

GW - 192

**GENERAL
CORRESPONDENCE**

YEAR(S):

2006-1994

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 application has been submitted to the Director of the Oil Conservation Division, 1220 S. St. Francis, Santa Fe, New Mexico 87505. Telephone (505) 476-3470:

(GW-192) Miller Chemicals, Inc., Mr. Steve Tigert, Area Manager, P.O. Box 298, Artesia, New Mexico, 88211-0298, has submitted a renewal application for the previously approved discharge plan for their Hobbs Facility located in the Section 21, Township 18 South, Range 38 East, NMPM, Lea County, in the city of Hobbs, New Mexico. The facility is an oil field chemical service company with no wastewater discharges from the facility. Groundwater most likely to be affected by a spill, leak or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-078) - Williams Field Service, David Bays, Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their 5-Points compressor station located in the NW/4 NE/4, Section 8, Township 25 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in a below

groundwater closed-top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 310 feet with a total dissolved solids concentrations of approximately 1225 mg/l. The OCD proposed conditions can be viewed at

www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-079) - Williams Field Service, David Bays, Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Wild Horse compressor station located in the SW/4 SW/4, Section 27, Township 26 North, Range 4 West, NMPM, Rio Arriba County, New Mexico. Approximately 420 gallons per day of waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 770 feet with a total dissolved solids concentrations of approximately 1398 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-112) - Williams Field Service, David Bays, Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Carracas CDP com-

pressor station located in the SE/4 NW/4, Section 34, Township 32 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is stored in a closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-062) - Williams Field Service, David Bays, Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Manzanares CDP compressor station located in the SE/4 SW/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 14 barrels per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 80 feet with a total dissolved solids concentrations of approximately 3150 mg/l.

(GW-063) - Williams Field Service, David Bays, Environmental

Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Pump Mesa CDP compressor station located in the SW/4 SE/4, Section 14, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 145 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 390 feet with a total dissolved solids concentrations of approximately 9800 mg/l.

(GW-064) - Williams Field Service, David Bays, Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Middle Mesa compressor station located in the SE/4 SW/4, Section 10, Township 31 North, Range 7 West, NMPM, San Juan County, New Mexico. Approximately 145 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 420 feet with a total dissolved solids concentrations of approximately 900 mg/l.

Any interested person may obtain further in-

formation 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 a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines 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 submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 2006.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

SEAL
Mark E. Fesmire, P.E.,
Director
Legal #78483
Pub. Feb. 24, 2006

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 1 weeks.

Beginning with the issue dated

February 23 2006

and ending with the issue dated

February 23 2006

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 23rd day of

February 2006

[Signature]
Notary Public.

My Commission expires
February 07, 2009
(Seal)



OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO

My Commission Expires: _____

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

LEGAL NOTICE
February 23, 2006

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 application has been submitted to the Director of the Oil Conservation Division, 1220 S. St. Francis, Santa Fe, New Mexico 87505, Telephone (505) 476-3470:

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 2006.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Mark E. Fesmire, P.E., Director
#22135

01100060000 67536171
STATE OF NEW MEXICO OIL &
1220 S. ST. FRANCIS
SANTA FE, NM 87505

THE SANTA FE
NEW MEXICAN
Founded 1849

NM EMNRD OIL CONSERVATION

ATTN: Ed Martin
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00157894 ACCOUNT: 00002212
LEGAL NO: 78483 P.O. #: 06-199-050125
672 LINES 1 TIME(S) 376.32
AFFIDAVIT: 6.00
TAX: 29.15
TOTAL: 411.47

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, R, Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 78483 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/24/2006 and 02/24/2006 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 24th day of February, 2006 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

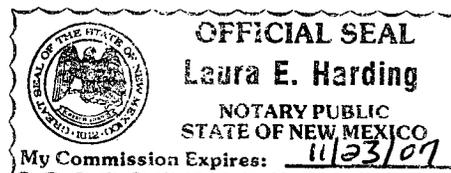
ISI R. Lara
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 24th day of February, 2006

Notary Laura E. Harding

Commission Expires: 11/23/07

2006 FEB 27 PM 2 32



www.santafenewmexican.com

**NOTICE OF
PUBLICACION**

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**STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION**

SEAL
Mark E. Fesmire, P.E.,
Director
Legal #78483
Pub. Feb. 24, 2006



MILLER CHEMICALS, INC.

Post Office Box 298
Artesia, N.M. 88211-0298
(505) 746-1919 Artesia Office
(505) 392-2893 Hobbs Office
(505) 746-1918 Fax
mci@plateautel.net

February 13, 2006

Mr. Edwin E. Martin
Oil Conservation Division
1220 South St. Frances Drive
Santa Fe, NM 87505



MILLER CHEMICALS, INC.

Post Office Box 298
Artesia, New Mexico 88211-0298

(505) 746-1919 Office
(505) 746-1918 Fax
(505) 365-4992 Cellular
(505) 365-5969 Cellular
(505) 748-2392 Home
mci@plateautel.net

STEVE TIGERT
Area Manager

Mr. Martin,

Enclosed is the application materials requested. If more information or clarification is needed, please contact me at any time. Thank you for your assistance in this matter.

In regard to your inquiry as to our facility re location.

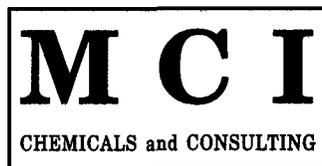
The company we were leasing from (Nova Mud) asked MCI Chemicals to leave the property. New equipment was purchased and our company began to blend from scratch at the new facility. No chemical materials were moved to the new facility from the old with the exception of trailers, trucks and hardware. No spills were incurred.

Immediately upon our move, a chemical company owned by Nova Mud began operations in our old site. No soil remediation was required.

The move was initiated and overseen by a former employee of the company that I replaced as Area Manager. I have no information on contact to Hobbs district OCD office at the time of the move.

Once again, thank you for your assistance

Regards,
Steve Tigert, Area Manager
MCI Chemicals and Consulting



MILLER CHEMICALS, INC.

Post Office Box 298
Artesia, N.M. 88211-0298
(505) 746-1919 Artesia Office
(505) 392-2893 Hobbs Office
(505) 746-1918 Fax
mci@plateautel.net

Item #4

Land Owner of facility Site:

Mr. David Bornstein

P.O.Box 310

Alto, New Mexico 88312

Phone (432)352-4087

Item #5

See attached

Item #6

Materials stored at facility

Drilling fluids- NA

Brines- NA

Acids- 15% hydrochloric acid and glacial acetic acid, stored in 55 gallon drums until utilized. Containers are housed indoors at the blend facility.

Detergents/Soaps- these industrial surfactants are stored in 55 gallon drums and are stored in large above ground containments.

Solvents and Degreasers- Utilized in our blending process and stored in self contained storage tanks behind the blend plant. These tanks are inside a large concrete containment system.

Materials stored here include Xylene, Toluene, HAN, and Methanol

Paraffin treatments/Emulsion breakers- These products are primarily blended by suppliers outside our plant, trucked in and stored in closed 55 gallon drums until use.

All these materials are stored in containment.

Biocides- NA

Item #10

Blend plant operator and the facility Manager inspect each morning for any type of leakage or spill. Contained materials are inspected for handling damage and leaks.

Any drum deemed damaged is placed in secondary containment closure and returned to the supplier when safe to do so. Any spill and or leak is cleaned up in secondary containment and disposed of as outlined in our Company Emergency response plan.

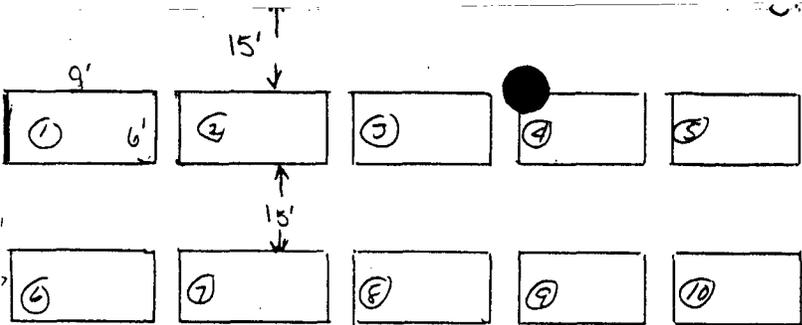
Item #11

With the exception of a drum leaking or rupturing (55 gallon volume) the only other source for spillage would be our storage tanks for the blend operation. In the event of a spill the material would reside in the containment system. Our tanks are plumbed together allowing the immediate removal of the spilled liquid by pulling it into a backup tank or bringing the material into the blend plant vats and finishing the product. Adsorbent material would be utilized to remove any residual chemical and placed in an approved land farm for remediation if applicable or drummed and shipped to an approved waste storage facility.

Drum leakage would involve sliding the drum into a secondary drum cover or pumping into a new drum. Containment would be vacuumed out and absorbent material applied. This material would be handled in the same fashion as above.

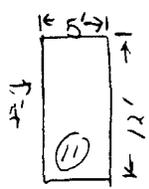
Our facility typically does not have large volumes of material that could escape in any great amount, however our company emergency operations plan includes maintaining a list of dirt contactors and trucking companies with large equipment for containment and removal in the event of a discharge.

In accordance with NMOCD rule 116 and WQCC Sec 1203 spill reporting will be made to the District OCD office as well as state and federal entities outlined in the company emergency response plan.

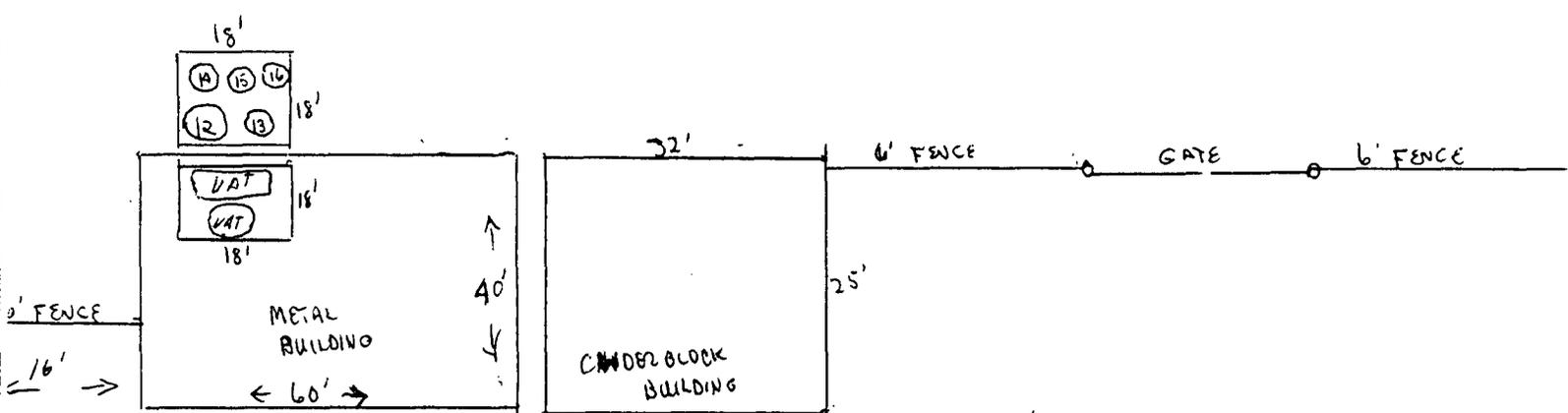


- #1 → 10 6'x9' SPILL CONTAINERS FOR FULL DRUMS
- #11 5'x12' SPILL CONTAINER FOR 330 GAL. TOTE
- #12 6'x12' 2500 GAL. HAZ. TANK
- #13 5'x8' 600 GAL. 86 CONTAINER
- #14 6'x8' 800 GAL. IPA TANK
- #15 6'x8' 950 GAL. TRUBUS TANK
- #16 6'x8' 800 GAL. METHANOL TANK

