

GW - 101

**GENERAL
CORRESPONDENCE**

YEAR(S):
1997-1985



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

August 20, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-961

Mr. Maurice Sticker
Smith International, Inc.
P.O. Box 60068
Houston, Texas 77205-0068

**RE: Closure Approval of Discharge Plan GW-101
Farmington Facility
San Juan County, New Mexico**

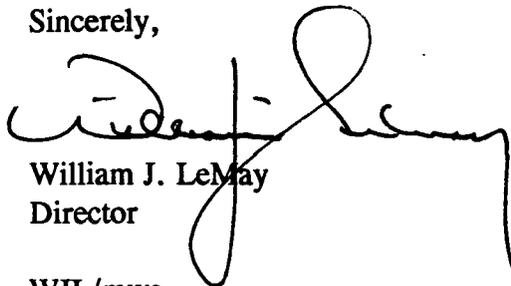
Dear Mr. Sticker:

The New Mexico Oil Conservation Division (OCD) has received the letter dated August 8, 1997 for the Closure of the Smith International, Inc. (Smith) GW-101 Discharge Plan located in the SE/4 SW/4 of Section 14, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. The closure of the Farmington facility was submitted pursuant to Section 3107 A.11 of the Water Quality Control Commission Regulations and is hereby approved, and discharge plan GW-101 is hereby repealed.

Please be advised that OCD approval of the closure for this facility does not relieve Smith from liability should it later be found that contamination exists at the GW-101 site. Further, OCD approval does not relieve Smith from compliance with other Federal, State, or Local rules and regulations.

On behalf of the staff of the Oil Conservation Division, I wish to thank the staff of Smith for your cooperation during this discharge plan closure. If Smith has any further questions or comments please contact Mark Ashley at (505)-827-7155.

Sincerely,



William J. LeMay
Director

WJL/mwa

xc: Denny Foust, OCD Aztec Office

P 288 258 961

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

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
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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



SMITH INTERNATIONAL, INC.

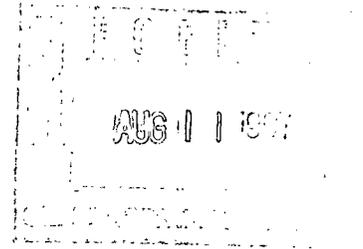
16740 Hardy Street
P.O. Box 60068
Houston, Texas 77205-0068

Tel: (281)443-3370
Telex: 62-880-472

Maurice Sticker, REM
Director, Environmental Affairs
Phone: (281)233-5092
Fax: (281)233-5620
E-Mail: msticker@smith-intl.com

August 8, 1997

Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
New Mexico Energy, Minerals & Natural Resources Dept.



**Subject: Discharge Plan GW-101 Renewal
Farmington Service Facility
San Juan County, New Mexico**

Dear Mr. Anderson:

Smith International, Inc. received a forwarded letter, originally addressed to Mr. Brake Stevens of Smith Energy Services, dated June 6, 1997, regarding renewal of the groundwater discharge plan. However, Smith International should no longer have any type of permitting obligation for the subject facility.

Smith International sold the property on or about December 21, 1991 to CLM Properties, Inc., 3211 Mountain View Drive, Farmington, New Mexico 87401. Smith International has no interest in the property nor do we have any operations on the property. The groundwater discharge plan, GW-101, was required as part of a transaction related remediation of the property. We believe that the remediation was successfully completed and that the groundwater discharge plan is no longer necessary.

Smith Energy Services was, at one time, a subsidiary of Smith International but was sold to Allied Products in the late 1980's. Smith Energy Services continued to operate at the Farmington location until some time after Smith International sold the property to CLM. A few years ago, Allied Products sold Smith Energy Services to another company at which time Smith Energy Services ceased to exist.

If you have any questions or comments, please call me at (281)233-5092.

Sincerely,

Maurice M. Sticker, Jr. REM
Director, Environmental Affairs

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 10:45 AM	Date 8-7-97
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<u>Originating Party</u> MARK ASWLEY	<u>Other Parties</u> MAURICE STICKER
---	---

Subject SMITH ENERGY SERVICES GW-101

Discussion OCD NEED A CLOSURE LETTER FROM SMITH
FOR GW-101.

Conclusions or Agreements MAURICE WILL SUBMIT A CLOSURE
TO THE OCD.

Distribution Signed *Mark Aswley*



State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0188

Bill Osborne file
RECEIVED FEB 18 1995
91410.02

MARK E. WEIDLER
SECRETARY

GARY E. JOHNSON
GOVERNOR
February 17, 1995

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Mr. Michael T. Greene
CLM Properties, Inc.
3211 Mountain View Drive
Farmington, New Mexico 87401

**RE: NO FURTHER ACTION REQUIRED AT SMITH ENERGY SERVICES SITE,
2198 EAST BLOOMFIELD HIGHWAY, FARMINGTON, NEW MEXICO**

Dear Mr. Greene:

The New Mexico Environment Department has reviewed the results of ground water monitoring for the previous two years. The Department has determined that this site does not pose an immediate public health or environmental threat for the following reasons:

1) Chemical analyses of ground water samples have found that hydrocarbon product constituents do not exceed cleanup levels as stipulated in Underground Storage Tank Regulations Part XII Section 1209.

2) Requirements of Underground Storage Tank Regulations Part XII Section 1219.A.(5) have been met.

Based on this information, the Department requires no additional work at this time, although it reserves the right to do so should petroleum hydrocarbon contamination resulting in a threat to public health or the environment be discovered.

Depth to ground water at this site is 30 feet.

Sincerely,

Jack Ford, C.P.G.
Project Manager
Underground Storage Tank Bureau

cc: Harlan Brown, Envirotech, Inc.
NMED Farmington Office
NMED District I Office
Anna Richards, Manager, Corrective Action Program
Tony Moreland, Geologist, Corrective Action Program



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 6, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-928

Mr. Brake Stevenson
Smith Energy Services
2198 East Bloomfield Hwy
Farmington, New Mexico 87401

**RE: Discharge Plan GW-101 Renewal
Farmington Service Facility
San Juan County, New Mexico**

Dear Mr. Stevenson:

On December 2, 1992, the groundwater discharge plan, GW-101, for the Smith Energy Services (Smith) Farmington Service Facility located in the SE/4 SW/4, Section 14, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulation 3106 and was approved pursuant to section 3109 for a period of five years. The approval will expire on December 2, 1997.

If the facility continues to have potential or actual effluent or leachate discharges and Smith wishes to continue operations, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires (on or before August 2, 1997), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Smith has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the Farmington Service Facility is subject to the 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 of \$690 for oil field service companies. The \$50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a

Mr. Brake Stevenson
June 6, 1997
Page 2

single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan with the first payment due the at the time of approval.

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

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with the discharge plan renewal request.** Copies of the WQCC regulations and discharge plan application form and guidelines have been enclosed. If Smith requires additional copies of these items notify the OCD at (505) 827-7152. A complete copy of the regulations is also available on the OCD's website at www.emnrd.state.nm.us/ocd/.

If Smith no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If Smith has any questions, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Aztec Office

P 288 258 928

P 288 258 935

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
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Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

US Postal Service
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Do not use for International Mail (See reverse)

Sent to	
Street & Number	
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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

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

December 7, 1994

Mr. William C. Olson
Hydrogeologist
State of New Mexico Environmental Bureau
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: Annual Monitoring Event
Groundwater Assessment
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico 87410

RECEIVED

DEC 14 1994

OIL CONSERVATION DIV.
SANTA FE

Project: 91410

Dear Mr. Olson:

Attached please find a September 1994 sampling report for evaluation of the reclamation operations at the above noted location. This sampling event followed the instructions outlined in the NMOCD's letter to Mr. Maurice Sticker of Smith International dated November 17, 1993.

The September 1994 sampling event completes 2 years of monitoring. Results of the 2-year monitoring plan indicate that reclamation has been successful. The site meets New Mexico Water Quality Control Commission groundwater quality standards. On behalf of Smith International Inc., we request permanent closure of all sites on the subject property and termination of monitoring requirements.

Please contact us if you have any additional questions or comments. We appreciate your assistance with this project.

Respectfully submitted,
Envirotech Inc.



Harlan M. Brown
Staff Geologist

Attachment: September 1994 Sampling Report

cc: Maurice Sticker - Smith International
Denny Foust - OCD Aztec Office
Jack Ford - ED Santa Fe Office

HMB/hmb

91410-01.LTR

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

December 7, 1994

Mr. Jack Ford
State of New Mexico Environment Department
Underground Storage Tank Bureau
P.O. Box 26110
Santa Fe, New Mexico 87502

RE: Phase 5 Sampling Event
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico 87410

RECEIVED

DEC 14 1994

OIL CONSERVATION DIV.
SANTA FE

Project: 91410

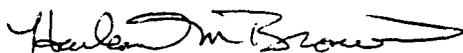
Dear Mr. Pullen:

Attached please find a September 1994 sampling report for evaluation of the reclamation operations at the above noted location. This sampling event followed tasks outlined in the Phase 5 Workplan, Smith International Inc., Farmington, San Juan County, New, Mexico submitted to you on March 18, 1993, with sampling revisions documented in a letter dated March 31, 1993.

The September 1994 sampling event is the last monitoring event scheduled under the NMED approved Phase 5 Workplan. This completes 2 years of monitoring. Results of the 2-year monitoring plan indicate that reclamation activities have been successful. The site meets New Mexico Water Quality Control Commission ground water quality standards. On behalf of Smith International Inc., we request permanent closure of all sites on the subject property and termination of monitoring requirements.

Please contact us if you have any additional questions or comments. We appreciate your assistance with this project.

Respectfully submitted,
Envirotech Inc.



Harlan M. Brown
Staff Geologist

Attachment: September 1994 Sampling Report

cc: Maurice Sticker - Smith International
Denny Foust - OCD Aztec Office
William Olson - OCD Santa Fe Office

HMB/hmb

91410-01.LTR

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

October 04, 1993

Mr. William C. Olson
Hydrogeologist
State of New Mexico Environment Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

RE: September Sampling Event
Groundwater Assessment
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico

Project No: 91410

Dear Mr. Olson:

Attached please find a September 1993 sampling report for evaluation of the reclamation operations at the above noted location. This sampling event followed the sampling instructions outlined in the NMOCD's letter to Mr. Maurice Sticker of Smith International dated November 17, 1993.

