GW - 115

INSPECTIONS & DATA

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 07, 2009 10:10 AM
To: 'Tom Hart'
Cc: Dade, Randy, EMNRD; Bratcher, Mike, EMNRD; Gray, Darold, EMNRD; Bonham, Sherry, EMNRD
Subject: GW-115, OCD RESPONSE

Mr. Tom Hart,

See my responses below

Photo #1

We will dispose of this tank or put it in secondary containment.
OCD RESPONSE: RESOLVED.

Photos #2, and #3

We will instruct employees to pull trucks completely on the wash bay before washing. This will ensure water does not escape the bermed area of the wash bay.
OCD RESPONSE: OCD request soil sampling be done in the noted run off area for TPH and Chlorides. Once tested submit those results to my attention at the Santa Fe OCD office. Please submit those no later than Oct. 1, 2009.

Photo #4

Illustration attached showing how the sump is constructed. It is secondarily contained with leak detection. We will insure that a documented monthly inspection is performed on the leak detection and keep inspection records on file.
OCD RESPONSE: RESOLVED. OCD will be in the area to check the leak detection system at the end of August.

Photo #6

I propose installing a metal liner in this grit pond. It will be constructed so that ample room is left between the metal walls and the cement walls that currently exist . This will utilize the existing cement pond as the secondary containment for the new metal liner. Leak detection will be visual inspection between the metal walls and the cement walls.
OCD RESPONSE: ensure that the bottom is doubled as well and that the leak detection is sufficient enough to ensure real data. Submit a drawing design of the new metal walls.

Photos #7, #8, and #9

Soil will be properly cleaned up and maintained to prevent further unauthorized discharges onto soil.
OCD RESPONSE: Please clarify "cleaned up", dig up and dispose of OR remediate? Submit response

Photo #11 through #16

I propose cleaning the inside of tanks, removing the tops, inspecting to make sure no cracks or holes exist. If tank integrity is good, I will install three smaller tanks inside these tanks using them for secondary containment for the new tanks. This will also allow for leak detection by having space between the inside tank walls and the new tanks. We will keep inspection records.
OCD RESPONSE: Make sure that the leak detection system is properly monitored and is engineered so that no indication of false readings occur (i.e. fluids in secondary at all times). If fluids are in the leak detection system, then the integrity of all containers will need to be verified each time fluids are noted. Build it right the first time will ensure proper detection and will be cost effective.

The seepage noted in Photos #12 and #15 was investigated and determined to be caused by a clogged drain line to the city POTW. When the plumbing clogged up, the fluid level raised in the tanks due to wash rack activity continuing. The tops of the tanks are bolted on so they leaked around the seal at the tops of the tanks. The maintenance shop has been instructed to stop wash rack activities if the drain line clogs. With the proposed secondary containment of the tanks no seepage will occur onto the ground.
OCD RESPONSE: These drains are to be monitored and hydrostatically tested every five years. OCD considers an open item until procedures, as stated above, are implemented. During the next OCD inspection, if noted then the OCD will require that the entire system be properly re-engineered.

Photos #17, #18, and #19

I propose plugging the sump in the maintenance shop and plugging the drain line downstream from the tank to the city POTW. This will prevent any fluid from entering the tank from either end. I will then clean out the tank to make sure that no fluid remains.
OCD RESPONSE: Make sure that no fluids are idle anywhere above or underground onsite. Your proposal of sealing all entry way of drains is acceptable. When the tank is cleaned out, make sure a visual inspection is done to very that it had integrity. If entry is not allowed then a hydrostatic test shall be conducted. Send results to me. This is still considered open until results are submitted.

If this meets your approval I will make sure all items are completed prior to renewal application in 2014.
The OCD appreciates your efforts. A few items are still considered open, but in resolution mode. Please keep OCD informed on changes. OCD considers the resolutions to these findings a modification to the discharge plan. No modification request is needed from Halliburton at this time. OCD request only a timeframe for complete resolution to the activities stated above.