MCI
HOBBS
YARD



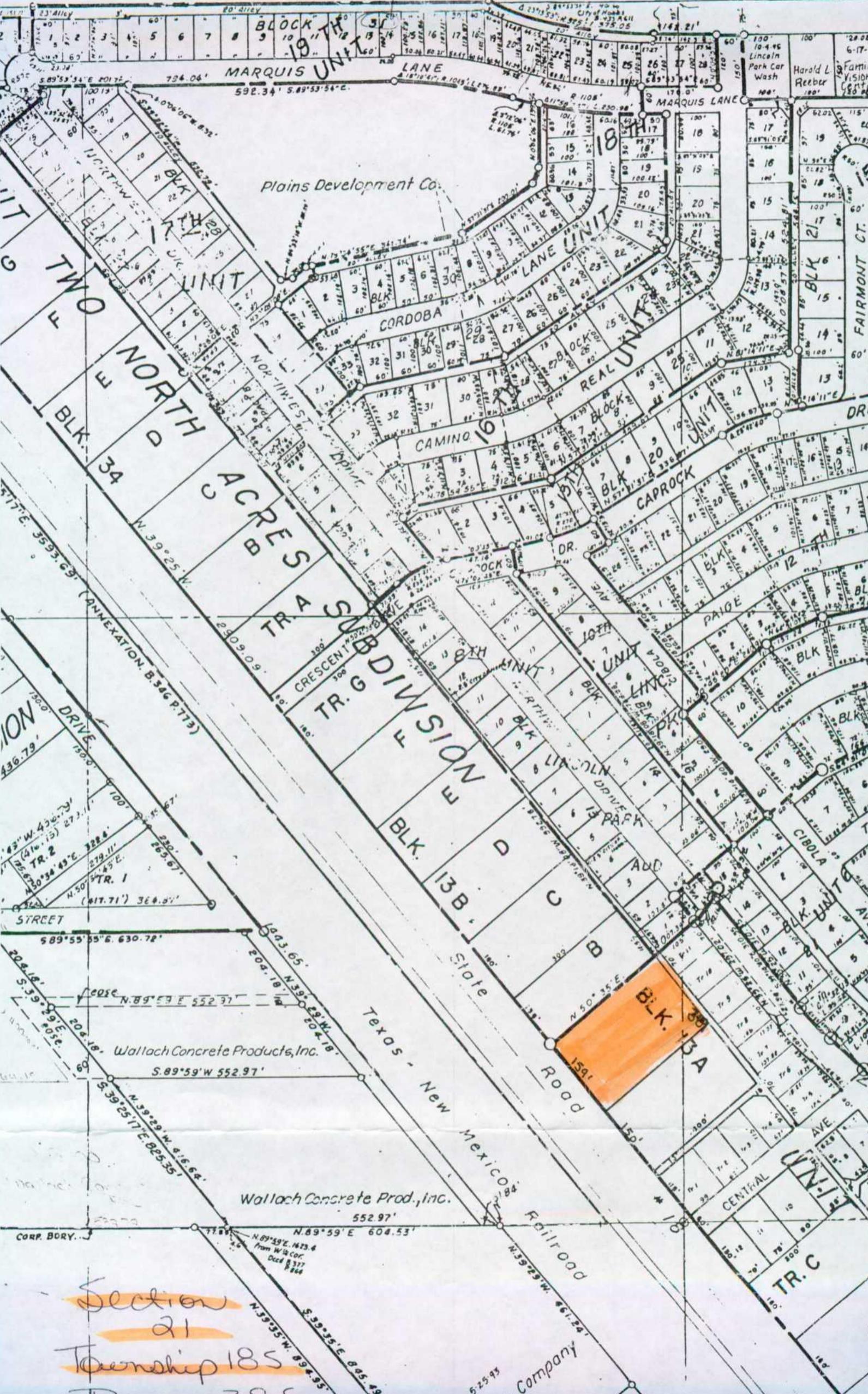
11



W ↓

7TH UNIT LINCOLN PARK A

145.39' 2348 P136
165.08' 2348 P143



Section
21
Township 18S
Range 38E

Company

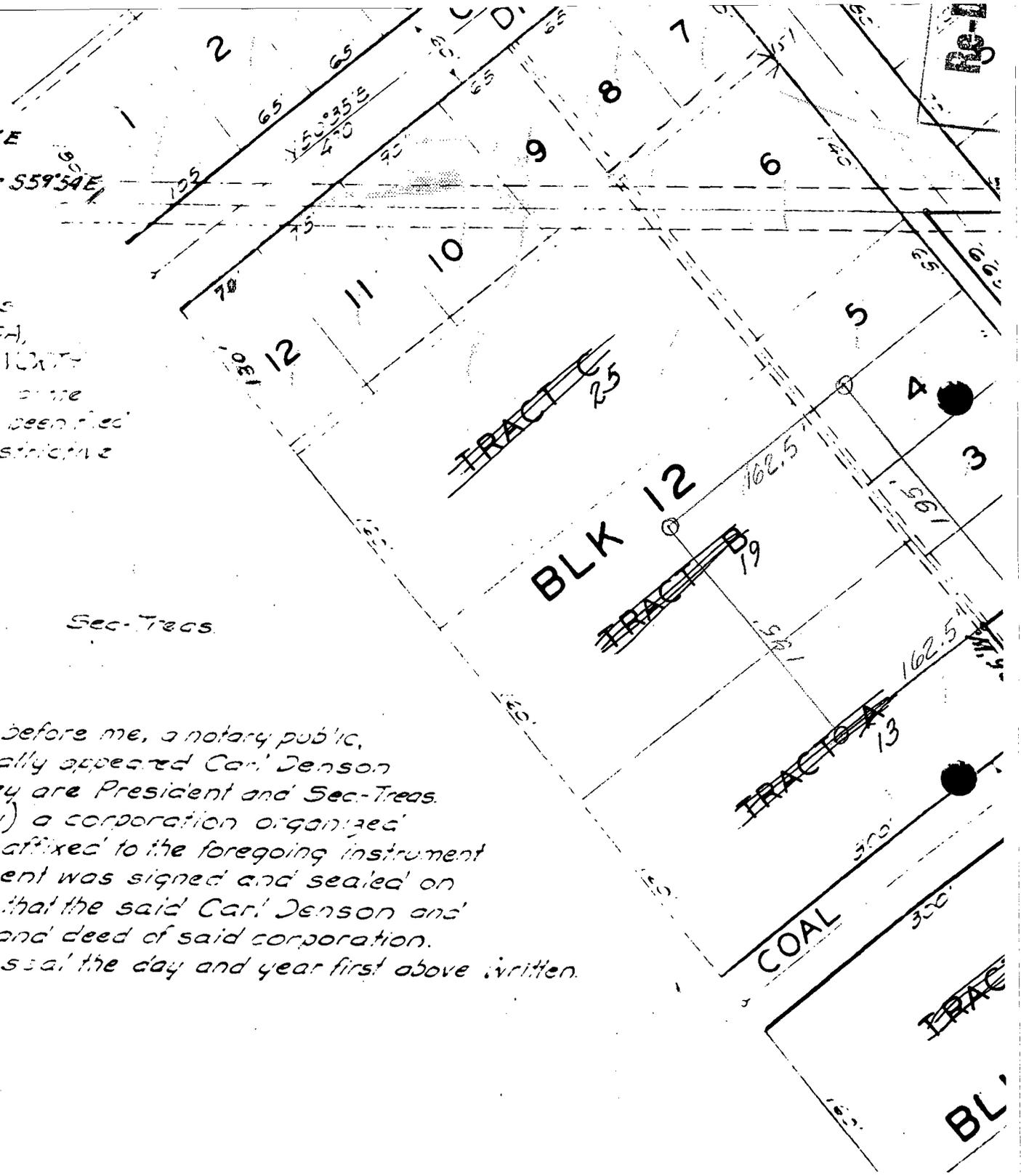
S 1°E 38'E; thence N 87°57'W,
 8925.0 ft; thence N 50°35'E,
 63.24 ft; thence S 39°25'E,
 110.0 ft; thence S 42°47'E,
 196.10 ft; thence S 21°26'E,
 S 22°26'E
 80.31 ft; thence S 7°24'E 110.53'; thence S 59°54'E
 211.73 ft; thence S 39°25'E, 182.0
 ft; thence N 89°58'E, 938.97 ft; thence
 N 89°58'E, 188.0 ft; thence S 0°02'E,
 ending and curved and curve, and to
 remaining blocks 1, 2, 3, 4, 5, 6, 7A, 8A, 9, 10A,
 and thereinafores shown thereon, and of 100%
 self and in accordance with the desires of the
 said Notice is hereby given that there has been filed
 in the Office of the County Clerk, in the County of
 Bernalillo, New Mexico, the restrictive
 covenants hereinafores described property.

RES-INC. (No Stockholders Liability)

Carl Denson
Vice-President

Carl Denson
Sec-Treas.

On this _____ day of _____, 1950, before me, a notary public,
 in and for said County, personally appeared Carl Denson
 of my duly sworn, did say that they are President and Sec-Treas.
 RES, INC., (No Stockholders Liability) a corporation organized
 in the State of New Mexico, and that the seal affixed to the foregoing instrument
 is the seal of said corporation; that said instrument was signed and sealed on
 this _____ day of _____, 1950, by authority of its Directors, and that the said Carl Denson and
 the said instrument to be the free act and deed of said corporation.
 I have hereunto set my hand and seal the day and year first above written.





MILLER CHEMICALS, INC.

Post Office Box 298
Artesia, N.M. 88211-0298
(505) 746-1919 Artesia Office
(505) 392-2893 Hobbs Office
(505) 746-1918 Fax

January 16, 2006

GW-192

Mr. Edwin E. Martin
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Mr. Martin:

Thank you for the example materials you sent and your assistance in acquiring a
Renewal for our discharge permit.

As we discussed, I am requesting an extension until February 15, 2006.

Thank you,

Steve Tigert
Area Manager

*Approved
1-17-06
Ed Martin*



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

December 20, 2005

CERTIFIED MAIL

RETURN RECEIPT NO. 7001-1940-0004-7920-7775

Mr. Andy R. Miller
Miller Chemicals, Inc.
P.O. Box 298
Artesia, NM 88211-0298

RE: Discharge Permit GW-192
Miller Chemicals, Inc.
Hobbs Facility
Lea County, New Mexico

Dear Mr. Miller:

The discharge permit GW-192 for the Hobbs Facility located in the NE/4 NE/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, **expired on June 29, 2005**. Permits for operation of oilfield service companies are required and issued pursuant to 20.6.2.3104 NMAC.

An application for renewal of your permit must be received in this office no later than January 20, 2005.

If you have any questions, you may contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

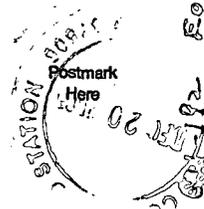
Copy: NMOCD, Hobbs

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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7001 1940 0004 7920 7775

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To
Randy R. Miller / Miller Chemicals
**Street, Apt. No.,
or PO Box No.** P.O. Box 298
City, State, ZIP+4 Georgia, GA 30211-0298
PS Form 3800 January 2001 See Reverse for Instructions

Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertising 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

Notice Of Publication

was published in a regular and entire issue of **THE LOVINGTON DAILY LEADER** and not in any supplement thereof, for one (1) day, beginning with the issue of July 14, 2000 and ending with the issue of July 14, 2000.

And that the cost of publishing said notice is the sum of \$ 52.36 which sum has been (Paid) as Court Costs.

Joyce Clemens

Subscribed and sworn to before me this 19th day of July 2000.

Debbie Schilling

Debbie Schilling
Notary Public, Lea County, New Mexico
My Commission Expires June 22, 2002

**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 application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-192) Miller Chemicals, Inc., Mr. Andy R. Miller, President, P.O. Box 298, Artesia, New Mexico, 88211, has submitted a renewal application for the previously approved discharge plan for their Hobbs Facility located in the NE/4 NE/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, in the city of Hobbs, New Mexico. The facility is an oil field chemical service company with no wastewater discharges from the facility. Groundwater most likely to be affected by a spill, leak or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately

100mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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 application, 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 and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines 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 the information in the discharge

plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of July 2000.

STATE OF
NEW MEXICO

OIL
CONSERVATION
DIVISION

LORI WROTENBERY,
Director

SEAL
Published in the
Lovington Daily Leader
July 14, 2000.

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 160064 ACCOUNT: 56689
LEGAL NO: 67738 P.O.#: 00199000278
175 LINES 1 time(s) at \$ 77.14
AFFIDAVITS: 5.25
TAX: 5.15
TOTAL: 87.54

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of July 2000.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

Legal #67738
Pub. July 18, 2000

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, Betsy Reiner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67738 a copy of which is hereto attached was published in said newspaper 1 day(s) between 07/18/2000 and 07/18/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 18 day of July, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ Betsy Reiner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 19 day of July A.D., 2000

Notary Janet L. Montoya
Commission Expires 12/30/03



OFFICIAL SEAL
Janet L. Montoya
NOTARY PUBLIC - STATE OF NEW MEXICO

MY COMMISSION EXPIRES 12/30/03



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

NOTICE OF PUBLICATION

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

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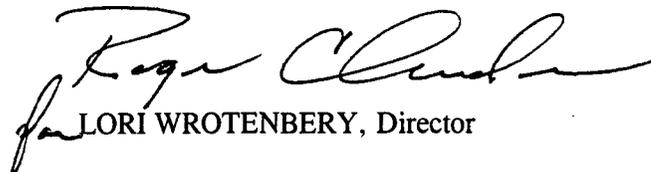
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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this *11th day of July 2000.*

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


for LORI WROTENBERY, Director

SEAL



MILLER CHEMICALS, INC.

Post Office Box 298
Artesia, N.M. 88211-0298
(505) 746-1919 Artesia Office
(505) 393-2893 Hobbs Office
(505) 746-1918 Fax

May 23, 2000

Mr. W. Jack Ford, C.P.G.
Environmental Bureau
Oil Conservation Division

Re: Discharge Plan Renewal – Hobbs Facility

Dear Mr. Ford:

I am submitting a copy of the original discharge plan attachments submitted by Envirochem in 1995 as attachments for the renewal. Miller Chemicals, Inc. purchased Envirochem in February of 1999 and no changes have been made to the existing facility.

I am also submitting a copy of the latest inspection performed by the Hobbs OCD office personnel in September 1999.

If this information is not adequate, please contact me at 505-746-1919 or 505-365-4991.

Sincerely,

A handwritten signature in cursive script that reads 'Andy R. Miller'.

Andy R. Miller

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

New Renewal Modification

1. Type: Oilfield Production Chemical Company

2. Operator: Miller Chemicals, Inc.

Address: P.O. Box 298 Artesia, NM 88211-0298

Contact Person: Andy R. Miller Phone: 505-746-1919 (office)
505-365-4991 (cell)

3. Location: _____ /4 _____ /4 Section _____ Township Hobbs Range _____
Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATION

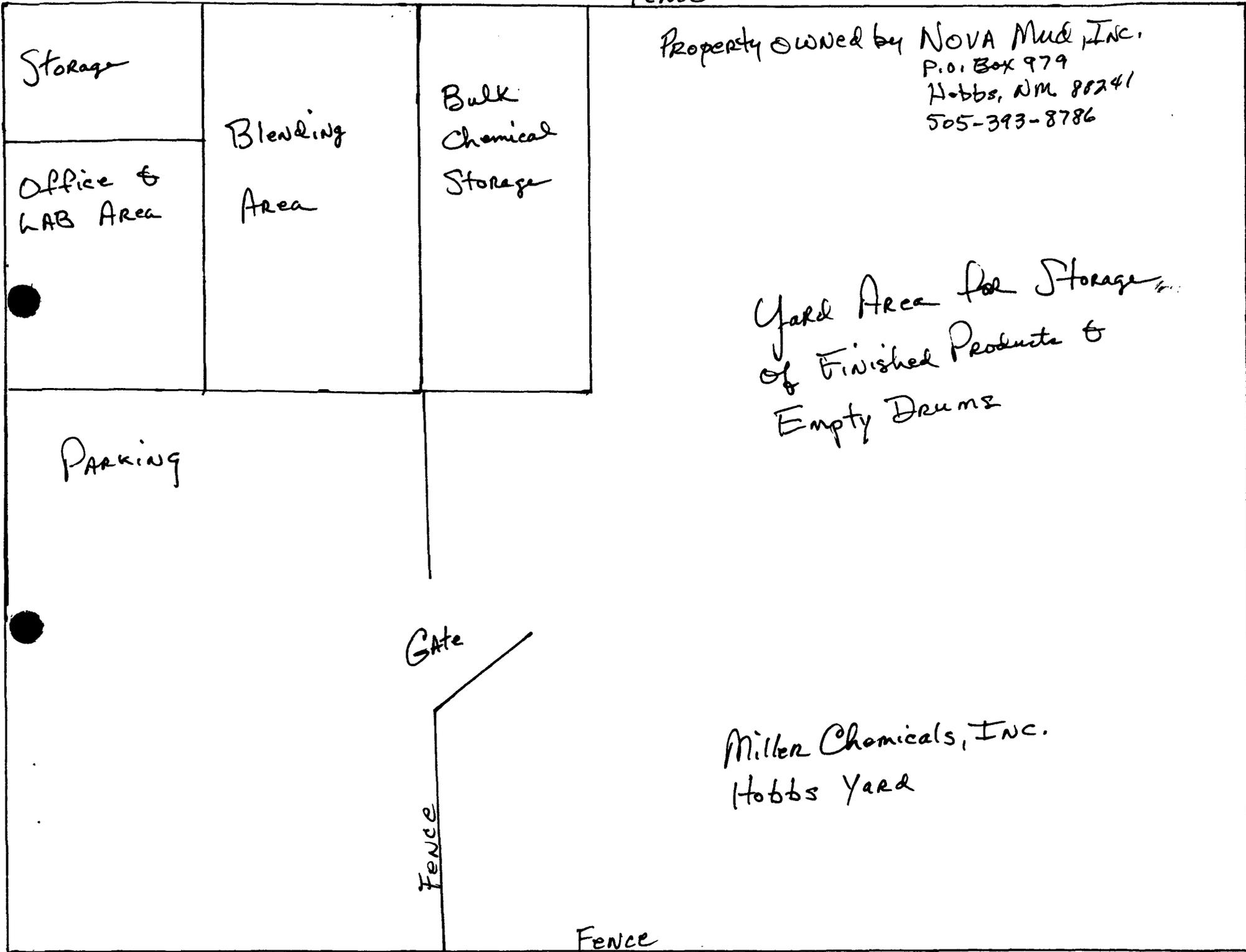
I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Andy R. Miller Title: President

Signature: Andy R. Miller Date: 5/23/00

ATTACHMENT TO DISCHARGE PLAN GW-192 APPROVAL
ENVIROCHEM - HOBBS
DISCHARGE PLAN REQUIREMENTS
(June 29, 1995)

1. **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 1 1/3 times the capacity of the tank or 1 1/3 times the volume of all interconnected tanks.
2. **Drum Storage:** All drums will be stored on pad and curb type containment.
3. **Spills:** All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
4. **Modifications:** All proposed modifications that include the construction of any below grade facilities or the excavation and disposal of wastes or contaminated soils will have OCD approval prior to excavation, construction or disposal.
5. **Concrete Pit:** A closure plan for the outdoor concrete pit will be submitted for approval to the NMOCD by July 31, 1995 .
6. **Wastes:** All wastes generated at the facility will be disposed of in a manner approved by NMOCD.
7. **Pit Wastes:** The Hazardous waste that is associated with the concrete pit will be removed pursuant to RCRA Hazardous Waste Regulations. Verification paperwork will be submitted to NMOCD.



Fence

Storage

Blending
Area

Bulk
Chemical
Storage

Property owned by NOVA Mud, Inc.
P.O. Box 979
Hobbs, NM 88241
505-393-8786

Office &
LAB Area

Yard Area for Storage
of Finished Products &
Empty Drums

Parking

Gate

Miller Chemicals, Inc.
Hobbs Yard

Fence

Fence

Fence



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87605
(505) 827-7131

September 7, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z-274-520-529

542

Mr. Andrew Miller
c/o MCI
P.O. Box 668
Hobbs, New Mexico 88240

Re: **Envirochem Miller Chemicals, Inc.**
GW-192 Hobbs Facility
Hobbs, New Mexico

Dear Mr. Miller:

The New Mexico Oil Conservation Division (OCD) would like to thank Mr. Ken Bromley for his cooperation during the June 17, 1999 inspection of the Hobbs facility (GW-192) located in Hobbs, New Mexico. The following OCD personnel were present during the inspection of the facility; Mr. Wayne Price and Mr. Jack, OCD Santa Fe office, Ms. Donna Williams, OCD Hobbs District Office. 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.*

Drums containing fluids were located on metal containment pads and labeled. (Photo #3) Three drums containing fluids required labeling for re-use or disposal. All drums should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

Empty drums were stored properly on racks for removal from the facility. (Photo #5)

2. *Above Ground Saddle Tanks: Above ground saddle tanks must have pad and curb type of containment below them unless they contain alcohol or fluids which are gases at normal atmospheric pressure and temperature.*

The diesel and the used motor oil saddle tanks that are used for fluids have proper pad and curb containment.