The next sampling event is scheduled for September 1994. If the hydrocarbon contamination continues to be non-detectable, it is anticipated that NMOCD will not require further sampling. Additionally, closure of the site is anticipated once the NMOCD is satisfied that the groundwater has not been adversely affected.

Please contact us if you have any additional questions or comments. We appreciate your assistance with this project.

Respectfully submitted,
ENVIROTECH INC.

Robert E. O'Neill

Robert E. O'Neill
Environmental Engineer

Attachment: September 1993 Sampling Report

cc: Maurice Sticker - Smith International Inc.
Denny Foust - NMOCD Aztec Office
Steve Pullen - NMED Santa Fe Office

REO/reo

91410SWO.LET

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

October 4, 1993

Mr. Steve Pullen
Water Resource Specialist
State of New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

RE: Phase 5 September Sampling Event
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico

Project No: 91410

Dear Mr. Pullen:

Attached please find a September 1993 sampling report for evaluation of the reclamation operations at the above noted location. This sampling event followed the Phase 5 Workplan submitted to you on March 18, 1993, with sampling revisions requested by you and documented in a letter dated March 31, 1993.

Future sampling may be discontinued or modified per NMED's instructions. Closure of the site is anticipated following a two year evaluation to determine if the groundwater has been adversely affected.

Please contact us if you have any additional questions or comments. We appreciate your assistance with this project.

Respectfully submitted,
ENVIROTECH INC.

Robert E. O'Neill

Robert E. O'Neill
Environmental Engineer

Attachment: September 1993 Sampling Report

cc: Maurice Sticker - Smith International
Denny Foust - NMOCD Aztec Office
William C. Olson - NMOCD Santa Fe Office

REO/reo

91410SSP.LET

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

April 12, 1993

Mr. William C. Olson
Hydrogeologist
State of New Mexico Environmental Bureau
Energy, Minerals and Natural resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RECEIVED

APR 15 1993

OIL CONSERVATION DIV.
SANTA FE

RE: March Sampling Event
Groundwater Assessment
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico

Project No: 91410

Dear Mr. Olson:

Attached please find a March 1993 sampling report for evaluation of the reclamation operations at the above noted location. This sampling event followed the sampling instructions outlined in the NMOCD's letter to Mr. Maurice Sticker of Smith International dated November 17, 1993.

The next sampling event is scheduled for September 1993. If no trace of hydrocarbon contamination is detected, it is anticipated that NMOCD will not require further sampling. Additionally, closure of the site is anticipated once the NMOCD is satisfied that the groundwater has not been adversely affected.

Please contact us if you have any additional questions or comments. We appreciate your assistance with this project.

Respectfully submitted,
ENVIROTECH INC.

Robert E. O'Neill

Robert E. O'Neill
Environmental Engineer

Attachment: March 1993 Sampling Report

cc: Maurice Sticker - Smith International
Denny Foust - OCD Aztec Office
Steve Pullen - ED Santa Fe Office

REO/reo

91410MWO.LET

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

RECEIVED

APR 15 1993

OIL CONSERVATION DIV.
SANTA FE

April 12, 1993

Mr. Steve Pullen
Water Resource Specialist
State of New Mexico Environment Department
P.O. Box 26110
Santa Fe, New Mexico 87502

RE: Phase 5 March Sampling Event
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico

Project No: 91410

Dear Mr. Pullen:

Attached please find a March 1993 sampling report for evaluation of the reclamation operations at the above noted location. This sampling event followed the Phase 5 Workplan submitted to you on March 18, 1993, with sampling revisions requested by you and documented in a letter dated March 31, 1993.

Future sampling will be discontinued or modified per NMED's instructions. Closure of the site is anticipated when the Environmental Department is satisfied the groundwater has not been adversely affected.

Please contact us if you have any additional questions or comments. We appreciate your assistance with this project.

Respectfully submitted,
ENVIROTECH INC.

Robert E. O'Neill

Robert E. O'Neill
Environmental Engineer

Attachment: March 1993 Sampling Report

cc: Maurice Sticker - Smith International
Denny Foust - OCD Aztec Office
William C. Olson - OCD Santa Fe Office

REO/reo

91410MSP.LET

SMITH ENERGY SERVICES

A DIVISION OF  ALLIED PRODUCTS CORPORATION



THIS CHECK IS IN PAYMENT OF THE ITEMS LISTED BELOW:

REFERENCE NO.

INVOICE DATE	INVOICE NUMBER	CODE	COMPANY OR DIVISION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
12/15/92			Fee for discharge plan for the state of New Mexico. <i>file # GW-101</i>			\$1,380.00

CODE:

1. YOUR CREDIT
2. YOUR DEBIT

3. OUR CREDIT
4. OUR DEBIT

PLEASE DETACH BEFORE DEPOSITING

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 12/15/92,

or cash received on 12/29/92 in the amount of \$ 1,380

from Smith Energy Services

for Farmington Sewer Facility GW-101
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 12/29/92

Received in ASD by: Sherry Gonzales Date: 12/29/92

Filing Fee _____ New Facility Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

SMITH ENERGY SERVICES

A DIVISION OF  ALLIED PRODUCTS CORPORATION

20011 Golden Gate Canyon Road
Golden, Colorado 80403-8125
Phone (303) 277-1250

70-2328
719

CHECK NO. [REDACTED]

PAY EXACTLY ONE THOUSAND THREE HUNDRED EIGHTY DOLLARS AND NO/100**

PAY TO THE ORDER OF

NMED-WATER QUALITY MANAGEMENT
P.O. BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NM 87504

DATE 12/15/92

PAY
EXACTLY \$ 1,380.00***
NON-NEGOTIABLE AFTER 90 DAYS

SMITH ENERGY SERVICES
A DIVISION OF ALLIED PRODUCTS CORPORATION

CONTINENTAL BANK
CHICAGO, ILLINOIS 60697
OR IF DESIRED
OLD KENT BANK
WHEATON, ILLINOIS 60189

[Signature]
[Signature]



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



BRUCE KING
GOVERNOR

November 17, 1992

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

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-310

Mr. Maurice Sticker
Environmental Affairs Coordinator
Smith International, Inc.
16740 Hardy St.
Houston, Texas 72205-0068

**RE: SITE REMEDIATION AND GROUND WATER ASSESSMENT
SMITH INTERNATIONAL, INC.
FARMINGTON, NEW MEXICO**

Dear Mr. Sticker:

The New Mexico Oil Conservation Division (OCD) has completed a comprehensive review of the following documents submitted by Envirotech, Inc. on behalf of Smith International, Inc. regarding soil remediation activities and ground water quality investigations at the Smith International, Inc. Farmington, New Mexico service company facility:

1. April 1992 "SURFACE IMPOUNDMENT CLOSURE REPORT, WASH BAY SOLIDS DISPOSAL AREA".
2. May 1992 "ACID UST AND SUMP CLOSURE REPORT".
3. June 1992 "OFFSITE DRAINAGE CLOSURE REPORT".
4. July 1992 "ACID UST & SUMP CLOSURE SUPPLEMENTAL REPORT, SMITH INTERNATIONAL, INC., 2198 EAST BLOOMFIELD HIGHWAY, FARMINGTON, NEW MEXICO".
5. October 1992 "GROUNDWATER ASSESSMENT SUPPLEMENTAL, CLOSURE REPORT, SMITH INTERNATIONAL, INC., FARMINGTON, NEW MEXICO".

Mr. Maurice Sticker
November 17, 1992
Page 2

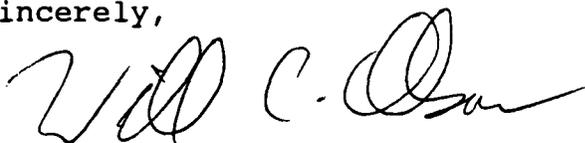
The remedial activities for contaminated soils related to Smith International's waste disposal activities, as contained in the above reports, meet the OCD's requirements in effect at the time of closure of these disposal units. However, since the October 1992 report documented the presence of low level ground water contaminants in the monitor wells downgradient of both the waste acid underground storage tank and the wash bay solids disposal area the OCD requires the following long term monitoring:

1. Monitor wells MW-4 and MW-5 will be sampled in March and September of 1993. Thereafter, these monitor wells will be annually sampled during the month of September. Upon renewal of the facility's ground water discharge plan the sampling requirements will be reviewed.
2. Ground water samples from the monitor wells will be analyzed for pH, Benzene, Toluene, Ethylbenzene and Xylenes using EPA approved laboratory methods.
3. The results of the monitor well sampling will be submitted to OCD within 60 days of the sampling event.

Please be advised that OCD approval does not relieve you of liability should future sampling show ground water to be contaminated in excess of New Mexico Water Quality Control Commission ground water standards as a result of these closed disposal areas.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Denny Foust, OCD Aztec Office
Michael K. Lane, Envirotech, Inc.

ENVIROTECH INC.

OIL UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
RECEIVED

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

'92 NOV 4 AM 8 59

October 30, 1992

Mr. Brake Stevenson
District Manager
Smith Energy Services
2198 East Bloomfield Highway
Farmington, NM 87401

RE: Groundwater Assessment
Smith International Inc.
2198 East Bloomfield Highway
SE/4, SW/4, Sec. 14, T29N, R13W, NMPM
San Juan County, Farmington, New Mexico

Project No: 91410

Dear Mr. Stevenson:

Attached, please find a copy of the Groundwater Assessment Report summarizing the findings of groundwater sampling and monitoring at the referenced Smith International property in Farmington, New Mexico.

This report supplements the closure reports for the Fuel UST, the Wash Bay Disposal Impoundment, and the Acid UST. Based on the findings of this report, there appears to have been minimal impact to the groundwater at the site. We feel no additional remedial action is required, and closure of all of the spill incident files is recommended. This has been requested of the New Mexico Oil Conservation Division and the New Mexico Environmental Department.

This report should complete all of the services Smith International retained Envirotech to provide in mitigation of the areas of environmental concern at the subject Farmington site.

Thank you for this opportunity to be of service. If you have any questions regarding this report or the other site assessments and closures, please contact us.

Respectfully submitted,
ENVIROTECH INC.


