-3200
Date: 08/17/07

Ad taker: C2 **Salesperson:** 08 **Classification:** 673

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	08/18/07	08/18/07	1	110.88		110.88
Bold						1.00
Affidavit for legals						3.00

Total:	114.88
Tax:	0.00
Net:	114.88
Prepaid:	0.00
Total Due	114.88

9/5/07
ok to pay
Carl Chavez

Payment Reference:

LEGAL NOTICE
August 18, 2007

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC); the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-094) BJ Services Company, USA, Mr. Jason Goodwin, Division Safety & Training, 707 North Leech Street, Hobbs, New Mexico 88241, has submitted a renewal application for the

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1

weeks.

Beginning with the issue dated

August 18 2007

and ending with the issue dated

August 18 2007

Kathi Bearden

Publisher

Sworn and subscribed to before me this 20th day of August 2007

Notary Public.

My Commission expires
February 07, 2009

(Seal)

OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: _____

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL NOTICE
August 18, 2007

NOTICE OF PUBLICATION

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

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(GW-094) BJ Services Company, USA, Mr. Jason Goodwin, Division Safety & Training, 707 North Leech Street, Hobbs, New Mexico 88241, has submitted a renewal application for the previously approved discharge plan for the UNICHEM-Hobbs Oilfield Service Company located in the NW/4, NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/L is disposed of after test to the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 52 feet below the ground surface with a total dissolved solids concentration of approximately 800 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the applications listed above are administratively complete and has prepared draft permits. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espan_ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of August 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL
#23475

Mark Fesmire, Director

01106077000 02595601

NEW MEXICO ENERGY, MINERALS AN
1220 SOUTH ST. FRANCIS DR.
SANTA FE, NM 87505

Chemical Services

October 2, 2007

New Mexico Oil Conservation Division
Attention: Carl J. Chavez
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: BJ Chemical Services Discharge Plan GW-094, 707 North Leech Street, Hobbs New Mexico 88241.

Dear Mr. Chavez

BJ Chemical Services (division of BJ Services Company, USA) would like to notify the New Mexico Oil Conservation Division (NMOCD) that public notice has been completed in response to your letter dated August 16, 2007 and in accordance with WQCC 20.6.2.3108 NMAC requirements. If you have any questions or concerns please do not hesitate to call me at 713-860-6851.

Sincerely,

Jason S. Goodwin P.G.
Division Safety and Training Manager

Attachment

c. OCD Region Office – Hobbs NM
Jim Britton – Hobbs
Jeff Day – Hobbs
File – Houston

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1

weeks.

Beginning with the issue dated

September 14 2007

and ending with the issue dated

September 14 2007

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 14th day of

September 2007

Dora Montz

Notary Public.

My Commission expires
February 07, 2009
(Seal)

OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO

My Commission Expires: _____

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LEGAL NOTICE
September 14, 2007

NOTICE OF PUBLICATION

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

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(GW-094) BJ Services Company, USA, Mr. Jason Goodwin, Division Safety & Training, 707 North Leech Street, Hobbs, New Mexico 88241, has submitted a renewal application for the previously approved discharge plan for the UNICHEM-Hobbs Oilfield Service Company located in the NW/4, NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/L is disposed of after test to the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 52 feet below the ground surface with a total dissolved solids concentration of approximately 800 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the applications listed above are administratively complete and has prepared draft permits. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

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Para obtener más información sobre esta solicitud en espan_ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of August 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

NOTIFICACION AL PUBLICO

ESTADO DE NUEVO MEXICO
Departamento de Energia, Minerales y Recursas Naturales
Depto. Conservacion del Petroleo

Por la Presente Notificamos que comforme a las Reglas de la Comision de Calidad y Control del Agua de Nuevo Mexico (20.6.2.3106 NMAC); La(s) siguiente(s) Aplicacion(es) Para un(os) Permiso(s) de vertido han sido submitidos al Director Del New Mexico Oil Conservation Division ("NMOCD"), 1220 S. saint Francis Drive, Santa Fe, New Mexico 87505, Tel. (505) 476-3440:

(GW-094) BJ Services Company, USA, Mr. Jason Goodwin, Division de Proteccion y Entrenamiento, 707 North Leech Street, Hobbs, New Mexico 88241, ha presentado una Aplicacion para la renovacion de el Plan Previamente aprobado para UNICHEM – Hobbs Oilfield Service Company localizada en el NW/4, NW/4 de la seccion 34, Township 18 South, Range 38 east, NMPM, Condado de Lea, Nuevo Mexico. Aproximadamente 3600 Galones de agua desecho con una total concentracion de solido disueltos de aproximadamente 1100 mg/L es vertido despues del analisis, al (City of Hobbs Publicly Owned treatment Works (POTW). Rios subterraneos que pudieran ser atectados por un derrame o fuga accidental esta a una profundidad de aproximadamente 52 pies con una concentracion total de solidos disueltos de aproximadamente 800 mg/L. El plan de vertido explica como los productos de los campos petroleros y desechos de los mismos seran manejados, almacenados, y deshechados apropiadamente incluyendo como derrames, fugas y otros vertidos accidentales en la superficie seran manejados para proteger el agua.

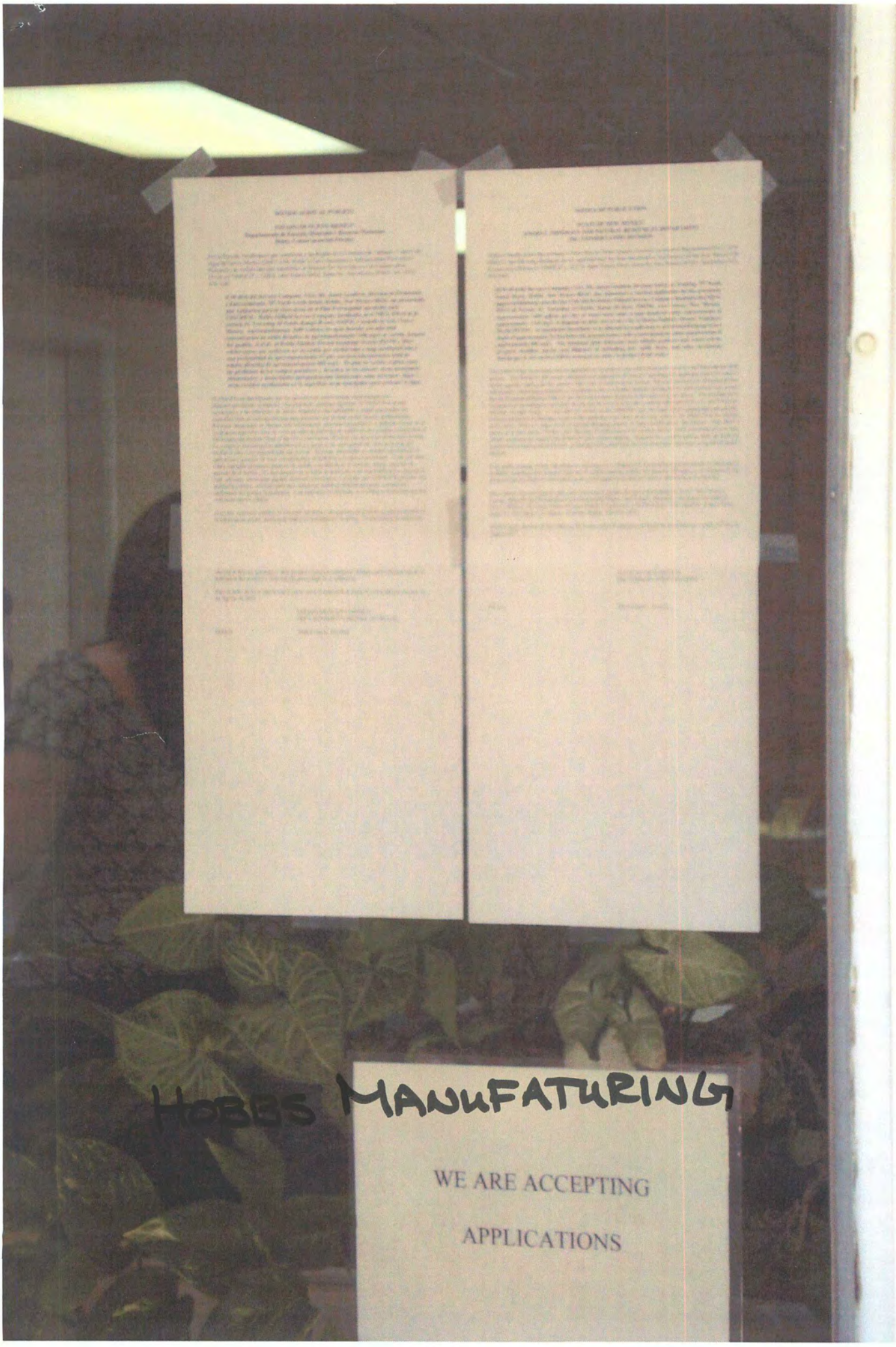
El NMOCD ha determinado que las aplicaciones anteriormente mencionadas son administrativamente completas y ha preparado permisos trazados. El NMOCD aceptara comentarios y declaraciones de interes respecto a esta aplicacion y creara una instalacion especifica lista de correspondencia para personas que deseen recibir futuras notificacianes. Personas interesadas en obtener mas informacion, presentar comentarios, o solicitar a estar en la instalacion-especifica lista de correspondencia para futuras notificaciones pueden comunicarse al Environmental Bureau Chief of the Oil Conservation Division a la direccion arriba mencionada. La completa determinacion administrativa y permiso de trazo puede ser visto en la rede del NMOCD http://wwwemnrd.state.nm.us/ocd/. Personas interesadas en obtener una copia de la aplicación y permiso de trazo comuniquense al NMOCD a la direccion anterior. Antes del fallo sobre cualquier propuesto permiso de vertido o modifcation, el Director debera permitir un periodo de al menos (30) dias despues de la fecha de publicacion de esta notificacion, durante la cual, personas interesadas pueden presentar comentarios o solicitar que el NMOCD presente una audiencia publica, *solicitaciones para* audiencias publicas deberan presentar razones por adelantado del porque la audiencia. Una audiencia se efectuara, si el Director determina que hay suficiente interes publico.

Si no hay audiencia publica, El Director aprobara o desaprobara el permiso propuesto basado en la informacion actual, incluyendo todos los comentarios recibidos. Si una audiencia publica se efectua el director aprobara o desa probara el permiso propuesto basado en la informacion de la aplicacion del permiso e informacion presentada en la audiencia.

Bajo el Sello de New Mexico oil Conservation Commision at Santa Fe, New Mexico en este 16 de Agosto de 2007

ESTADO DE NUEVO MEXICO
DEPT. CONSERVACION DEL PETROLEO
Mark Fesmire, Director

SELLO
#23524


HOBBS MANUFATURING
WE ARE ACCEPTING
APPLICATIONS

Residential ommunity Clean-Up

Hobbs

u Can Haul It To The Curb, We'll Haul It Off."

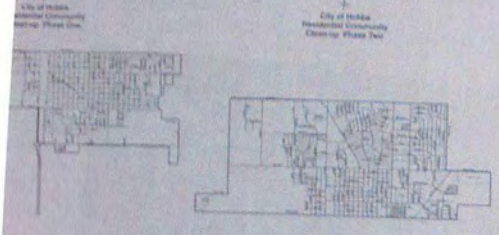
Every Street Will Be Covered From Broadway thin The City Limits. No Commercial Pick-Ups.

ay, September 15 • 8:00 a.m. - ?

ok, bulk items, and yard to the curbside by 8:00 September 15 and City pose of it that day.

Refrigerators must have compressors removed **AND** must be drained. Tree trimmings should be bundled no more than 4' in diameter & no more than 4' long.

ng FREE Assistance to move items to the curbside may call y Wednesday **PRIOR TO THE** scheduled pick up day.



— For Your Information —

- North side Convenience Center is open and available free of charge for regular and large item disposal.

*North Side: 4401 HAF Road
Mon. - Sat. 8 a.m. - 6 p.m.
Sun. - Noon - 6 p.m.

- Waste Management will pick up large items (3 items per year free of charge by contacting their office at 392-6511

FUTURE CLEAN-UP AREAS:
October 13 - Broadway to Bender
November 10 - North of Bender
South Side is No - Open

THE CITY OF HOBBS PRESENTS THE
2ND ANNUAL

G DAZE OF SUMMER!!!

EVENT!!!

Door PRIZES!

TRAINING TIPS

GISTRATION

Del Norte Aquatic Facility

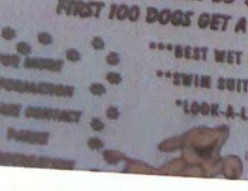
SEPTEMBER 15, 2007

Bring your POOCH to the POOL!!!

gie Paddle Starts at 1:00 PM - 3:00 PM

FIRST 100 DOGS GET A FREE GOODIE BAG!

BEST WET LOOK CONTEST
SWIM SUIT COMPETITION
LOOK-A-LIKE CONTEST



NO AGGRESSIVE DOGS ALLOWED!!!
DOGS SHOWING AGGRESSIVE BEHAVIOR WILL

NOTICE OF PUBLICATION

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

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Departamento de Energia, Minerales y Recursos Naturales
Depto. Conservacion del Petroleo

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ESTADO DE NUEVO MEXICO
DEPT. CONSERVACION DEL PETROLEO

SEAL

Mark Fesmire, Director

HOBBS
City HALL


Violent Crimes Hotline
393-0001
NOTICE
DO YOU NEED HELP?
DIAL 2-1-1
Corporate Leader
United Way
leadership matters.
Residential Community Clean-Up
DOG DAZE OF SUMMER!!!
Del Norte Aquatic Facility
SEPTEMBER 15, 2007

Chavez, Carl J, EMNRD

From: Jason_Goodwin@bjservices.com
Sent: Friday, August 17, 2007 9:13 AM
To: Chavez, Carl J, EMNRD
Subject: BJCS Response to Request
Attachments: Evap Process.pdf

As requested,

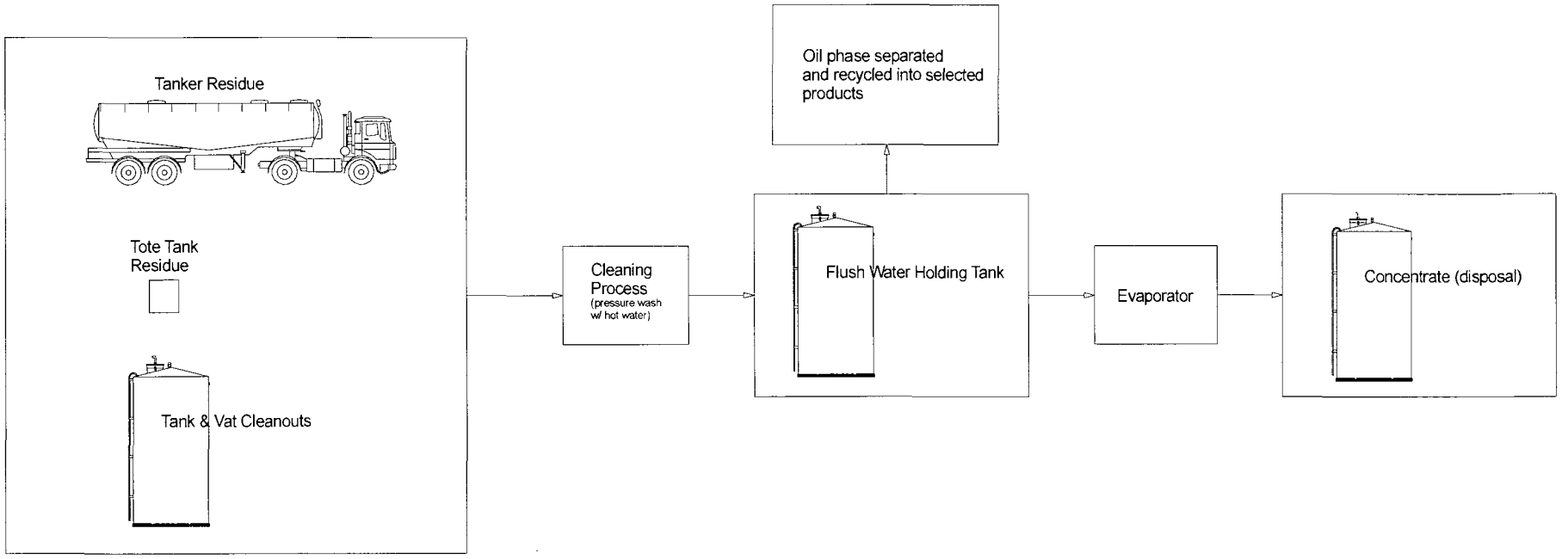
The tanks are going in the waterside tank farm Area 4 as seen on the figure. A 6000-gallon butyl cellosolve tank will be replaced with a 8000-gallon. A 5500-gallon Didecyl dimethyl ammonium chloride (Maquat 4480E) tank will be replaced with a 8000-gallon tank.

Flow diagram:

Hope this helps.

"My customer is you"

Jason Goodwin P.G.
BJ Chemical Services
Division Safety Training Manager
Phone: 713-860-6851
Cell: 713-805-0284
Fax: 713-860-6880



Chemical Services

BJ Chemical Services
Hobbs, NM
Evaporation
Process Flow Diagram

APPROVED BY	DATE
TSS	8/16/07
DRAWN BY	DATE
TSS	8/16/07

July 27, 2007

UPS AIRBILL

New Mexico Oil Conservation Division
Attention: Mr. Carl Chavez, CHMM
1220 South Saint Francis Drive
Santa Fe, NM 87505

RE: Discharge Plan Renewal Application, GW-094, BJ Chemical Services 707 North Leech Street, Hobbs, NM 88241.