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

All tanks were clearly labeled. (Photo #6)

4. *Below Grade Tanks/Sumps:* *All below grade tanks, sumps, and pits must be approved by the OCD prior to installation and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing and visual inspection of cleaned out tanks /or sumps.*

The below grade tank previously associated with the mixing and blending processes has been closed and no longer poses an environmental hazard.

5. *Underground Process/Wastewater Lines:* *All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter. Companies may propose various methods for testing such as pressure testing or other means acceptable to the OCD.*

Laboratory fluid wastes are collected in a sealed fiberglass tank prior to disposal offsite. Some containment vessels were near overflow at the time of the inspection. Careful attention by onsite personnel is required to prevent overflow from any containment vessels.

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

The facility has greatly improved in record keeping and record availability since the previous inspection. Orderly storage of drums and cleanliness of process and storage areas has also greatly improved. (Photo #2, Photo #3, and Photo #5)

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

All previous spills/releases have been reported and immediate abatement actions taken.

Mr. Andrew Miller
September 7, 1999
Page 3

Notification to the OCD is required upon change of ownership and approval from the OCD for transfer of the current discharge plan. The OCD is not in receipt of such notification which is due immediately. Once again, OCD would like to thank Mr. Ken Bromley for his time during our 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.
Environmental Bureau
Oil Conservation Division

xc: OCD Hobbs District Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 18, 2000

Mr. Andrew Miller
MCI
P.O. Box 298
Artesia, New Mexico 88211

**RE: Discharge Plan GW-192 Renewal
Hobbs Facility
Lea County, New Mexico**

Dear Mr. Miller:

Enclosed is a copy of the original approved discharge plan issued to Envirochem, dated June 29, 1995, which was requested this date. Again a reminder that the approval will expire on June 29, 2000.

If the Hobbs Facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If MCI has any questions, please do not hesitate to contact me at (505) 827-7156 as I have been assigned the responsibility to review this renewal application.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jack Ford".

W. Jack Ford, C.P.G.
Environmental Bureau
Oil Conservation Division

cc: OCD Hobbs District Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 25, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9245

Mr. Andrew Miller
MCI
P.O. Box 298
Artesia, New Mexico 88211

**RE: Discharge Plan GW-192 Renewal
Hobbs Facility
Lea County, New Mexico**

Dear Mr. Miller:

On June 29, 1995, the groundwater discharge plan, GW-192, for the MCI Hobbs Facility located in the NE/4 NE/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea 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) regulations and was approved for a period of five years. **The approval will expire on June 29, 2000.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, 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 December 15, 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 MCI 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 **Hobbs Facility** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for oil field service facilities. The \$50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. Andrew Miller
February 25, 2000
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is also available on OCD's website at www.emnrd.state.nm.us/o cd/).

If the Hobbs Facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If MCI has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Hobbs District Office

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To:	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	
Name (Please Print Clearly) (To be completed by mailer) <i>A. Miller</i>	
Street, Apt. No., or PO Box No. <i>MCI</i>	
City, State, ZIP+4 <i>Artesia</i> <i>612-192</i>	
PS Form 3800, July 1999 See Reverse for Instructions	

7099 3220 0000 5050 9245



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 827-7131

September 7, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z-274-520-⁵⁴²~~529~~

Mr. Andrew Miller

c/o MCI

P.O. Box ~~668~~ ²⁹⁸

Hobbs, New Mexico ~~88240~~ ⁸⁸²¹¹

Artesia

**Re: Envirochem
GW-192 Hobbs Facility
Hobbs, New Mexico**

Dear Mr. Miller:

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All tanks were clearly labeled. (Photo #6)

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The facility has greatly improved in record keeping and record availability since the previous inspection. Orderly storage of drums and cleanliness of process and storage areas has also greatly improved. (Photo #2, Photo #3, and Photo #5)

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

All previous spills/releases have been reported and immediate abatement actions taken.

Mr. Andrew Miller
September 7, 1999
Page 3

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Sincerely,


W. Jack Ford, C.P.G.
Environmental Bureau
Oil Conservation Division

xc: OCD Hobbs District Office

Z 274 520 542 *FOOD* *OCD*

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

Sent to	<i>A. Miller</i>
Street & Number	<i>MCI</i>
Post Office, State, & ZIP Code	<i>Altesia</i>
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	<i>GW-192</i>

PS Form 3800, April 1995

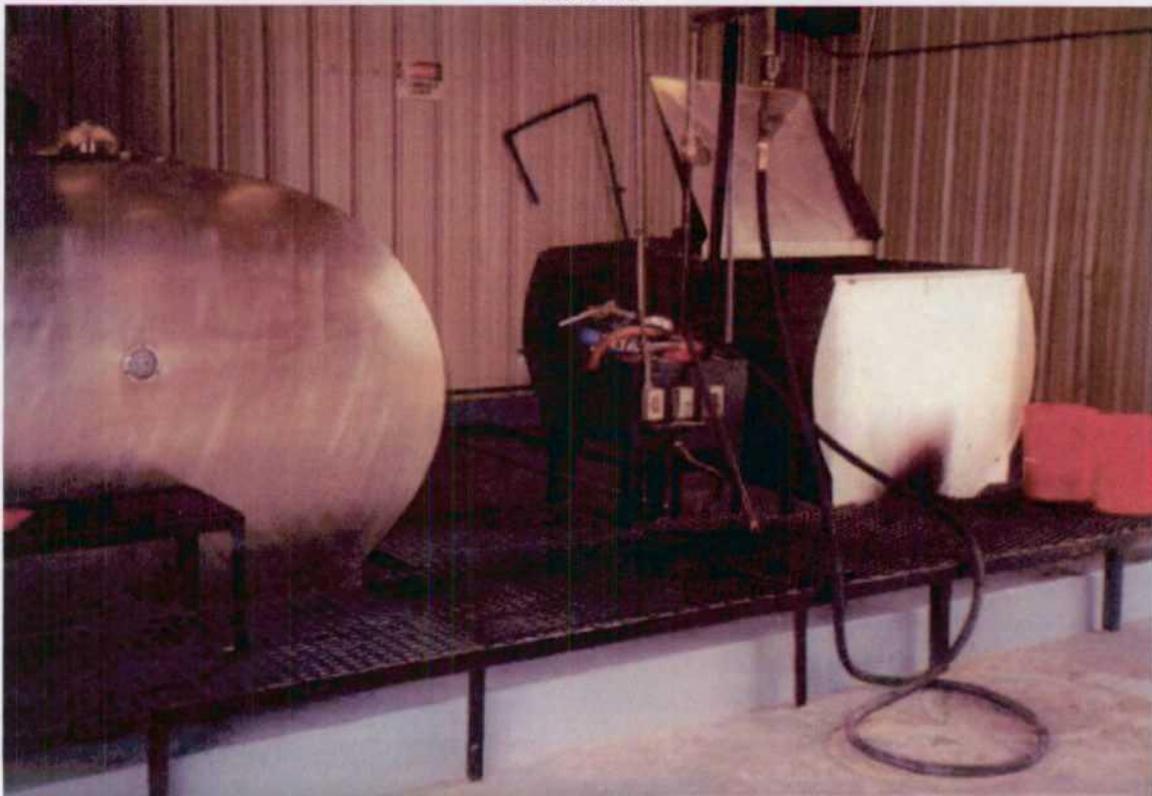
SANTA FE NM 87502
OCT 19 1999
USPS

Photo #1



GW-192 MCI HOBBS FACILITY
Building identifying sign

Photo #2



GW-192 MCI HOBBS FACILITY
Mixing vat

Photo #3



GW-192 MCI HOBBS FACILITY
Warehouse drum storage

Photo #4



GW-192 MCI HOBBS FACILITY
Outside drum storage within steel containment

Photo #5



GW-192 MCI HOBBS FACILITY
Racked and secured empty drum storage along west side of yard.

Photo #6

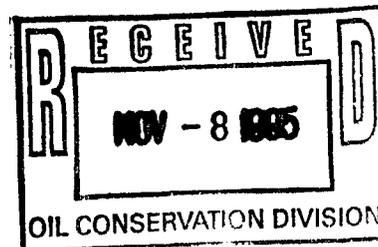


GW-192 MCI HOBBS FACILITY
Bulk chemical storage within concrete containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733



NOV 6 1995

Mr. Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Garcia:

This letter is to inform you and your staff of the following scheduled fact-finding meeting and conference calls between the U.S. Environmental Protection Agency (EPA) and the RCRA regulated facilities inspected by EPA this past year. Enviro-Chem of Hobbs, New Mexico, will meet at EPA offices on November 8, 1995. In addition, fact-finding conference calls with Chemical Distributors, Inc., (CDI) of Farmington, New Mexico, and Solv-Ex of Albuquerque, New Mexico, will be held on November 7, 1995, and November 9, 1995, respectively. The objective of the meetings and conference calls is to discuss with each facility the findings from the RCRA Compliance Evaluation Inspection (CEI) conducted at these facilities during April 1995 by EPA. The inspections were part of a regional compliance assurance initiative to address non-compliance among the oil field services and other related industrial sectors subject to regulation under the Toxics Characteristic Rule.

Out of any enforcement that may ensue, we hope to gain broader compliance across the industry by having violating companies sponsor educational outreach. In addition, we will discuss with these companies other supplemental projects that would benefit the surrounding communities.

We have discussed the meeting and conference calls with the facilities and our general objectives with Mr. Coby Muckelroy informally and will coordinate with your office and the Oil Conservation Division on the development and implementation of these beneficial projects.

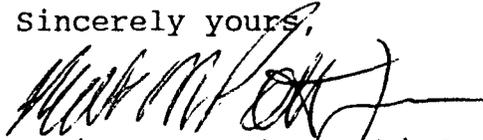
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NOV 8 1995

Environmental Bureau
Oil Conservation Division

Should you have any questions, please contact me at
(214) 665-6746, or have your staff contact Greg Pashia at
(214) 665-2287.

Sincerely yours,



Desi A. Crouther, Chief
Hazardous Waste Enforcement Branch

cc: Mr. Coby Muckelroy
New Mexico Environment Department
↓ Mr. Roger Anderson
Oil Conservation District of New Mexico

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 and modification application have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-032) - GIANT REFINING Company, Route 3, Box 7, Gallup, New Mexico, 87301 has submitted a modification application for the previously approved discharge plan for their Ciniza Refinery located in Section 28 and Section 33, Township 15 North, Range 15 West, NMPM, Mckinley County, near Gallup, New Mexico. The modification will consist of the addition of a landfarm for the treatment of non-hazardous oily wastes. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 70 feet to 140 feet with an approximate total dissolved solids concentration of 950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-192) - ENVIRO-CHEM, P.O. BOX 668, Hobbs, New Mexico, 88240 has submitted a discharge plan application for their Enviro-Chem facility located in NE/4 NE/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, in the city of Hobbs, New Mexico. The facility is an oil field chemical service company with no wastewater discharges from the facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-193) - Meridian Oil Inc., P.O. BOX 4289, Farmington, New Mexico, 87499-4289 has submitted a discharge plan application for their Sandstone Compressor Station located in SE/4, Section 32, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. The station will compress natural gas with no process waste stream discharges to the ground; all waste streams will be stored onsite in closed top tanks and then transported to an NMOCD approved disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

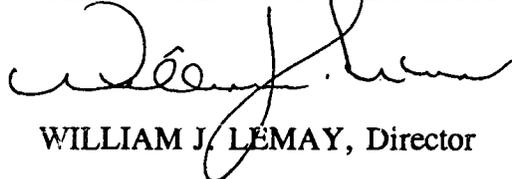
(GW-194) - Meridian Oil Inc., P.O. BOX 4289, Farmington, New Mexico, 87499-4289 has submitted a discharge plan application for their Frances Mesa Compressor Station located in SW/4, Section 27, Township 30 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. The station will compress natural gas with no process waste stream discharges to the ground; all waste streams will be stored onsite in closed top tanks and then transported to an NMOCD approved disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 240 feet with a total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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 2nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

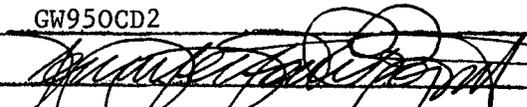
S E A L

NO EFFECT FINDING

The described action will have no effect on listed species,
~~and the important wildlife resources.~~

Date May 15, 1995

Consultation # GW95OCD2

Approved by 

U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

CERTIFIED

Z 004 844 526

MAIL



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JUN 23 1986

Environmental 1980
Oil Conservation Division

Return Receipt Requested

From:



ZIADRIL, INC.

BOX 1860

HOBBS, NEW MEXICO 88241

To:

Mr. Patrico W. Sanchez
Petroleum Engineer
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, N.M. 87505



P.O. BOX 668
HOBBS, NEW MEXICO 88240
(505) 393-1917

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JUN 28 1995

Environmental Bureau
Oil Conservation Division

OIL CONSERVATION DIVISION
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1995 JUN 28 PM 8 52

MR. PATRICO W. SANCHEZ
PETROLEUM ENGINEER
NEW MEXICO OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, N.M. 87505

DEAR MR. SANCHEZ:

THIS IS IN RESPONSE TO THE CERTIFIED LETTER DATED JUNE 5, 1995 CONCERNING ENVIRO-CHEM'S DISCHARGE PLAN GW-192.

THE FOLLOWING EXPLANATIONS ARE SUBMITTED FOR YOUR REVIEW:

1. EXHIBIT C (B)

ATTACHED IS REVISED EXHIBIT C WITH THE WORD "NONE" REMOVED.

2. EXHIBIT D

WE RECOGNIZE THE LIABILITY IN LEAVING THE CONCRETE PIT IN USE. THE CONCRETE PIT WILL BE CLOSED AND PLUGGED. THEREFORE WE HAVE REVISED EXHIBIT D TO REFLECT THIS CHANGE. OUR PLAN IS SHOWN IN EXHIBIT E PROPOSED MODIFICATIONS.

3. EXHIBIT E

THE ZERO WASTE HAS BEEN REPLACED BY THE PHRASE MINIMUM WASTE. THE FLUID IN THE CONCRETE PIT WILL BE DISPOSED OF IN AN APPROVED MANNER. THE CONCRETE PIT WILL BE CLEANED AND INSPECTED. MR. WAYNE PRICE, OCD DISTRICT 1, WILL BE CONTACTED FOR APPROVAL AND GUIDANCE BEFORE THE CONCRETE PIT IS CLOSED. A REVISED EXHIBIT E IS ATTACHED.

4. EXHIBIT F & G

THE PHRASE BOTH WQCC 1-203 AND NMOCD RULE 116 HAS BEEN INCLUDED AS REQUESTED. ATTACHED IS REVISED EXHIBITS F & G.

ATTACHED ARE REVISED EXHIBITS C(2 PAGES), D, E, F & G. PLEASE INSERT THESE REVISIONS INTO OUR DISCHARGE PLAN.

SHOULD YOU HAVE ANY QUESTIONS OR REQUIRE ANY ADDITIONAL INFORMATION PLEASE CALL ME AT 505-939-1917.

SINCERELY,

Joe Smith
JOE E. SMITH
PRESIDENT

EXHIBIT C

SOURCES AND QUANTITIES OF EFFLUENT AND WASTE GENERATED AT THE FACILITY

PART VII

	<u>WASTE TYPE</u>	<u>COMPOSITION & SOURCE</u>	<u>VOLUME PER MO</u>
1.	TRUCK WASTES		NONE
2.	TRUCK, TANK AND DRUM WASHING		NONE DRUMS ARE CLEANED BY OUTSIDE CONTRACTOR. IN ODESSA, TEXAS
3.	STEAM CLEANING		NONE
4.	SOLVENT AND DEGREASERS		NONE
5.	ACIDS OR CAUSTICS		NONE
6.	WASTE SLOP OIL		NONE
7.	WASTE LUBRICATION AND ETC.		NONE
8.	OIL FILTERS		NONE
9.	SOLIDS AND SLUDGES		NONE
10.	PAINTING WASTES		NONE
11.	SEWAGE		NONE
12.	OTHER WASTE LIQUIDS		
	BLENDING PRODUCTS	PRODUCTS-BLEND VAT	5 GAL
	LABORATORY WASTE		NONE NO LAB
	RAIN WATER IN BERMS	WTR-DRUM BERMS	10 GAL
13.	OTHER WASTE SOLIDS		NONE
	SPILL ABSORBENTS	PRODUCTS-DRUM LEAKS	ONLY FROM SPILLS

EXHIBIT C

SUMMARY DESCRIPTION LIQUID AND SOLID WASTE COLLECTION AND DISPOSAL

PART VIII

	<u>WASTE TYPE</u>	TANK(T) DRUM(D)	BLENDING PRODUCT	<u>OFF-SITE DISPOSAL</u>
12.	OTHER WASTE LIQUIDS			
	BLENDING PRODUCT:	VAT	BOTH	NO
	LABORATORY WAST.	NONE		
	RAIN WATER	DRUMS	BOTH	NO
13.	OTHER WASTE SOLIDS			
	SPILL ABSORBENTS	TD		YES

EXHIBIT D

CURRENT LIQUID AND SOLID WASTE COLLECTION/STORAGE/ DISPOSAL/PROCEDURES

VIII.(A) STORAGE:

DRUMS: DRUMS WITH PRODUCTS ARE STORED ON WOOD PALLETS ON THE GROUND SURFACE.