Michael K. Lane, P.E.
Project Manager/Geological Engineer

dc: NMOCD
NMED
Smith International Inc.
CLM Properties

MKL:mkl

141CSII6.LTR



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

OIL CONSERVATION DIVISION
RECEIVED
'92 NOV 2 AM 8 52

October 28, 1992

Mr. William J. LeMay
Director, State of New Mexico
Oil Conservation Division
P.O. Box 2086
Santa Fe, New Mexico 87504-2088

Dear Mr. LeMay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on October 5, 1992, regarding Oil Conservation Division (OCD) discharge permits GW-101, GW-114, GW-128, GW-129, and GW-130, on fish, shellfish, and wildlife resources in New Mexico.

The Service has determined there are no wetlands or other environmentally sensitive habitats, plants, or animals that will be adversely affected by the following discharge permits.

GW-101- Smith Energy Services, located in Section 14, T29N, R13W, NMPM, San Juan County, New Mexico. Approximately 1,000 gallons per day of waste water is treated in an oil/water separator prior to transfer to the City of Farmington wastewater treatment system.

GW-114- Dowell Schlumberger, located in Section 4, T17S, R26E, NMPM, Eddy County, New Mexico. Approximately 280 gallons per day of waste water is stored in a closed top steel tank prior to disposal at an OCD approved offsite disposal facility.

GW-128- GPM Gas Corporation, Hat Mesa Compressor Station located in Section 4, T21S, R32E, NMPM, Lea County, New Mexico. Approximately 1,250 gallons per day of waste water is stored in a closed top steel tank prior to disposal at an OCD approved off site treatment and disposal facility.

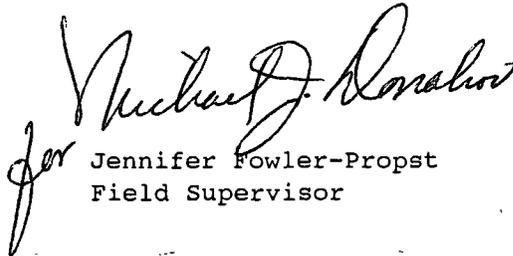
Regarding GW-129, Gas Company of New Mexico, Crouch Mesa Compressor Station, the Service has the following comments on the issuance of a permit to allow approximately 15 gallons per day of waste water to be stored in a fiberglass tank prior to disposal at an OCD approved off site disposal facility. The facility is located in Section 23, T29N, R12W, NMPM, San Juan County, New Mexico. It was not disclosed in the permit whether the tank was a closed tank or not. The Service is concerned an open tank would create a potential risk to Department of the Interior Trust Resources. If this is the case, the

Mr. William J. LeMay

3

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,


for Jennifer Fowler-Propst
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas



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



BRUCE KING
GOVERNOR

December 2, 1992

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

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-146

Mr. Brake Stevenson, District Manager
Smith Energy Services
2198 East Bloomfield Hwy
Farmington, New Mexico 87401

RE: Discharge Plan GW-101
Farmington Service Facility
San Juan County, New Mexico

Dear Mr. Stevenson:

The groundwater discharge plan GW-101 for the Smith Energy Services Farmington Service Facility located in the SE/4 SW/4, Section 14, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated September 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

Mr. Brake Stevenson
December 2, 1992
Page -2-

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 2, 1997 and you should submit an application for renewal in ample time before that date.

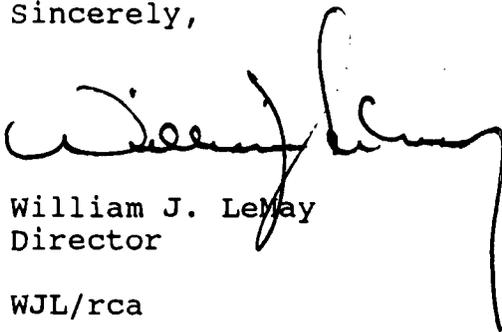
The discharge plan application for the Smith Energy Services Farmington Service Facility is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen 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: Denny Foust-OCD Aztec Office

**ATTACHMENT TO DISCHARGE PLAN GW-101 APPROVAL
SMITH ENERGY SERVICES FARMINGTON SERVICE FACILITY
DISCHARGE PLAN REQUIREMENTS /
(December 2, 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 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.
5. Underground Tanks: All Underground tanks under the jurisdiction of the OCD will be pressure tested on an annual basis
6. Remedial Activities: All remedial activities previously required remain in effect and become discharge plan requirements. Any changes or additional requirements will be discharge plan modifications.



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 3, 1992

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

Mr. Marshall Cain
Smith Energy Services
999 18th Steet
Suite 3100
Denver, CO 80202-2431

**RE: Hydrologic Information
Smith Energy Services, Farmington Facility (GW-101)**

Dear Mr. Cain:

The Oil Conservation Division has received your request for hydrologic information on the area surrounding your Farmington Service Facility located at 2198 E. Bloomfield Highway.

The groundwater at your Farmington Service Facility is at approximately 70 feet with a total dissolved solids concentration ranging from 600 mg/l to 900 mg/l.

If you have any additional questions, you can contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

xc: Denny Foust, OCD Aztec Office

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
 COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Legal Notice

~~and numbered~~ in the

~~County of New Mexico~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~once each week on the same day of the week~~ for one (1) day

~~consecutive weeks~~, beginning with the issue of

October 8, 19 92

and ending with the issue of

October 8, 19 92

And that the cost of publishing said notice is the sum of \$ 57.78

which sum has been (Paid) ~~Assessed~~ as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 15th

day of October, 19 92

Ms. Jean Serier
 Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 94

LEGAL NOTICE 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, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-101) - Smith Energy Services, Brake Stevenson, District Manager, 2198 East Bloomfield Highway, Farmington, New Mexico 87401, has submitted a discharge plan application for their Farmington Service Facility located in the SE/4 SW/4, Section 14, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. Approximately 1000 gallons per day of waste water is treated in an oil/water separator prior to transfer to the City of Farmington wastewater treatment system. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 27 feet with a total dissolved solids concentration ranging from 600 mg/1 to 900 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-114) - Dowell Schlumberger, Richard B. Connell, Manager, 500 Richey Street, Artesia, New Mexico 88210, has submitted a discharge plan application for their Artesia Service Facility located in the SE/4 SE/4, Section 4, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 280 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/1 is stored in a closed top steel tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 1500 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-128) - GPM Gas Corporation, Vincent B Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas 79762, has submitted a discharge plan application for their Hat Mesa Compressor Station located in the SW/4 SE/4, Section 4, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Approximately 1250 gallons per day of waste water with a total dissolved solids concentration of approximately 5000 mg/1 is stored in a closed

top steel tank prior to disposal at an OCD approved off site treatment and disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-129) - Gas Company of New Mexico, Sam Mohler, Compressor Operations Supervisor, P.O. Box 1899, Bloomfield, New Mexico 87413, has submitted a discharge plan application for its Crouch Mesa Compressor Station located in the NE/4 NE/4, Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 15 gallons per day of waste water will be stored in a fiberglass tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 252 feet with a total dissolved solids concentration of approximately 1500 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-130) - Bloomfield Refining Company, David Roderick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a discharge plan application to construct and operate a Class I (non-hazardous) disposal well located in the NW/4 SW/4,

Section 26, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 2380 barrels (100,000 gallons) per day of non-hazardous refinery waste will be disposed of by injection into the Cliff House formation at a depth from 3400 to 3600 feet. The total dissolved solids concentration of the waste is approximately 15,600 mg/1. The total dissolved solids concentration of the formation fluids is approximately 25,000 mg/1. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other unauthorized discharges to the ground surface. Groundwater most likely to be affected by any accidental discharge is at a depth from approximately 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/1.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address

between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of September, 1992.

STATE OF NEW MEXICO
 OIL CONSERVATION
 DIVISION
 WILLIAM J. LEMAY,
 Director

SEAL
 Published in the Lovington Daily
 Leader October 8, 1992.

Affidavit of Publication

No. 14094

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

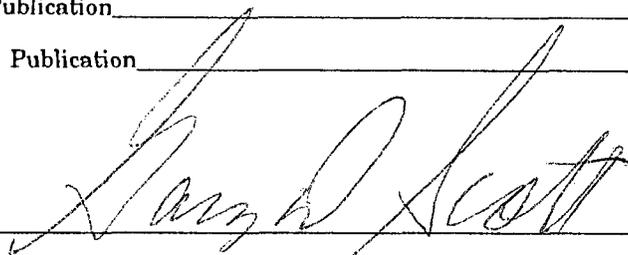
_____ was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 days consecutive weeks on the same day as follows:

First Publication October 9, 1992

Second Publication _____

Third Publication _____

Fourth Publication _____



Subscribed and sworn to before me this 23rd day of October 19 92

Barbara Kim Brans

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Publication

LEGAL NOTICE

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, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505)-827-5800:

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a closed top steel tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be

affected by an accidental discharge is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-128) - GPM Gas Corporation, Vincent B. Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas 79762, has submitted a discharge plan application for their Hat Mesa Compressor Station located in the SW/4 SE/4, Section 4, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Approximately 1250 gallons per day of waste water with a total dissolved solids concentration of approximately 5000 mg/l is stored in a closed top steel tank prior to disposal at an OCD approved off site treatment and disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-129) - Gas Company of New Mexico, Sam Mohler, Compressor Operations Supervisor, P.O. Box 1899, Bloomfield New Mexico 87413, has submitted a discharge plan application for its Crouch Mesa Compressor Station located in the NE/4 NE/4, Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 15 gallons per day of waste water will be stored in a fiberglass tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 252 feet with a total dissolved solids concentration of approximately 1500 mg/l.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-130) - Bloomfield Refining Company, David Roderick, Refinery Manager,

P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a discharge plan application to construct and operate a Class 1 (non-hazardous) disposal well located in the NW/4 SW/4, Section 26, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 2380 barrels (100,000 gallons) per day of non-hazardous refinery waste will be disposed of by injection into the Cliff House formation at a depth from 3400 to 3600 feet. The total dissolved solids concentration of the waste is approximately 15,600 mg/l. The total dissolved solids concentration of the formation fluids is approximately 25,000 mg/l. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other unauthorized discharges to the ground surface. Groundwater most likely to be affected by any accidental discharge is at a depth from approximately 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of September, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY,
Director

SEAL
Published in the Artesia Daily
Press, Artesia, N.M. October
9, 1992.