Dear Mr. Chavez:

BJ Chemical Services (BJ Services Company, USA) has enclosed its discharge plan renewal application. The following locations will be utilized for public notice in accordance with NMAC 20.6.2.3108:

BJ Chemical Services
707 North Leech Street
Hobbs, NM 88241
(505) 393-7751

Hobbs City Hall
300 North Turner
Hobbs, NM 88240
(505) 397-9335

Hobbs News Sun
201 North Thorp
Hobbs, NM 88240
(505) 391-5402

If you have any questions or concerns do not hesitate to call me at (713) 860-6851.

Sincerely,

Jason Goodwin P.G.
Division Safety and Training Manager

c. Jo Ann Cobb – Tomball (Cover Letter)
Jim Britton – Hobbs (Cover Letter)
Jeff Day – Hobbs
District 1 Region Office – Hobbs
File – Houston

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 7/26/07

or cash received on _____ in the amount of $ 100 00

from BJ Services Co.

for GW-094

Submitted by: Lawrence Romero Date: 8/7/07

Submitted to ASD by: Lawrence Romero Date: 8/7/07

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

July 27, 2007

UPS AIRBILL

New Mexico Oil Conservation Division
Attention: Mr. Carl Chavez, CHMM
1220 South Saint Francis Drive
Santa Fe, NM 87505

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Jason Goodwin P.G.
Division Safety and Training Manager

c. Jo Ann Cobb – Tomball (Cover Letter)
Jim Britton – Hobbs (Cover Letter)
Jeff Day – Hobbs
District 1 Region Office – Hobbs
File – Houston

BJ SERVICES COMPANY
BJ Services Company U.S.A.
P.O. BOX 4442
HOUSTON, TX 77210
713/462-4239

JPMorgan Chase Bank, N.A.
North Syracuse, NY 13212-4710

50-937
213

VENDOR NO. 157889

CHECK NO. [redacted]

CHECK DATE	CHECK AMOUNT
07/26/07	*******100.00

ONE HUNDRED AND 00/100 **********

PAY TO THE ORDER OF
NEW MEXICO ENVIRONMENTAL DEPT
WATER QUALITY MANAGEMENT FUND
OIL CONSERVATION DIVISION
1220 SOUTH ST FRANCIS DR
SANTA FE NM 87505

VOID AFTER 90 DAYS
AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.

[redacted]

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☑ Renewal ☐ Modification

1. Type: Oil and Gas Service, Distribution and Storage of Specialty Chemicals
2. Operator: BJ Services Company, USA

   Address: 707 N. Leech St., Hobbs, NM 88241

   Contact Person: Jason Goodwin Phone: (713) 860-6851
3. Location: NW1/4 NW1/4 Section 34 Township 29 N Range 38 E
   Submit large-scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

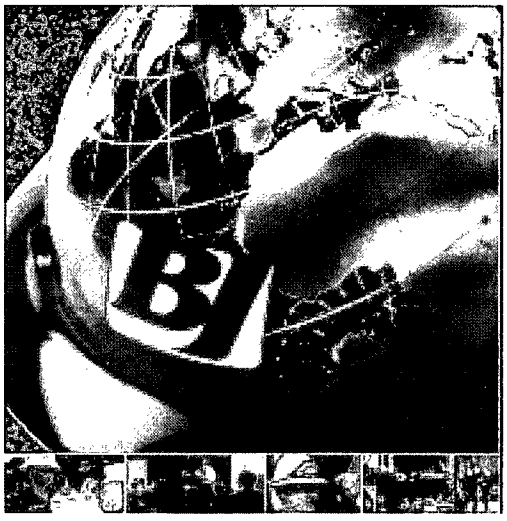
14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Jason Goodwin P.G. Title: Division Safety and Training Manager

Signature: _____ Date: 7.25.07

E-mail Address: jason_goodwin@bjservices.com

Hobbs Manufacturing Discharge Plan



BJ Chemical Services

Division of BJ Services Company, USA

707 N Leech Street

July 2007

Table of Contents

Appendices

Management Approval

Management has reviewed the following Discharge Plan for the Hobbs MFG Chemical Services facility. This plan has been prepared in accordance with New Mexico Oil Conservation Divisions (NMOCD) discharge plan guidance and will be implemented immediately upon the following signature and peridocially updated as necessary.

_____
Signature

_____
Name

_____
Title

_____
Date

I. Type of Operation

BJ Chemical Services is an oilfield and industrial specialty chemical blending facility

II. Operator

BJ Chemical Services
707 N. Leech Street
Hobbs, NM 88240
Contact: Jim Britton – Director of Manufacturing
Phone: 505-393-7751

III. Location

NW ¼ NW ¼
Township 29 North
Range 38 East
Section 34

IV. Landowner of Facility Site

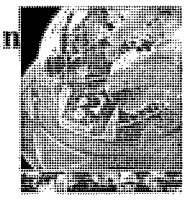
BJ Services Company, U.S.A.
4601 Westway Park Blvd.
Houston, Texas 77041
Contact: Jason Goodwin P.G.
Office: 713-860-6851
Mobile: 713-805-8024

V. Facility Description

See Appendix B, Site Plans

VI. Materials Stored or Used at the Facility

Material	Hazardous Ingredients	Form	Type of Container	Estimated Volume Stored (gallons)	Location
Flammables Corrosives, and Biocides	Varies by Product	Liquid	Aboveground Storage Tanks, Drums, Pails & Totes	570,000 gallons	See Figure



VII. Sources of Effluent and Waste Solids

Waste Type	Source and Composition	Volume per Month	Major Additives
Incidental Spills	Various Chemicals	150 lbs.	Varies by Product
Cleaning Rinsate	Various Chemicals	5000 lbs.	Varies by Product
Off Specification Product	Various Chemicals	220 – 2200 lbs.	Varies by Product
Cooling Water & Washdown	Sumps inside plant	40,000 gals	Varies by Product

VIII. Current Liquid and Solid Waste Collection/Treatment/Disposal Procedures

Waste Type	On Site Handling	Disposal	Disposal Facilities
Incidental Spills	Stored in gaylord box for offsite disposal	Recycled Offsite	Pollution Control Millington 2485 Victory Lane Millington TN 38053 901-353-5291
Cleaning Rinsate	Stored onsite in aboveground storage tank for offsite disposal	Recycled Offsite	Systech Environmental Corporation 1420 S Cement Road Fredonia, KS 66736 620-378-4451
Off Specification Product	Stored onsite in the northern most warehouse building	Recycled and disposed offsite	Pollution Control Millington 2485 Victory Lane Millington TN 38053 901-353-5291
Cooling Water & Washdown	Oil/Water Separator	City of Hobbs	City of Hobbs

IX. Proposed Modifications

Proposed modifications for the facility include the following:

- Installation of a wastewater evaporator to concentrate the wastewater produced from the container (blend vats, delivery tankers, tote tanks, drums, etc.) cleaning process. The evaporator will reduce the cleaning rinsate wastewater volume by 85%.
- Installation of three 8000-gallon capacity aboveground storage tanks to replace existing tanks.

X. Inspection and Maintenance

- See Appendix G, Inspection Checklist
- See Appendix C, Base/District HSE Inspection Form
- See Appendix A, Permit Requirements
- All facility sumps are inspected on an annual basis using NMOCD approved methods.
- All underground lines are inspected every five years using NMOCD approved methods.

XI. Contingency Plan

See Appendix D, Facility Emergency Response and Contingency Plan

XII. Site Characteristics

Bodies of Water: None within 1 mile. Nearest body of water is green Meadows.

Arroyos: None

Groundwater Characteristics: Depth to ground water is 52 feet.

Flooding Potential: None

Appendix A

Permit

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 23, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 9161

Mr. Robert Barr
BJ Unichem Chemical Services
707 N. Leech
Hobbs, New Mexico 88240

RE: **Discharge Plan Renewal Approval GW-094**
BJ Unichem Chemical Services
Hobbs Service Facility
Lea County, New Mexico

Dear Mr. Barr:

The ground water discharge plan renewal GW-094 for the BJ Unichem Chemical Services Hobbs Service Facility located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on July 22, 1992 and approved December 2, 1992. The discharge plan renewal application, dated August 1, 2002, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve BJ Unichem Chemical Services of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., BJ Unichem Chemical Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **December 1, 2007**, and BJ Unichem Chemical Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Proposed modifications consisting of a new maintenance facility, office area and cement testing area is herewith approved.

The discharge plan application for the BJ Unichem Chemical Services Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of $100. There is a flat fee assessed for oil and gas service companies equal to $1,700.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-094
BJ UNICHEM CHEMICAL SERVICES
HOBBS SERVICE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(September 23, 2002)

1. Payment of Discharge Plan Fees: The $100.00 filing fee has been received by the OCD. There is a flat fee assessed for oil and gas service companies equal to $1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. BJ Unichem Chemical Services Commitments: BJ Unichem Chemical Services will abide by all commitments submitted in the discharge plan renewal application dated August 1, 2002 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. 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.

11. Class V Wells: No 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. 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. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a BJ Unichem Chemical Services's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.

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

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: BJ Unichem Chemical Services shall maintain storm water runoff controls. As a result of BJ Unichem Chemical Services's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then BJ Unichem Chemical Services shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. BJ Unichem Chemical Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service Facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: BJ Unichem Chemical Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. BJ Unichem Chemical Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

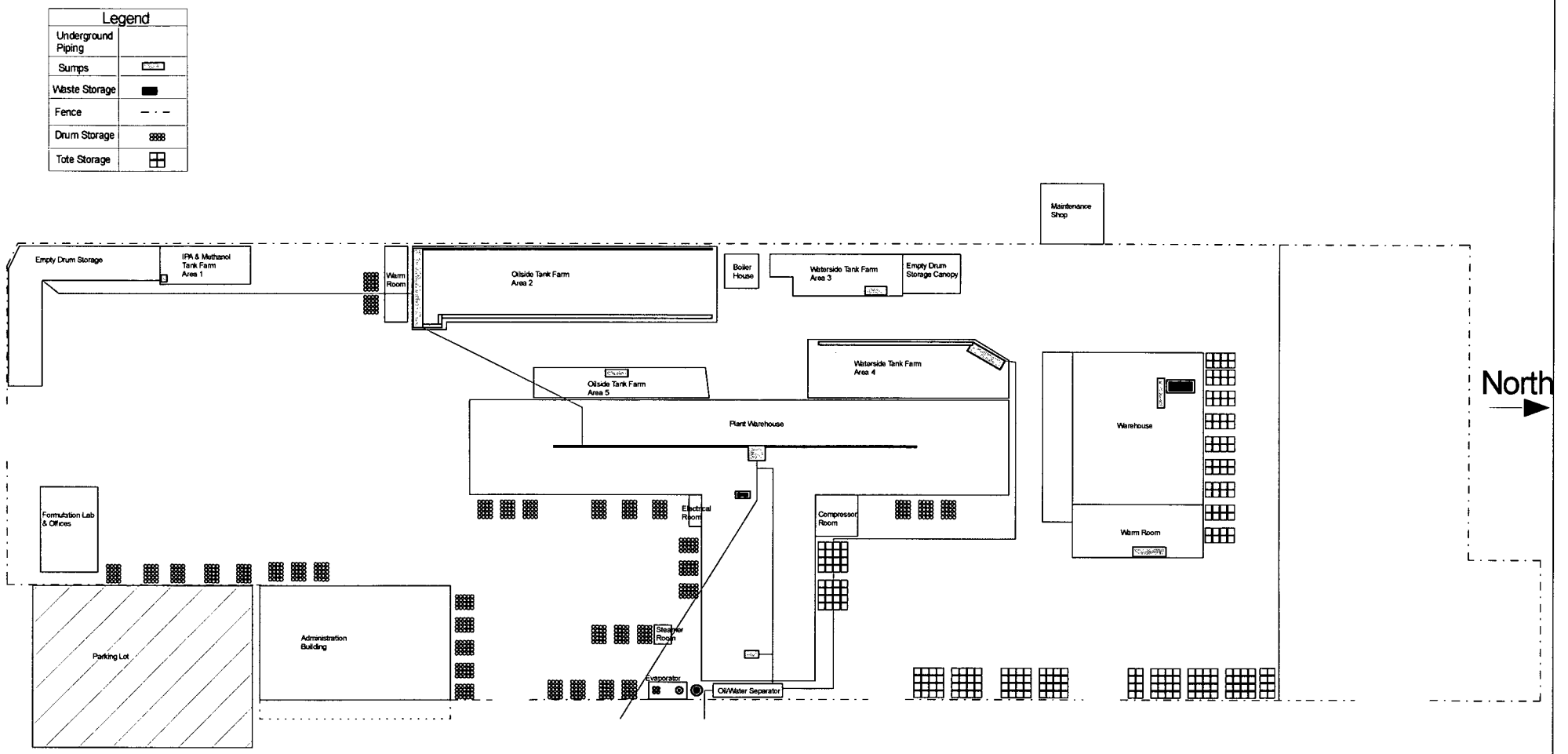
BJ UNICHEM CHEMICAL SERVICES

by_____

Title

Appendix B

Site Plans



BJ Chemical Services

BJ Chemical Services
Hobbs, NM
Sump Locations & Underground Piping

TSS	7/15/07
TSS	7/15/07
	1" = 50'

Appendix C

Base/ District HSE Inspection Form

US Inspection - 2007
Base/District HSE Inspection Report

Region: BJ Chemical Services
District/Base: Support - Hobbs Warehouse - Chemical Services
Inspector: _____

Job Title of Inspector(s): _____

Date of Inspection:_____

Product Line : BJ Chemical Services - Manufacturing

Key
N/A - Not Applicable (Default Value)
0 - Needs Immediate Attention
1 - Needs Attention
2 - Meets Standards

Housekeeping Key
N/A - Note Applicable (Default Value)
0 - Needs Immediate Attention
1 - Poor
2 - Needs some attention
4 - Good - Meets Standards

SUMMARY - AREAS

HSE Management Standards
General Facility Conditions
BJ Chemical Services Manufacturing - General Conditions
BJ Chemical Services Manufacturing - Office
BJ Chemical Services Manufacturing - Chemical Storage Area
BJ Chemical Services Manufacturing - Empty Drum Storage Area
BJ Chemical Services Manufacturing - Tank Farms
BJ Chemical Services Manufacturing - Yard/External Equipment Storage Area
BJ Chemical Services Manufacturing - Waste Management
BJ Chemical Services Manufacturing - Laboratory
BJ Chemical Services Manufacturing - Shop
BJ Chemical Services Manufacturing - Forklifts
BJ Chemical Services Manufacturing - Facility Files
BJ Chemical Services Maunfacturing - SCBA
BJ Chemical Services Manufacturing - Locker Room - Washrooms - Break Rooms
Significant Facility Changes
Environmental

QUESTIONS

HSE Management Standards

1	Managers and Supervisors demonstrate ability to navigate QHSE Standards and other HSE system databases
2	Managers and Supervisors are knowledgable of the QHSE Standards that apply to their area of responsibility (have read the standards)
3	HSE Plan for facility, region, or country in place per standard (QHSE Standard - Health & Safety 3.8)
4	All Trainers are competent (demonstrated by CAP participation, certifications, education, or Training Plan in place)
5	Field personnel oriented per standards prior to field assignment (QHSE Standard - Health & Safety 6.3 plus Region Req'd orientation)
6	Facility APT in place per standard (QHSE Standards - Health & Safety 5.2)
7	HSE Facility and Jobsite Inspections by region/district staff are current for previous quarter
8	Corrective actions from previous inspections (30 days and older) are closed out
9	Journey Management guidelines followed (QHSE Standard - Health & Safety Section 14._)

10	Quality of accident reports - complete, corrective action taken, and closed out

General Facility Conditions

1	Emergency plans for fire, injury or chemical spill (posted, current)
2	Fire extinguishers - (operable, inspected, proper location, proper type)
3	Personal protective equipment (used as required)
4	PPE available for visitors or vendors
5	Trained first aiders at facility (sufficient number, identified, posted)
6	Safety signs and notices (sufficient number, all hazards, current)
7	Safety bulletin board (current)
8	Entryway/gateway (signed, unobstructed)
9	Parking (sufficient, unobstructed, signed)
10	Road surfaces (safe, maintained)
11	Lighting (sufficient, working, assess both internal and external)
12	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
13	Electrical panels and wiring (labeled, secure, maintained)
14	Landscape (presentable, maintained)
15	Safety signs for LTI free days (up to date, visible)
16	Notice to visitors and vendors (where to go, posted)
17	Speed limit signs (posted, visible, adhered to)
18	Security fence (sufficient, maintained)
19	Fixed stairs, ladders, walkways, handrails, gates and doors (maintained, clear, safe)
20	Material safety data sheets (accessible locally, current) Dispatch?
21	Containers (appropriate, stacked, labeled)
22	Pallets (adequate, maintained, safe)
23	Noise levels (signage, measured)
24	Flammable gas (caged, signed, segregated)
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - General