EMPTY DRUMS ARE STORED ON THE GROUND SURFACE.

TANKS: ABOVE GROUND TANKS ARE ON CONCRETE SURFACE WITH CONCRETE CURBING. CALCULATED VOLUME = 8725 GAL..
TANK VOLUME= 6900 GAL.

- (B)(1) BLENDING AREA: ALL TANKS ARE ON CONCRETE WITH CONCRETE CURBS. AN EMERGENCY PIT IS CONNECTED TO THE BLENDING AREA THRU A FLOOR DRAIN. CALCULATED BERM VOLUME = 4990 GAL..
TANK VOLUME= 3020 GAL.

RAW MATERIAL TANKS: TANKS ARE ON CONCRETE WITH CURBS AND ARE CONNECTED TO THE EMERGENCY PIT THRU FLOOR DRAIN.

EMERGENCY PIT: IS CONCRETE LINED 8'X 8'X 8'.
CONCRETE PIT WILL BE PLUGGED.

- (B)(2) TANKS: ARE ON CONCRETE PAD AND BERMED WITH CONCRETE CURB OF SUFFICIENT SIZE TO CONTAIN VOLUME PLUS 1/3.
TANK VOLUME = 6900 GAL. BERM VOLUME= 8730 GAL.

DRUMS : ON WOOD PALLETS WILL BE ADDRESSED IN IX MODIFICATIONS

- (C)(1)(A) ON SITE FACILITIES ARE LOCATED ON TOPO MAP.

- (C)(1)(A)(2) CONCRETE PIT BUILT 1989. SIZE 8'X8'X8' = 3800 GALS.
CONCRETE PIT WILL BE PLUGGED AND WILL BE ADDRESSED IN IX MODIFICATIONS.

EXHIBIT F
INSPECTION MAINTENANCE AND REPORTING
PART X

INSPECTION :

THE ENVIRO-CHEM FACILITY OPERATES ON AN 10-12 HR ,
6 DAY PER WEEK SCHEDULE. ALL CONTAINERS, DRUMS,
TANKS, BUCKETS AND ETC. ARE TO BE VISUALLY INSPECTED
EACH WORK DAY. THE PLANT MANAGER WILL CORRECT
ANY LEAKING OR DAMAGED CONTAINER AS SOON AS
POSSIBLE. THESE INSPECTIONS WILL BE RECORDED
WEEKLY. THE OCD WILL BE NOTIFIED OF ANY LEAK OR
SPILL PURSUANT TO WQCC 1-203 AND OCD RULE 116.
TWO COPIES OF OCD FORM " NOTIFICATION OF, LEAKS,..."
WILL BE SUBMITTED TO HOBBS DISTRICT OFFICE.

CONTAINMENT:

THE TOPO MAP INDICATES THAT RAIN WATER WILL BE
DIVERTED FROM THE FACILITY TO STORM DRAINAGE
AREAS ALONG THE STREET. ALL THE CHEMICAL STORAGE
AREAS ARE TO BE ELEVATED ABOVE GRADE FROM THE
SURROUNDING AREA. THE STORAGE PADS ARE CURBED
AND ARE LINED WITH 12 MIL PLASTIC TO PREVENT THE
CHEMICAL FROM LEACHING THOUGH THE PAD AND
CONTAMINATING THE SOIL. ANY SPILL LEAVING THE FACILITY
IS EXTREMELY UNLIKELY.

EXHIBIT G

SPILL/LEAK PREVENTION AND REPORTING PROCEDURES

PART XI

THE BLENDING PLANT AND LIQUID TRANSFER SYSTEM IS DESIGNED TO KEEP SPILLS AT A MINIMUM. THE PLANT OPERATOR MUST USE PROPER SAFEGUARDS DURING FILLING, EMPTYING AND CIRCULATING OPERATIONS. THE PLANT OPERATOR IS THOROUGHLY FAMILIAR WITH ALL THE EQUIPMENT AND THAT ALL CONNECTIONS ARE PROPERLY MADE UP AND TIGHT. BEFORE MAKING ANY TRANSFER THE OPERATOR WILL ASCERTAIN THAT THE TRANSFER WILL NOT CAUSE AN OVERFLOW. BEFORE BREAKING ANY CONNECTIONS THE PLANT OPERATOR WILL BE CERTAIN THAT ALL VALVES ARE PROPERLY CLOSED AND LINES ARE CLEAR TO PREVENT ANY SPILL FROM THE LINE. IN THE BLENDING PROCESS THE OPERATOR WILL USE CAUTION IN THE MIXING OPERATION TO PREVENT ALL SPILLS.

SHOULD A SPILL OCCUR THE PERSON FINDING THE SPILL WILL TAKE IMMEDIATE ACTION TO CONTAIN THE SPILL. BAGS OF ABSORBENT, SHOVELS, RAKES, AND EMPTY DRUMS ARE LOCATED IN THE WAREHOUSE FACILITY. AFTER TAKING ACTION TO CONTAIN THE SPILL THE MANAGER WILL BE NOTIFIED OF THE LOCATION AND EXTENT OF THE SPILL.

DEPENDING ON THE SIZE AND NATURE OF THE SPILL ACTION WILL BE TAKEN AS FOLLOWS:

MINOR SPILLS: THE SPILL WILL BE RECOVERED WITH ABSORBENT MATERIAL SUCH AS HAY, FULLERS EARTH, OR NEUTRALIZING MATERIAL. THE ABSORBENT MATERIAL WILL BE COLLECTED FOR INCINERATION, BURIAL OR DISPOSAL IN AN APPROVED MANNER. SINCE THIS IS NOT A SIGNIFICANT SPILL THE OCD WILL NOT BE NOTIFIED.

MAJOR SPILLS: THE SPILL WILL BE PUMPED INTO EMPTY DRUMS. THE PORTION OF SPILL WHICH CANNOT BE RECOVER BY PUMP WILL BE RECOVERED BY ABSORBENT MATERIAL SUCH AS HAY, FULLERS EARTH, OR NEUTRALIZING MATERIAL. THE ABSORBENT MATERIAL WILL BE COLLECTED FOR INCINERATION, BURIAL OR DISPOSAL IN AN APPROVED MANNER. SINCE THIS IS A SIGNIFICANT SPILL THE OCD WILL BE NOTIFIED PURSUANT TO OCD RULE 116 AND WQCC 1-203. THE NECESSARY FORMS WILL BE FILED WITH THE HOBBS DISTRICT OFFICE.

IF THE SPILL IS A FLAMMABLE MATERIAL THE MANAGER SHALL DECIDE IF THE FIRE DEPARTMENT WILL BE NOTIFIED. THIS DETERMINATION SHALL BE BASED UPON THE VOLUME OF THE SPILL AND THE POTENTIAL FOR IGNITION.



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 10:30 AM	Date 6-22-95
---	-----------------------------------	------------------	-----------------

<u>Originating Party</u>	<u>Other Parties</u>
Ken McPeters - Environment	Pat Sanchez - NMED

Place Environment discharge Plan

Discussion They (Joe & Ken) have agreed to close the concrete pit. They will use wash water in the blending vats so that it may indeed be a product.

Conclusions or Agreements Ken will send us a letter addressing the June 5 letter I sent them - & HC will get with Wayne Price on the pit closure. When all information is in I will draft up the approval letter.

Signature Signed



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Personal	Time 9:15 AM	Date 6/13/95
---	--	-----------------	-----------------

<u>Originating Party</u>	<u>Other Parties</u>
Ken McPeterson - Consultant For Envirochem	Pat Sanchez
<u>Subject</u> Letter I Sent Dated June 5, 1995	

Discussion Discussed contents of letter - Ken has no problem with any of the prints. He will address the pit w/ Joe Smith. Discussed that using this "wash water" maybe considered HAZARDOUS WASTE Disposal.

Conclusions or Agreements Try to get pit closed out; Use "wash water" in containment for blending in pits.

Signature Signed



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

June 5, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-691

Mr. Joe E. Smith
President
ENVIROCHEM
P.O. Box 668
Hobbs, NM 88240

**RE: Discharge Plan GW-192 ENVIROCHEM - Hobbs facility
Lea County, New Mexico**

Dear Mr. Smith:

The NMOCD has received the proposed amendments to the proposed ENVIROCHEM discharge plan application for the facility located in NE/4 NE/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Upon review of the discharge plan amendments as proposed by ENVIROCHEM on May 11, 1995 the NMOCD requests that the following points be **clarified**.

Please note that unless otherwise stated, response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan.

On the cover letter sent by Mr. Joe E. Smith.

1. EXHIBIT C (B.)

In this portion of the plan ENVIROCHEM still maintains that no waste stream will be generated. i.e. EXHIBIT C. PART VII 13. OTHER WASTE SOLIDS-SPILL SORBENT, PRODUCTS DRUM LEAKS, NONE ONLY FROM SPILLS.

It is recommended that the last portion should read **ONLY FROM SPILLS**, with the word **NONE** removed. The spill sorbent would be considered a waste stream - therefore the word **NONE** under the volume per month is wrong.

Mr. Joe E. Smith
June 5, 1995
Page 2

2. EXHIBIT D

What prevents chemicals from mixing with this wash water that collects in the concrete pit? If this is the case then this material might be classified as a solid waste at the point of generation and be subject to RCRA rules and regulations. As stated in the previous NMOCD correspondence dated May 4, 1995 - under what regulatory citation can ENVIROCHEM justify calling the wash water a product?

3. EXHIBIT E (Proposed Modifications IX) ZERO WASTE

Submit justification for using the term ZERO WASTE facility. ENVIROCHEM in the past has generated hazardous waste in the concrete pit. Also in the event of a spill it appears that a waste stream would be generated. Please amend the plan to reflect this.

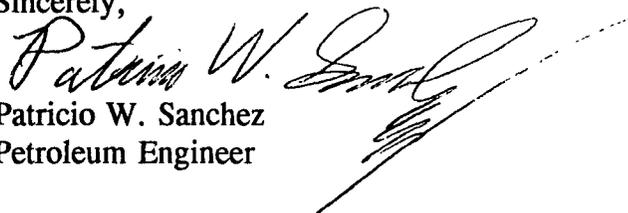
4. EXHIBIT G (Spill/Leak Prevention and Reporting Procedures Part XI).

Spill reporting will be pursuant to both WQCC 1-203 and NMOCD Rule 116, EXHIBIT F and G will be corrected to reflect this.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,


Patricio W. Sanchez
Petroleum Engineer

xc: Mr. Wayne Price-Environmental Engineer

**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 and modification application have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-082)-GIA IT REFINING Company, Route 3, Box 7, Gallup, New Mexico, 87031 has submitted a modification application for the previously approved discharge plan for their Cintex Refinery located in Section 28 and Section 33, Township 15 North, Range 15 West, NMPM, McKinley County, near Gallup, New Mexico. The modification will consist of the addition of a landfill for the treatment of non-hazardous oily wastes. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 70 feet to 160 feet with an approximate total dissolved solids concentration of 960 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-182)-ENVIRO-CHEM, P.O. BOX 688, Hobbs, New Mexico, 88240 has submitted a discharge plan application for their Enviro-Chem facility located in NE/4 NE/4, Section 4, Township 16 South, Range 35 East, NMPM, Lea County, in the City of Hobbs, New Mexico. The facility is an oil field chemical service company with no wastewater discharges from the facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-193)-Meridian Oil Inc., P.O. BOX 4288, Farmington, New Mexico, 87404-4288 submitted a discharge application for their Stone Compressor Station located in SE/4, Section 22 Township 31 North, Range 1 West, NMPM, San Juan County, New Mexico. The station will compress natural gas with no process waste stream discharges to the ground; all waste streams will be stored onsite in closed top tanks and transported to an NMOC approved disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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. This 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 modification, the Director of the Oil Conservation Division shall allow at least (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 2nd day of May, 1995.
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Journal: May 12, 1995.

**STATE OF NEW MEXICO
County of Bernalillo SS**

Bill Tafoya being duly sworn declares and says that he is Classified 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 cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for _____ times, the first publication being of the 12 day of May, 1995, and the subsequent consecutive publications _____, 1995.

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JUN 13 1995
Environmental Bureau
Oil Conservation Division

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 15 day of May, 1995

Bill Tafoya

PRICE 53.71
Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER 230932

Pat Sanchez

From: Wayne Price
To: Pat Sanchez
Cc: Roger Anderson; Wayne Price; Jerry Sexton
Subject: Enviro-Chem DP GW-192 review-comments
Date: Tuesday, May 30, 1995 11:29AM
Priority: High

Dear Pat,

Per your request I have included the following comments:

1. Exhibit C (B.). If and when they have a spill! and a solid waste is generated, Enviro-chem should commit to notifying the NMOCD and ammend it's discharge plan to reflect this new waste stream.

2. Exhibit D (A.2.) What prevents chemicals from mixing with this wash water that collects in the concrete pit. If so, then this material might be classified as a solid waste at the point of generation and be subject to RCRA Rules and Regulations:

Recommendation: I recommend that Enviro-chem demonstrate that this material is not classified as a Solid Waste and not subject to RCRA Solid Waste Laws. Otherwords they need to demonstrate that they have the proper engineering controls and/or procedures to prevent this mixing or demonstrate that the recycling sernio meets the requirements of RCRA.

Exhibit E (Proposed Modifications IX) Ref: Zero Waste:
Enviro-Chem needs to commit to ammending their discharge plan if they ever create a waste. They should also be ask to explain how their operations have changed in order to prevent from creating waste. Their past history does not reflect zero waste.

Exhibit G (Spill/Leak Prevention and Reporting Procedures Part XI).

What is a minor spill? Enviro-Chem should define what a minor spill is and on both major and minor spills should commit to ammending their discharge plan from zero waste if a solid waste is generated during the process.



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
525 Camino De Los Marquez
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-4358
Fax (505) 827-4389

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

May 23, 1995

Walter Biggins, Grants Section Chief
RCRA Programs Branch (6H-HS)
U.S. Environmental Protection Agency
1445 Ross Ave., Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Biggins:

This letter is in response to your verbal request during our meeting in Santa Fe on May 17, 1995 concerning the grant workplan mid-year review. Specifically, you requested a list of the facilities in New Mexico recently inspected by the Region VI Hazardous Waste Division. Enclosed is a list of the facilities that Region VI and contractor staff inspected or had planned to inspect. We have not received any copies of inspection reports or letters from Region VI as a result of the inspections.

Members of my staff accompanied Region VI staff on some of the inspections and are available to answer any questions you may have concerning them. Mr. Roger Anderson of the New Mexico Oil Conservation Division brought some matters of concern to Benito Garcia concerning the Region VI inspection team. Should you have any questions you wish to direct to Mr. Anderson directly, he can be reached at (505) 827-7152. Please feel free to contact me concerning this or any other matter at (505) 827-4308.