Legal 14094

AFFIDAVIT OF PUBLICATION

No. 30140

STATE OF NEW MEXICO,
County of San Juan:

CHRISTINE HILL being duly
sworn, says: "That she is the
NATIONAL AD MANAGER of
The Farmington Daily Times, a daily
newspaper of general circulation
published in English in Farmington,
said county and state, and that the
hereto attached LEGAL NOTICE

was published in a regular and entire
issue of the said Farmington Daily
Times, a daily newspaper duly quali-
fied for the purpose within the
meaning of Chapter 167 of the 1937
Session Laws of the State of New
Mexico for ONE consecutive
(days) (//////) on the same day as
follows:

First Publication FRIDAY, OCTOBER 9, 1992

Second Publication _____

Third Publication _____

Fourth Publication _____

and the cost of publication was \$ 81.33

Christine Hill

Subscribed and sworn to before me
this 20 day of
OCTOBER, 1992.

Genny Beck
Notary Public, San Juan County,
New Mexico

My Comm expires: ~~JULY 3, 1993~~ April 2, 1996

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, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

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(GW-128) - GPM Gas Corporation, Vincent B. Bernard, Safety and Environmental Supervisor, 4044 Pennington, Texas 79762, has submitted a discharge plan application for their Hat Mesa Compressor station located in the SW/4 SE/4, Section 4, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Approximately 1250 gallons per day of waste water with a total dissolved solids concentration of approximately 5000 mg/l is stored in a closed top steel tank prior to disposal at an OCD approved off site treatment and disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-129) - Gas Company of New Mexico, Sam Mohler, Compressor Operations Supervisor, P.O. Box 1899, Bloomfield New Mexico 87413, has submitted a discharge plan application for its Crouch Mesa Compressor Station located in the NE/4 NE/4, Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 15 gallons per day of waste water will be stored in a fiberglass tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 252 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-130) - Bloomfield Refining Company, David Roderick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a discharge plan application to construct and operate a Class I (non-hazardous) disposal well located in the NW/4 SW/4, Section 26, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 2380 barrels (100,000 gallons) per day of non-hazardous refinery waste will be disposed of by injection into the Cliff House formation at a depth from 3400 to 3600 feet. The total dissolved solids concentration of the waste is approximately 15,600 mg/l. The total dissolved solids concentration of the formation fluids is approximately 25,000 mg/l. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other unauthorized discharges to the ground surface. Groundwater most likely to be affected by any accidental discharge is at a depth from approximately 10 to 30 feet and is a water zone directly cause by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to the ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest. If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of September, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

SEAL

Legal No 30140 published in the Farmington Daily Times Farmington, New Mexico on Friday, October 9, 1992.

Thomas J. Smithson being duly sworn declares and says that he is the National Advertising manager of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 10 day of October, 1992, and the subsequent consecutive publications on _____, 1992.

Thomas J. Smithson
Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 10 day of Oct, 1992.

PRICE \$51.71

Statement to come at end of month.

ACCOUNT NUMBER C81873

Bernadette Oat

12-18-93

CLA-22-A (R-12/92)

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 Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, PO Box 2088, Santa Fe, New Mexico 87504-2088, telephone (505) 827-5800; (GW-101) Smith Energy Services, Brake Stevenson, District Manager, 2188 East Bloomfield Highway, Farmington, New Mexico 87401, has submitted a discharge plan application for their Farmington Service Facility located in the SE/4 SW/4 Section 14, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. Approximately 1000 gallons per day of waste water is treated in an oil/water separator prior to transfer to the City of Farmington wastewater treatment system. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 27 feet with a total dissolved solids concentration ranging from 800 mg/l to 900 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-114) Dowell Schlumberger, Richard B. Cornell, Manager, 500 Richey Street, Artesia, New Mexico 88210, has submitted a discharge plan application for their Artesia Service Facility located in the SE/4 SE/4 Section 4, Township 17 South, Range 29 East, NMPM, Lea County, New Mexico. Approximately 250 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is stored in a closed top steel tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-128) GPM Gas Corporation, Vincent B. Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas 79762, has submitted a discharge plan application for their Her Mesa Compressor Station located in the SW/4 SE/4 Section 4, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Approximately 1250 gallons per day of waste water with a total dissolved solids concentration of approximately 5000 mg/l is stored in a closed top steel tank prior to disposal at an OCD approved off site treatment and disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-129) Gas Company of New Mexico, Sam Mohler, Compressor Operations Supervisor, PO Box 1899, Bloomfield, New Mexico 87413, has submitted a discharge plan application for its Crouch Mesa Compressor Station located in the NE/4 NE/4 Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 15 gallons per day of waste water will be stored in a fiberglass tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 25 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-130) Bloomfield Refining Company, David Roderick, Refinery Manager, PO Box 159, Bloomfield, New Mexico 87413, has submitted a discharge plan application to construct and operate a Class 1 (non-hazardous) disposal well located in the NW/4 SW/4, Section 28, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 2380 barrels (100,000 gallons) per day of non-hazardous refinery waste will be disposed of by injection into the Cliff House formation at a depth from 3400 to 3600 feet. The total dissolved solids concentration of the waste is approximately 15,800 mg/l. The total dissolved solids concentration of the formation fluids is approximately 25,000 mg/l. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other unauthorized discharges to the ground surface. Groundwater most likely to be affected by any accidental discharge is at a depth from approximately 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/l.

Any interested person may obtain further information from the Oil and Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing. Given under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of September, 1992.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/16/92,
or cash received on 10/15/92 in the amount of \$ 50

from Smith Energy Services

for Farmington Service Company GW-101
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy M. Brown Date: 10/15/92

Received in ASD by: Shirley C. Montoya Date: 10/15/92

Filing Fee New Facility _____ Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521-07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

SMITH ENERGY SERVICES

70-2328
719

A DIVISION OF  ALLIED PRODUCTS CORPORATION

20011 Golden Gate Canyon Road
Golden, Colorado 80403-8125
Phone (303) 277-1250

CHECK NO. [REDACTED]

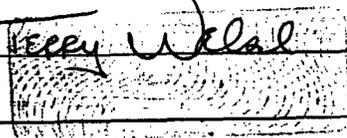
PAY FIFTY DOLLARS AND NO CENTS***

DATE SEPTEMBER 16, 1992

PAY TO THE ORDER OF

STATE OF NEW MEXICO
NMED - WATER QUALITY MANAGEMENT
ENERGY, MINERALS, AND NATURAL RESOURCES DEPT.
PO BOX 2088
SANTA FE NM 87504

PAY
EXACTLY \$ 50.00***
NON-NEGOTIABLE AFTER 90 DAYS
SMITH ENERGY SERVICES
A DIVISION OF  ALLIED PRODUCTS CORPORATION

W. Terry Uddal


CONTINENTAL BANK
CHICAGO, ILLINOIS 60697
OR IF DESIRED
OLD KENT BANK
WHEATON, ILLINOIS 60169

[REDACTED]

SMITH ENERGY SERVICES

A DIVISION OF  ALLIED PRODUCTS CORPORATION



THIS CHECK IS PAYMENT OF THE ITEMS LISTED BELOW:

REFERENCE NO.

INVOICE DATE	INVOICE NUMBER	CODE	COMPANY OR DIVISION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
09/16/92			FILING FEE FOR DISCHARGE PLAN APPLICATION			\$50.00

CODE:

1. YOUR CREDIT
2. YOUR DEBIT

3. OUR CREDIT
4. OUR DEBIT

PLEASE DETACH BEFORE DEPOSITING



One Denver Place, South Tower
999 18th Street, Suite 3100
Denver, Colorado 80202-2431
(303) 297-0750 Office
(303) 297-1326 Fax

RECEIVED

SEP 23 1992

OIL CONSERVATION DIV.
SANTA FE

GW-101

William J. LeMay
State of New Mexico
Energy, Minerals, and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87401

RE: Discharge Plan

Dear Mr. LeMay:

Enclosed please find Smith Energy Services discharge plan application and the required filing fee of \$50.00. Please give me a call if I can be of any assistance.

Sincerely,

Brake Stevenson
District Manager
Farmington, NM

MBC/rlh
enclosures

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, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-101) - Smith Energy Services, Brake Stevenson, District Manager, 2198 East Bloomfield Highway, Farmington, New Mexico 87401, has submitted a discharge plan application for their Farmington Service Facility located in the SE/4 SW/4, Section 14, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. Approximately 1000 gallons per day of waste water is treated in an oil/water separator prior to transfer to the City of Farmington wastewater treatment system. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 27 feet with a total dissolved solids concentration ranging from 600 mg/l to 900 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-114) - Dowell Schlumberger, Richard B. Connell, Manager, 500 Richey Street, Artesia, New Mexico 88210, has submitted a discharge plan application for their Artesia Service Facility located in the SE/4 SE/4, Section 4, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 280 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is stored in a closed top steel tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-128) - GPM Gas Corporation, Vincent B Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas 79762, has submitted a discharge plan application for their Hat Mesa Compressor Station located in the SW/4 SE/4, Section 4, Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. Approximately 1250 gallons per day of waste water with a total dissolved solids concentration of approximately 5000 mg/l is stored in a closed top steel tank prior to disposal at an OCD approved off site treatment and disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately

1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-129) - Gas Company of New Mexico, Sam Mohler, Compressor Operations Supervisor, P.O. Box 1899, Bloomfield New Mexico 87413, has submitted a discharge plan application for its Crouch Mesa Compressor Station located in the NE/4 NE/4, Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 15 gallons per day of waste water will be stored in a fiberglass tank prior to disposal at an OCD approved off site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 252 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

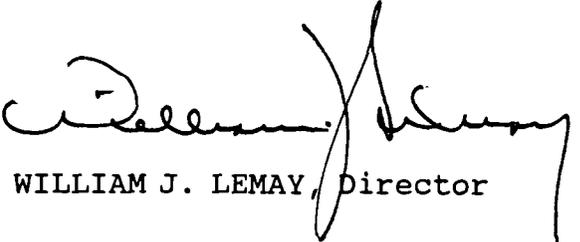
(GW-130) - Bloomfield Refining Company, David Roderick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a discharge plan application to construct and operate a Class I (non-hazardous) disposal well located in the NW/4 SW/4, Section 26, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 2380 barrels (100,000 gallons) per day of non-hazardous refinery waste will be disposed of by injection into the Cliff House formation at a depth from 3400 to 3600 feet. The total dissolved solids concentration of the waste is approximately 15,600 mg/l. The total dissolved solids concentration of the formation fluids is approximately 25,000 mg/l. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other unauthorized discharges to the ground surface. Ground water most likely to be affected by any accidental discharge is at a depth from approximately 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of September, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
OIL CONSERVATION
RECEIVED

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

1992 JUL 14 AM 8 35

July 12, 1992

Mr. Roger Anderson
Environmental Engineer
New Mexico Oil Conservation Div.
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: Offsite Drainage Closure Report
Smith International Inc.
2198 East Bloomfield Highway
Farmington, New Mexico

Dear Mr. Anderson:

Attached, please find a copy of a supplement to the acid UST & sump site assessment and abatement for the above referenced Smith International property in Farmington, New Mexico.