Conditions

1	Current mandatory safety legislation posters
2	Local legislative accident log (e.g. OSA 300 or equivalent)
3	Emergency evacuation assembly point (posted, visible, unobstructed)
4	Emergency plans for fire, injury or chemical spill (posted, current)
5	Emergency phone numbers posted (fire, ambulance, police, doctor, chemical spills, injuries)
6	Fire extinguishers (operable, inspected, proper location, proper type)
7	Personal protective equipment (available, provided, and used as required)
8	PPE available for visitors or vendors)
9	First aid kit (adequate number of, adequately stocked, highly visible)
10	Trained first aiders at facility (sufficient number, identified, posted)
11	Safety signs and notices (sufficient number, all hazards, current)
12	Safety bulletin board (current)
13	Entryway/gateway (signed, unobstructed)
14	Parking (sufficient, obstructed, signed)
15	Road surfaces (safe, maintained)
16	Lighting (sufficient, working, assess both internal and external)
17	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
18	Electrical panels and wiring (labeled, secure, maintained)
19	Landscape (presentable, maintained)
20	BJ Services company signs (visible, maintained)
21	Prohibited articles/substances sign (visible, maintained)
22	Safety signs for LTI free days (up to date, visible)
23	Notices to visitors and vendors (where to go, posted)
24	Speed limit signs (posted, visible, adhered to)
25	Security fence (sufficient, maintained)
26	Fixed stairs, ladders, walkways, handrails, gates, and doors (maintained, clear, safe)
27	Emergency exits/routes (signed, unobstructed, site plane of)
28	Hazardous chemicals inventory (held locally, current-6 Month Rule)
29	Material safety data sheets (accessible locally, current) Dispatch?
30	Spills or leaks visible
31	Spill control material (available, appropriate, utilized)
32	Knowledge of environmental and safety (HSE) manuals

33	Knowledge of emergency response plans (fire, injury, spillage)
34	No open containers outside collecting water
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Office

1	Heating and cooling checked annually
2	Adequacy and cleanliness of toilet facilities
3	Floors clean and free of obstructions
4	Doorways and passageways free of obstructions
5	Exits clearly marked
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Chemical
Storage Area

1	All chemicals (identified, labeled)
2	Proper stacking (drums and bag pallets-no more than three (3) high)
3	Safety shower and eyewash (maintained, tested)
4	Hoses, piping, and valves (clear, operable, stowed appropriately)
5	Proper chemical segregation (types, aisles, labeled)
6	Used spill material container (available, empty, clean, isolated)
7	Floors (flat, clean, impermeable)
8	Sump (empty, clean, isolated)
9	Racking (capacity signed, inspections)
10	Material safety data sheets (accessible locally, current)
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Empty Drum
Storage Area

1	Empty drums and pails removed on a routine basis

2	Empty drums stored horizontally with bungs at 3 & 9
3	Empty drums and pails completely empty
4	No leakers
5	Empty drums stored without connections
6	Salvage drum available
7	Empty drums on pallets, cement or asphalt
8	No standing water, sump empty and clean

BJ Chemical Services
Manufacturing - Tank Farms

1	All tanks properly labeled (metal sign, NFPA diamond)
2	No visible leaks around tanks or header
3	Catch buckets (empty, properly labeled, and lid on container)
4	No chemical or water in sumps
5	Spill kits available and stocked
6	Bonding cables available, coiled, and in proper working condition
7	Connections properly stored in cabinet
8	Lids, PVVs closed, operable on all tanks
9	No leaking or damaged hoses, valves, or pumps
10	Safety shower/eyewash functioning, inspected, not obstructed, clean
11	Catwalks available and in working order
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Yard/External
Equipment Storage Area

1	Pallets (adequate, maintained, safe)
2	Noise levels (signage, measured)
3	Road traffic signage (speed limits posted, warning signage for pedestrians)
4	Segregation of pedestrians/vehicles (walkways marked, railings)
5	PPE (signage, appropriate to risk assessed)
6	Washbay sump(s) clean (routinely maintained and emptied)

7	POTW (inspected, cleaned routinely, randomly sampled)
8	All drums labeled, stacked neatly
9	Inventory controlled (LIFO _ taken monthly)

BJ Chemical Services Manufacturing - Waste Management

1	Waste documents filed properly
2	Waste log sheets attached and properly completed
3	Lab waste properly labeled and handled
4	No chemically contaminated waste in ordinary waste containers
5	Parts cleaner waste being properly handled
6	Waste documents filed properly
7	Weekly inspection of hazardous waste area documented (SQG & LQG only)
8	Waste/surplus chemicals (routinely identified, correct storage, correct and regular disposal)
9	Hazardous Waste Satellite accumulation point(s) labeled properly and lid secured
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services Manufacturing - Laboratory

1	Chemical containers identified (BJ Chemical Services policy)
2	Only required chemicals on hand
3	Vent hood installed and operating properly
4	Ground-fault interruption provided for electrical sockets near water
5	Waste containers (labeled, log sheets attached, lids secured, disposed of routinely)
6	MSDSs available
7	Sinks labeled "No Chemical Down Sink~
8	No excessive accumulation of samples
9	Hazardous Waste Satellite accumulation point(s) (labeled and lid secured)

BJ Chemical Services
Manufacturing - Shop

1	Condition of hand tools
2	Grinding equipment and signs
3	Welding and cutting equipment
4	Overhead storage posted for capacity
5	Oily rag container provided and labeled
6	Fixed stairs and railings
7	Paint, lubricants, cleaning agents and solvents properly stored and MSDSs available
8	Confined space permit system
9	Hot work permit system
10	Lockout/Tagout system
11	Ladders
12	Lighting
13	Signs
14	Air Compressors (belts guarded, PRV checked annually)

BJ Chemical Services
Manufacturing - Forklifts

1	Forks (condition, maintained, appropriate)
2	Pre-use daily check sheets (available, utilized)
3	Area FLT warning signage (visible)
4	Rated capacity shown on FLT
5	Backup alarm and/or flashing light (audible, working)
6	FLT Operators (trained, licensed, nominated)
7	Controls (operate properly, maintained)
8	Brakes (operate properly, maintained)
9	Horn (operates properly, maintained)
10	Seat condition (maintained, comfortable)
11	Headlights (sufficient, working)
12	Rollover protection fitted

BJ Chemical Services
Manufacturing - Facility Files

1	Waste manifests, LDRs, profiles, analyses
2	EPA ID
3	Facility inspections
4	Safety meetings
5	Waste tracking reports
6	Annual and Biennial reports (SARA Tier II, SARA TRI, Hazardous Waste)
7	DOT and hazard communication labels
8	DOT Drivers qualification files
9	Spill reports
10	Injury/illness and vehicle accident reports
11	H2S monitors calibrations
12	Tank inspection certifications
13	Training records
14	Policies and procedures (HazComm, respiratory protection, LO/TO, ER, Drug Alcohol)

BJ Chemical Services
Maunfacturing - SCBA

1	Facepiece - Clean and sealed
2	Facepiece - Skirt flexible and clean
3	Facepiece - Headstraps and buckles adjusted out and ok
4	Facepiece - Exhalation valve
5	Rubber Hose - Fitting tight, O-rings, crack, cuts
6	Regulator - Bypass valve closed
7	Regulator -Main valve locked open
8	Regulator - regulator knob in DON position
9	Alarm Bell - Open cylinder valve, close cylinder valve, vent air slowly by opening bypass valve and bleed down to 500 psi on regulator, "bell rings",close bypass valve
10	Cylinder Valve - Leaks, excessive torque
11	Cylinder Valve - Leaves in close position
12	Pressure Gauges - Pressure above 1500 psi, check for cracks
13	Compressed Air Cylinder - Hydrostatic test date less than 5 years old for steel and 3 years old for composite

14	Compressed Air Cylinder -Rust, pits, dents and scratches
15	Back Pack - Broken, twisted or frayed straps
16	Back Pack - Buckles ok and adjusted out

BJ Chemical Services
Manufacturing - Locker Room - Washrooms - Break Rooms

1	Ventilation (adequate)
2	Showers and sinks (adequate, clean, maintained)
3	Toilets (adequate, clean, maintained)
4	Lockers (sufficient size/number, accessible, lockable)
5	Drinking water (available)
6	Sufficient personal storage and changing space (clean, maintained, adequate)
7	Any required regulations/posters

Significant Facility Changes

1	Tank Change (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not notify)
2	Product Volume (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not notify)
3	Facility Moved (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not notify)
4	Number of Employees (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not notify)
5	Biocide Used (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not notify)

Additional Information Required
Please contact Bill Steiner if any of the above have significantly changed. If the facilty has moved, please type in the date it was moved:

Environmental

1	Environmental recordkeeping systems established
2	Permits & registrations available & current when applicable
3	Waste records maintained (Bill of lading, manifests)
4	Waste disposed of by certified or Company approved vendor
5	Environmental plans current (storm water, spill prevention, emergency response)
6	Proper storage of waste materials (segerated and labeled)

7	Spill control material (available, appropriate, utilized)
8	Surface-water/storm-water drains & discharge points free of oil, debris, etc
9	No open containers outside collecting water
10	Yard free of leaks and spills
11	Trash containers closed - Lids viable
12	Containers present to contain leaking drums, fluids or clean up materials
13	All fuel, oil and diesel tanks in good condition
14	All fuel and oil tanks have adequate containment and free of spills

CORRECTIVE ACTION RESPONSIBILITY

Corrective Actions Assigned to: _____

Due Date for Completion: _____

Corrective Action Status: _____

SIGNATURE SECTION

If you are the relevant District/Facility Manager, Region/Country/Area Manager, District/ HSE Officer or Other Relevant Manager you should sign the report when you have read it. To add your signature to the appropriate section, click the **Edit** button (to enter Edit mode), then click on the **Review and Sign Off** button. This will add your name and the current date to the Accident Report in the relevant section below.

Reviewed and Signed Off by the Following:-

District Safety/Training Supervisor _____

District Manager _____

Region Safety/Training Manager _____

Region Manager _____

Facility / Service Supervisor _____

Other Relevant Personnel _____

Appendix D

Facility Emergency Response Contingency Plan

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

(Includes Contingency Plan)

Hobbs, NM

Chemical Services

Hobbs – Manufacturing Facility

December/2006
Management Approval

Management has reviewed this SPCC Plan. The Plan has management's approval and will be implemented and periodically updated in accordance with 40 CFR 112 and applicable state requirements.

District	**Safety & Environmental Department**
_____	_____
Signature	Signature
_____	_____
Name	Name
_____	_____
Title	Title
_____	_____
Date	Date

Engineer's Certification

I hereby certify that I am familiar with SPCC requirements (40 CFR 112) and have examined the SPCC Plan for BJ Chemical Services, Hobbs – Manufacturing Facility and either I or my agent have visited and examined the facility. I also certify that it has been prepared in accordance with good engineering practices and effectively satisfies the requirements of 40 CFR 112.3 (d) as amended.

_____	_____
Signature, Registered Professional Engineer	Name
_____	_____
Registration Number and State	Date

Table of Contents

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
(Includes Contingency Plan)

BJ Chemical Services – Hobbs Manufacturing Facility

1.0 INTRODUCTION

1.1 Purpose

The purpose of the Spill Prevention Control and Countermeasure (SPCC) Plan is to prevent the discharge of petroleum products into the waters of the United States. This will be accomplished by preventing spills and detailing clean up and recovery measures by focusing on prevention, point source control, emergency spill control, and secondary containment.

1.2 General Requirements

This SPCC Plan must be reviewed at least once every five years to include recently developed prevention and control technology, if such technology will significantly reduce the likelihood of a spill event from the facility and if such technology has been field-proven at the time of the review, (40 CFR 112.5 [b]). Certification is required by a registered professional engineer (40 CFR 112.5 [c]). All changes to the SPCC plan must be documented in Appendix A.

This SPCC Plan must be amended whenever there is a material change in facility design, construction, operations or maintenance that alters the potential for a petroleum product spill or whenever a facility has (40 CFR 112.5 (a):

1. Discharged more than 1,000 gallons into navigable waters in a single spill event, or
2. Discharged petroleum products in harmful quantities into navigable waters of the United States or adjoining shorelines, or waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or deepwater Port Act, or affecting certain natural resources in two reportable spill events (>42 gallons) within any 12-month period;

A copy of this SPCC Plan must be submitted to the EPA and the appropriate State agency after a spill meeting the criteria described in Items 1 or 2 occurs. When amendments to the SPCC Plan are directed by the EPA Administrator or the State, they must be implemented within six months. The provisions of this SPCC Plan will be immediately carried out whenever there is a fire,

explosion or release that could threaten human health or the environment. Copies of this SPCC Plan and all revisions will be maintained at the ***Hobbs – Manufacturing*** facility.

2.0 FACILITY OPERATIONS

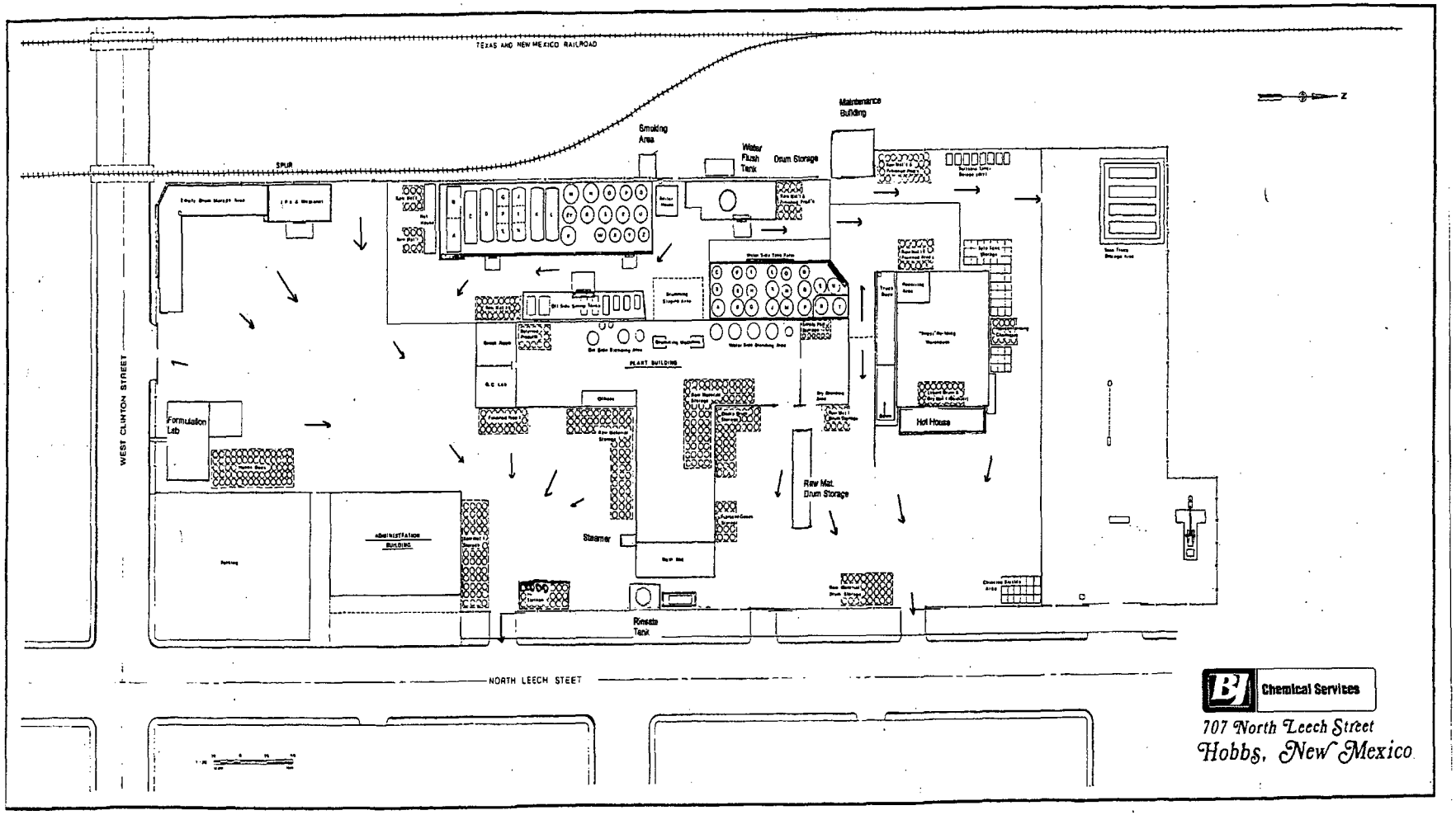
2.1 Description of Facility Operations

Hobbs – Manufacturing Facility is categorized by SIC codes 2899 and 5169 and the facility operates 9 hours a day, 5 days a week. The facility engages in chemical manufacturing, chemical storage and chemical distribution for the oil and gas industry.

The facility consists of an office building, warehouse, general maintenance building, aboveground storage tanks, truck wash water separator, truck wash rack, and yard for truck parking and equipment storage.

Site Data:

A.	**Name of Facility:**	BJ Chemical Services – Hobbs Manufacturing
B.	**Type of Facility:**	Chemical and Allied Products Manufacturing, Sub-Sector: Miscellaneous Chemical Products, SIC 2899; Chemical Distribution /Oil and Gas Services, SIC 5169
C.	**Date of Initial Operation:**	***July/1975***
D.	**Facility Location:**	***707 N. Leech Street*** ***Hobbs, NM 88240***
E.	**Owner Name/Address:**	BJ Services Company, USA 5500 Northwest Central Drive Houston, TX 77092
F.	**Operator Name/Address:**	***BJ Chemical Services*** ***5005 Mitchelldale, Suite 200*** ***Houston, TX 77092***
G.	**EPA ID Number:**	***NMD000333559***
H.	**Name and Title of Spill Prevention Coordinator (SPC):**	*Shane Stroh* *Plant Engineer*


TEXAS AND NEW MEXICO RAILROAD
SPUR
WEST CLINTON STREET
NORTH LEECH STEET
Smoking Area
Water Flush Tank
Drum Storage
Maintenance Building
PLANT BUILDING
Formulation Lab
Hot House
Raw Mat. Drum Storage
Steamer
Rinsate Tank
Chemical Services
707 North Leech Street
Hobbs, New Mexico

2.3 Oil Products Spill History

This facility has not experienced an oil products spill event as defined by 40 CFR 112 in its history of operations. Any release that matches the description under Section 1.2 of this plan must be documented in Lotus Notes and noted in Appendix B. All other spills will be documented and retained in Lotus Notes.