Sincerely,

Coby Muckelroy
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau

Enclosure

xc: Benito Garcia, Chief, HRMB
John Tymkowych, RCRA Inspection Group Supervisor, HRMB
✓ Roger Anderson, Oil Conservation Division

XC: Envirochem File (Abbs)

NO.	FACILITY LOCATION	EPA SITE ID NO.	INSPECTION DATE	FACILITY INSPECTION TEAM	SAMPLES COLLECTED	REPORT NUMBER	REPORT DATE	DATE DELIVERED
01	Multi-site							
Farmington, NM								
02	Enertek (no report due)	-	4/3	Ayers, Butler, Vega, Heas	-	-	None	-
03	Unichem International	NMAD102790128	4/3	Ayers, Butler, Vega, Heas	No	Czochowski	5/3	
04	Wenken-Hall Inc.	NMAD097971636	4/3	Ayers, Butler, Vega, Heas	No	Czochowski	5/3	
05	CDI Chemical Distributors	-	4/4, 4/5	Ayers, Butler, Vega, Heas	yes		6/2	
06	Coastal Chemical Co., Inc.	NMAD130100155	4/5	Butler, Heas	No	Sankari	5/5	
Artes, NM								
16	Triple S, Touch Retail, Artes Drilling	-	4/6	Butler, Heas, Ayers, Vega	Yes		6/5	
Albuquerque, NM								
07	National Research Laboratories	NMAD130100155	4/17	Ayers, Butler, Vega, Heas	Yes		6/16	
08	Van Weeren & Rogers, Inc.	NMAD076467364	4/11	Butler, Collins, Ayers, Vega	No		5/11	
09	Lytosa Drum Co.	NMAD980868608	4/10	Butler, Heas, Ayers, Vega	Yes		6/9	
10	Fleming Chemical Company	-	4/11	Butler	No		5/11	
11	Organic Plus	-	4/13	Butler	No		5/12	
17	Solv-Ex	NMAD9866603597	4/12, 4/13	Butler, Collings Ayers, Vega	Yes		6/12	
Artesia, NM								
12	SES - <i>WHEED</i>	-	4/18	Ayers, Butler, Vega, Heas	Yes		6/16	
Carlsbad, NM								
18	DMC Fertilizer	NMAD035718634	4/19	Butler, Heas, Ayers, Vega	No		5/19	
Hobbs, NM								
13	Enrico-Chem	-	4/25	Ayers, Butler, Vega, Collins	Yes		6/23	
14	B J Western	NMAD052377637	4/24, 4/25	Butler, Ayers, Collins, Vega	Yes		6/23	
15	Cobra Oil Industries Co.	-	4/26	Ayers, Butler, Collins, Vega	Yes		6/5	

* Possible RCRA problems per Greg Pashia w/ EPA Region 5SR. (7/6/95)



P. O. BOX 668
HOBBS, NEW MEXICO 88240
(505) 393-1917

CONSERVATION DIVISION
RECEIVED
MAY 10 1995

MR. PATRICO W. SANCHEZ
PETROLEUM ENGINEER
OCD
SANTA FE, N.M. 87505

DEAR MR. SANCHEZ:

THIS IS IN RESPONSE TO THE CERTIFIED LETTER DATED MAY 4, 1995 CONCERNING ENVIRO-CHEM'S DISCHARGE PLAN GW-192.

THE FOLLOWING EXPLANATIONS ARE SUBMITTED FOR YOUR REVIEW:

1. EXHIBIT C

- A. 5 GAL BLENDING PRODUCT PER MO. THE SOURCE OF THIS COMES IN THE BLENDING PROCESS. IT IS DIFFICULT TO BLEND A BATCH OF PRODUCT WHICH WILL FILL DRUMS AND BUCKETS IN THE EXACT VOLUME. FOR EXAMPLE IF YOU ARE BLENDING 5 DRUMS OF PRODUCT OR 275 GAL. BUT THE FINAL VOLUME IN THE BLENDING TANK IS 276.5 GAL OR 1.5 GAL IN EXCESS OF YOUR REQUIREMENTS. THIS 1.5 GAL IS STORED IN A DRUM, LABELED AND USED IN FUTURE BLENDING OPERATIONS OF THIS PRODUCT. IN OTHER WORDS THIS ESTIMATED 5 GAL. PER MO. IS RECYCLED INTO PRODUCTS.
- B. OTHER WASTE SOLIDS. ENVIRO-CHEM HAS NEVER HAD A SPILL. HOWEVER IF A SPILL WAS TO HAPPEN ENVIRO-CHEM WILL CLEAN UP WITH THE NECESSARY ABSORBENT. STORE IN A DRUM AND DISPOSE OF THIS WASTE IN AN APPROVED MANNER.
- C. LABORATORY WASTES. AFTER YOUR VISIT TO ENVIRO-CHEM'S FACILITY 3-8-95 MR. JOE SMITH RECOGNIZED THE LAB TO BE A REAL PROBLEM AREA. THE LAB HAS BEEN CLOSED, ALL EQUIPMENT REMOVED AND ALL TESTS ARE DONE IN THE FIELD.
- D. TRUCK.....DRUM WASHING. LONE STAR PICKS UP , CLEANS AND RECONDITIONS ALL OF ENVIRO-CHEMS DRUMS IN ODESSA TEXAS. ANY DRUM FOUND TO BE DEFECTIVE IS DISPOSED OF BY LONE STAR AND ENVIRO-CHEM IS CHARGED FOR THE DRUM.
- E. RAINWATER. ANY RAIN WATER THAT COLLECTS IN THE OUTSIDE CONTAINMENT AREAS WILL BE COLLECTED AND USED IN THE BLENDING OF WATER SOLUBLE PRODUCTS OR USED IN THE FLUSH OF CHEMICAL TREATMENTS.

2. EXHIBIT D

- A. 1. TANK FARM. THE DRAIN IN THE TANK FARM SUMP WILL BE PLUGGED AND THE LINES LEADING TO THE CONCRETE PIT WILL BE ISOLATED. THIS PREVENTS ANY SPILL IN THE TANK FARM AREA FROM DRAINING INTO THE CONCRETE PIT.
- A. 2. CONCRETE PIT. ENVIRO-CHEM PROPOSES TO KEEP THE CONCRETE PIT TO USE IN WASHING DOWN THE OUTSIDE OF THE BLENDING TANKS AND OTHER EQUIPMENT AFTER OUR DUST STORMS. THE WASH WATER WILL BE RECYCLED IN BLENDING OF PRODUCTS OR AS FLUSH IN CHEMICAL TREATMENTS.

A.2. a CONCRETE PIT. THE CONCRETE PIT MEASURES 8X8X8 FT AND HAS A CALCULATED VOLUME OF 3830 GAL. THE LARGEST BLENDING VAT IS 1320 GAL. 1 1/3 OF THE VOLUME IS EQUAL TO 1755 GAL.

A. 2. b WASTE IN CONCRETE PIT. THE WASTE IN THE CONCRETE PIT WILL BE DISPOSED OF IN AN APPROVED MANNER. THE PIT WILL BE CLEANED ,INSPECTED AND TESTED. IT IS NOT THE INTENT OF ENVIRO-CHEM TO RECLASSIFY THIS WASTE AS PRODUCT.

A. 2.c "WASH WATER" AFTER ONE OF OUR DUST STORMS THE ENTIRE BLENDING TANK AREA IS COVERED WITH DUST. THE ENTIRE AREA IS WASHED WITH SOAP AND WATER.

A. 2. d OUT DOOR PIT. THE NAME OF THE EXISTING OUTDOOR PIT IS **CONCRETE PIT.**

3.EXHIBIT E

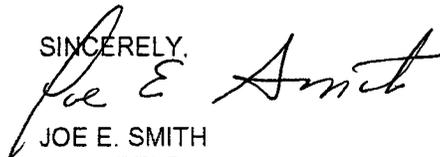
A. EXISTING CONCRETE PIT. THE CONCRETE PIT WILL BE USED ONLY FOR SOAP AND WATER FROM THE BLENDING AREA. THE TANK FARM DRAIN WILL BE CLOSED ISOLATING IT FROM THE CONCRETE PIT. THE CONCRETE PIT WILL BE CLEANED, INSPECTED , INTEGRITY TESTED AND DOCUMENTED ON AN ANNUAL BASIS.

B. LAB. THE LAB HAS BEEN CLOSED AND ANY TESTS WILL BE RUN IN THE FIELD.

PLEASE FIND ENCLOSED ORIGINAL AND TWO COPIES OF ENVIRO-CHEM'S DISCHARGE PLAN APPLICATION(REVISED 5-10-95) FOR OILFIELD SERVICE FACILITIES. THIS REVISED PLAN HAS INCLUDED THE ADDITIONAL INFORMATION REQUESTED IN YOUR LETTER DATED MAY 4, 1995. PLEASE ADD COPIES OF TOPO MAP AND MSD SHEETS TO COMPLETE THE APPLICATIONS.

SHOULD YOU HAVE ANY QUESTIONS OR REQUIRE ANY ADDITIONAL INFORMATION PLEASE CALL ME AT 505-939-1917.

SINCERELY,



JOE E. SMITH
PRESIDENT

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICES FACILITIES

SUBMITTED BY : ENVIRO-CHEM INC.

I. TYPE: OFFICE AND WAREHOUSE LOCATION FOR THE BLENDING, SALE AND DISTRIBUTION OF SPECIALTY OIL FIELD CHEMICALS USED AS CORROSION CHEMICALS, MUD ADDITIVES, AND PRODUCTION OIL AND WATER TREATING ADDITIVES.

II. OPERATOR: ENVIRO-CHEM. INC.
BOX 668
HOBBS, NEW MEXICO 88241

CONTACT

PERSON: JOE LEE SMITH
505-393-1917 - *disconnected*

III. LOCATION: 821 1/2 WEST MARLAND
HOBBS NEW MEXICO

LEGAL LOC: BLOCK 1, BYERS HEIGHTS ADD. LOTS 11-23
NE/4 NE/4 SEC. 4, T19S, R38E LEA CO. N.M.

IV. LANDOWNER: ZIADRIL, INC.
BOX 1860
HOBBS, NEW MEXICO 88241

V. FACILITY DESCRIPTION:
DESCRIPTION OF THE FACILITY WITH A DIAGRAM INDICATING THE LOCATION OF FENCES, PITS, DIKES AND TANKS ON THE FACILITY.
EXHIBIT A

VI. MATERIALS STORED OR USED AT FACILITY.
EXHIBIT B

VII. SOURCES AND QUANTITIES OF EFFLUENT AND WASTE GENERATED AT THE FACILITY.
EXHIBIT C

VIII. CURRENT LIQUID AND SOLID WASTE COLLECTION/STORAGE/DISPOSAL PROCEDURES.
EXHIBIT D

IX. PROPOSED MODIFICATIONS
EXHIBIT E

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICES

PAGE 2

X INSPECTION, MAINTENANCE AND REPORTING

EXHIBIT F

XI SPILL/LEAK PREVENTION AND REPORTING PROCEDURES

EXHIBIT G

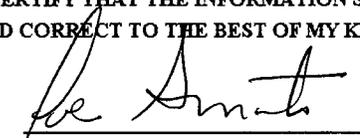
XII SITE CHARACTERISTICS

EXHIBIT H

XIV CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Signature:



JOE SMITH
PRESIDENT

Date:

5-11-95

EXHIBIT A

EXHIBIT B

EXHIBIT B

PART VI

DISCHARGE PLAN APPLICATION
OILFIELD SERVICE FACILITIES
MATERIALS STORED OR USED AT ENVIRO-CHEM

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION
1. DRILLING FLUIDS				
A) Bentonite	SOLID	SACKS	AS NEEDED 400 MAX	YARD
B) Attapulgate	SOLID	SACKS	AS NEEDED 400 MAX	YARD
C) LIGNOSULFONATES (ZINC)	SOLID	SACKS	40	SHOP
D) AMMONIUM NITRATE	SOLID	SACKS	15 MAX	SHOP
C) KCL	SOLID	SACKS	AS NEEDED 400 MAX	YARD
D) SODA ASH	SOLID	SACKS	AS NEEDED 15	YARD
E) ENVIRODRILL NE	LIQUID	BULK	1500 GAL	YARD
2. BRINES				
A) KCL	LIQUID	BULK	AS NEEDED 500 BBLs.	YARD
B) NaCL	LIQUID	BULK	AS NEEDED	YARD
3. ACIDS / CAUSTICS				
A) CAUSTIC	SOLIDS	SACKS	AS NEEDED 40 MAX	SHOP
B) CAUSTIC	LIQUID	DRUM	220 GAL	YARD
C) CITRIC ACID	LIQUID	DRUM	110 GAL	SHOP
D) ACETIC ACID	LIQUID	DRUM	165 GAL	SHOP
* E) H.C.L. ACID	LIQUID	DRUM	165 GAL	SHOP
* NOTE: HYDROCHLORIC ACID				
F) MURIATIC ACID	LIQUID	DRUM	110 GAL	SHOP
G) AMMONIA	LIQUID	DRUM	110 GAL	SHOP
H) INC-2213	LIQUID	DRUM	165 GAL	YARD
I) INC-2216	LIQUID	DRUM	440 GAL	YARD
J) S-445-W	LIQUID	DRUM	330 GAL	YARD
K) S-445-A	LIQUID	DRUM	770 GAL	YARD

EXHIBIT B

PART VI

PAGE 2

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION
4. DETERGENTS / SOAPS				
A) SU-300-W	LIQUID	DRUM	440 GAL.	YARD
B) SU-305-W	LIQUID	DRUM	550 GAL.	YARD
C) SU-320-W	LIQUID	DRUM	275 GAL.	YARD
D) SU-350-W	LIQUID	DRUM	330 GAL.	YARD
E) SU-351-W	LIQUID	DRUM	330 GAL.	YARD
F) SU-385-W	LIQUID	DRUM	330 GAL.	YARD
G) INC-1801	LIQUID	DRUM	165 GAL.	YARD
H) INC-1850	LIQUID	DRUM	165 GAL.	YARD
I) INC-1875	LIQUID	DRUM	330 GAL.	YARD
J) INC.1895	LIQUID	DRUM	165 GAL.	YARD
5. SOLVENTS / DEGREASERS				
A) XYLENE	LIQUID	DRUM	275 GAL.	YARD
B) TOLUENE	LIQUID	DRUM	220 GAL.	YARD
C) METHANOL	LIQUID	BULK	1600 GAL	YARD
D) ACETONE	LIQUID	DRUM	55 GAL.	YARD
E) METHYL ISOBUTYL KETONE	LIQUID	DRUM	165 GAL	SHOP
F) METHYL ETHYL KETONE	LIQUID	DRUM	55 GAL	SHOP
E) ETHYLENE GLYCOL	LIQUID	BULK	800 GAL	YARD
* F) HAN	LIQUID	BULK	2300 GAL	YARD
* NOTE: HEAVY AROMATIC NAPHTHA, AROMATIC HYDROCARBON, ASHLAND CHEMICAL TRADE NAME HI SOL XB.				
G) ISOPROPANOL	LIQUID	BULK	800 GAL.	YARD
H) LACTOL 215		BULK	800 GAL.	YARD
6. PARAFFIN TREATMENTS / EMULSION BREAKER				
A) INC-2100	LIQUID	DRUM	165 GAL	YARD
B) INC-2102	LIQUID	DRUM	165 GAL	YARD
C) INC-2122	LIQUID	DRUM	165 GAL	YARD
D) INC-2133	LIQUID	DRUM	165 GAL	YARD
E) INC-2141	LIQUID	DRUM	165 GAL	YARD
F) INC-2143	LIQUID	DRUM	165 GAL	YARD
G) INC-2155	LIQUID	DRUM	110 GAL	YARD
H) INC-2157	LIQUID	DRUM	110 GAL	YARD
I) INC-2160	LIQUID	DRUM	220 GAL	YARD
J) INC-2182	LIQUID	DRUM	165 GAL	YARD
K) INC-2560	LIQUID	DRUM	165 GAL	YARD
L) INC-2571	LIQUID	DRUM	440 GAL	YARD
M) INC-2590	LIQUID	DRUM	330 GAL	YARD
N) P-500	LIQUID	DRUM	550 GAL	YARD
O) P-505	LIQUID	DRUM	275 GAL	YARD
P) P-513	LIQUID	DRUM	220 GAL	YARD
Q) P-520	LIQUID	DRUM	275 GAL	YARD

EXHIBIT B

PART VI

6. PARAFFIN TREATMENTS / EMULSION BREAKER

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION	
R)	P-530	LIQUID	DRUM	220 GAL	YARD
S)	P-560	LIQUID	DRUM	330 GAL	YARD
T)	P-570	LIQUID	DRUM	220 GAL	YARD
U)	P-580	LIQUID	DRUM	330 GAL	YARD
V)	P-590	LIQUID	DRUM	330 GAL	YARD
W)	P-591	LIQUID	DRUM	330 GAL	YARD
X)	EB-713	LIQUID	DRUM	275 GAL	YARD
Y)	EB-713-X	LIQUID	DRUM	110 GAL	YARD
Z)	EB-7135	LIQUID	DRUM	330 GAL	YARD
AA)	EB-715	LIQUID	DRUM	330 GAL	YARD
BB)	EB-7155	LIQUID	DRUM	275 GAL	YARD
CC)	EB-716	LIQUID	DRUM	330 GAL	YARD
DD)	EB-725	LIQUID	DRUM	330 GAL	YARD
EE)	EB-732	LIQUID	DRUM	330 GAL	YARD
FF)	EB-735	LIQUID	DRUM	330 GAL	YARD
GG)	EB-742	LIQUID	DRUM	330 GAL	YARD
HH)	EB-750	LIQUID	DRUM	330 GAL	YARD
II)	EB-755	LIQUID	DRUM	330 GAL	YARD
JJ)	EB-755	LIQUID	DRUM	275 GAL	YARD
KK)	EB-760	LIQUID	DRUM	385 GAL	YARD
LL)	EB-761	LIQUID	DRUM	330 GAL	YARD
MM)	EB-777	LIQUID	DRUM	440 GAL	YARD
NN)	EB-777-L	LIQUID	DRUM	330 GAL	YARD
OO)	EB-7775	LIQUID	DRUM	440 GAL	YARD
PP)	EB-780	LIQUID	DRUM	550 GAL	YARD
QQ)	EB-7805	LIQUID	DRUM	275 GAL	YARD
RR)	EB-758	LIQUID	DRUM	550 GAL	YARD
SS)	EB-790	LIQUID	DRUM	330 GAL	YARD
TT)	TB-799-W	LIQUID	DRUM	550 GAL	YARD
UU)	TB-7995-W	LIQUID	DRUM	660 GAL	YARD
VV)	TB-799-O	LIQUID	DRUM	330 GAL	YARD
WW)	TB-79995-O	LIQUID	DRUM	330 GAL	YARD
XX)	P-215	LIQUID	DRUM	330 GAL	YARD