Copies of this supplement have been submitted to Smith International, and CLM Properties, Inc.

Thank you for this opportunity to be of service. If you have any questions regarding our site assessment or the closure operations, please contact us.

Respectfully submitted,
Envirotech, Inc.



Michael K. Lane, P.E.
Project Manager/ Geological Engineer

MKL/pb



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



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

July 7, 1992

Mr. Marshall B. Cain
Safety/Training Manager
Smith Energy Services
20011 Golden Gate Canyon Road
Golden, Colorado 80403-8125

**RE: Correction: Extension for Discharge Plan GW-101 Submittal
Smith Energy Services Farmington Facility
San Juan County, New Mexico**

Dear Mr. Cain:

The Oil Conservation Division granted Smith Energy a 90 day extension for the submission of a discharge plan application for the above referenced facility in a letter dated June 25, 1992. In that letter the extension was granted until June 16, 1992. The correct date of the extension should be September 24, 1992.

I am sorry for any inconvenience that this may have caused. If you have any questions, please feel free to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

xc: Denny Foust, OCD Aztec Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

June 24, 1992

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-651

Mr. Marshall B. Cain
Safety/Training Manager
Smith Energy Services
20011 Golden Gate Canyon Road
Golden, Colorado 80403-8125

**RE: Extension for Discharge Plan GW-101 Submittal
Smith Energy Services Farmington Facility
San Juan County, New Mexico**

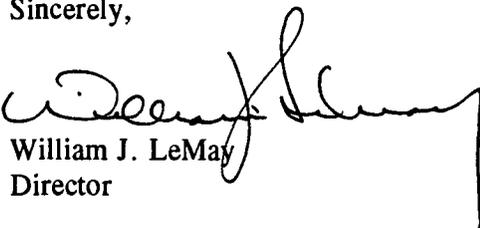
Dear Mr. Cain:

The Oil Conservation Division has received your request dated June 19, 1992 for a 90 extension for the submission of a discharge plan application for the above referenced facility.

Pursuant to Section 3-106.A of the New Mexico Water Quality Control Commission (WQCC) Regulations, and for good cause shown, Smith Energy is hereby granted an extension until June 16, 1992 for the submission of a discharge plan application for the Farmington Service Facility. This extension is granted to allow Smith Energy sufficient time to complete site assessments and abatement at the facility and incorporate the changes into the discharge plan.

If you have any questions, please feel free to contact Kathy Brown at (505) 827-5884.

Sincerely,


William J. LeMay
Director

WJL/kmb

xc: Denny Foust, OCD Aztec Office



OIL CONSERVATION DIVISION
RECEIVED

'92 JUN 23 AM 8 39

20011 Golden Gate Canyon Road
Golden, Colorado 80403-8125
(303) 277-1250

June 19, 1992

William J. LeMay, Director
Energy, Minerals and Natural Resources Dept.
Oil Conservation Division
Post Office Box 2088
State Land Office Building
Santa Fe, NM 87504

RE: Discharge Plan Requirement
Farmington New Mexico
San Juan County New Mexico

Dear Mr. LeMay:

This letter is to request a 90 day extension of the time period for submittal of the discharge plan application for Smith Energy Services facility located at 2198 East Bloomfield Highway, Farmington, New Mexico.

For the past several months, site assessments and abatement for a large portion of our Farmington facility has been underway. This has resulted in numerous on going changes at the facility which will have a impact on our discharge plan. It appears now that most of the abatement program is nearly complete and closure reports have been submitted to Mr. Roger Anderson of your office.

With the completion of the Abatement program we can get a much clearer perception of what we will need to do for our site discharge plan.

I appreciate your consideration of this request.

Sincerely,


Marshall B. Cain
Safety/Training Manager

cc: Denny Foust - OCD Aztec, New Mexico

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

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JUN 01 1992

OIL CONSERVATION DIV.
SANTA FE

May 27, 1992

Mr. Roger Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: Acid UST and Sump Closure Report
Acid Storage Tank and Loading Area
Smith International Inc.
2198 East Bloomfield Highway
SE/4, SW/4 Section 14, Township 29N, Range 13W
Farmington, San Juan County, New Mexico

Project No: 91410

Dear Mr. Anderson:

Attached please find a copy of the Acid UST and Sump Closure Report summarizing the site assessment and abatement for the Acid Storage and Loading Area at the above referenced Smith International property in Farmington, New Mexico.

Copies of this Closure Report have been submitted to Mr. Denny Foust, Deputy Inspector of your Aztec, New Mexico office. Additional, copies have been forwarded to CLM Properties, Inc., the current property owner.

The findings of the site assessment indicate the hydrocarbon contamination was primarily limited to the area around the UST and dump catchment. Based on the field screening and laboratory analyses, it appears the highly contaminated soils were abated by excavation, removal and treatment at Envirotech's Soil Remediation Facility.

Monitor wells to assess if the groundwater has been impacted will be installed per NMOC's request. If favorable, we feel that no additional remedial action may be required.

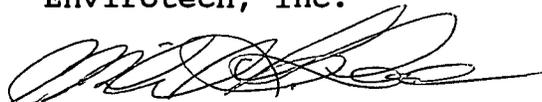
OCD SF: SMITH INTERNATIONAL-ACID CLOSURE REPORT
ENVIROTECH INC.
May 27, 1992

Page 2
PROJECT: 91410

Based on the report findings, we have requested from the NMOCD that this file be closed.

Thank you for this opportunity to be of service. If you have any questions regarding our site assessment or the closure operations, please contact us.

Respectfully submitted,
Envirotech, Inc.



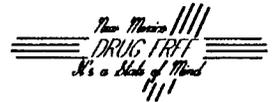
Michael K. Lane, P.E.
Project Manager/Geological Engineer

MKL:mkl/sr

1410OCD3.LTR



STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

RECEIVED OIL CONSERVATION DIVISION

AZTEC DISTRICT OFFICE

APR 30 1992

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

1000 RIO BRAZOS ROAD
AZTEC, NEW MEXICO 87410
(505) 334-6178

April 30, 1992

Envirotech Inc.
Attn. Mike Lane, Project Engineer
5796 U. S. Highway 64-3014
Farmington, NM 87401

RE: Monitor Wells for Smith Energy Services Remediation Site Farmington, New Mexico
Funded by Smith International.

Dear Mr. Lane:

A minimum of two additional groundwater monitor wells must be installed at the Smith Energy Services Remediation Site. Contamination did reach the water table at the Wash Bay Solids Disposal Area and UST Acid Disposal Facility. Each of these sources of contamination is to have a monitor well installed S-SW of the point source in approximately the down gradient direction or the direction of flow towards the San Juan River. Monitor wells are to penetrate the water table five to ten feet and utilize a design similar to existing wells. The new wells are to be located at optimum locations to integrate with the existing monitor wells while detecting potential contamination. Additional wells may be needed if groundwater contamination is indicated by samples from the new wells.

Please feel free to contact this office for any clarification.

Yours truly,

Denny G. Foust
Environmental Geologist

DGF\sh

Xc: Smith Energy Services
OCD Environmental Bureau
Environmental File
DGF File

ENVIROTECH INC.

UNDERGROUND TANK TESTING • OIL SPILLS DIVISION
SITE ASSESSMENT • SITE REMEDIATION
RECEIVED

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

'92 APR 27 AM 9 42

April 17, 1992

Mr. Roger Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: Surface Impoundment Closure Report
Wash Bay Solids Disposal Area
Smith International Inc.
2198 East Bloomfield Highway
SE/4, SW/4 Section 14, Township 29N, Range 13W
Farmington, San Juan County, New Mexico

Project No: 91410

Dear Mr. Anderson:

Attached please find a copy of the Surface Impoundment Closure Report summarizing the site assessment and abatement for the Wash Bay Solids Disposal Area at the above referenced Smith International property in Farmington, New Mexico.

Copies of this Surface Impoundment Closure Report have been submitted to Mr. Denny Foust, Deputy Inspector of your Aztec, New Mexico office. Additional, copies have been forwarded to CLM Properties, Inc., the current property owner.

The findings of the site assessment indicate the hydrocarbon contamination was primarily limited to the area at the center of the Disposal Area. Based on the field screening and laboratory analyses, it appears the highly contaminated soils were abated by excavation, removal and treatment at Envirotech's Soil Remediation Facility. Laboratory analysis of groundwater samples from the monitor well near the Disposal Area and excavation bottom indicate that the hydrocarbon plume had minor impact on groundwater. Additional monitor wells to verify these findings will be installed per NMOCD's request. If favorable, we feel that no additional remedial action may be required.

OCD SF: SMITH INTERNATIONAL-CLOSURE REPORT
ENVIROTECH INC.
MARCH 25, 1992

Page 2
PROJECT: 91410

Based on the report findings, we have requested from the NMOCD that this Surface Impoundment file be closed.

Thank you for this opportunity to be of service. If you have any questions regarding our site assessment or the closure operations, please contact us.

Respectfully submitted,
Envirotech, Inc.



Michael K. Lane, P.E.
Geological Engineer

MKL:mkl/sr

1410OCD.LTR

ENVIROTECH INC.

OIL CONSERVATION DIVISION
RECEIVED

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

92 MAR 31 AM 9 44

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

March 25, 1992

Mr. Roger Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: UST Closure Report
Diesel and Gasoline Fuel System
Confirmed Petroleum Hydrocarbon Release
Smith International
2198 East Bloomfield Highway
Farmington, New Mexico

Project No: 91410

Dear Mr. Anderson:

Attached please find a copy of the UST Closure Report summarizing the site assessment and abatement for the confirmed release incident at the above referenced Smith International property in Farmington, New Mexico.