Potential Spill Areas

Location	Container	Contents	Failure Type	Stored Amount	Containment
2	18000 gal AST	Xylenes	Rupture or Spill	18000 gallons	* Concrete Containment
2	(2) 20000 gal AST	Aromatic Solvent	Rupture or Spill	40000 gallons	* Concrete Containment
2	(2) 7000 gal AST	Aromatic Solvent	Rupture or Spill	14000 gallons	* Concrete Containment
2	(2) 20000 gal AST	Oil Soluble Finished Products	Rupture or Spill	40000 gallons	* Concrete Containment
2	(4) 6500 gal AST	Oil Soluble Finished Products	Rupture or Spill	26000 gallons	* Concrete Containment
2	(10) 7500 gal AST	Intermediate Oil Soluble Products	Rupture or Spill	75000 gallons	* Concrete Containment
5	(5) 6000 gal AST	Intermediate Oil Soluble Products	Rupture or Spill	30000 gallons	* Concrete Containment
7	(250) 55-gal drums	Oil Soluble Finished Products	Rupture or Spill	13750 gallons	+ Concrete Containment
8	(300) 55-gal drums	Intermediate Oil Soluble Products	Rupture or Spill	16500 gallons	+ Concrete Containment

9B	(20) 330-gal IBC	Intermediate Oil Soluble Products	Rupture or Spill	6600 gallons	+ Concrete Containment

* On Concrete Foundations	* On Asphalt Foundations
AST–Above Ground Storage Tank	IBC-Intermediate Bulk Container

2.4 Facility Drainage

Drainage from aboveground storage tanks located in areas 2 & 5 are contained within the secondary containment. Drainage for the other areas of the facility flows in a manner to exist outfalls ocated at gate 1 and gate 2.

2.5 Storage Facilities

Area 2: Twenty-one above ground storage tanks that range in capacity from 6500 gallons – 20,000 gallons are used to store solvents, oil soluble intermediates, and oil soluble finished products. The ASTs are contained within a secondary containment that has a capacity of 120,000 gallons.

Area 5: Five above ground storage tanks that are 6000-gallons capacity each. The AST tanks are used to store oil soluble intermediates. The ASTs are contained within a secondary containment that has a capacity of 18,000 gallons.

Area 7: Drums are used to store oil soluble intermediates. The entire facility is contained within a 6" curb for secondary containment of drums and IBCs.

Area 8: Drums are used to store oil soluble intermediates. The entire facility is contained within a 6" curb for secondary containment of drums and IBCs.

Area 9B: **IBC containers are used to store** oil soluble intermediates. The entire facility is contained within a 6" curb for secondary containment of drums and IBCs

2.6 Description of Facility Transfer Operations

TRANSFER OPERATIONS AND FREQUENCY

Area 2: Loading and unloading of product to and from the aboveground storage tanks performed, on average, twice a week.

Area 5: Loading and unloading of product to and from the aboveground storage tanks performed, on average, twice a week.

Area 7: Physical transfer of drums and totes by forklift performed daily.

Area 8: Physical transfer of drums and totes by forklift performed daily.

Area 9B: Physical transfer of drums and totes by forklift performed daily.

3.0 SPILL PREVENTION AND CONTROL PROCEDURES

3.1 Location and Description of Emergency Spill Response Supplies

The facility is prepared to contain and recover a spill on-site. Supplies necessary for spill containment and recoveries are:

- Shovels to construct temporary berms and containment depressions
- Secondary containment/barrier materials that will be used to encircle a spill and prevent migration
- Sorbants such as mats, rags, socks and granules

This equipment is maintained by the Spill Prevention Coordinator and is located near Area A. Personnel are prepared to use them properly during a spill event.

In the event that BJ Services cannot safely recover or contain the spill, CURA National Emergency Response will be contacted for further assistance.

CURA National Emergency Response 1-800-579-2872

3.2 Removal of Spills

The procedure for handling a spill is as follows:

- Barrier materials will be appropriately placed to keep spills from leaving the boundaries of the site and to keep material pooled.
- Absorbent materials will be placed on the spill as needed.
- Absorbent materials will be collected and placed into DOT approved drums.
- The drums will be transported by a licensed transporter to an approved disposal site in accordance with applicable state and federal rules.

3.3 Personnel Training

The facility is responsible for training its personnel in the operation and maintenance of equipment described in section 2.3 to prevent the discharge of oil products as required by 40 CFR 112.7 (f). The training schedule will consist of frequent briefings with at least one briefing per year to assure adequate understanding of the SPCC Plan. The Spill Prevention Coordinator or the district trainer will maintain training records in Pathlore.

Training will be scheduled for the following:

- Initial assignment training for new employees
- Annual refresher training (periodic safety meetings)
- Special training sessions to be conducted for review of spill events or other events that trigger amendments to the SPCC Plan

Training Program content:

At a minimum, train your oil-handling personnel in the operation and maintenance of equipment described in section 2.3 of this plan, discharge procedure protocols (discovery and notification), applicable pollution control laws, general facility operations. All personnel should have a general knowledge of the plan and its contents.

Response to a Spill:

An employee who identifies a spill will take action to control the spill and then will notify his/her immediate supervisor who will notify the Spill Prevention Coordinator.

3.4 Storage Procedures

No storage container will be used unless its material and its construction are compatible with the material stored and the conditions of storage such as pressure, temperature, corrosivity, as well as other compatibility considerations. Bulk petroleum storage tank installations will be constructed so that a secondary means of containment is provided for the entire contents of the largest single tank plus precipitation. Drain valves for discharge of secondary containment are kept secured and closed when in non-operating or standby status.

3.5 Transfer Operation Procedures

All personnel of the City District shall ensure that the following precautionary measures are taken during transfer procedures in all areas of the facility:

- No smoking in the vicinity of flammable and/or explosive tanks, drums or carrier vehicles.
- Transferring vehicle will set parking brake or set wheel chocks to prevent vehicles from departing before complete disconnection of transfer lines.
- Verify that the volume being transferred is less than the unfilled volume of the receiving container.

- Trained personnel will conduct and/or oversee the transfer operation.
- Clean up any material dripped or spilled during the transfer.

3.6 Security

The facility operates 24 hours per day, 7 days per week. A dispatcher, and a chain link security fence controls access to the facility 24 hours per day.

3.7 Illumination

External lights on buildings and light poles located throughout the site light the work areas of the facility during the hours of darkness.

3.8 Inspection and Recording Procedures

Facility Reviews that include aspects of the facility's SPCC program are conducted at the facility on a quarterly basis. These facility reviews are conducted annually by the Corporate HSE Department, at least semiannually by the Regional Safety and Training Manager, and quarterly by the Spill Prevention Coordinator or his designee. The inspections will include potential spill sources such as:

- Storage tanks
- Drums
- Containers
- Piping and hoses
- Separators
- Loading and unloading areas

Availability of spill response equipment and supplies will also be checked during these inspections. Deficiencies will be reported to the Spill Prevention Coordinator.

The Spill Prevention Coordinator will maintain inspection records. Completed inspection records will be maintained in the facility environmental files for a period of three years.

The Spill Prevention Coordinator will maintain inspection records. Completed inspection records will be maintained in the facility environmental files for a period of three years.

Integrity Testing 40 CFR 112.8 (c) (6):

The Hobbs – Manufacturing Facility has deviated from the required integrity testing, in accordance with 40 CFR 112.7 (a) (2), by conducting quarterly visual inspections to provide equivalent environmental protection.

4.0 CONTINGENCY PLAN

4.1 Emergency Response Action List

Plant Manager
Jeff Day
1527 Camino Del Arco
Hobbs, NM 88240
(w) (505) 393-7751
(h) (505) 392-6378

Spill Prevention Coordinator
Shane Stroh
2208 N. Adobe Drive
Hobbs, NM 88240
(w) (505) 393-7751
(h) (505) 393-0254

Fire Department.....911

Ambulance.....911

Physician.....***911***

Hospital.....***911***

Clean-up Contractor.....CURA Emergency Services (CES)
.....1-800-579-2872

Law Enforcement.....911 – POLICE

BJ Chemical Services – Manager of HSE

Jim Britton.....(505) 393-7751

BJ Services Company, USA – Manager of Environmental Services

Jo Ann Cobb.....281-351-8131

4.2 Emergency Procedures

During an emergency, the Spill Prevention Coordinator will take all reasonable measures

necessary to ensure that fires, explosions and releases do not occur, recur or spread to other areas of the facility. Those measures must include, where applicable, stopping processes and operations and collecting and containing spill material. If the facility stops operations in response to a fire, explosion or release, the Spill Prevention Coordinator must monitor for leaks, pressure buildup or ruptures in valves, pipes or other equipment, wherever this is appropriate.

Response to Spills

The facility employees must report all spills, with the exception of minor spills or drips. When observing a spill, personnel on the scene will immediately notify his supervisor who will notify the Spill Prevention Coordinator (SPC) and take immediate action to control the spill. The SPC will call CURA Emergency Services for assistance if needed.

4.3 Corrective Action

If a significant spill or other event occurs, a meeting that includes all relevant personnel will be held to discuss causes of the situation, remedial activities and preventative measures. The meeting will be documented and the SPCC Plan amended as necessary. Personnel will receive additional training as necessary to prevent future incidents and to review SPCC Plan revisions.

4.4 Spill Reporting and Documentation

The Facility Spill Prevention Coordinator is responsible for all reporting and documentation procedures. Any spills entering the drainage ditches that are located on the sides of the facility in harmful quantities (sheen) as defined by 40 CFR 110.3 are required to be reported under 40 CFR 110.10. The facility will document for its own records all spills as required by the BJ Services US Environmental Procedures Manual.

- The Spill Prevention Coordinator, when notified that a spill has occurred, will complete a BJ Spill Report in Lotus Notes.

- If it is determined by the Spill Prevention Coordinator that the spill has entered off-site ditches, the Coordinator must:

  Notify BJ Services Company, USA Corporate HSE Department:

  Jo Ann Cobb **281-351-8131**
  11211 FM 2920
  Tomball, Texas 77375

- BJ Services Company, USA Corporate HSE Department will insure that regulatory agencies are notified and that reports are submitted.

  1. Call the Federal and State Regulatory Agency or Authority.

National Response Center	**1-800-424-8802**

EPA Region 6	**(214) 665-6660**

US EPA Region 6
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

State Dept. of Environmental Quality	**(800) 219-0110**

New Mexico Environmental Department
1190 St. Francis Dr., N4050
Santa Fe, NM 87502-0110

Appendix A
Annual SPCC Plan Review

Appendix B
Spill Reports

Appendix C
Visual Inspection Form

Appendix E

Boring Log

BROWN AND CALDWELL

BORING LOG

Project Name: BI. SERVICES - SYSTEM INSTALLATION Project Number: 2832.31

Soil Boring ☐ Monitoring Well ☒ Boring/Well Number: AV-5 Sheet 1 of 1

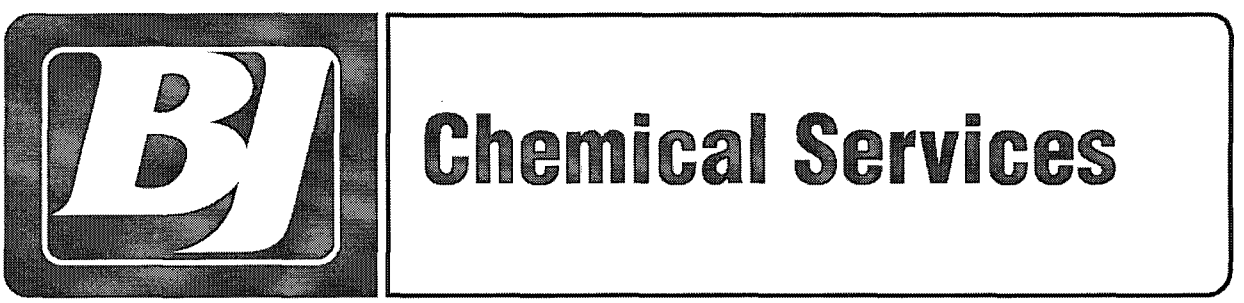
Boring Location: Hobbs, NM FACILITY		Elevation and Datum:	
Drilling Contractor: APJ	Driller: JOSE'	Date Started: 8/5/95	Date Finished: 8/5/95
Drilling Equipment: CME '75	Borehole Diameter: "6"	Completed Depth: (feet) 61.8'	Water Depth: (feet) 52.0'
Sampling Method: SPLIT SPOON		WELL CONSTRUCTION	
Drilling Method: HOLLOW STEM	Drilling Fluid: H_2O	Type and Diameter of Well Casing: 1" & 2" SCH 40 PVC	
Backfill Material: GROUT 2-6'		Slot Size: .010	Filter Material: 10-20
Logged By:	Checked By:	Development Method: N/A	

Depth (feet)	USC Soil Type	Description	Recovery %	Blow Counts	Sample No.	Graphic Log: Sample	Graphic Log: Lithology	Graphic Log: Backfill	Readings OVA PPM	Remarks	Elevation (feet)
		CONCRETE/SURFACE GRAVEL								1" WELL COMPLETION	
		BRN SAND/CLAY/(CL) MOIST, FIRM W/GRAVEL							67.8	SCREEN = 56.8 - 61.8 (5')	
0		SILTY GRAVEL (GM) - CALICHE dry, hard w/sand							191.5	SAND = 53.0 - 61.8'	
		- inc. in sand @ 60.0'								BENT = 51.0 - 53.0'	
20		SILTY SAND (SM) W/gravel med to fine grain								2" WELL COMPLETION	
5		SAND/GRAVEL (SP) med. clay w/silt.								SCREEN = 10-30'	
30		SANDSTONE, CONSOLIDATED MEDIUM								SAND = 8-30'	
		SILTY SAND (SM) dry med to fine grain w/gravel								BENT = 6-8'	
40										37'-38' SS SEAM	
										42-43' SS SEAM	
50		FINE SAND (SP) damp - SATURATED								GW @ 52.0'	
60		TD = 61.8'								TD = 61.8'	
5											

Appendix F

Storm Water Best Management Practices

STORM WATER POLLUTION PREVENTION PLAN



Hobbs Manufacturing Facility

Hobbs, New Mexico

Storm Water Pollution Prevention Plan

BJ Chemical Services – Hobbs Manufacturing Facility

BJ Chemical Services
707 N. Leech
Hobbs, NM 88240

T. Shane Stroh
Plant Engineer
October 28, 2003

Certification Statement:
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

_____ _____

Signature (Manufacturing Director) Date

Certification (30 TAC 305.44):

_____ _____

Signature (Vice President of Technology and Logistics) Date

Table of Contents

1. INTRODUCTION

1.1. Background

In 1972, the United States Congress passed the Clean Water Act (CWA) that prohibits the discharge of any pollutants to waters of the United States from a point source unless that discharge is authorized by a National Discharge Elimination System (NPDES) permit. Since its introduction in 1972, the NPDES permit program is responsible for significant improvements to our Nation's water quality.

Activities that take place at industrial facilities, such as material handling and storage, are often exposed to storm water. The runoff from these activities discharges industrial pollutants into nearby storm sewer systems and water bodies. This may adversely impact water quality.

To limit pollutants in storm water discharges from industrial facilities, the NPDES Phase I Storm Water Program includes an industrial storm water permitting component. Operators of industrial facilities included in one of the 11 categories of "storm water discharges associated with industrial activity" (40 CFR 122.26 (b)(14)(i)-(xi)) that discharge storm water to a municipal separate storm sewer system (MS4) or directly to waters of the United States require authorization under a NPDES industrial storm water permit. If an industrial facility has a Standard Industrial Classification (SIC) code or meets the narrative description listed in the 11 categories, the facility operator must determine if the facility is eligible for coverage under a general or an individual NPDES industrial storm water permit.

The BJ Chemical Services – Hobbs manufacturing facility is categorized by SIC codes 2899 and 5169. SIC code 2899 is included in the 11 categories of "storm water discharges associated with industrial activity" required to obtain permit coverage. The BJ Unichem Chemical Services – Hobbs manufacturing facility has permit coverage under the Multi-Sector General Permit (MSGP).

The MSGP-2000 published in the Federal Register on October 30, 2000, replaces the original MSGP that EPA issued on September 29,1995. To apply for permit coverage under the MSGP, a facility operator must complete and submit to the appropriate NPDES permitting authority a Notice of Intent (NOI). The deadline for submission of an NOI requesting coverage under the MSGP-2000 was January 29, 2001.

The MSGP requires certain pollution prevention and control measures, possible monitoring and reporting, and annual inspections. The permit also requires the preparation and implementation of a pollution prevention plan that is tailored to the facility site.

1.2. Overview

The goal of the SWPPP is to improve water quality by reducing the pollutants contained in storm water discharges. The SWPPP must be prepared in accordance with good engineering practices. The plan identifies the sources of pollution on the site and describes the measures that will be implemented to prevent or control the discharge of pollutants in storm water runoff. The SWPPP outlines site specific Best Management Practices (BMPs) that will be used to reduce the amount of pollution entering surface water. The provisions of the SWPPP must be implemented as part of the conditions of the general storm ware permit for industrial activity.