7. BIOCIDES

A) N/A

8. OTHERS

A)	BAROID				
	DEFOAM	LIQUID	5 GAL PAILS	240 GAL	YARD
B)	BAROID H2S	LIQUID	5 GAL PAILS	440 GAL	YARD
C)	BAROID				
	B-9000	LIQUID	5 GAL PAILS	240 GAL	YARD
D)	DE-110-W	LIQUID	5 GAL PAILS	660 GAL	YARD
E)	C-200-W	LIQUID	DRUMS	1650 GAL	YARD
F)	C-205-W	LIQUID	DRUMS	330 GAL	YARD
G)	C-240-W	LIQUID	DRUMS	165 GAL	YARD
H)	C-240-O	LIQUID	DRUMS	110 GAL	YARD
I)	C-273-O	LIQUID	DRUMS	330 GAL	YARD
J)	C-275-O	LIQUID	DRUMS	660 GAL	YARD
K)	C-280-O	LIQUID	DRUMS	330 GAL	YARD
L)	C-285-O	LIQUID	DRUMS	330 GAL	YARD
M)	CS-2424-W	LIQUID	DRUMS	550 GAL	YARD

EXHIBIT B

PART VI

PAGE 4

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION	
8. OTHERS					
N) DEFLOC	LIQUID	DRUMS	110 GAL	YARD	
O) S-400-W	LIQUID	DRUMS	275 GAL	YARD	
P) S-420-W	LIQUID	DRUMS	110 GAL	YARD	
Q) S-447-W	LIQUID	DRUMS	330 GAL	YARD	
R) S-460-W	LIQUID	DRUMS	275 GAL	YARD	
S) O-600-W	LIQUID	DRUMS	1100 GAL	YARD	
T) H-800-W	LIQUID	DRUMS	880 GAL	YARD	
U) H-824-W	LIQUID	DRUMS	220 GAL	YARD	
V) H-850-W	LIQUID	DRUMS	220 GAL	YARD	
W) H-880-W	LIQUID	DRUMS	330 GAL	YARD	
X) H-885-W	LIQUID	DRUMS	550 GAL	YARD	
Y) SP-900-W	LIQUID	DRUMS	495 GAL	YARD	
Z) SP-945-W	LIQUID	DRUMS	220 GAL	YARD	
AA) SP-960-W	LIQUID	DRUMS	1600 GAL	YARD	
BB) SP-985-W	LIQUID	DRUMS	440 GAL	YARD	
CC) PF-982-W	LIQUID	DRUMS	440 GAL	YARD	
DD) SP-983-W	LIQUID	DRUMS	550 GAL	YARD	
EE) INC-990	LIQUID	DRUMS	220 GAL	YARD	
FF) NC-993	LIQUID	DRUMS	220 GAL	YARD	
GG) EDTA	LIQUID	DRUMS	110 GAL	YARD	
	HAMP-ENE TRADE NAME OF PIONEER CHEMICAL				
HH) IOA	LIQUID	DRUMS	165 GAL	YARD	
	2-ETHYLHEXANOL				
II) FORMALDEHYDE					
	SOLUTION	LIQUID	DRUMS	385 GAL	YARD
JJ) SULFA-RID	LIQUID	DRUMS	55 GAL	SHOP	
KK) INC-1414	LIQUID	DRUMS	110 GAL	YARD	
LL) INC-1415	LIQUID	DRUMS	110 GAL	YARD	
MM) INC-1425	LIQUID	DRUMS	110 GAL	YARD	
NN) INC-1427	LIQUID	DRUMS	440 GAL	YARD	
OO) INC-1470	LIQUID	DRUMS	440 GAL	YARD	
PP) INC-1477	LIQUID	DRUMS	110 GAL	YARD	
QQ) INC-1478	LIQUID	DRUMS	440 GAL	YARD	
RR) INC-1480	LIQUID	DRUMS	165 GAL	YARD	

EXHIBIT B

MSD SHEETS OF RAW MATERIALS

MSD SHEETS FOR SPECIFIC PRODUCTS ARE ON FILE AT OFFICE AND WILL BE FURNISHED UPON REQUEST.

EXHIBIT C

EXHIBIT C

SOURCES AND QUANTITIES OF EFFLUENT AND WASTE GENERATED AT THE FACILITY

PART VII

	<u>WASTE TYPE</u>	<u>COMPOSITION & SOURCE</u>	<u>VOLUME PER MO</u>
1.	TRUCK WASTES		NONE
2.	TRUCK, TANK AND DRUM WASHING		NONE DRUMS ARE CLEANED BY OUTSIDE CONTRACTOR.
3.	STEAM CLEANING		NONE
4.	SOLVENT AND DEGRSR		NONE
5.	ACIDS OR CAUSTICS		NONE
6.	WASTE SLOP OIL		NONE
7.	WASTE LUBRICATION		NONE
8.	OIL FILTERS		NONE
9.	SOLIDS AND SLUDGES		NONE
10.	PAINTING WASTES		NONE
11.	SEWAGE		NONE
12.	OTHER WASTE LIQUIDS		
	BLENDING PRODUC	PRODUCTS - BLEND VAT	5 GAL
	LABORATORY WASTE		NONE- NO LAB
	RAIN WATER	WATR - DRUM BERMS	10
13.	OTHER WASTE SOLIDS		
	SPILL ABSORBENT:	PRODUCTS-DRUM LEAKS	NONE ONLY FOR SPILLS

EXHIBIT C

SUMMARY DESCRIPTION LIQUID AND SOLID WASTE COLLECTION AND DISPOSAL

PART VIII

	<u>WASTE TYPE</u>	TANK(T) DRUM(D)	PRODUCT OR FLUSH	<u>OFF-SITE DISPOSAL</u>
12.	OTHER WASTE LIQUIDS			
	BLENDING PRODUCT:	VAT	BOTH	NO
	LABORATORY WAST.	NONE		
	RAIN WATER	DRUMS	BOTH	NO
13.	OTHER WASTE SOLIDS			
	SPILL ABSORBENTS	TD		YES

EXHIBIT D

EXHIBIT D

CURRENT LIQUID AND SOLID WASTE COLLECTION/STORAGE/ DISPOSAL/PROCEDURES

VIII.(A) STORAGE:

DRUMS: DRUMS WITH PRODUCTS ARE STORED ON WOOD PALLETS ON THE GROUND SURFACE.

EMPTY DRUMS ARE STORED ON THE GROUND SURFACE.

TANKS: ABOVE GROUND TANKS ARE ON CONCRETE SURFACE WITH CONCRETE CURBING. CALCULATED VOLUME = 8725 GAL..

- (B)(1) BLENDING AREA: ALL TANKS ARE ON CONCRETE WITH CONCRETE CURBS. AN EMERGENCY PIT IS CONNECTED TO THE BLENDING AREA THRU A FLOOR DRAIN. CALCULATED BERM VOLUME = 4990 GAL.. TANK VOLUME= 3020 GAL.

RAW MATERIAL TANKS: TANKS ARE ON CONCRETE WITH CURBS AND ARE CONNECTED TO THE EMERGENCY PIT THRU FLOOR DRAIN.

EMERGENCY PIT: IS CONCRETE LINED 8'X 8'X 8'.

- (B)(2) TANKS: ARE ON CONCRETE PAD AND BERMED WITH CONCRETE CURB OF SUFFICIENT SIZE TO CONTAIN VOLUME PLUS 1/3. TANK VOLUME = 6500 GAL. BERM VOLUME= 8730 GAL.

DRUMS : ON WOOD PALLETS WILL BE ADDRESSED IN IX MODIFICATIONS

- (C)(1)(A) ON SITE FACILITIES ARE LOCATED ON TOPO MAP.

- (C)(1)(A)(2) CONCRETE PIT BUILT 1989. SIZE 8'X8'X8' = 3800 GALS. INTEGRITY TESTED ON AN ANNUAL BASIS.

EXHIBIT E

EXHIBIT E

PROPOSED MODIFICATIONS IX

DRUM STORAGE:

ALL FULL OR PARTIALLY USED DRUMS WILL BE STORED ON AN IMPERMEABLE PAD (CONCRETE OR ASPHALT) WITH A DOUBLE LAYER OF 12 MIL PLASTIC AND WITH CURBING. ALL EMPTY DRUMS WILL BE STORED ON THEIR SIDES WITH BUNGS LINED UP ON A HORIZONTAL PLANE. EMPTY DRUMS WILL BE STORED ON AN IMPERMEABLE PAD (CONCRETE OR ASPHALT) WITH A DOUBLE LAYER OF 12 MIL PLASTIC AND WITH CURBING.

BUCKETS, SACKS AND ETC.:

ALL CHEMICALS IN CONTAINERS SUCH AS SACKS OR BUCKETS WILL BE STORED ON AN IMPERMEABLE PAD WITH CURBING.

CONCRETE PIT:

THE FLUID IN THE EXISTING PIT WILL BE DISPOSED OF IN AN APPROVED MANNER. THE CONCRETE PIT WILL BE CLEANED, INSPECTED AND TESTED FOR INTEGRITY. THE FLOOR DRAINS IN THE TANK FARM AREA WILL BE PLUGGED. THE PIT WILL BE USED FOR SOAP AND WATER FROM THE BLENDING AREA. THIS WASH WATER WILL BE USED IN PRODUCT BLENDING OR CHEMICAL FLUSH. THE CALCULATED CONCRETE VOLUME IS ESTIMATED AT 3830 GAL. 1 1/3 OF LARGEST VAT VOLUME IS CALCULATED AT 1755 GAL.

BLENDING PLANT:

THE BLENDING PLANT WILL BE REVISED TO PERMIT THE COMPLETE SEPARATION OF WATER SOLUBLE CHEMICALS AND OIL SOLUBLE CHEMICALS. ALL PRODUCTS WILL BE SAVED IN SEPARATE DRUMS AND BE RECYCLED.

LAB:

THE LAB WILL BE CLOSED. ALL TESTS WILL BE RUN IN THE FIELD.

ZERO WASTE:

THESE MODIFICATIONS WILL RESULT IN A FACILITY OF ZERO WASTE. ALL PRODUCTS WILL BE RECYCLED THRU THE BLENDING PROCEDURE. WASTE WATER WILL BE USED IN WATER SOLUABLE PRODUCTS OR CHEMICAL FLUSH

PROPOSED TIME SCHEDULE:

THE ABOVE MODIFICATIONS WILL START IMMEDIATELY AND WILL CONTINUE IN A RESPONSIBLE MANNER UNTIL ALL ARE COMPLETED. WE PROPOSE A TIME TO COMPLETE ALL THE ABOVE MODIFICATIONS OF ONE YEAR OR MAY 1, 1996.

EXHIBIT F

EXHIBIT F
INSPECTION MAINTENANCE AND REPORTING
PART X

INSPECTION :

THE ENVIRO-CHEM FACILITY OPERATES ON AN 10-12 HR ,
6 DAY PER WEEK SCHEDULE. ALL CONTAINERS, DRUMS,
TANKS, BUCKETS AND ETC. ARE TO BE VISUALLY INSPECTED
EACH WORK DAY. THE PLANT MANAGER WILL CORRECT
ANY LEAKING OR DAMAGED CONTAINER AS SOON AS
POSSIBLE. THESE INSPECTIONS WILL BE RECORDED
WEEKLY. THE OCD WILL BE NOTIFIED OF ANY LEAK OR
SPILL PURSUANT TO OCD RULE 116. TWO COPIES OF
OCD FORM " NOTIFICATION OFSPILLS, LEAKS,..."
WILL BE SUBMITTED TO HOBBS DISTRICT OFFICE.

CONTAINMENT:

THE TOPO MAP INDICATES THAT RAIN WATER WILL BE
DIVERTED FROM THE FACILITY TO STORM DRAINAGE
AREAS ALONG THE STREET. ALL THE CHEMICAL STORAGE
AREAS ARE TO BE ELEVATED ABOVE GRADE FROM THE
SURROUNDING AREA. THE STORAGE PADS ARE CURBED
AND ARE LINED WITH 12 MIL PLASTIC TO PREVENT THE
CHEMICAL FROM LEACHING THROUGH THE PAD AND
CONTAMINATING THE SOIL. ANY SPILL LEAVING THE FACILITY
IS EXTREMELY UNLIKELY.

EXHIBIT G

EXHIBIT G

SPILL/LEAK PREVENTION AND REPORTING PROCEDURES

PART XI

THE BLENDING PLANT AND LIQUID TRANSFER SYSTEM IS DESIGNED TO KEEP SPILLS AT A MINIMUM. THE PLANT OPERATOR MUST USE PROPER SAFEGUARDS DURING FILLING, EMPTYING AND CIRCULATING OPERATIONS. THE PLANT OPERATOR IS THOROUGHLY FAMILIAR WITH ALL THE EQUIPMENT AND THAT ALL CONNECTIONS ARE PROPERLY MADE UP AND TIGHT. BEFORE MAKING ANY TRANSFER THE OPERATOR WILL ASCERTAIN THAT THE TRANSFER WILL NOT CAUSE AN OVERFLOW. BEFORE BREAKING ANY CONNECTIONS THE PLANT OPERATOR WILL BE CERTAIN THAT ALL VALVES ARE PROPERLY CLOSED AND LINES ARE CLEAR TO PREVENT ANY SPILL FROM THE LINE. IN THE BLENDING PROCESS THE OPERATOR WILL USE CAUTION IN THE MIXING OPERATION TO PREVENT ALL SPILLS.

SHOULD A SPILL OCCUR THE PERSON FINDING THE SPILL WILL TAKE IMMEDIATE ACTION TO CONTAIN THE SPILL. BAGS OF ABSORBENT, SHOVELS, RAKES, AND EMPTY DRUMS ARE LOCATED IN THE WAREHOUSE FACILITY. AFTER TAKING ACTION TO CONTAIN THE SPILL THE MANAGER WILL BE NOTIFIED OF THE LOCATION AND EXTENT OF THE SPILL.

DEPENDING ON THE SIZE AND NATURE OF THE SPILL ACTION WILL BE TAKEN AS FOLLOWS:

MINOR SPILLS: THE SPILL WILL BE RECOVERED WITH ABSORBENT MATERIAL SUCH AS HAY, FULLERS EARTH, OR NEUTRALIZING MATERIAL. THE ABSORBENT MATERIAL WILL BE COLLECTED FOR INCINERATION, BURIAL OR DISPOSAL IN AN APPROVED MANNER. SINCE THIS IS NOT A SIGNIFICANT SPILL THE OCD WILL NOT BE NOTIFIED.

MAJOR SPILLS: THE SPILL WILL BE PUMPED INTO EMPTY DRUMS. THE PORTION OF SPILL WHICH CANNOT BE RECOVER BY PUMP WILL BE RECOVERED BY ABSORBENT MATERIAL SUCH AS HAY, FULLERS EARTH, OR NEUTRALIZING MATERIAL. THE ABSORBENT MATERIAL WILL BE COLLECTED FOR INCINERATION, BURIAL OR DISPOSAL IN AN APPROVED MANNER. SINCE THIS IS A SIGNIFICANT SPILL THE OCD WILL BE NOTIFIED PURSUANT TO OCD RULE 116 AND THE NECESSARY FORMS WILL BE FILED WITH THE HOBBS DISTRICT OFFICE

IF THE SPILL IS A FLAMMABLE MATERIAL THE MANAGER SHALL DECIDE IF THE FIRE DEPARTMENT WILL BE NOTIFIED. THIS DETERMINATION SHALL BE BASED UPON THE VOLUME OF THE SPILL AND THE POTENTIAL FOR IGNITION.