Copies of this UST Closure Report has been submitted to Mr. Steve Pullen of the State of New Mexico Environmental Department UST Bureau. Additional, copies have been forwarded to CLM Properties, Inc., the property owner, and Mr. Denny Foust, Deputy Inspector of your Aztec, New Mexico office.

The findings of the site assessment indicate the hydrocarbon contamination was primarily limited to the area at the center of the UST system where piping leaks appear to have been the primary cause of the fuel release. Based on the field screening and laboratory analyses, it appears the highly contaminated soils were abated immediately following the tank removal by excavation, removal and treatment at Envirotech's soil remediation facility. Laboratory analysis of groundwater samples from monitor well near the UST system indicate that groundwater was not impacted by the hydrocarbon plume. We feel that no additional remedial action is required.

OCD SF: SMITH INTERNATIONAL-UST CLOSURE REPORT
ENVIROTECH INC.
MARCH 25, 1992

Page 2
PROJECT: 91410

Based on these findings, we have requested from the NMED that this UST file be closed.

Thank you for this opportunity to be of service. This UST Closure Report completes the scope of services for the fuel UST system at the Farmington site. If you have any questions regarding our site assessment or the closure operations, please contact us.

Respectfully submitted,
Envirotech, Inc.



Michael K. Lane, P.E.
Geological Engineer

MKL:mkl/sr

1410OCD.LTR

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

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

February 21, 1992

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-291

Mr. Michael G. Much, District Manager
Smith Energy Services
2198 East Bloomfield Highway
Farmington, New Mexico 87401

**RE: DISCHARGE PLAN REQUIREMENT
FARMINGTON SERVICE FACILITY
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Much:

Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for your existing Farmington Service Facility located at 2198 East Bloomfield Highway, Farmington, San Juan County, New Mexico.

This notification of discharge plan requirement is pursuant to Part 3-104 and Part 3-106 of the WQCC Regulations. The discharge plan, defined in Part 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the facility or adjacent to the facility site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in below grade sumps, buried underground process tanks and/or piping), and closure plans for any pits or ponds whose use will be discontinued.

A copy of the regulations is enclosed for your convenience. Also enclosed is an application and a copy of OCD Guidelines for the Preparation of Discharge Plans at Oil Field Service Facilities. Three copies of your discharge plan should be submitted for review purposes.

Section 3-106.A. of the regulations requires submittal of the discharge plan application within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Part 3-106.A. also allows discharges to

Mr. Michael G. Much
February 21, 1992
Page -2-

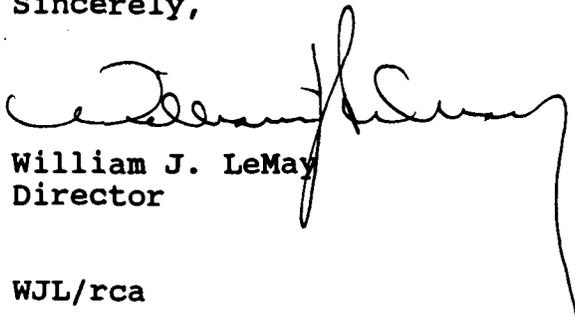
continue without an approved discharge plan until 240 days after written notification by the Director of the OCD that a discharge plan is required. An extension of this time may be sought and approved for good cause.

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3-114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund". WQCC Rule 3-114 became effective as of August 18, 1991, and is found on page 33.1 of the enclosed WQCC Rules and Regulations.

Every billable facility submitting a new discharge plan will be assessed a fee equal to the filing fee plus either a flat fee or discharge fee. The filing fee is fifty (50) dollars and shall be submitted with the discharge plan application (nonrefundable). The remainder of the "total fee" for oil and gas service companies falls under the "flat fee" category and is equal to one-thousand, three-hundred and eighty dollars (\$1380). 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 discharge plan, with the first payment due at the time of approval. Please make all checks out to the **NMED - Water Quality Management**.

If there are any questions on this matter, please feel free to contact Roger Anderson at (505) 827-5812 or Kathy Brown at (505) 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,



William J. LeMay
Director

WJL/rca

xc: Denny Foust - OCD Aztec Office

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

February 6, 1992

Mr. Roger Anderson, Environmental Engineer
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

RE: Request to Receive From
Smith Energy Services
2198 E. Bloomfield Highway
Farmington, New Mexico

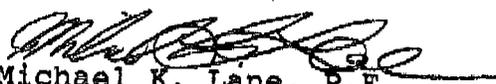
Dear Mr. Anderson:

Envirotech Inc. requests authorization to receive soils from the Smith Energy UST site, 2198 E. Bloomfield Highway, Farmington, New Mexico at Envirotech's Soil Remediation Site, Hilltop, New Mexico.

Attached please find a copy of the CERTIFICATION OF ORIGIN OF CONTAMINATED SOILS, executed by Mr. Len Murray of the NMED. These soils were contaminated with diesel and gasoline from the UST system.

The amount of material transported will be completed upon completion of the closure operations.

Respectfully submitted,
ENVIROTECH, INC.


Michael K. Lane, P.E.
Geological Engineer

Verbal OK

2/17/92



Attachment: CERTIFICATION OF ORIGIN OF CONTAMINATED SOILS

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

CERTIFICATION OF ORIGIN OF CONTAMINATED SOILS

The soil at SMITH ENERGY SERVICES
2198 E. BOONFIELD HWY, FARMINGTON, NM
(DIESEL & GASOLINE TANKS)

was contaminated by a leaking Underground Storage Tank System.

Ken Wulfsberg 2-6-92
EID INSPECTOR DATE

I certify that ENVIROTECH, Inc. has transported
cubic yards of hydrocarbon
contaminated soils from SMITH ENERGY SERVICES YARD
2198 E. BOONFIELD HWY, FARMINGTON, NM

To Envirotech's Soil Remediation Site at Hilltop, New Mexico.

BY: M. B. Be 2/6/92
ENVIROTECH INC. DATE

 **SMITH INTERNATIONAL, INC.**

16740 Hardy Street
Post Office Box 60068
Houston, Texas 77205-0068
Phone: (713) 443-3370 Telex: 76-2517

January 30, 1992

Mr. Roger Anderson
Environmental Engineer
State of New Mexico
Oil Conservation Division
1190 Harold Runnels Building
Santa Fe, New Mexico

RE: Remediation of
Smith International Property
2198 Bloomfield Highway
Farmington, New Mexico

Dear Mr. Anderson:

This letter outlines the remediation of our referenced property in Farmington, New Mexico.

Under previous cover, ENERLOG performed two Site Assessments of the site, dated April 1990 and August 1990. These reports were submitted to your office by Mr. Morris Young of Envirotech, Inc. on December 13, 1991, for your review and comment.

Smith International has retained Envirotech, Inc. of Farmington to commence the site assessment and remediation. It is our intent to Remediate the site and complete the final assessment concurrently while excavating to the full extent of contamination.

Three sites requiring remediation were identified in the previous assessment reports and are:

- Underground Storage Tank System (USTS)
- Acid Tank Storage and Loading Area
- Wash Bay Solids Disposal Pit Area

The closure of the USTS has been scheduled on February 6, 1992, with Mr Leonard Murray of the New Mexico Environment Department (NMED). Envirotech Inc. will remove the UST and perform a site assessment. A visual assessment of the removed tanks and the excavation will be made, as well as, soil sampling from under the tanks and concrete fuel pad area. Soil samples will be field tested for organic vapors and/or laboratory tested for total

 **SMITH INTERNATIONAL, INC.**

Page 2

petroleum hydrocarbons following the New Mexico Environment Department protocol.

In the Acid Tank and Wash Bay Solids Disposal area, we have instructed Envirotech to remediate by excavating to the limit of contamination. The protocol outlined in the New Mexico Oil Conservation Division's proposed Guidelines for Surface Impoundment Closure (October 29, 1991), will be followed. Specifically, excavations will be made to the limits of highly contaminated soil. Highly contaminated soil being defined as those soils having 100 parts per million or greater of total organic vapor as measured by the Field Headspace Method for disposal.

All excavations will be backfilled with imported clean granular soil and compacted.

Mr. Denny Foust of the NMOCD Aztec District Office will be notified to inspect all excavations upon completion and prior to backfilling and closure.

Envirotech has been instructed to transport all excavated soils, to Soil Treatment and Remediation Facility at Hilltop, New Mexico.

Previous TCLP analysis for contaminated soil from the Acid Tank and Wash Bay Solids excavation area has been forwarded by Envirotech to your office. We understand authorization to receive at the Hilltop Facility has been given by the NMOCD.

At the conclusion of the excavation work, the three (3) existing groundwater monitor wells referenced in the ENERLOG Reports will be sampled and tested to ascertain that groundwater has not been impacted. Specifically, the water samples will be analyzed for total petroleum hydrocarbons (TPH) by US EPA Method 418.1 and for BTEX components by US EPA Method 8020. Sample collection will follow US EPA SW-846 protocol. The results of that testing will be forwarded to your attention.

We request authorization from NMOCD to expedite this site remediation.

Respectfully submitted,
Smith International, Inc.

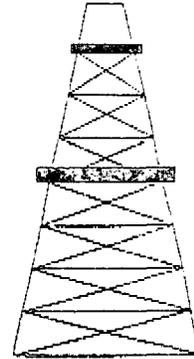


Maurice Sticker
Environmental Affairs Coordinator

C: Mr. Morris D. Young, Envirotech
Mr. Michael Much, Smith Energy Services
Mr. Chuck Hagen, Dimmick Reality

SMITH INTERNATIONAL, INC.

16740 Hardy Street
Post Office Box 60068
Houston, Texas 77205-0068
Phone: (713) 443-3370 Telex: 76-2517



FACSIMILE TRANSMISSION COVER SHEET

DATE: 2-4-92

TO: Roger Anderson

LOCATION: Santa Fe

FROM: Maurice Sticker

LOCATION: SI HOUSTON

2 PAGES TO FOLLOW EXCLUDING COVER SHEET

REMARKS: _____

IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL BACK AS SOON AS POSSIBLE. (713) 233-5092

RAPICOM/FAX NUMBER: (713) 233-5259

ENVIROTECH INC.