The development of a SWPPP involves four steps:

1. Formation of a team of qualified facility personnel who will be responsible for preparing the plan and assisting the facility manage in its implementation
2. Assessment of potential storm water pollution sources
3. Selection and implementation of appropriate management practices and controls
4. Periodic evaluation of the plan's effectiveness in preventing or reducing storm ware pollution and the facility's compliance with the terms and conditions of the permit

The SWPPP must describe activities, materials, and physical features of the facility that may contribute significant amounts of pollutants to storm water runoff and the measures that will be implemented to control these pollutants. As conditions and practices at BJ Chemical Services – Hobbs manufacturing change to accommodate pollution prevention activities, sections of this document shall be revised accordingly. If the SWPPP is ineffective in eliminating or minimizing the storm water pollutant sources identified, the plan will also be amended. The format for the SWPPP is designed to easily accommodate these changes.

The SWPPP shall be retained on-site at the facility that generates the storm water discharge. The plan shall be available upon request to the EPA Region 6 director or authorized representatives, and in the case of a storm water discharge through a municipal separate storm sewer system, to the operator of the municipal system.

The SWPPP for the BJ Chemical Services – Hobbs manufacturing facility was prepared in accordance with the requirements of the EPA Multi-Sector General Permit, as outlined in paragraph 4.1.

2. POLLUTION PREVENTION TEAM

The first step of the SWPPP is to identify individuals within the facility organization to be members of a Storm Water Pollution Prevention Team. The team is responsible for developing, implementing, maintaining and revising the SWPPP. The purpose of designating specific team members makes it clear that it is part of these individual's responsibilities to prevent storm water pollution. The team is made up of key on-site personnel who are familiar with the facility and its operations. The team is comprised

of representatives from all phases of the facility's operations. It includes personnel form management, operations, and maintenance.

Table 1 shows the personnel who have been assigned to the team, along with their phone numbers, and responsibilities. A copy of this roster will be posted at the facility so that other BJ Chemical Services – Hobbs manufacturing employees are aware of who is responsible for storm water management. The active participation of all BJ Chemical Services – Hobbs manufacturing personnel in helping to identify and eliminate potential storm water pollution sources is vital to the success of this SWPPP.

Table 1: Storm Water Pollution Prevention Team

Name	Title	Phone	Responsibilities
Shane Stroh	Plant Engineer	(505) 393-7751 x215	
Jeff Day	Plant Manager	(505) 393-7751 x232	
Santos DeLaTorre	Maintenance	(505) 393-7751	

The Pollution Prevention Team will gather at regular scheduled meetings held biannually. During these meetings, the team will discuss the goals of the SWPPP, review BMP progress, address comments and suggestions received from others, and determine if changes need to be mad to the plan. The team will revise the SWPPP, including the BMP implementation schedule, as necessary.

3. POLLUTION SOURCE ASSESSMENT

The second step of the SWPPP is to provide a description of potential sources which may be reasonably expected to add significant amounts of pollutants to storm water discharges or which may result in the may result in the discharge of pollutants during dry weather from separate storm sewers. The potential sources of storm water pollution were identified by a joint effort from the HSE department, operations personnel, and the product management group of BJ Unichem. This assessment provides a risk-based approach by assisting in targeting the most important pollutant sources for corrective and/or preventative action.

3.1. Site Location and Description

The BJ Chemical Services – Hobbs manufacturing facility is located at 707 N. Leech in Hobbs, New Mexico. The facility manufactures, packages, and transports oilfield chemicals of many types. The facility is built upon a four-acre area. The facility is completely paved with asphalt or cement. The manufacturing operations are housed within a single level metal building. The offices are housed within a separate dual-level metal office building.

The BJ Chemical Services – Hobbs manufacturing facility is located in a residential/business area. A chain link fence, topped with barbed wire, surrounds the entire facility. Appendix C shows a complete layout of the site location.

A site drainage map, illustrated in Appendix D, shows the information listed below.

- Property boundaries
- Buildings and structures
- Operation or process areas
- Storm water outfalls

3.2. Materials Inventory

An inventory of materials that may have been or are exposed to rain water was taken. The following items have been prepared in accordance with the permit requirements:

- A list of significant materials that have been exposed to storm water in the past three years with a focus on areas where materials are stored, processed, transported, or transferred.
- A summary of methods and locations of on-site storage and disposal.
- A description of materials management practices employed to minimize contact of the materials with storm water runoff.
- A discussion of existing structural and non-structural control measures used to reduce pollutants in storm water runoff.
- A discussion of existing treatment of storm water runoff.

Table 2 contains an inventory of significant materials used, stored, or produced on site that have a potential to contribute pollutants to storm water runoff and include the following information:

Table 2: Material Inventory

Completed By: Shane Stroh/Plant Engineer Date: 12/20/2006

Instructions: Determining whether interior storage areas are contained (i.e. trench drains or curbing). Only items not stored in contained areas, or areas having the potential of contributing to storm water pollution should be inventoried. List all materials used, stored, or produced on site that have a potential to contribute to storm water runoff.

Material	**Purpose**	**Location**	**Quantity (Used, Produced, or Stored)**	**Contact with storm water and descriptive reason**	**Material Management Practice** (covered, curbing, sealed container)
Aromatic Solvents	Solvent for oil soluble finished products	West oilside tank farm	100,000 gallons	Contact from leaks in pumps, piping and/or hoses	Stored in tanks within secondary containment
Emulsion Breaker Intermediates	Emulsion Breaker component of Finished products	West and East oilside tank farm	100,000 gallons	Contact from leaks in pumps, piping and/or hoses	Stored in tanks within secondary containment

Emulsion Breaker Intermediates	Emulsion Breaker component of Finished products	Southeast of plant warehouse	25,000 gallons	Contact from leaks in drums or accidental spill	Stored in sealed container within secondary containment
Scale Inhibitor Intermediates	Scale inhibitor component of Finished products	East waterside tank farm	50,000 gallons	Contact from leaks in pumps, piping and/or hoses	Stored in tanks within secondary containment
Scale Inhibitor Intermediates	Scale inhibitor component of Finished products	Northeast of plant warehouse	10,000 gallons	Contact from leaks in drums or accidental spill	Stored in sealed drums within secondary containment
Corrosion Inhibitor Intermediates	Corrosion inhibitor component of Finished products	East waterside tank farm	10,000 gallons	Contact from leaks in pumps, piping and/or hoses	Stored in tanks within secondary containment
Corrosion Inhibitor Intermediates	Corrosion inhibitor component of Finished products	Northeast of plant warehouse	5,000 gallons	Contact from leaks in drums or accidental spill	Stored in sealed drums within secondary containment
Acids & Bases	Neutralizing Agents for finished products	East Waterside tank farm	25,000 gallons	Contact from leaks in pumps, piping and/or hoses	Stored in tanks within secondary containment
Biocides	Biocide finished products	East waterside tank farm	10,000 gallons	Contact from leaks in pumps, piping and/or hoses	Stored in tanks within secondary containment

The BJ Chemical Services – Hobbs manufacturing facility has some material exposed to storm water. All of the exposed materials are located on the paved area within the facility fence. The materials stored outside and exposed to storm water not in contained areas are raw materials and finished goods. The raw materials and finished products are stored in sealed containers consisting of drums and totes. The facility also has outdoor loading and unloading operations that include the receiving of raw materials and the preparation for the delivery of finished products.

The BJ Chemical Services – Hobbs manufacturing facility uses large quantities of flammable materials in the form of solvents. The flammable solvents are used in the manufacturing process during the blending of finished goods. The manufacturing facility uses small quantities of flammable materials including some lubricants, paints and cleaning solvents. The manufacturing facility also uses large quantities of corrosive materials in the form of acids and bases. The corrosive materials are used in the manufacturing process during the blending of finished goods.

Hazardous waste generated at the facility include flammable solvents, corrosives, and biocides.

3.3. Spill History

A list, located in Appendix E, is updated on a quarterly basis It is BJ Chemical Services' policy to report spills of more than a pint or a pound of any material. This policy is more rigorous than the EPA requirements which is limited to reportable quantity spills and leaks reported to state or federal agencies within the past 3 years.

3.4. Non-Stormwater Discharges

This facility has non-stormwater discharges (see Table 3). The sources of these discharges, their quantities, there frequencies, their characteristics, and points of release are as follows:

Table 3: Approved Non-Storm Water Discharge

Source	Quantities	Frequencies	Characteristics	Points of Release
Pavement and Building Washing	200 Gallons per event (no detergents or soap)	Twice a week for 5 to 10 minutes each event	Muddy Water	Near buildings and pavement. Outfalls could also be effected
Hydrant Flushing	200 Gallons per event	Once a year for 3 to 5 minutes	Rusty Water	Fire hydrant discharged into North asphalt surface of facility
Air Conditioner	0.25 Gallons per event	Daily	Clear Water	West side of Office building and Plant Breakroom

4. Best Management Practices

4.1. Good Housekeeping

The staff will perform proper traditional "housekeeping" practices so the facility will be kept clean and orderly condition. This element of the stormwater pollution prevention program is an ongoing task and is continually implemented to minimize the exposure of significant materials to stormwater. Proper housekeeping practices include:

- Sweeping of impervious surfaces
- Maintenance of spill kits in areas of potential spillage.
- Proper storage and rainfall protection techniques for potential contaminants.

4.2. Waste Handling/Recycling

The following types of waste are generated at the BJ Chemical Services – Hobbs manufacturing facility.

- Empty product drums – Some 55-gallon drums are generated through site activities. These empty drums either are returned to the vendor or are sent to a permitted and company approved drum recycler.
- Contaminated or obsolete chemical products – Products used at the facility may change frequently or become otherwise unusable. These products either are returned to the vendor or properly disposed of in accordance with applicable regulations.
- General Trash – General trash is generated through office activities along with acceptable maintenance shop trash.

4.3. Recordkeeping

Storm water records are stored at the district or on Lotus Notes according to BJ Services policies and procedures. These procedures ensure that all records of inspections, spills, maintenance activities, corrective actions, and visual observations are developed and retained. Records of all storm water monitoring information and copies of all reports required by the General Permit are retained for a minimum of five years from the date of the observation, measurement, or report. These records include:

- Date, place, time, and individual(s) who performed the site inspections, sampling, visual observations;
- Non-stormwater discharge inspections and visual observations and stormwater discharge visual observation records;
- The records of any corrective actions and follow-up activities that resulted from the visual observations.

4.4. Inspections and Preventative Maintenance

Periodic Inspections

Qualified personnel, who are familiar with the industrial activities performed at the facility, shall conduct facility HSE inspections to determine the effectiveness of the Good Housekeeping, Spill Prevention, Erosion Control, Maintenance Program for Structural Controls, and Best Management Practices. Inspections must be conducted on a frequency of once per quarter. Inspections must be documented and made readily available for inspection and review by the TCEQ. Facility HSE Inspections are documented and retained in Lotus Notes.

Quarterly Visual Observations

Quarterly Visual Observations of storm water discharges will be made at the facility. Observations of storm water discharges will occur once per quarter. These observations will be made only when the storm event meets the following criteria:

- During daylight, operating hours
- Preceded by at least 3 days without storm water discharges
- Within 30 minutes of discharge

Records of these visual observations will be kept and will include the following information: date/time the samples were collected and examined, name of personnel collecting and examining the sample, the nature of the discharge (snow

melt, runoff, etc.), and the visual quality of the sample. The Storm Water Pollution Prevention Team should examine results and Best Management Practices should be modified if necessary.

Annual Comprehensive Site Compliance Evaluation
Once per year, a representative of the Corporate HSE Department will conduct an inspection of the facility, a review of the SWPPP and BMPs, a review of all visual observation records, and will complete an annual Site Compliance Evaluation Report.

4.5. Spill Clean-up, Reporting, and Documentation

Spills should be handled in accordance with the SPCC Plan, Contingency Plan, and BJ Services US Environmental Standards and Procedures. These documents are incorporated into this plan by reference and include procedures for spill clean up, reporting, and documentation. The BJ Chemical Services – Hobbs manufacturing facility has spill kits and emergency collection devices or containers at strategic locations around the facility, particularly where the above mentioned spill potential exists.

4.6. Training

Training shall be provided to all employees who are responsible for implementing or maintaining activities identified in the SWPPP. Individuals listed on Table are responsible for training. Employee training shall include, at a minimum:

- Proper material management and handling practices for specific chemicals, fluids, and other materials used or commonly encountered at the facility;
- Spill prevention methods;
- The location of materials and equipment necessary for spill cleanup;
- Spill cleanup techniques;
- Proper spill reporting procedures; and
- Familiarization with good housekeeping measures, BMPs, and goals of the SWPPP.

Training will be conducted at least once per year and documented.

4.7. Soil Control and Site Stabilization

Erosion control devices will be implemented in areas to control erosion when necessary. This may include planting and maintenance of vegetation, diversion of run-on and run-off, placement of sandbags, silt screens, or other sediment control devices.

4.8. Sampling Requirements

The Hobbs manufacturing facility is categorized, based on its Standard Industrial Classification (SIC) code of 2899, as Sector C: Chemical and Allied Products Manufacturing, Sub-Sector: Miscellaneous Chemical Products.

Visual examinations are required based on the Hobbs facility's industrial category. Analytical monitoring and compliance monitoring are not required for the Hobbs facility's industrial category. Visual examinations should be conducted in the following manner:

1) Visual examinations must be performed on a quarterly basis throughout the term of the permit.
2) Grab samples must be collected from the discharge resulting from a storm event greater that 0.1 inches in magnitude and that occurs at least 72 hours from the previous measurable storm event.
3) Grab samples should be collected within the first 30 minutes of discharge.
4) Storm event data such as amount should also be recorded during the discharge (see procedure and data sheet).
5) Examination should be made for any color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other indictors of possible storm water pollution.
6) Document the visual examination should be in the facility's SWPPP, including the date, the name of the person performing the examination, storm event data (amount and type), and the visual examination results. A facility is not required to submit visual examination results unless requested by EPA.
7) Results of visual examinations should be used by the facility to identify any problems that need to be addressed. The operator should document any changes made to SWPPP as a result of visual examinations.
8) The SWPPP for the Hobbs facility shows three outfalls. We currently only sample from one. The MSGP requires when a facility has two or more outfalls that the permittee reasonably believes discharge substantially identical effluents, the permittee may examine a sample from one of such outfalls and reports that the examination data applies to the substantially identical effluent. Permittees must document their rationale for this in the SWPPP.
9) The MSGP allows for waivers from visual examination requirements under two circumstances: adverse weather conditions, and unstaffed and inactive sites. Document waivers in SWPPP.

APPENDIX A: QUATERLY VISUAL INSPECTIONS

QUATERLY VISUAL INSPECTIONS

January - March	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
April - June	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
July - Sept.	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
Oct - Dec	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No

QUATERLY VISUAL INSPECTIONS

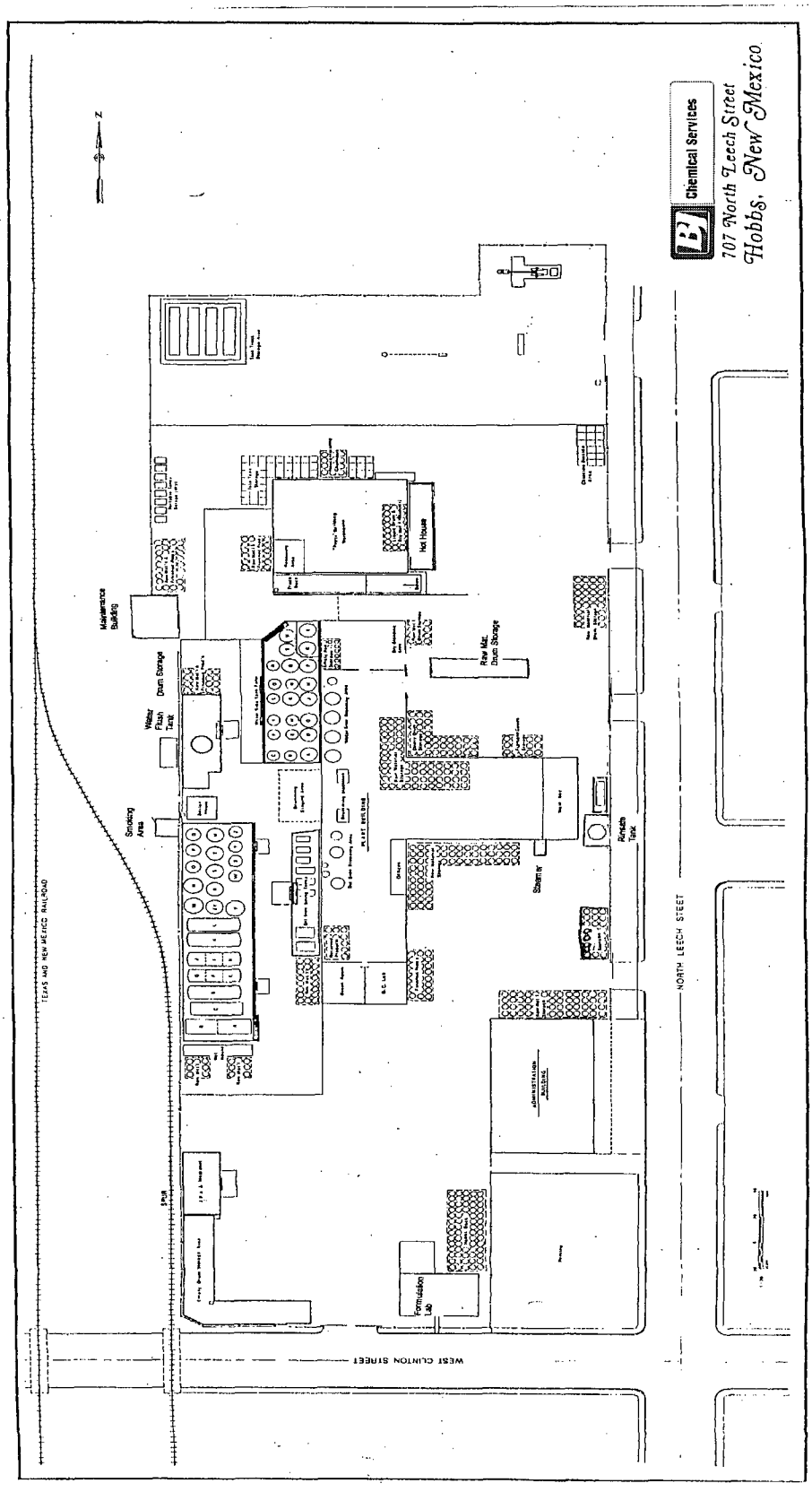
January - March	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
April - June	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
July - Sept.	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
Oct - Dec	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No