EXHIBIT H

EXHIBIT H

REVISED 5-10-95

SITE CHARACTERISTICS

PART XII

1. NO STREAMS, CANALS OR GROUND WATER DISCHARGES WITHIN ONE MILE OF THE FACILITY. WATER WELLS WITHIN GENERAL AREA ARE FOR DOMESTIC USE.
2. GROUND WATER IS FROM "OGALLALA" AT DEPTH OF 50 FT. THIS IS THE WATER SOURCE FOR THE CITY OF HOBBS AND IS POTABLE WATER WITH TDS OF 100 mg/l.
3. TOP SOIL 5'
CALICHE 5-40'
SAND AND SHALE 40-50'
WATER SAND 50-150'
ANHYDRITE AND LIME 150-290'
RED BED 290-450'
- 3b "OGALLALA" AQUIFER
- 3c SANDSTONE
- 3d WATER SAND 50-150'. TOP OF RED BED @290'.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

May 4, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-677

Mr. Joe E. Smith
President
ENVIROCHEM
P.O. Box 668
Hobbs, NM 88240

**RE: Discharge Plan GW-192 ENVIROCHEM - Hobbs facility
Lea County, New Mexico**

Dear Mr. Smith:

The NMOCD has received the proposed ENVIROCHEM discharge plan application for the facility located in NE/4 NE/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. The application filing fee in the amount of \$50 and flat fee of \$1380 was received by the NMOCD along with the discharge plan application. The NMOCD has prepared and sent out the public notice for the ENVIROCHEM facility as stated in WQCC section 3-108 and has performed a preliminary review of the discharge plan as proposed by ENVIROCHEM on April 24, 1995.

The following comments and request for additional information are based on the review of the ENVIROCHEM application. **Please note that unless otherwise stated, response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan application.**

1. Under Exhibit C "SOURCES AND.....FACILITY."

A. Item 12. Other waste liquids - 5 gallons per month blending product.
Where does this waste come from and how is this waste stored and how will it be disposed of?

Mr. Joe E. Smith
May 4, 1995
Page 2

B. Item 13. Other waste solids - NONE

Please clarify this point, it appears that there would be a waste stream associated with spill sorbents. Also how will these items be handled as far as storage and disposal.

C. In reviewing the discharge plan it appears that laboratory wastes are not addressed.

Please clarify this matter-it should be noted that only untested crude oil and produced water samples can be classified as exempt. Lab samples that have been tested shall be stored separately from untested produced E&P fluids. Lab samples that have been tested will have to be characterized for Hazardous constituents and then approved by the NMOCD prior to disposal.

D. Item 2. Truck....Drum washing - None - Cleaned by an outside contractor.

Are these drums cleaned onsite? If so where does the rinsate go? Also empty drums that must be disposed of - where do they go for disposal?

E. There appears to be no method for dealing with rainwater that will collect in containment areas surrounding outdoor storage. Please address how this source will be handled.

2. Under Exhibit D "Current liquid....disposal/procedures"

A. VIII.(A) Storage: Tanks.....

1. The sump in the tank farm must be closed so that it is no longer connected with the larger sump adjacent to the tank farm area because it renders the secondary containment at the tank farm ineffective.

2. Envirochem proposes to leave the existing large pit in place and utilize it as storage for wash water from the shop. The wash water would then be used as flush water during treatments at customers wells.

a. The out door pit must be large enough to contain 1 1/3 the volume of the largest blending vat or 1 1/3 the volume of all interconnected blending vats.

b. Prior chemical characterization of waste from the pit indicated that hazardous waste constituents were present in the pit. If it is the intent of ENVIROCHEM to reclassify this waste as a product, ENVIROCHEM must submit documentation with proper regulatory citations as justification.

c. Clarify where exactly the "wash water" stream will come from.

d. Clarify the actual name of the out door pit - it is called "existing pit, tank pit, and shop sump pit."

Mr. Joe E. Smith
May 4, 1995
Page 3

3. Under Exhibit E "Proposed modifications"

A. Existing pit:

If the pit in question does remain open to the blending plant area it must be isolated from the tank farm outside by closing the existing sump in the tank farm and it must be cleaned and inspected for integrity at least yearly and documented by ENVIROCHEM.

B. Lab:

Clarification is needed regarding the segregation of exempt waste from non-exempt waste and disposal procedures.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer

xc: Mr. Wayne Price-Environmental Engineer

Pat Sanchez

From: Pat Sanchez
To: Wayne Price
Subject: ENVIROCHEM DISCHARGE PLAN GW 192
Date: Tuesday, May 02, 1995 11:15AM
Priority: High

Wayne,

I have made the following revisions to the GW 192 submittal from Joe Smith.

1. Legal location NE/4 NE/4, Section 4, T 19 S, R 38 E, NMPM.
per Mr. Joe Smith
2. Depth to groundwater 50'(feet) per state engineer data.
3. TDS of groundwater 100 mg/l per Bill Olson based on data he has collected on Marland.

I have already sent out the public notice.
Do you have any additional comments regarding the proposed discharge plan?

Thankyou for your time - it is appreciated!!!!!!

Pat Sanchez

From: POSTOFFICE
To: Pat Sanchez
Subject: Registered: Wayne Price
Date: Wednesday, May 03, 1995 7:05AM

[013] ***** CONFIRMATION OF REGISTERED MAIL *****
Your message:

TO: Wayne Price DATE: 05-02-95
SUBJECT: ENVIROCHEM DISCHARGE PLAN GW 192 TIME: 11:18

Was accessed on 05-03-95 07:05

Pat Sanchez

From: Wayne Price
To: Pat Sanchez
Cc: Wayne Price
Subject: Enviro-Chem (Comments)
Date: Wednesday, May 03, 1995 7:53AM
Priority: High

Dear Pat,

Enviro-Chem indicates that they are going to have zero-discharge. A great concept, except what happens when they have a spill. The discharge plan indicated under Exhibit G that spills will be disposed of properly. I think Exhibit C should be changed to reflect this under their item 13.

Also Drums should be put on the list. They talk about drum washing, but do not mention the empty drums. (only mention storage - Exhibit E. Drum storage)

Also what is their procedure for disposing/handling of "rain water".

Item 12 exhibit "C". (Other waste liquids) How, and where are they going to dispose of this material. Will it be tested for hazardous characteristics.

Exhibit E "LAB" If they run analytical work at this facility using various reagents, then it appears they are transporting and disposing of this waste at the production site! Is this proper and/or legal? If the portion of the sample taken is not used then it still is crude oil or produced water and returning is no problem. I think they should address this issue.

I think the other chemical companies which run analytical work at their facilities will be classifying this as "Hazardous waste"; of course the RCRA laws are very complex and Enviro-chem may be excluded or exempt, but I think they should demonstrate this in their discharge plan.

Please note, the sump liquid has been tested and is classified as "Hazardous Waste". They have plans on disposing of this waste.

Thanks, I hope this helps you.

Wayne Price

AFFIDAVIT OF PUBLICATION

COPY OF PUBLICATION

No. 34755

STATE OF NEW MEXICO
County of San Juan:

ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Wednesday, May 10, 1995

and the cost of publication was: \$97.25

Robert Lovett

On 5-10-95 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Connie Beale
My Commission Expires

April 2, 1996

Legals

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulation the following discharge plan applications and modification application have been submitted to Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, telephone (505) 827-7131:

UK
pub
(GW-032) - GIANT REFINING Company, Route 3, Box 7, Gallup, New Mexico, 87301 has submitted a modification application for the previously approved discharge plan for their Cliniza Refinery located in Section 28 and Section 33, Township 15 North, Range 15 West, NMPM, McKinley County, near Gallup, New Mexico. The modification will consist of the addition of a landfarm for the treatment of non-hazardous oily wastes. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 70 feet to 140 feet with an approximate total dissolved solids concentration of 950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

pub
(GW-192) - ENVIRO-CHEM, P.O. BOX 668, Hobbs, New Mexico, 88240 has submitted a discharge plan application for their Enviro-Chem facility located in NE/4 NE/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, in the city of Hobbs, New Mexico. The facility is an oil field chemical service company with no wastewater discharges from the facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

pub
(GW-193) - Meridian Oil Inc., P.O. BOX 4289, Farmington, New Mexico, 87499-4289 has submitted a discharge plan application for their Sandstone Compressor Station located in SE/4, Section 32, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. The station will compress natural gas with no process waste stream discharges to the ground; all waste streams will be stored onsite in closed top tanks and then transported to an NMOCD approved disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

pub
(GW-194) - Meridian Oil Inc., P.O. BOX 4289, Farmington, New Mexico, 87499-4289 has submitted a discharge plan application for their Frances Mesa Compressor Station located in SW/4, Section 27, Township 30 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. The station will compress natural gas with no process waste stream discharges to the ground; all waste streams will be stored onsite in closed top tanks and then transported to an NMOCD approved disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 240 feet with a total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and 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.

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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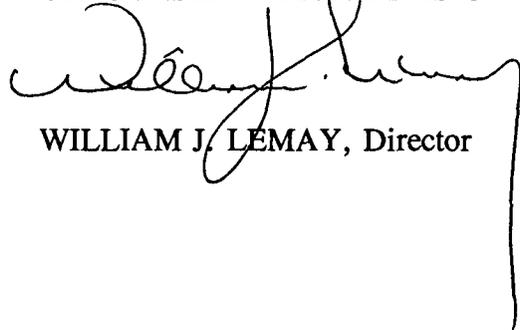
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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the 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 2nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L



MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal

Time 3:20 pm

Date 5/1/95

Originating Party

Other Parties

Pat Sanchez

Secretary For Joe Smith
at ENVIROCHEM

Subject Data For Discharge Plan

Discussion Will use 100 mg/l for TDS and
50 feet to groundwater level. Based on
State Engineer data and Bill Olsen information
on contamination studies.

Conclusions or Agreements Told her to give Joe the values
and if he had any further questions to give me
a call.

Signature

Signed



MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal

Time 2:10 pm

Date 5-1-95

Originating Party

Other Parties

Joe Smith
Enviro chem

Pat Sanchez
NMUCD

Subject
Location of yard

Discussion
Location

(NE/4) NE/4, NE/4 Section 4, T19S, R38E
SE/4 NE/4, NE/4 per Joe Smith.

I told Joe approximate water Depth probably
more like 50' with a TDS of 100 mg/l.

However, Now that I have legal location I'll
look on the state Engineers Date & get a better
handle on the Info.

Conclusions or Agreements

I will use NE/4 NE/4, Section 4,
T19S, R38E in publication of public notice -
I'll call Joe Smith back with new numbers on
TDS and groundwater depth.

Signature

Signed



P. O. BOX 668
HOBBS, NEW MEXICO 88240
(505) 393-1917

GW192

RECEIVED

APR 28 1995

Environmental Bureau
Oil Conservation Division

April 25, 1995

Mr. William J. Lemay
Director
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Dear Mr. Lemay:

Please find enclosed:

The original and two copies of Enviro-Chems' discharge plan application for oilfield service facilities.

A check for \$50.00 filing fee plus \$1380 flat fee.

One set of material safety data sheets on the raw materials.

Should you have any questions or need any additional information concerning this application please call me at 505-393-1917.

Sincerely,

Joe E. Smith
President

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICES FACILITIES

SUBMITTED BY : ENVIRO-CHEM INC.

I. TYPE: OFFICE AND WAREHOUSE LOCATION FOR THE BLENDING, SALE AND DISTRIBUTION OF SPECIALTY OIL FIELD CHEMICALS USED AS CORROSION CHEMICALS, MUD ADDITIVES, AND PRODUCTION OIL AND WATER TREATING ADDITIVES.

II. OPERATOR: ENVIRO-CHEM . INC.
BOX 668
HOBBS, NEW MEXICO 88241
CONTACT
PERSON: JOE LEE SMITH
505-393-1917

RECEIVED

APR 28 1995

Environmental Bureau
Oil Conservation Division

III. LOCATION: 821 1/2 WEST MARLAND
HOBBS NEW MEXICO

NE 1/4 NE 4, Section 4, T19 South, Range 38 East, NMPM

LEGAL LOC: BLOCK 1, BYERS HEIGHTS ADD. LOTS 11-23

*per Verbal w/ Joe Smith
on 5-1-95*

IV. LANDOWNER: ZIADRIL, INC.
BOX 1860
HOBBS, NEW MEXICO 88241

V. FACILITY DESCRIPTION:

DESCRIPTION OF THE FACILITY WITH A DIAGRAM INDICATING THE LOCATION OF FENCES, PITS, DIKES AND TANKS ON THE FACILITY.

EXHIBIT A

VI. MATERIALS STORED OR USED AT FACILITY.

EXHIBIT B

VII. SOURCES AND QUANTITIES OF EFFLUENT AND WASTE GENERATED AT THE FACILITY.

EXHIBIT C

VIII. CURRENT LIQUID AND SOLID WASTE COLLECTION/STORAGE/DISPOSAL PROCEDURES.

EXHIBIT D

IX. PROPOSED MODIFICATIONS

EXHIBIT E

X INSPECTION, MAINTENANCE AND REPORTING

EXHIBIT F

XI SPILL/LEAK PREVENTION AND REPORTING PROCEDURES

EXHIBIT G

XII SITE CHARACTERISTICS

EXHIBIT H

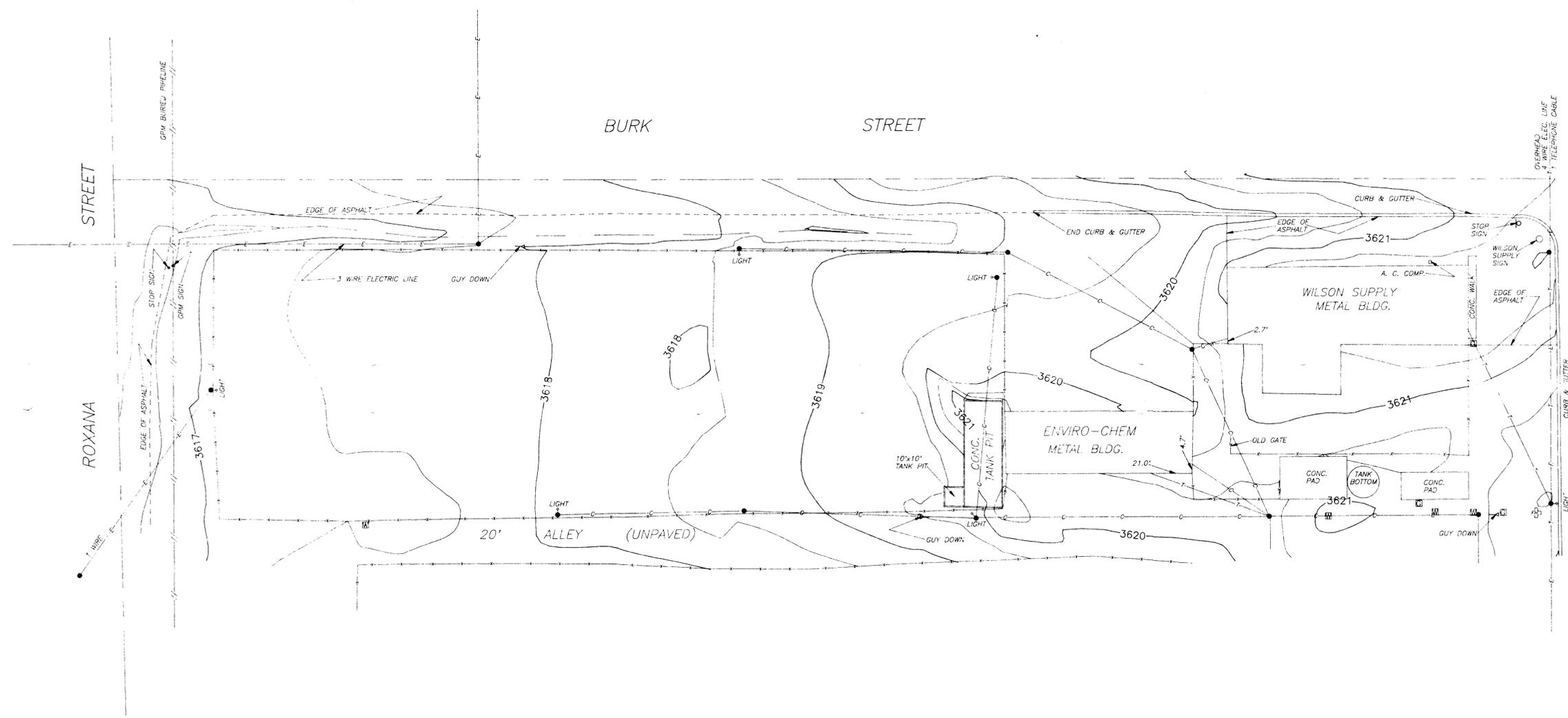
XIV CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Signature: *Joe Smith*
JOE SMITH
PRESIDENT

Date: 7-26-95

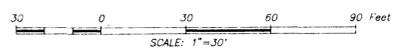
EXHIBIT A



- LEGEND**
- DOWN GUY
 - UTILITY POLES
 - GAS METER
 - WATER METER
 - FIRE HYDRANT

- OVERHEAD ELEC. LINES
- CHAIN LINK FENCE
- OVERHEAD ELEC. CABLE

CONTOUR INTERVAL 6"
INDEX CONTOUR INTERVAL 1'-0"



ENVIRO-CHEM

TOPO SURVEY OF THE WEST HALF OF BLOCK 1,
BYERS HEIGHTS ADDITION TO THE CITY OF HOBBS
LEA COUNTY, NEW MEXICO.