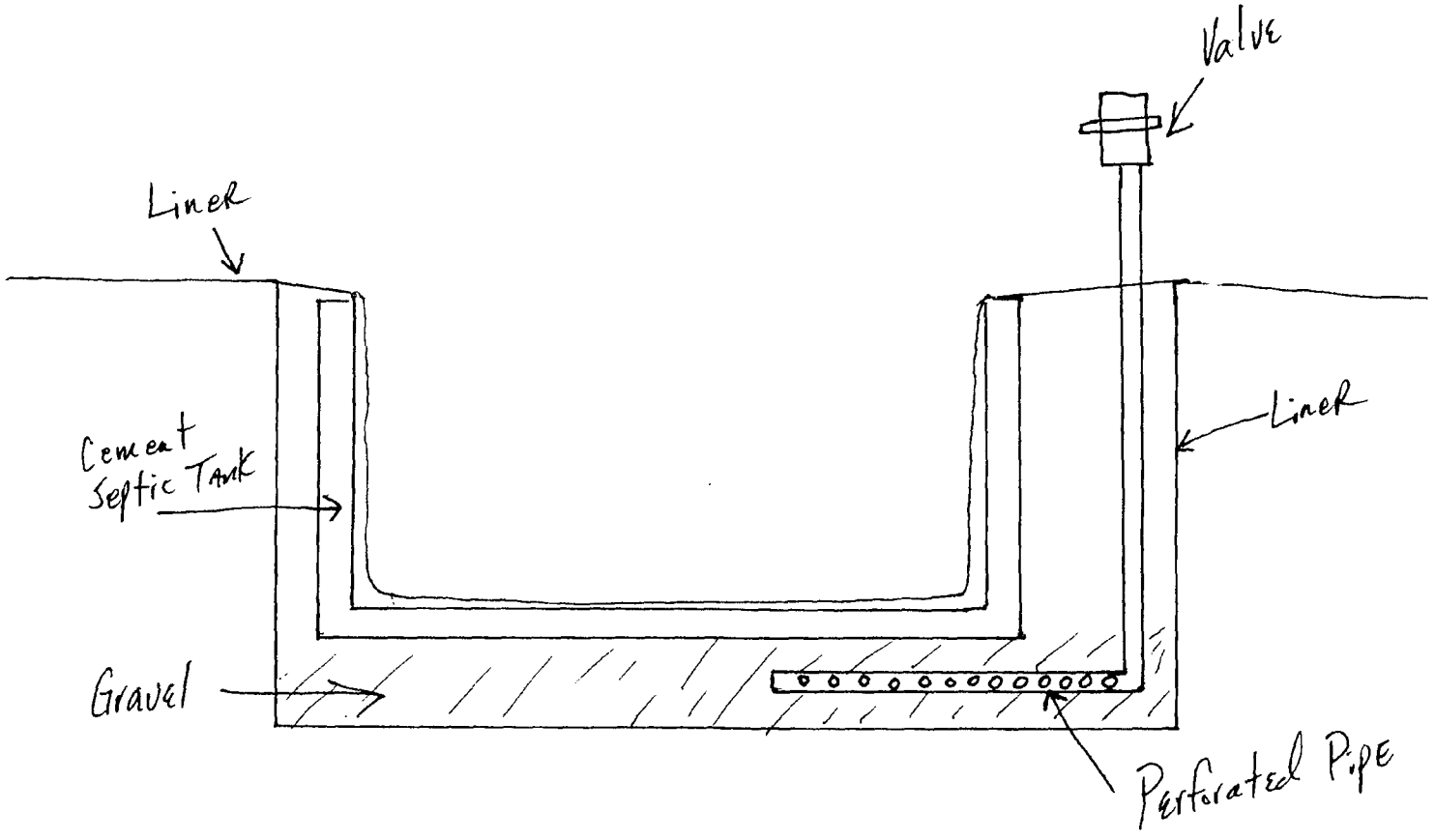
If you have any questions please feel free to contact me.

llowe

Leonard Lowe
Environmental Engineer

ATTACHMENT

PHOTO #9



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

November 20, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-039

Mr. Sherman Pierce
Permian Basin Environmental Coordinator
Halliburton Energy Services
4000 North Big Spring, Suite 400
Midland, Texas 79705

Re: Inspection Report
Artesia Facility GW-115
Artesia, New Mexico

Dear Mr. Pierce:

The New Mexico Oil Conservation Division (OCD) would like to thank you and Scott Nelson for your cooperation during the October 16, 1998 inspection of the Artesia facility located in Artesia, New Mexico. Comments from the inspection conducted are as follows:

1. *Drum Storage: All drums that contain materials other than fresh water must be stored on an impermeable pad (i.e. concrete, asphalt, or other suitable containment) with curbing. All Empty drums should be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad with curbing.*

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

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

   Vehicles should be parked on protected surface (asphalt surface) to prevent the potential of leaks going directly on the ground surface. It is OCD's understanding that individual parking spaces will be assigned on the asphalt surface for all vehicles.

   It is OCD's understanding that overhead protection structures will be constructed for the oil skimmer and drum storage areas. This will help greatly in the prevention of overflow of the oil skimmer reservoir and potential of a spill onto the ground surface.

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

Just a reminder of the necessity of reporting any spills that might occur at the facility or in the field.

I would again like to compliment the Halliburton management, you and your staff for the timely attention to upgrading your facilities and adherence to the environmental concerns of our Agency. Thank you for your time during our recent visit to your facility, and for your commitment to operate in an environmentally conscience manner. If you have any questions, please call me at (505) 827-7156.

Sincerely,

W. Jack Ford, C.P.G., P.G.
Geologist
Oil Conservation Division

xc: Mr. Scott Nelson, Halliburton Energy Services, Hobbs, NM
OCD Artesia Office