QUATERLY VISUAL INSPECTIONS

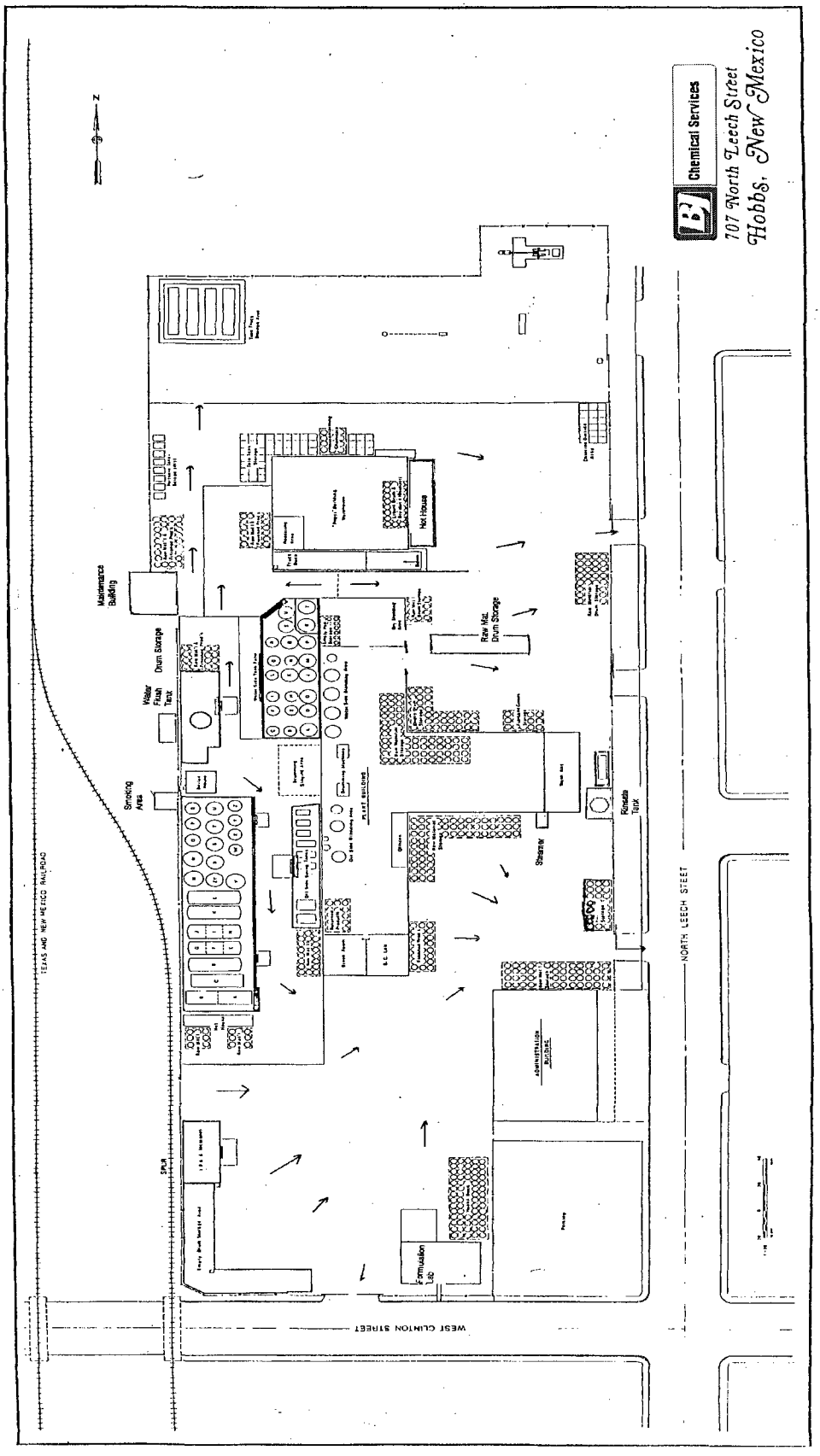
January - March	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
April - June	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
July - Sept.	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No
Oct - Dec	Observation Date:	Drainage Location	1	2
	Observers Name:	Observation Time	am pm	am pm
	Title:	Time Discharge Began	am pm	am pm
	Signature:	Were Pollutants Observed	Yes No	Yes No

APPENDIX B: STORMWATER PERMIT AND NOTICE OF INTENT

APPENDIX C: FACILITY DIAGRAM



APPENDIX D: FACILITY DRAINAGE DIAGRAM



APPENDIX E: SPILL REPORTS

Date	Spill Description	Material Spilled	Spill Amount
6/3/03	Delivery driver had his delivery pump connected in reverse which resulted in the product being pumped from the storage tank onto the tanker truck and caused overflow	UN 2491, Ethanolamine solutions	45 gallons
6/3/03	Reconditioned drum had developed a split in the side which caused product to spill.	UN 2924, Flammable liquid, corrosive liquid	4 gallons
7/29/03	While retrieving a tote tank from our storage area, employee stuck the forks through the bottom of one tote and into the side of the tote behind it. Result was a puncture causing a spill.	UN 1760, Potassium Dimethyldithiocarbamate	10 gallons
5/12/04	Chemical spill occurred as a result of a ruptured hose on the oilside drum filler.	UN1993, Flammable Liquids, n.o.s.	2 gallons
5/27/04	Overflow of a tank compartment on delivery tanker	UN1993, Flammable Liquids, n.o.s.	5 gallons
6/11/04	While unloading a raw material from a tanker the fitting vibrated loose and caused the hose to come off the end of the loadline	UN 2693, Bisulphites, Aqueous solution, NOS	10 gallons
6/18/04	While packaging a drum the transfer hose came out of the drum and began spraying chemical all over the blend area.	UN1993, Flammable Liquids, n.o.s.	5 gallons
7/8/04	While backing in to our loading dock, a delivery driver clipped a drum that was stacked close to the loading area. A gash was cut into the side of the drum resulting in product loss.	Non regulated material	1 gallon
7/29/04	Leaking drum	UN1993, Flammable Liquids, n.o.s.	4 gallons
10/8/04	Spill occurred when the ears on a hose were thought to be closed, but they were not and the hose became disconnected from the main line at the blending station.	UN 1268, Petroleum Distillates: N.O.S.	4 gallons
11/30/04	While running the drumming machine, the lance came out of the drum and it was still open. This caused product to spew over the top of the drums and on the asphalt.	UN1993, Flammable Liquids, n.o.s.	5 gallons
12/23/04	Raw material liquid was spilled within storage tank containment due to a failure in the transfer piping. About 35-gallons of liquid was spilled and recovered within the containment sump.		35 gallons
1/10/05	Overfilled an IMO destined for Alaska. The tank was not the correct size.	UN1993, Flammable Liquids, n.o.s.	30 gallons
2/28/05	Leak from sample valve on raw material tank. Contained within secondary containment	UN1993 Flammable Liquids, n.o.s. (contains: methanol & xylene)	20 gallons
6/20/05	Transfer pipe constructed of PVC separated at the fitting connection. The piping separation resulted in 95 gallons raw material being spilt within the tank farm containment.		95 gallons

7/28/05	The leak due to a gasket failure that appears to be incompatible with the material. Flange was on transfer line.	UN1268 Petroleum Distillates, n.o.s.	145 gallons
8/2/05	Over ran tank of 1247H while unloading tanker.	UN1993 flammable liquid, n.o.s.	50 gallons
8/22/05	Leaking threaded connection on tank piping. Spill contained in secondary containment	UN3082 Environmentally Hazardous Substance, Liquid, N. O. S. (Ethylene Glycol)	20 gallons
10/12/05	Valve open and overfilled mixing tank	UN3082 Environmentally Hazardous Substance, Liquid, N. O. S. (Ethylene Glycol)	5 gallons
9/28/06	Chemical tanker valve failure during chemical transfer	UN2920 Corrosive liquid, flammable	450 gallons

Appendix G

Inspection Checklist

US Inspection - 2007
Base/District HSE Inspection Report

Region: BJ Chemical Services
District/Base: Support - Hobbs Warehouse - Chemical Services
Inspector: _____

Job Title of Inspector(s): _____

Date of Inspection: _____

Product Line : BJ Chemical Services - Manufacturing

Key
N/A - Not Applicable (Default Value)
0 - Needs Immediate Attention
1 - Needs Attention
2 - Meets Standards

Housekeeping Key
N/A - Note Applicable (Default Value)
0 - Needs Immediate Attention
1 - Poor
2 - Needs some attention
4 - Good - Meets Standards

SUMMARY - AREAS

QUESTIONS

HSE Management Standards

1	Managers and Supervisors demonstrate ability to navigate QHSE Standards and other HSE system databases
2	Managers and Supervisors are knowledgable of the QHSE Standards that apply to their area of responsibility (have read the standards)
3	HSE Plan for facility, region, or country in place per standard (QHSE Standard - Health & Safety 3.8)
4	All Trainers are competent (demonstrated by CAP participation, certifications, education, or Training Plan in place)
5	Field personnel oriented per standards prior to field assignment (QHSE Standard - Health & Safety 6.3 plus Region Req'd orientation)
6	Facility APT in place per standard (QHSE Standards - Health & Safety 5.2)
7	HSE Facility and Jobsite Inspections by region/district staff are current for previous quarter
8	Corrective actions from previous inspections (30 days and older) are closed out
9	Journey Management guidelines followed (QHSE Standard - Health & Safety Section 14._)

10	Quality of accident reports - complete, corrective action taken, and closed out

General Facility Conditions

1	Emergency plans for fire, injury or chemical spill (posted, current)
2	Fire extinguishers - (operable, inspected, proper location, proper type)
3	Personal protective equipment (used as required)
4	PPE available for visitors or vendors
5	Trained first aiders at facility (sufficient number, identified, posted)
6	Safety signs and notices (sufficient number, all hazards, current)
7	Safety bulletin board (current)
8	Entryway/gateway (signed, unobstructed)
9	Parking (sufficient, unobstructed, signed)
10	Road surfaces (safe, maintained)
11	Lighting (sufficient, working, assess both internal and external)
12	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
13	Electrical panels and wiring (labeled, secure, maintained)
14	Landscape (presentable, maintained)
15	Safety signs for LTI free days (up to date, visible)
16	Notice to visitors and vendors (where to go, posted)
17	Speed limit signs (posted, visible, adhered to)
18	Security fence (sufficient, maintained)
19	Fixed stairs, ladders, walkways, handrails, gates and doors (maintained, clear, safe)
20	Material safety data sheets (accessible locally, current) Dispatch?
21	Containers (appropriate, stacked, labeled)
22	Pallets (adequate, maintained, safe)
23	Noise levels (signage, measured)
24	Flammable gas (caged, signed, segregated)
HK	Housekeeping (Rating 0,1,2,4)

Conditions

1	Current mandatory safety legislation posters
2	Local legislative accident log (e.g. OSA 300 or equivalent)
3	Emergency evacuation assembly point (posted, visible, unobstructed)
4	Emergency plans for fire, injury or chemical spill (posted, current)
5	Emergency phone numbers posted (fire, ambulance, police, doctor, chemical spills, injuries)
6	Fire extinguishers (operable, inspected, proper location, proper type)
7	Personal protective equipment (available, provided, and used as required)
8	PPE available for visitors or vendors)
9	First aid kit (adequate number of, adequately stocked, highly visible)
10	Trained first aiders at facility (sufficient number, identified, posted)
11	Safety signs and notices (sufficient number, all hazards, current)
12	Safety bulletin board (current)
13	Entryway/gateway (signed, unobstructed)
14	Parking (sufficient, obstructed, signed)
15	Road surfaces (safe, maintained)
16	Lighting (sufficient, working, assess both internal and external)
17	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
18	Electrical panels and wiring (labeled, secure, maintained)
19	Landscape (presentable, maintained)
20	BJ Services company signs (visible, maintained)
21	Prohibited articles/substances sign (visible, maintained)
22	Safety signs for LTI free days (up to date, visible)
23	Notices to visitors and vendors (where to go, posted)
24	Speed limit signs (posted, visible, adhered to)
25	Security fence (sufficient, maintained)
26	Fixed stairs, ladders, walkways, handrails, gates, and doors (maintained, clear, safe)
27	Emergency exits/routes (signed, unobstructed, site plane of)
28	Hazardous chemicals inventory (held locally, current-6 Month Rule)
29	Material safety data sheets (accessible locally, current) Dispatch?
30	Spills or leaks visible
31	Spill control material (available, appropriate, utilized)
32	Knowledge of environmental and safety (HSE) manuals

33	Knowledge of emergency response plans (fire, injury, spillage)
34	No open containers outside collecting water
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Office

1	Heating and cooling checked annually
2	Adequacy and cleanliness of toilet facilities
3	Floors clean and free of obstructions
4	Doorways and passageways free of obstructions
5	Exits clearly marked
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Chemical
Storage Area

1	All chemicals (identified, labeled)
2	Proper stacking (drums and bag pallets-no more than three (3) high)
3	Safety shower and eyewash (maintained, tested)
4	Hoses, piping, and valves (clear, operable, stowed appropriately)
5	Proper chemical segregation (types, aisles, labeled)
6	Used spill material container (available, empty, clean, isolated)
7	Floors (flat, clean, impermeable)
8	Sump (empty, clean, isolated)
9	Racking (capacity signed, inspections)
10	Material safety data sheets (accessible locally, current)
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Empty Drum
Storage Area

1	Empty drums and pails removed on a routine basis

2	Empty drums stored horizontally with bungs at 3 & 9
3	Empty drums and pails completely empty
4	No leakers
5	Empty drums stored without connections
6	Salvage drum available
7	Empty drums on pallets, cement or asphalt
8	No standing water, sump empty and clean

BJ Chemical Services
Manufacturing - Tank Farms

1	All tanks properly labeled (metal sign, NFPA diamond)
2	No visible leaks around tanks or header
3	Catch buckets (empty, properly labeled, and lid on container)
4	No chemical or water in sumps
5	Spill kits available and stocked
6	Bonding cables available, coiled, and in proper working condition
7	Connections properly stored in cabinet
8	Lids, PVVs closed, operable on all tanks
9	No leaking or damaged hoses, valves, or pumps
10	Safety shower/eyewash functioning, inspected, not obstructed, clean
11	Catwalks available and in working order
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Yard/External
Equipment Storage Area

1	Pallets (adequate, maintained, safe)
2	Noise levels (signage, measured)
3	Road traffic signage (speed limits posted, warning signage for pedestrians)
4	Segregation of pedestrians/vehicles (walkways marked, railings)
5	PPE (signage, appropriate to risk assessed)
6	Washbay sump(s) clean (routinely maintained and emptied)

7	POTW (inspected, cleaned routinely, randomly sampled)
8	All drums labeled, stacked neatly
9	Inventory controlled (LIFO _ taken monthly)

BJ Chemical Services
Manufacturing - Waste Management

1	Waste documents filed properly
2	Waste log sheets attached and properly completed
3	Lab waste properly labeled and handled
4	No chemically contaminated waste in ordinary waste containers
5	Parts cleaner waste being properly handled
6	Waste documents filed properly
7	Weekly inspection of hazardous waste area documented (SQG & LQG only)
8	Waste/surplus chemicals (routinely identified, correct storage, correct and regular disposal)
9	Hazardous Waste Satellite accumulation point(s) labeled properly and lid secured
HK	Housekeeping (Rating 0,1,2,4)

BJ Chemical Services
Manufacturing - Laboratory

1	Chemical containers identified (BJ Chemical Services policy)
2	Only required chemicals on hand
3	Vent hood installed and operating properly
4	Ground-fault interruption provided for electrical sockets near water
5	Waste containers (labeled, log sheets attached, lids secured, disposed of routinely)
6	MSDSs available
7	Sinks labeled "No Chemical Down Sink~
8	No excessive accumulation of samples
9	Hazardous Waste Satellite accumulation point(s) (labeled and lid secured)

BJ Chemical Services

Chemical Services

Sump Inspection

Inspector's Name:	
Designation and Location of Item Inspected:	
Date Inspected:	

Instructions: Drain the sump and perform the specified inspection and maintenance tasks. Make any comments, which are pertinent to future maintenance needs.