OIL CONSERVATION DIVISION

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

'92 FEB 16 AM 9 34

January 24, 1992

Fax received on 1/27/92

Mr. Roger Anderson
Environmental Engineer
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

RE: Contaminated Soil from
Smith International, Inc.
2198 Bloomfield Highway
Farmington, New Mexico

Project No: 91410

Dear Mr. Anderson:

Enclosed are the laboratory results of chemical analyses for soil samples, collected December 20, 1991, from the referenced Smith International facility in Farmington, New Mexico. The samples are of the contaminated material around the acid tank and acid disposal pit areas, as discussed with you earlier by Mr. Morris Young of Envirotech.

The results for all parameters are non-detectable or below RCRA limits.

Therefore, Envirotech requests permission to receive this soil at Envirotech's Soil Remediation Facility at Hilltop, New Mexico.

Respectfully submitted,
ENVIROTECH, Inc.


Michael K. Lane, P.E.
Geological Engineer

Enclosures

C: Mr. Maurice Sticker, Smith International, Inc.
Mr. Chuck Hagen

MKL/mkl
410TCLP.LTR

TOXICITY CHARACTERISTIC LEACHING PROCEDURE HSL VOLATILE COMPOUNDS

Client:	ENVIROTECH	Date Reported:	01/24/92
Sample ID:	Waste Pit Comp.	Date Sampled:	12/20/91
Project ID:	Smith Energy	Date Received:	12/21/91
Laboratory ID:	B914207	Date Extracted TCLP:	01/03/92
Sample Matrix:	Soil	Date Analyzed:	01/08/92
Preservation:	Cool		
Condition:	Intact		

Parameter	Analytical Result	Detection Limit	Units
Vinyl Chloride	ND	0.025	mg/L
1,1-Dichloroethene	ND	0.025	mg/L
Chloroform	ND	0.025	mg/L
1,2-Dichloroethane	ND	0.025	mg/L
Carbon Tetrachloride	ND	0.025	mg/L
Trichloroethene	ND	0.025	mg/L
Benzene	ND	0.025	mg/L
Tetrachloroethene	ND	0.025	mg/L
Chlorobenzene	ND	0.025	mg/L
2-Butanone	ND	0.125	mg/L

ND - Compound not detected at stated Detection Limit.

J - Meets identification criteria, below Detection Limit.

B - Compound detected in Method Blank.

Inter-Mountain Laboratories, Inc.

910 Technology Boulevard, Suite B
Bozeman, Montana 59715

TOXICITY CHARACTERISTIC LEACHING PROCEDURE TENTATIVELY IDENTIFIED COMPOUNDS

Client:	ENVIROTECH	Date Reported:	01/24/92
Sample ID:	Waste Pit Comp.	Date Sampled:	12/20/91
Laboratory ID:	B914207	Date Analyzed:	01/08/92
Sample Matrix:	Soil		

Tentative Identification	Retention Time (min)	Concentration	Units
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No additional compounds found at reportable levels.

Unknown concentrations calculated assuming a Relative Response Factor = 1.

QUALITY CONTROL:

Surrogate Recovery	%
1,2-Dichloroethane-d4	98
Toluene-d8	96
Bromofluorobenzene	93

References:

Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics,
Test Methods for Evaluating Solid Wastes, SW-846, United States
Environmental Protection Agency, Third Edition, November 1986.

Toxicity Characteristic Leaching Procedure, Final Rule, Federal Register,
40 CFR 261-302, Part V, Environmental Protection Agency, Vol. 55, No. 126,
June 29, 1990.



Analyst



Reviewed

Inter-Mountain Laboratories, Inc.

910 Technology Boulevard, Suite B
Bozeman, Montana 59715

TOXICITY CHARACTERISTIC LEACHING PROCEDURE HSL SEMI-VOLATILE COMPOUNDS

Client:	ENVIROTECH	Report Date:	01/23/92
Sample ID:	Waste Pit Comp.	Date Sampled:	12/20/91
Project ID:	Smith Energy	Date Received:	12/21/91
Laboratory ID:	B914207	Date Extracted-TCLP:	** 01/17/92
Sample Matrix:	Soil	Date Analyzed:	01/21/92
Preservation:	Cool	Date Extracted-BNA:	** 01/20/92
Condition:	Intact		

** - Sample was re-extracted due to low surrogate recoveries. First extractions were TCLP=1/3/92 and BNA=1/10/92

Parameter	Analytical Result	Detection Limit	Units
1,4-Dichlorobenzene	ND	0.015	mg/L
Hexachloroethane	ND	0.015	mg/L
Nitrobenzene	ND	0.015	mg/L
Hexachloro-1,3-butadiene	ND	0.015	mg/L
2,4,6-Trichlorophenol	ND	0.015	mg/L
2,4,5-Trichlorophenol	ND	0.015	mg/L
2,4-Dinitrotoluene	ND	0.015	mg/L
Hexachlorobenzene	ND	0.015	mg/L
Pentachlorophenol	ND	0.015	mg/L
o-Cresol	ND	0.015	mg/L
m & p-Cresol	ND	0.015	mg/L
Pyridine	ND	0.15	mg/L

ND - Compound not detected at stated Detection Limit

J - Meets identification criteria, below Detection Limit

B - Compound detected in Method Blank.

Inter-Mountain Laboratories, Inc.

910 Technology Boulevard, Suite B
Bozeman, Montana 59715

TOXICITY CHARACTERISTIC LEACHING PROCEDURE TENTATIVELY IDENTIFIED COMPOUNDS

Client:	ENVIROTECH	Date Reported:	01/23/92
Sample ID:	Waste Plt Comp.	Date Sampled:	12/20/91
Laboratory ID:	B914207	Date Analyzed:	01/21/92
Sample Matrix:	Soil		

Parameter	Retention Time (min.)	Concentration	Units
Unknown organic acid	13.71	0.03	mg/L
Unknown hydrocarbon	21.33	0.03	mg/L
Diethylphthalate	26.09	0.06	mg/L
Unknown hydrocarbon	28.12	0.02	mg/L

Unknown concentrations calculated assuming Relative Response Factor = 1.

QUALITY CONTROL:

Surrogate Recoveries	%
2-Fluorophenol	52
Phenol-d6	43
Nitrobenzene-d5	92
2-Fluorobiphenyl	82
2,4,6-Tribromophenol	68
Terphenyl-d14	79

References:

Method 8270, Gas Chromatography/Mass Spectrometry for Semi-Volatile Organics, Test Methods for Evaluating Solid Wastes, United States Environmental Protection Agency, December 1987.

Toxicity Characteristic Leaching Procedure, Final Rule, Federal Register, 40 CFR 261-302, Part V, Environmental Protection Agency, Vol. 55, No. 126, June 29, 1990.



Analyst



Reviewed

**METHOD 8150
CHLORINATED HERBICIDES
TCLP PARAMETERS**

Client:	ENVIROTECH	Date Reported:	01/24/92
Sample ID:	Waste Pit Comp.	Date Sampled:	12/20/91
Project ID:	Smith Energy	Date Received:	12/21/91
Laboratory ID:	B914207	Date Extracted:	01/10/92
Sample Matrix:	Soil	Date Analyzed:	01/23/92
Preservative:	Cool		
Condition:	Intact		

Parameter	Analytical Result	Detection Limit	Units
2,4-D	ND	0.001	mg/L
2,4,5-TP	ND	0.001	mg/L

ND - Parameter Not Detected at Stated Detection Limits

Reference: Method 8150, Chlorinated Herbicides, Test Methods for Evaluating Solid Waste, United States Environmental Protection Agency, SW-846, Vol. IB, November, 1986.

Analyst

R.M.

Reviewed

US

**EPA METHOD 8080
ORGANOCHLORINE PESTICIDES
TCLP PARAMETERS**

Client:	ENVIROTECH	Date Reported:	01/24/92
Sample ID:	Waste Pit Comp.	Date Sampled:	12/20/91
Project ID:	Smith Energy	Date Received:	12/21/91
Laboratory ID:	B914207	Date Extracted:	01/10/92
Sample Matrix:	Soil	Date Analyzed:	01/15/92
Preservative:	Cool		
Condition:	Intact		

Parameter	Analytical Result	Detection Limit	Units
Lindane (gamma BHC)	ND	0.006	mg/L
Endrin	ND	0.006	mg/L
Methoxychlor	ND	0.02	mg/L
Heptachlor	ND	0.006	mg/L
Toxaphene	ND	0.5	mg/L
Chlordane	ND	0.03	mg/L

ND - Parameter Not Detected at Stated Detection Limits

References: Method 8080, Organochlorine Pesticides and PCB's, Test Methods for Evaluating Solid Waste, United States Environmental Protection Agency SW-846, Vol. IB September 1986.

Analyst RM

Reviewed UD

Inter-Mountain Laboratories, Inc.

1633 Terra Avenue
Sheridan, Wyoming 82801

**TOXICITY CHARACTERISTIC LEACHING PROCEDURE
TRACE METAL CONCENTRATIONS**

Client:	Envirotech	Report Date:	01/23/92
Sample Id:	7788	Date Sampled:	12/20/91
Lab Id:	B914207/4659	Date Received:	12/21/91
Matrix:	Soil	TCLP Extract:	01/04/92
Preservation:	COOL / INTACT	Date Analyzed:	01/21/91

Parameter:	(units)	Analytical Result	Regulatory Level
Arsenic	mg/L	<0.1	5.0
Barium	mg/L	3.5 B	100
Cadmium	mg/L	0.008	1.0
Chromium	mg/L	<0.01	5.0
Lead	mg/L	<0.2	5.0
Mercury	mg/L	<0.001	0.2
Selenium	mg/L	<0.1	1.0
Silver	mg/L	<0.01	1.0

Toxicity Characteristic Leaching Procedure, Final Rule,
Federal Register, 40 CFR 261-302, Part V, EPA Vol 55, No. 126
June 29, 1990

Method 6010A: Inductively Coupled Plasma-Atomic Emission
Spectroscopy, SW-846, Nov. 1990.

Method 7470A: Mercury in Liquid Waste (Manual Cold-Vapor
Technique), SW-846, Nov. 1990.

Reviewed by: CB.

ENVIROTECH[®] INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

October 23, 1991

Mr. Chuck Hagen
Dimmick Realty Co.
205 North Auburn Ave.
Farmington, NM 87401

Re: Remediation of the Smith Energy Service Yard
2190 Bloomfield Highway, Farmington, New Mexico

Dear Mr. Hagen:

Envirotech, Inc., has evaluated the ENERLOG/TIS, Inc. Environmental Assessment reports, dated April 1990 and August 1990, and performed an on-site inspection of the Smith energy Services Yard, 2198 Bloomfield Highway, Farmington, New Mexico.