Item to Be Inspected	**Comments**
Check concrete for cracks, breaks; exposed reinforcing: settlement.	
Check sediment depth and remove manually or by vacuum truck.	
Inspect piping for corrosion, open joints, cracked or crushed sections, obstructions.	

Chavez, Carl J, EMNRD

From: SStroh@bjservices.com
Sent: Monday, August 20, 2007 7:49 AM
To: Chavez, Carl J, EMNRD
Cc: Jason_Goodwin@bjservices.com
Subject: RE: BJCS Response to Request
Attachments: Evaporator.pdf; AREA4.pdf; HobbsMFG.pdf

Carl,

Here are the drawings of the items we discussed on Friday for the discharge plan.

Let me know if anything else is required.

Regards,

T. Shane Stroh
Plant Engineer
BJ Chemical Services - Hobbs Manufacturing
(505) 393-7751 x215
(505) 393-6754 FAX

----- Forwarded by Jason Goodwin/BJS/BJSERVICES on 08/17/2007 11:01 AM -----

"Chavez, Carl J, EMNRD" <CarlJ.Chavez@state.nm.us>

08/17/2007 10:55 AM

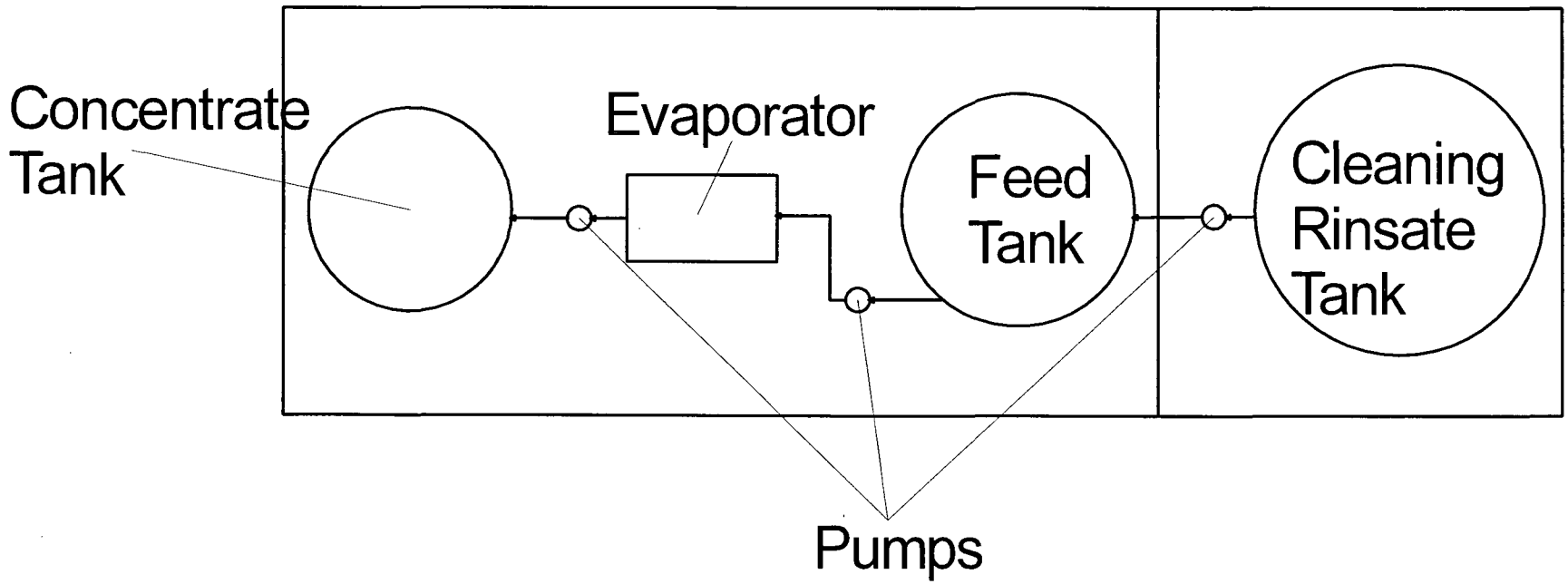
To <Jason_Goodwin@bjservices.com>
cc
Subject RE: BJCS Response to Request

Jason:

Please upgrade your flow diagram submitted with your application to show influent and/or effluent/disposal within the diagram. Your submitted diagram shows the evaporator, but does not show the overall schematic of influent into it, i.e., a flow line from the clean out sump flowing into the evaporator, etc. If is a stand alone system, without influent lines, please clarify and this diagram will work. Also, a diagram exhibiting the tank farm with tanks to be replaced was not included in your e-mail. Please provide the tank diagram of the tanks to be replaced. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462

E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/index.htm
(Pollution Prevention Guidance is under "Publications")



Chemical Services

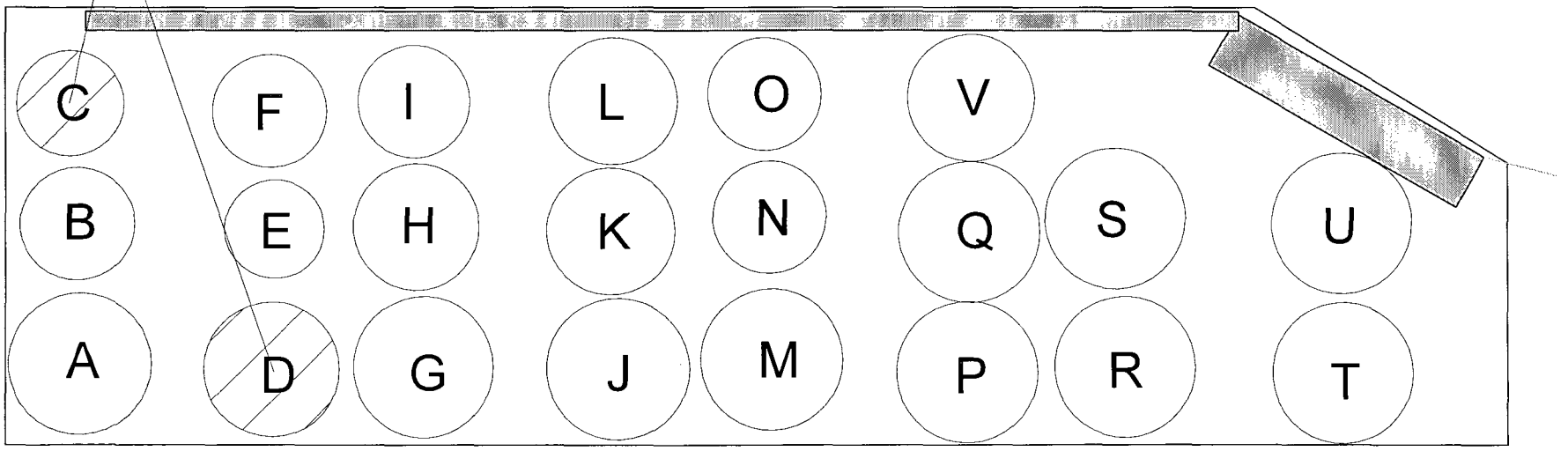
BJ Chemical Services
Hobbs, NM

Evaporator Process
to Concentrate Cleaning Rinsate

APPROVED BY: TSS	DATE: 8/17/07
DRAWN BY: TSS	DATE: 8/17/07
	SCALE: 1" = 6'

Proposed
Tank Modifications

Waterside Tank Farm
Area 4

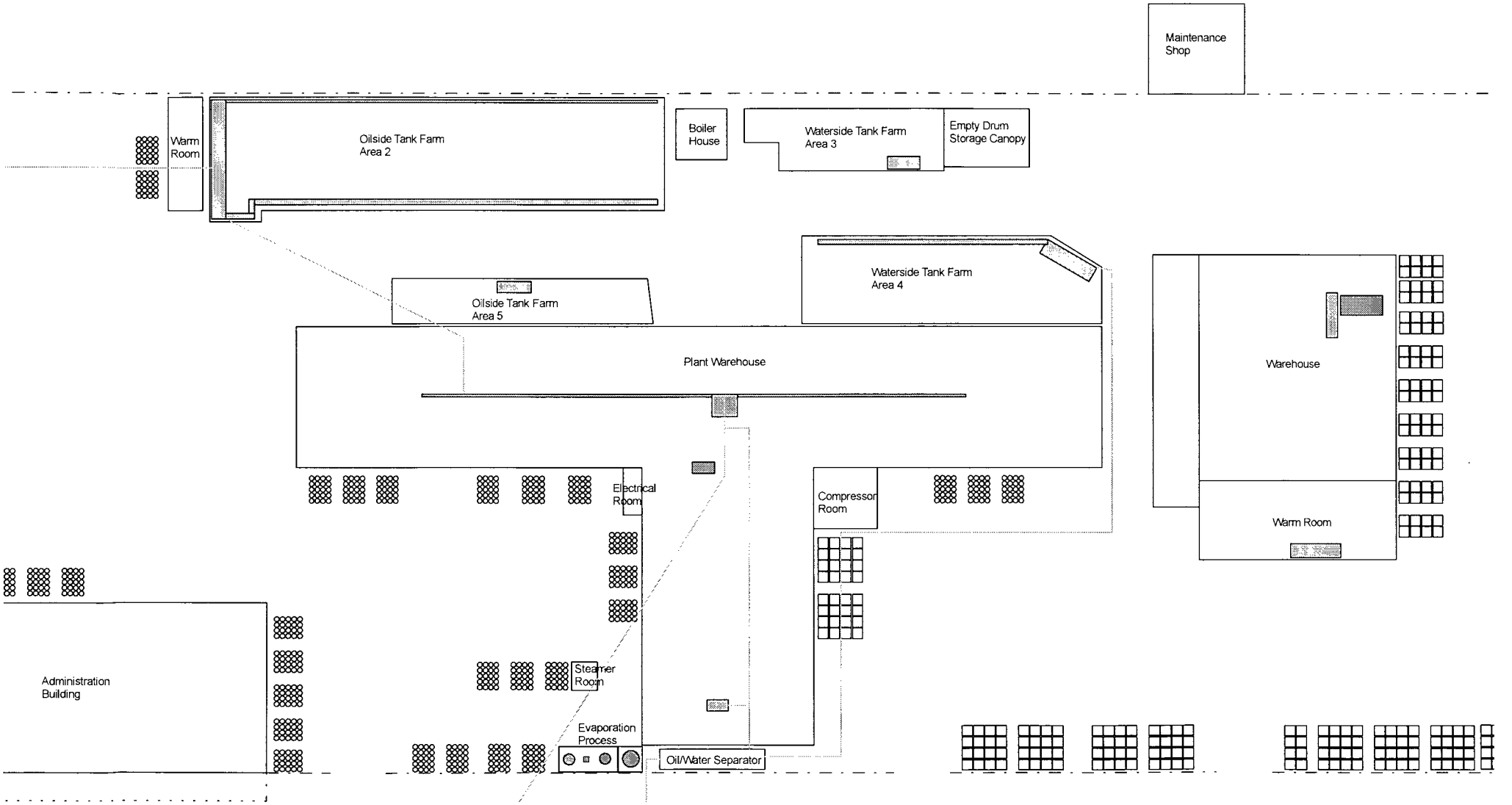


BJ Chemical Services

BJ Chemical Services
Hobbs, NM

Future Tank Replacements
Waterside Tank Farm - Area 4

APPROVED BY: TSS	DATE: 8/17/07
DRAWN BY: TSS	DATE: 8/17/07
	SCALE: 1" = 12'


Maintenance Shop
Warm Room
Oilside Tank Farm Area 2
Boiler House
Waterside Tank Farm Area 3
Empty Drum Storage Canopy
Waterside Tank Farm Area 4
Oilside Tank Farm Area 5
Plant Warehouse
Warehouse
Warm Room
Electrical Room
Compressor Room
Administration Building
Steamer Room
Evaporation Process
Oil/Water Separator

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

CK# 2268437

Lori Wrotenbery
Director
Oil Conservation Division

September 23, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 9161

Mr. Robert Barr
BJ Unichem Chemical Services
707 N. Leech
Hobbs, New Mexico 88240

RE: Discharge Plan Renewal Approval GW-094
BJ Unichem Chemical Services
Hobbs Service Facility
Lea County, New Mexico

Dear Mr. Barr:

The ground water discharge plan renewal GW-094 for the BJ Unichem Chemical Services Hobbs Service Facility located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on July 22, 1992 and approved December 2, 1992. The discharge plan renewal application, dated August 1, 2002, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve BJ Unichem Chemical Services of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., BJ Unichem Chemical Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **December 1, 2007**, and BJ Unichem Chemical Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Proposed modifications consisting of a new maintenance facility, office area and cement testing area is herewith approved.

The discharge plan application for the BJ Unichem Chemical Services Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of $100. There is a flat fee assessed for oil and gas service companies equal to $1,700.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-094
BJ UNICHEM CHEMICAL SERVICES
HOBBS SERVICE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(September 23, 2002)

1. Payment of Discharge Plan Fees: The $100.00 filing fee has been received by the OCD. There is a flat fee assessed for oil and gas service companies equal to $1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. BJ Unichem Chemical Services Commitments: BJ Unichem Chemical Services will abide by all commitments submitted in the discharge plan renewal application dated August 1, 2002 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. 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.

11. Class V Wells: No 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. 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. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a BJ Unichem Chemical Services's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.

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

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: BJ Unichem Chemical Services shall maintain storm water runoff controls. As a result of BJ Unichem Chemical Services's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then BJ Unichem Chemical Services shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. BJ Unichem Chemical Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service Facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: BJ Unichem Chemical Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. BJ Unichem Chemical Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

BJ UNICHEM CHEMICAL SERVICES

by Robert E. Barr

10/1/02 Title EH+S MGR.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 23, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 9161

Mr. Robert Barr
BJ Unichem Chemical Services
707 N. Leech
Hobbs, New Mexico 88240

RE: Discharge Plan Renewal Approval GW-094
BJ Unichem Chemical Services
Hobbs Service Facility
Lea County, New Mexico

Dear Mr. Barr:

The ground water discharge plan renewal GW-094 for the BJ Unichem Chemical Services Hobbs Service Facility located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on July 22, 1992 and approved December 2, 1992. The discharge plan renewal application, dated August 1, 2002, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve BJ Unichem Chemical Services of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., BJ Unichem Chemical Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **December 1, 2007**, and BJ Unichem Chemical Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Proposed modifications consisting of a new maintenance facility, office area and cement testing area is herewith approved.

The discharge plan application for the BJ Unichem Chemical Services Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of $100. There is a flat fee assessed for oil and gas service companies equal to $1,700.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

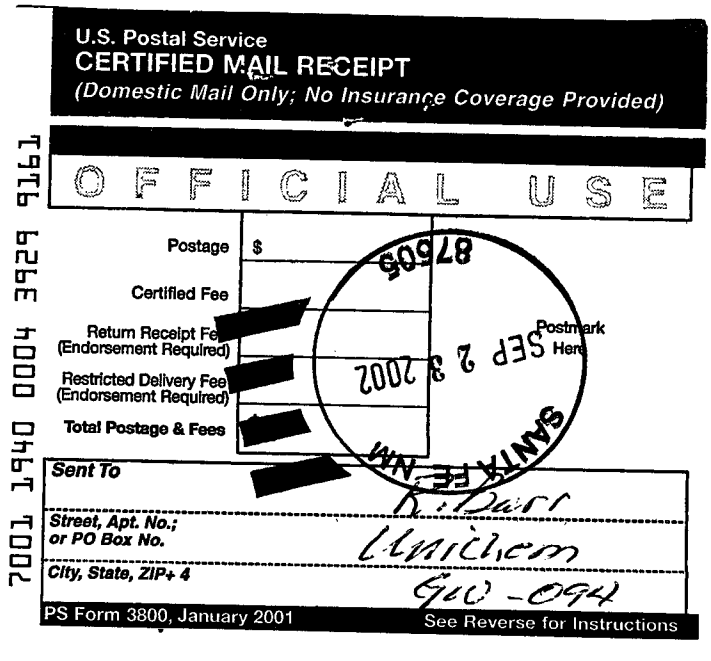
If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office



ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-094
BJ UNICHEM CHEMICAL SERVICES
HOBBS SERVICE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(September 23, 2002)

1. Payment of Discharge Plan Fees: The $100.00 filing fee has been received by the OCD. There is a flat fee assessed for oil and gas service companies equal to $1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. BJ Unichem Chemical Services Commitments: BJ Unichem Chemical Services will abide by all commitments submitted in the discharge plan renewal application dated August 1, 2002 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. 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.

11. Class V Wells: No 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. 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. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a BJ Unichem Chemical Services's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.

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

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: BJ Unichem Chemical Services shall maintain storm water runoff controls. As a result of BJ Unichem Chemical Services's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then BJ Unichem Chemical Services shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. BJ Unichem Chemical Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service Facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: BJ Unichem Chemical Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. BJ Unichem Chemical Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

BJ UNICHEM CHEMICAL SERVICES

by_____
Title

ATTACHMENT TO THE DISCHARGE PLAN GW-094 RENEWAL
UNICHEM INTERNATIONAL
HOBBS SERVICE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(December 9, 1997)

1. Payment of Discharge Plan Renewal Fees: The $50.00 filing fee has been received. A renewal flat fee for service company facilities is equal to one-half of the original flat fee.

2. Unichem Commitments: Unichem International will abide by all commitments submitted in the discharge plan application dated August 29, 1997.

3. Waste Disposal: All wastes shall be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. 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.

5. 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.

6. 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.

7. 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.

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

9. 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.

10. 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. Permittees 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.