The purpose of our evaluation was to determine if the ENERLOG/TIS Assessments defined the areas of Environmental Risk associated with the occupancy and use of the property, and to estimate the cost of remediation.

The Smith Energy Service Yard consists of a 9.31 acre parcel. The yard is bordered on the south by Bloomfield Highway (US 64) and on the west by Molta Avenue. The site is approximately 0.5 miles north of the San Juan River and 0.5 miles south of the Animas River. Surface drainage is to the northwest.

The ENERLOG/TIS Assessment, identified three (3) major areas of contamination:

- 1) The Disposal Pit area
- 2) The Acid Tank area
- 3) The Fuel and Lube Oil Storage and service area

Page 2
October 23, 1991
Mr. Hagen

From our observation, these areas will require remediation to be in compliance with US EPA, New Mexico Environmental Department (NMED) Regulations and New Mexico Oil Conservation Division (NMOCD).

Based on our observations and the data available, we suggest the remediation of the three (3) contaminated sites could be accomplished best by excavation and off-site treatment of the contaminated soils. Excavation would require approximately 2-3 weeks. It would present a minimum of disruption for the present site operations and, in our opinion, would be the most cost effective remediation option. Excavation removes the potential source of groundwater contamination, which so far appears not to have been effected.

The Disposal Pit Area

The disposal pit is approximately 33' wide x 120' long. The site soils are sand and gravel which are susceptible to vertical migration of contaminating fluids. The drilling log of Monitor Well #1 indicates the contamination did not extend in a horizontal direction. Test Hole (TH) #1, (August 1990), indicates the heavy hydrocarbons extend to a depth of approximately 18 feet. To be in compliance with New Mexico Environmental Department Regulations and New Mexico Oil Conservation guidelines, this excavation would have to remove all soils with total petroleum hydrocarbon content greater than 100 parts per million (ppm).

Approximately 3000 cubic yards of soil would have to be excavated, transported and remediated at Envirotech's, State of New Mexico licensed soil remediation facility, Hilltop, New Mexico. This facility is located 11 1/2 miles south of Bloomfield, New Mexico on US Highway 44, and is operated under the direction of the State of New Mexico Oil Conservation Division.

Estimated costs are:

Excavation	\$ 7,000
Loading & Trucking	23,500
Disposal and remediation fees (3000 yds @ \$18.00)	54,000
Backfill	<u>8,500</u>
Estimated Total	\$ 93,000

Page 3
October 23, 1991
Mr. Hagen

Acid Tank Area

This area appears to be highly contaminated by oils from run-off of the equipment parking area. This is an unpaved area surrounded by pavement. The site assessment data does not define the horizontal extent of contamination, but based on the permeable soils and TH #2 (August 1990) analysis, we estimated approximately 360 cubic yards of soil would require excavation.

The estimated costs are:

Excavation	\$ 1,500
Loading & Trucking	3,500
Disposal and Remediation fees (360 yd ³ @ \$18.00)	6,500
Backfill	<u>1,000</u>
Estimated Total	\$ 12,500

Fuel and Lube Oil Area

The horizontal extend of contamination is not defined in this area. On the north-west corner of the concrete fueling pad, MW-3 encountered hydrocarbon above regulatory levels to approximately 15 feet below ground surface. The Smith Energy people indicated a gasoline tank was previously located in this area. This explains the presence of contamination in this area.

From the ENERLOG/TIS data and our observation, we assume an area approximately 75' x 30' x 20' deep would require excavation. Both the diesel and gasoline tanks have currently tested tight so we would anticipate excavation around those tanks instead of removing them.

It is difficult to determine how much horizontal migration has occurred under the concrete pad and lube oil storage building, but we estimate about five foot (5') of the east end of the pad and possibly the block storage building will have to be removed. Our best estimate is approximately 1500 cubic yards of contaminated soil would require removal. The excavation of soils will continue in all directions until the soil contains less than the 100 parts per million total petroleum Hydrocarbon as per NMOCD guidelines.

Page 4
October 23, 1991
Mr. Hagen

The estimated costs are:

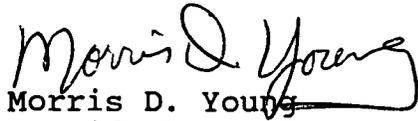
Excavation	\$ 6,500
Loading & Trucking	12,000
Disposal and Remediation fees (1500 yds @ \$18.00)	27,000
Backfill	<u>4,000</u>

Estimated Total \$ 49,500

This estimate does not include the cost to replace the block lube oil storage, or the portion of concrete pad that may have to be removed during excavation.

We trust the above estimates will be helpful in determining a remediation plan for this property. Please contact us if we can be helpful in anyway.

Sincerely,


Morris D. Young
President

MDY/tjg

745.doc

WELL SERVICE COMPANY INSPECTION

NAME OF COMPANY: SMITH ENERGY SERVICE

LOCATION: 2198 Bloomfiled Hwy, Farmington, NM

INSPECTION DATE: 9/12/85

REPORT: Marshall Cain tour guide. Company acidizes, fracs, cements wells.

City water; concrete yard.

Underground Storage Tanks:

a) (1) 20,000 gal diesel

b) (1) 4,000 gal. gasoline

c) 10,000 gal. acid tank. Leftover acid in trucks washed into tank along with acid additives unused from mixing area. Mixture used again along with fresh water when mixing up new batch. "Beneficial reuse." Tank never

cleaned out, sludge accumulated is ignored. Effluent put into tank not filtered. Some surface leakage apparent around acid tank: yellow crystals on sand spread on top of tank area. Cain said leak probably occurred when pumped out to mix fresh batch of acid.

d) Wash bays drain to sump separator and to city sewer. Sump separator cleaned out by Westbrook Vacuum Septic Service.

Used oil stored in drums. General Crude Process takes used oil; Cominski Drum Co. (Denver) takes used drums.

WELL SERVICE COMPANY INSPECTION (PAGE 2)

NAME OF COMPANY: SMITH ENERGY SERVICE

LOCATION: _____

INSPECTION DATE: 9/12/85

POTENTIAL PROBLEM AREA: Inlined pit approximately 40' x 25' with sloped ramp receives storm water, 1st washing of outside of trucks, drainage from blender manifold. Sand and salt lenses evident in pit. Small amount of water present in bottom from rain the night before.

SAMPLES TAKEN: NONE

RECOMMENDATIONS: _____

FOLLOW UP: _____

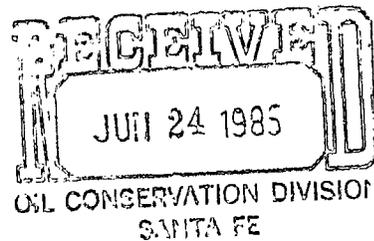


SMITH ENERGY SERVICES

Division of Smith International, Inc.

Junction Highways 58 & 93
Golden, Colorado 80403
Phone (303) 277-1250

June 18, 1985



ENERGY AND MINERALS DEPARTMENT
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Dear Sir:

Attached please find the completed survey that was requested. Please note that SMITH ENERGY SERVICES beneficially reuses all acids not pumped into the well. Those spent acids and fracturing fluids flowed back from the formation through the well bore are the responsibility of the lease operator or well owner. SMITH ENERGY SERVICES does not haul or otherwise dispose of any fluids recovered from the well bore.

If I may be of further assistance or answer any other questions, please feel free to call.

Sincerely,

Marshall B. Cain
Loss Control/Training Rep

MBC:djh

cc: Teddy Gandy, District Manager
Farmington District

WELL SERVICE COMPANIES
QUESTIONNAIRE

Check one or more, as applicable.

I. Types of Services Performed:

- Vacuum Hauling/Tank Cleaning
- Acidizing
- Fracturing
- Cementing
- Drilling mud/additives
- Other (Specify)

II. General Types of Products and Quantities Used in Service or Transported in 1984:

	Quantity (bbls.)
<input checked="" type="checkbox"/> Acids Acetic 56 BBLS.	HCL 3225 BBLS.
<input type="checkbox"/> Brines	_____
<input type="checkbox"/> Caustics	_____
<input type="checkbox"/> Drilling Mud/Additives	_____
<input type="checkbox"/> Corrosion Inhibitors	_____
<input type="checkbox"/> Surfactants/Polymers	_____
<input type="checkbox"/> Shale Control Inhibitors	_____
<input type="checkbox"/> Radioactive Tracers Returned from Wellbores or Pipelines	_____
<input type="checkbox"/> Oxygen Scavengers	_____
<input checked="" type="checkbox"/> Waste Oil - Used Motor Oil	18 BBLS.
<input type="checkbox"/> Produced Water	_____
<input type="checkbox"/> Other (Specify)	_____

*Smith Energy
Services*

III. TYPE, QUANTITY, AND LOCATION OF WELL SERVICE FLUIDS AND SOLIDS, PRODUCED WATER,
OR WASTE OIL DISPOSAL

TYPE OF FLUID OR SOLID	VOLUME (BARRELS)	DISPOSAL SITE		NATURE OF DISPOSAL LOCATION (LETTER FROM BELOW)
		(NO. FROM BELOW)	LOCATION	
Hydrochloric acid solution, inhibited (left over in transport vehicles after acid treatments on wells)	100 BBLS (estimated)	7. <u>Not disposed of</u>		Beneficially reused
Used oil from shop	18 BBLS.	8. Sold to oil recycler		General crude processing Farmington, New Mexico
Acetic Acid Aqueous solution (left over in transports after jobs)	3 BBLS (estimated)	7. <u>Not Disposed of</u>		Beneficially reused
Note: Spent acids and fracturing fluids recovered from individual wells are the responsibility of the lease holder or production company. We have no way of knowing what the disposition of these fluids are.				

Disposal Sites

1. Individual Well Site (Do not list all locations)
2. Sanitary Landfill
3. Injection Wells (Do not list locations)
4. Evaporation Pond
5. Chemical Waste Tank
6. City Sewer
7. Company Facilities
8. Other (Specify)

Nature of Disposal Location

- A. Lined Pit
- B. Unlined Pit
- C. Ground Surface
- D. Above Ground Tank
- E. Buried Tank
- F. Injection Well
- G. Other (Specify)