11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

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

13. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

16. Certification: Unichem International, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Unichem International further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

UNICHEM INTERNATIONAL

by Charles N. Root

Title

Manager, Environmental, Health & Safety

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

December 9, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-869-903

Mr. Charles N. Root
Unichem International
P.O. Box 1499
Hobbs, New Mexico 88240

RE: Discharge Plan GW-094 Renewal
Hobbs Service Facility
Lea County, New Mexico

Dear Mr. Root:

The ground water renewal discharge plan GW-094, for the Hobbs Service Facility located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan as approved December 1, 1992, and the discharge plan renewal application dated August 29, 1997. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Unichem International of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. Unichem International is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.G.4., this plan is for a period of five years. This approval will expire on November 30, 2002, and Unichem International should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the Unichem International Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $50 plus a flat fee equal to one-half of the original flat fee. The OCD has received the filing fee.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/wjf
Attachment

xc: OCD Hobbs Office

Z 357 869 903

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Charles N. Root	
Street & Number PO Box 1499	
Post Office, State, & ZIP Code Hobbs, NM 88240	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

ATTACHMENT TO THE DISCHARGE PLAN GW-094 RENEWAL
UNICHEM INTERNATIONAL
HOBBS SERVICE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(December 9, 1997)

1. Payment of Discharge Plan Renewal Fees: The $50.00 filing fee has been received. A renewal flat fee for service company facilities is equal to one-half of the original flat fee.

2. Unichem Commitments: Unichem International will abide by all commitments submitted in the discharge plan application dated August 29, 1997.

3. Waste Disposal: All wastes shall be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. 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.

5. 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.

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8. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessa[illegible] if they were to rupture, spill, or ignite.

16. Certification: Unichem International, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Unichem International further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

UNICHEM INTERNATIONAL

by_____
Title

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

December 1, 1992

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-145

Mr. James H. Britton
Unichem International
P.O. Box 1499
Hobbs, New Mexico 88240

RE: Discharge Plan GW-94
Hobbs Service Facility
Lea County, New Mexico

Dear Mr. Britton:

The groundwater discharge plan GW-94 for the Unichem International Hobbs Service Facility located in the W/2 NW/4, Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated July 22, 1992.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission Regulations and is approved pursuant to section 3-109.A. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with

the terms and conditions of the plan". Pursuant to Section 3-107.c. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire December 1, 1997 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the Unichem International Hobbs Service Facility is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen hundred and eighty (1380) dollars for service companies.

The OCD has received your $50 filing fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/rca

xc: OCD Hobbs Office

ATTACHMENT TO DISCHARGE PLAN GW-94 APPROVAL
UNICHEM INTERNATIONAL HOBBS SERVICE FACILITY
DISCHARGE PLAN REQUIREMENTS
(December 1, 1992)

1. Drum Storage: All drums will be stored on pad and curb type containment.

2. Sump Inspection: All sumps at this facility will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will be approved by the OCD prior to installation and will incorporate secondary containment with leak detection in their designs.

3. Tank Berming: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain one and one third times the capacity of the tank.

4. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 13, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-723

Mr. James H. Britton
UNICHEM
P.O. Box 1499
Hobbs, NM 88240

RE: Minor Modification
UNICHEM - Hobbs
GW-094
Lea County, New Mexico

Dear Mr. Britton:

The New Mexico Oil Conservation Division (OCD) has received UNICHEM's letter dated December 11, 1996 requesting the addition of an empty drum storage shed, and hot house to store high freeze point products at the UNICHEM Hobbs facility GW-094. The UNICHEM request is considered a minor modification to the above referenced discharge plan and public notice will not be issued. **The requested minor modification is hereby approved**, with the following condition:

- **Sumps**: The below grade sump that will be part of the "hot house" must incorporate secondary containment and leak-detection into the design. (See the discharge plan approval letter from OCD dated December 1, 1992, permit condition 2.)

The Application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3107.C and is approved pursuant to WQCC Regulation 3109. Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. **The discharge plan approval of December 1, 1992 will expire December 1, 1997, and an application for renewal should be submitted in ample time before that date.**

Please note that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3107.C UNICHEM is required to notify the Director of any facility expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

Note, that OCD approval does not relieve UNICHEM of liability should UNICHEM's operation's result in contamination of surface water, ground water or the environment.

If you have any questions please feel free to call me at (505)-827-7152 or Pat Sanchez at (505)-827-7156.

Sincerely,

Roger C. Anderson
Bureau Chief
Environmental Bureau - OCD

RCA/pws

PS Form **3800**, April 1995

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to: UNICHEM - Mr Britton
Street & Number: Mail Stop GW-094
Post Office, State, & ZIP Code:

Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

P 288 258 723

xc: Mr. Wayne Price - Environmental Engineer, OCD Hobbs District

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

March 2, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-946

Mr. Wayne Price, Staff Engineer
Unichem International Inc.
707 N. Leech
Hobbs, New Mexico 88240

RE: DISCHARGE PLAN GW-94 ADDENDUM # 1
HOBBS SERVICE FACILITY
LEA COUNTY, NEW MEXICO

Dear Mr. Price:

The New Mexico Oil Conservation Division (OCD) has received your December 2, 1992 request to modify your discharge plan GW-94 for the Hobbs Service Facility located at 707 N. Leech, Lea County, New Mexico. The modification is to transport non-Hazardous solid waste from outlying Unichem facilities throughout New Mexico to the Hobbs Service Facility. The non-domestic wastes are generated from oilfield service work and accumulate at outlying chemical docks which are small distribution points located in the oil field to supply chemical on a daily basis to the oil and gas production areas. The Hobbs Service Facility is classified as a large quantity generator and is permitted with the US EPA (ID# ~~TXD 06-945-2340~~).

NMD000333559 See 4/28/93 letter

Based on the information in the above referenced correspondence, the OCD hereby approves the modification to discharge plan GW-94 for the Hobbs Service Facility with the following conditions:

1. Only solid wastes from outlying Unichem International facilities will be transported to the Unichem Hobbs Service Facility.

2. Only those solid wastes which are non-hazardous are approved to be transported to the Unichem Hobbs Facility. Any wastes which are hazardous by either listing or testing must have the New Mexico Environment Department's (NMED) approval prior to transport.

3. Transportation of solid waste will be per DOT Rules and Regulations.

4. All wastes from the outlying areas which are transported to the Unichem Hobbs Facility will be shipped off-site to a US EPA permitted "TSDF".

Please be advised that OCD approval does not relieve you of responsibility for compliance with other federal, state and local laws and/or regulations. In addition, approval of this modification does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

The discharge plan modification for the Unichem International Hobbs Service Facility is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan modification will be subject to the filing fee of fifty (50) dollars plus one-half of the flat fee or six hundred and ninety (690) dollars for service facilities. The Director may waive the flat fee for discharge plan modifications.

This is considered a minor modification to the discharge plan and the Director has waived the flat fee and public notice is not required.

The OCD has not received your $50 filing fee and it is due upon receipt of this letter. Please make all checks out to: **NMED - Water Quality Management** and addressed to the OCD Santa Fe Office.

If you have any questions, please do not hesitate to contact Kathy Brown at (505) 827-5884.

Sincerely,

William J. LeMay
Director

WJL/kmb

xc: Jerry Sexton, OCD Hobbs Office

UNICHEM
INTERNATIONAL

707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

December 2, 1992

Mr. Chris Eustice
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Certified Mail # P 661 764 445

Dear Mr. Eustice:

Discharge Plan Application Addendum #1 -
Hobbs Facility - Lea County, New Mexico

As discussed on November 24, 1992, Unichem International is submitting an addendum to our discharge plan application for the Hobbs Facility, 707 N. Leech, Lea County, New Mexico.

Our intentions are to transport non-Hazardous solid waste (non-domestic waste resulting from oilfield service work) from our outlying facilities located throughout New Mexico to our Hobbs, New Mexico plant and warehouse located at 707 N. Leech. These outlying facilities shall include any permitted "billable facility" as defined in the State of New Mexico Water Quality Control Commission Regulations Part 3-114.A.2. and various outlying chemical docks located on or near oil and gas production sites.

These outlying chemical docks are small distribution points located in the oilfield to supply chemical on a daily basis to the oil and gas production areas. These facilities are presently under the jurisdiction of the NM Oil Conservation Division.

The Hobbs facility is presently classified as a large quantity generator and our generator EPA ID # is NMD000333559. As discussed, we routinely ship this type of waste off-site to a US EPA permitted "TSDF"; and in this case it goes to US Texas Ecologists Inc. located in Robstown, Texas, (US EPA # TXD 06-945-2340).

This solid waste stream is generated from routine operations, such items include soil, dirt, hoses, plastic buckets, gloves, paper towels, rags, absorbent material and pigs which are contaminated with chemicals. Some of the locations have a solid waste drum and a log-in sheet to identify each component and which chemical it was contaminated with. Operations in areas without solid waste drums will carry these solid waste to the nearest yard or dock

that has a solid waste drum. Waste determinations are made on this knowledge and will be substantiated with occasional random and/or composite sampling. EPA SW-846 protocols will be used for these procedures.

Transportation of this solid waste will be per DOT Rules and Regulations. Documentation will be maintained in the Hobbs, New Mexico office.

Attached are the following inserts. Please remove the old pages and insert new ones to reflect change.

2 copies - Last page of Part VII - Book 1 & 2

2 copies - Next to last page of Part VIII - Book 1 & 2.

2 copies - Appendix B - Solid waste flow diagram - Book 1 & 2.

Unichem appreciates your time and effort in this matter and if you have any further questions please do not hesitate to call or write.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price
Staff Engineer

LWP:jd
cc: B. Clements
J. Britton
H. McCullough
C. Root
L. Gardner
M. Zachary
J. Hay
M. Pye

13 (f). Other Waste Solids	Municipal solid waste from plant and office facilities, including empty aerosol cans, plastic pails, empty powder chemical sacks, paper towels, office trash, lab glass, etc. (Non-hazardous)	2,200 loose cu.ft./ month (est. annual average)	None
13 (g). Other Waste Solids	Construction debris (Non-hazardous)	Depends upon level of construct-ion activity.	None
13 (h). Other Waste Solids	Oily soils at bioremediation site. (Non-hazardous)	Depends upon depth and extent of spills to be remediated.	None
13 (i). Other Waste Solids	Other contaminated soils. (Non-hazardous)	Depends upon depth and extent of spill in question.	None
13 (j). Other Waste Solids	Scrap metal. (Non-hazardous)	Depends upon demolition activity undertaken.	None
13 (k). Other Waste Solids	Used batteries from fleet vehicles	1 per month (est. annual average)	None
13 (l). Other Waste Solids	Non-Hazardous solid waste from outlying field operations located in New Mexico. This solid stream is generated from routine operations, such items include; soil, dirt, hoses, plastic buckets, gloves, paper towels, rags, absorbent material and pigs which are contaminated with chemicals.	Estimated volume 1-10 drums/month	None

VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures:

Current liquid and solid waste collection, treatment and disposal procedures are addressed in Form VIII, which is included below, and are further described by the Solid Waste Flow Diagram attached as Appendix B:

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

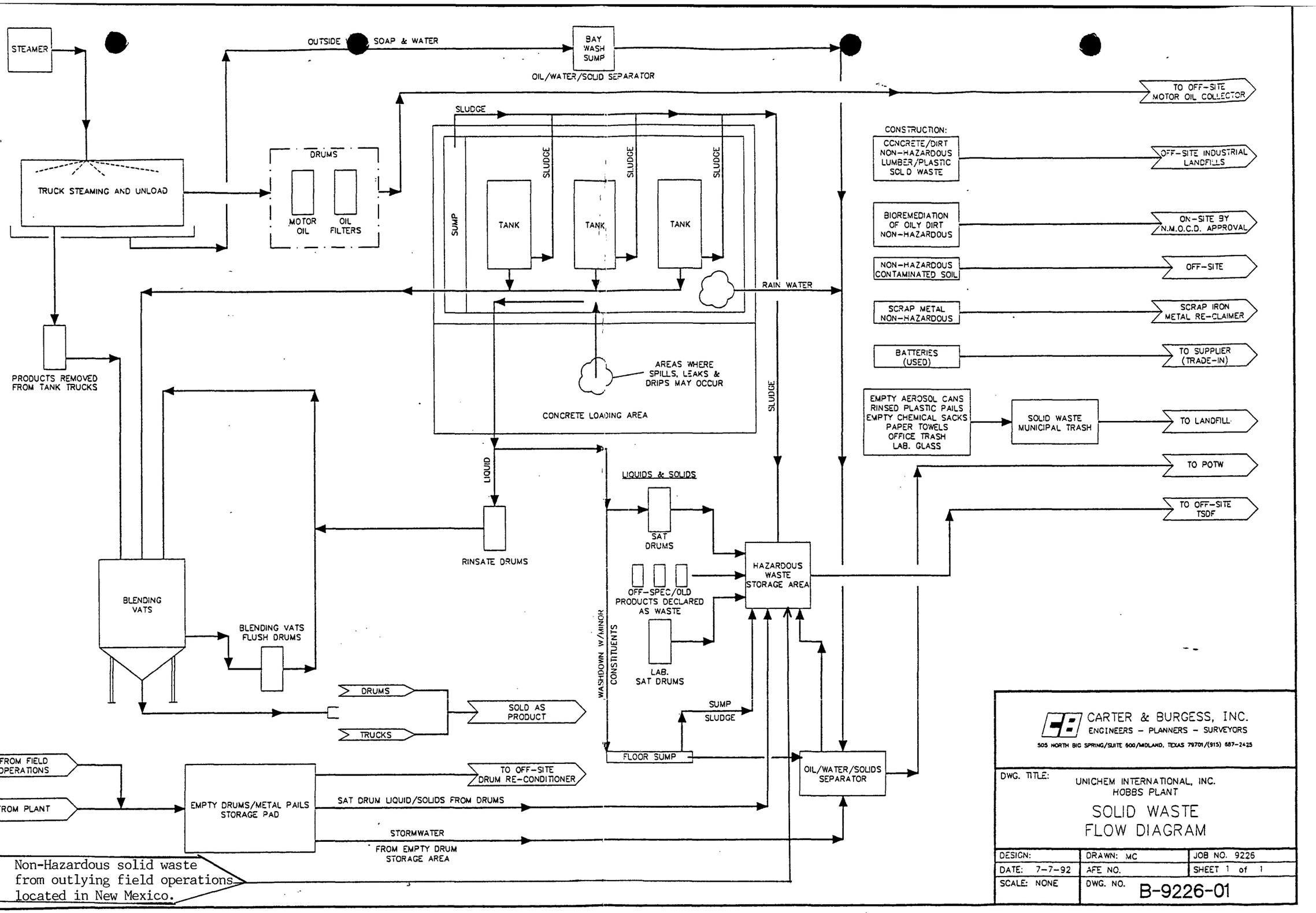
Part VIII. Form

Summary Description of Existing Liquid and Solids Waste Collection and Disposal - For each waste type listed in Part VII, Provide summary information about onsite collection and disposal systems. Information on basic construction features, specific descriptions, and wastewater schematics should be provided as required in the Guidelines. The use of this form is optional, but the summary information requested must be provided.

Note: Unichem does not own or operate on-site injection wells or leach fields of any type at the Hobbs plant, so those items are left out of the following table.

13 (f). Other Waste Solids	Municipal solid waste from plant and office facil-ities, including empty aerosol cans, plastic pails, empty powder chemical sacks, paper towels, office trash, lab glass, etc. (Non-hazardous)	N/A	N/A	N/A	Stored in a waste bin for delivery off-site to a municipal landfill.
13 (g). Other Waste Solids	Construction debris (Non-hazardous)	N/A	N/A	U	Off-site to municipal and/or industrial landfill.
13 (h). Other Waste Solids	Oily soils at bioremediation site. (Non-hazardous)	N/A	N/A	L	Bioremed-iated per NMOCD cleanup levels and disposed of on-site or off-site to industrial landfill.
13 (i). Other Waste Solids	Other contam-inated soils. (Non-hazardous)	N/A	N/A	L	Off-site to industrial landfill.
13 (j). Other Waste Solids	Scrap metal. (Non-hazardous)	N/A	N/A	U	Off-site to scrap metal buyer.
13 (k). Other Waste Solids	Used batteries from fleet vehicles	N/A	N/A	N/A	Not stored - Immediate trade-in for new battery.
13 (l). Other Waste Solids	Non-Hazardous solid waste from outlying field operations located in New Mexico. This solid stream is generated from routine operations, such items include; soil, dirt, hoses, plastic buckets, gloves, paper towels, rags, absorbent material and pigs which are contaminated with chemicals.	D	N/A	N/A	Manifested off-site to a RCRA TSDF

A concrete-lined floor drain/sump system, interconnected by 3" Schedule 80 CPVC underground lines, drains all areas likely to come into contact with chemicals from spills, leaks or drips. This system is shown on Figure 4 - Underground Utilities Site Plan, which is included in this report as a part of Section XI. This system is returned to a dry condition within 24 hours of any rainfall event, by company policy, so the system is never under more than minimal pressure and leak potential is minimized.



CARTER & BURGESS, INC.
ENGINEERS - PLANNERS - SURVEYORS
505 NORTH BIG SPRING/SUITE 600/MIDLAND, TEXAS 79701/(915) 687-2425

DWG. TITLE:
UNICHEM INTERNATIONAL, INC.
HOBBS PLANT

SOLID WASTE FLOW DIAGRAM

DESIGN:	DRAWN: MC	JOB NO. 9226
DATE: 7-7-92	AFE NO.	SHEET 1 of 1
SCALE: NONE	DWG. NO. B-9226-01	

REVISED 12/2/92