I HEREBY CERTIFY THAT THIS PLAT WAS PREPARED FROM FIELD NOTES OF AN ACTUAL SURVEY AND MEETS THE REQUIREMENTS FOR LAND SURVEYS AS SPECIFIED BY THIS STATE.

[Signature] 4-18-95

JOHN W. WEST, N.V. S.E. & P.S. No. 676
 RONALD W. HOBBS, N.V. S.E. & P.S. No. 1138
 GARY G. ELSON, N.V. S.E. & P.S. No. 1883
 JOHN W. WEST, N.M. L.S. No. 12641
 GARY G. ELSON, TEXAS P.L.S. No. 4735

JOHN W. WEST ENGINEERING COMPANY
CONSULTING ENGINEERS & SURVEYORS - HOBBS, NEW MEXICO

Surveyed By: D. HICKS	Drawn By: J.L. Presley	Last Rev. Date:	Drawing Number
Date Begin: 3/6/95	Date: 4/6/95	Disk: JLP#123	E-2814-1
Date End: 3/21/95	Approved By:	Sheet of Sheets	
W.O. Number: 95-11-0335		File Name: EN/0335	

EXHIBIT B

EXHIBIT B

PART VI

DISCHARGE PLAN APPLICATION
OILFIELD SERVICE FACILITIES
MATERIALS STORED OR USED AT ENVIRO-CHEM

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION
1. DRILLING FLUIDS				
A) Bentonite	SOLID	SACKS	AS NEEDED 400 MAX	YARD
B) Attapulgate	SOLID	SACKS	AS NEEDED 400 MAX	YARD
C) LIGNOSULFONATES (ZINC)	SOLID	SACKS	40	SHOP
D) AMMONIUM NITRATE	SOLID	SACKS	15 MAX	SHOP
C) KCL	SOLID	SACKS	AS NEEDED 400 MAX	YARD
D) SODA ASH	SOLID	SACKS	AS NEEDED 15	YARD
E) ENVIRODRILL NE	LIQUID	BULK	1500 GAL	YARD
2. BRINES				
A) KCL	LIQUID	BULK	AS NEEDED 500 BBLs.	YARD
B) NaCL	LIQUID	BULK	AS NEEDED	YARD
3. ACIDS / CAUSTICS				
A) CAUSTIC	SOLIDS	SACKS	AS NEEDED 40 MAX	SHOP
B) CAUSTIC	LIQUID	DRUM	220 GAL	YARD
C) CITRIC ACID	LIQUID	DRUM	110 GAL	SHOP
D) ACETIC ACID	LIQUID	DRUM	165 GAL	SHOP
* E) H.C.L. ACID	LIQUID	DRUM	165 GAL	SHOP
* NOTE: HYDROCHLORIC ACID				
F) MURIATIC ACID	LIQUID	DRUM	110 GAL	SHOP
G) AMMONIA	LIQUID	DRUM	110 GAL	SHOP
H) INC-2213	LIQUID	DRUM	165 GAL	YARD
I) INC-2216	LIQUID	DRUM	440 GAL	YARD
J) S-445-W	LIQUID	DRUM	330 GAL	YARD
K) S-445-A	LIQUID	DRUM	770 GAL	YARD

EXHIBIT B

PART VI

PAGE 2

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION
4. DETERGENTS / SOAPS				
A) SU-300-W	LIQUID	DRUM	440 GAL.	YARD
B) SU-305-W	LIQUID	DRUM	550 GAL.	YARD
C) SU-320-W	LIQUID	DRUM	275 GAL.	YARD
D) SU-350-W	LIQUID	DRUM	330 GAL.	YARD
E) SU-351-W	LIQUID	DRUM	330 GAL.	YARD
F) SU-385-W	LIQUID	DRUM	330 GAL.	YARD
G) INC-1801	LIQUID	DRUM	165 GAL.	YARD
H) INC-1850	LIQUID	DRUM	165 GAL.	YARD
I) INC-1875	LIQUID	DRUM	330 GAL.	YARD
J) INC.1895	LIQUID	DRUM	165 GAL.	YARD
5. SOLVENTS / DEGREASERS				
A) XYLENE	LIQUID	DRUM	275 GAL.	YARD
B) TOLUENE	LIQUID	DRUM	220 GAL.	YARD
C) METHANOL	LIQUID	BULK	1600 GAL	YARD
D) ACETONE	LIQUID	DRUM	55 GAL.	YARD
E) METHYL ISOBUTYL KETONE	LIQUID	DRUM	165 GAL	SHOP
F) METHYL ETHYL KETONE	LIQUID	DRUM	55 GAL	SHOP
E) ETHYLENE GLYCOL	LIQUID	BULK	800 GAL	YARD
* F) HAN	LIQUID	BULK	2300 GAL	YARD
* NOTE: HEAVY AROMATIC NAPHTHA, AROMATIC HYDROCARBON, ASHLAND CHEMICAL TRADE NAME HI SOL XB.				
G) ISOPROPANOL	LIQUID	BULK	800 GAL.	YARD
H) LACTOL 215		BULK	800 GAL.	YARD
6. PARAFFIN TREATMENTS / EMULSION BREAKER				
A) INC-2100	LIQUID	DRUM	165 GAL	YARD
B) INC-2102	LIQUID	DRUM	165 GAL	YARD
C) INC-2122	LIQUID	DRUM	165 GAL	YARD
D) INC-2133	LIQUID	DRUM	165 GAL	YARD
E) INC-2141	LIQUID	DRUM	165 GAL	YARD
F) INC-2143	LIQUID	DRUM	165 GAL	YARD
G) INC-2155	LIQUID	DRUM	110 GAL	YARD
H) INC-2157	LIQUID	DRUM	110 GAL	YARD
I) INC-2160	LIQUID	DRUM	220 GAL	YARD
J) INC-2182	LIQUID	DRUM	165 GAL	YARD
K) INC-2560	LIQUID	DRUM	165 GAL	YARD
L) INC-2571	LIQUID	DRUM	440 GAL	YARD
M) INC-2590	LIQUID	DRUM	330 GAL	YARD
N) P-500	LIQUID	DRUM	550 GAL	YARD
O) P-505	LIQUID	DRUM	275 GAL	YARD
P) P-513	LIQUID	DRUM	220 GAL	YARD
Q) P-520	LIQUID	DRUM	275 GAL	YARD

EXHIBIT B

PART VI

PAGE 3

6. PARAFFIN TREATMENTS / EMULSION BREAKER

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION	
R)	P-530	LIQUID	DRUM	220 GAL	YARD
S)	P-560	LIQUID	DRUM	330 GAL	YARD
T)	P-570	LIQUID	DRUM	220 GAL	YARD
U)	P-580	LIQUID	DRUM	330 GAL	YARD
V)	P-590	LIQUID	DRUM	330 GAL	YARD
W)	P-591	LIQUID	DRUM	330 GAL	YARD
X)	EB-713	LIQUID	DRUM	275 GAL	YARD
Y)	EB-713-X	LIQUID	DRUM	110 GAL	YARD
Z)	EB-7135	LIQUID	DRUM	330 GAL	YARD
AA)	EB-715	LIQUID	DRUM	330 GAL	YARD
BB)	EB-7155	LIQUID	DRUM	275 GAL	YARD
CC)	EB-716	LIQUID	DRUM	330 GAL	YARD
DD)	EB-725	LIQUID	DRUM	330 GAL	YARD
EE)	EB-732	LIQUID	DRUM	330 GAL	YARD
FF)	EB-735	LIQUID	DRUM	330 GAL	YARD
GG)	EB-742	LIQUID	DRUM	330 GAL	YARD
HH)	EB-750	LIQUID	DRUM	330 GAL	YARD
II)	EB-755	LIQUID	DRUM	330 GAL	YARD
JJ)	EB-755	LIQUID	DRUM	275 GAL	YARD
KK)	EB-760	LIQUID	DRUM	385 GAL	YARD
LL)	EB-761	LIQUID	DRUM	330 GAL	YARD
MM)	EB-777	LIQUID	DRUM	440 GAL	YARD
NN)	EB-777-L	LIQUID	DRUM	330 GAL	YARD
OO)	EB-7775	LIQUID	DRUM	440 GAL	YARD
PP)	EB-780	LIQUID	DRUM	550 GAL	YARD
QQ)	EB-7805	LIQUID	DRUM	275 GAL	YARD
RR)	EB-758	LIQUID	DRUM	550 GAL	YARD
SS)	EB-790	LIQUID	DRUM	330 GAL	YARD
TT)	TB-799-W	LIQUID	DRUM	550 GAL	YARD
UU)	TB-7995-W	LIQUID	DRUM	660 GAL	YARD
VV)	TB-799-O	LIQUID	DRUM	330 GAL	YARD
WW)	TB-79995-O	LIQUID	DRUM	330 GAL	YARD
XX)	P-215	LIQUID	DRUM	330 GAL	YARD

7. BIOCIDES

A) N/A

8. OTHERS

A)	BAROID				
	DEFOAM	LIQUID	5 GAL PAILS	240 GAL	YARD
B)	BAROID H2S	LIQUID	5 GAL PAILS	440 GAL	YARD
C)	BAROID				
	B-9000	LIQUID	5 GAL PAILS	240 GAL	YARD
D)	DE-110-W	LIQUID	5 GAL PAILS	660 GAL	YARD
E)	C-200-W	LIQUID	DRUMS	1650 GAL	YARD
F)	C-205-W	LIQUID	DRUMS	330 GAL	YARD
G)	C-240-W	LIQUID	DRUMS	165 GAL	YARD
H)	C-240-O	LIQUID	DRUMS	110 GAL	YARD
I)	C-273-O	LIQUID	DRUMS	330 GAL	YARD
J)	C-275-O	LIQUID	DRUMS	660 GAL	YARD
K)	C-280-O	LIQUID	DRUMS	330 GAL	YARD
L)	C-285-O	LIQUID	DRUMS	330 GAL	YARD
M)	CS-2424-W	LIQUID	DRUMS	550 GAL	YARD

EXHIBIT B

PART VI

NAME	SOLIDS OR LIQUIDS	TYPE CONTAINER	ESTIMATED VOLUME	LOCATION	
8. OTHERS					
N)	DEFLOC	LIQUID	DRUMS	110 GAL	YARD
O)	S-400-W	LIQUID	DRUMS	275 GAL	YARD
P)	S-420-W	LIQUID	DRUMS	110 GAL	YARD
Q)	S-447-W	LIQUID	DRUMS	330 GAL	YARD
R)	S-460-W	LIQUID	DRUMS	275 GAL	YARD
S)	O-600-W	LIQUID	DRUMS	1100 GAL	YARD
T)	H-800-W	LIQUID	DRUMS	880 GAL	YARD
U)	H-824-W	LIQUID	DRUMS	220 GAL	YARD
V)	H-850-W	LIQUID	DRUMS	220 GAL	YARD
W)	H-880-W	LIQUID	DRUMS	330 GAL	YARD
X)	H-885-W	LIQUID	DRUMS	550 GAL	YARD
Y)	SP-900-W	LIQUID	DRUMS	495 GAL	YARD
Z)	SP-945-W	LIQUID	DRUMS	220 GAL	YARD
AA)	SP-960-W	LIQUID	DRUMS	1600 GAL	YARD
BB)	SP-985-W	LIQUID	DRUMS	440 GAL	YARD
CC)	PF-982-W	LIQUID	DRUMS	440 GAL	YARD
DD)	SP-983-W	LIQUID	DRUMS	550 GAL	YARD
EE)	INC-990	LIQUID	DRUMS	220 GAL	YARD
FF)	NC-993	LIQUID	DRUMS	220 GAL	YARD
GG)	EDTA	LIQUID	DRUMS	110 GAL	YARD
	HAMP-ENE TRADE NAME OF PIONEER CHEMICAL				
HH)	IOA	LIQUID	DRUMS	165 GAL	YARD
	2-ETHYLHEXANOL				
II)	FORMALDEHYDE				
	SOLUTION	LIQUID	DRUMS	385 GAL	YARD
JJ)	SULFA-RID	LIQUID	DRUMS	55 GAL	SHOP
KK)	INC-1414	LIQUID	DRUMS	110 GAL	YARD
LL)	INC-1415	LIQUID	DRUMS	110 GAL	YARD
MM)	INC-1425	LIQUID	DRUMS	110 GAL	YARD
NN)	INC-1427	LIQUID	DRUMS	440 GAL	YARD
OO)	INC-1470	LIQUID	DRUMS	440 GAL	YARD
PP)	INC-1477	LIQUID	DRUMS	110 GAL	YARD
QQ)	INC-1478	LIQUID	DRUMS	440 GAL	YARD
RR)	INC-1480	LIQUID	DRUMS	165 GAL	YARD

EXHIBIT B

MSD SHEETS OF RAW MATERIALS

MSD SHEETS FOR SPECIFIC PRODUCTS ARE ON FILE AT OFFICE AND WILL BE FURNISHED UPON REQUEST.

EXHIBIT C

EXHIBIT C

SOURCES AND QUANTITIES OF EFFLUENT AND WASTE GENERATED AT THE FACILITY

1.	TRUCK WASTES	NONE
2.	TRUCK, TANK AND DRUM WASHING	NONE DRUMS ARE CLEANED BY OUTSIDE CONTRACTOR.
3.	STEAM CLEANING	NONE
4.	SOLVENT AND DEGREASERS	NONE
5.	ACIDS OR CAUSTICS	NONE
6.	WASTE SLOP OIL	NONE
7.	WASTE LUBRICATION AND ETC.	NONE
8.	OIL FILTERS	NONE
9.	SOLIDS AND SLUDGES	NONE
10.	PAINTING WASTES	NONE
11.	SEWAGE	NONE
12.	OTHER WASTE LIQUIDS	5 GAL PER MONTH BLENDING PRODUCTS
13.	OTHER WASTE SOLIDS	NONE

EXHIBIT D

EXHIBIT D

CURRENT LIQUID AND SOLID WASTE COLLECTION/STORAGE/ DISPOSAL/PROCEDURES

VIII.(A) STORAGE:

DRUMS: DRUMS WITH PRODUCTS ARE STORED ON WOOD PALLETS ON THE GROUND SURFACE.

EMPTY DRUMS ARE STORED ON THE GROUND SURFACE.

TANKS: ABOVE GROUND TANKS ARE ON CONCRETE SURFACE WITH CONCRETE CURBING. CALCULATED VOLUME = 8725 GAL..

- (B)(1) BLENDING AREA: ALL TANKS ARE ON CONCRETE WITH CONCRETE CURBS. AN EMERGENCY PIT IS CONNECTED TO THE BLENDING AREA THRU A FLOOR DRAIN. CALCULATED BERM VOLUME = 4990 GAL.. TANK VOLUME= 3020 GAL.

RAW MATERIAL TANKS: TANKS ARE ON CONCRETE WITH CURBS AND ARE CONNECTED TO THE EMERGENCY PIT THRU FLOOR DRAIN.

EMERGENCY PIT: IS CONCRETE LINED 8'X 8'X 8'.

- (B)(2) TANKS: ARE ON CONCRETE PAD AND BERMED WITH CONCRETE CURB OF SUFFICIENT SIZE TO CONTAIN VOLUME PLUS 1/3. TANK VOLUME = 6500 GAL. BERM VOLUME= 8730 GAL.

DRUMS : ON WOOD PALLETS WILL BE ADDRESSED IN IX MODIFICATIONS

- (C)(1)(A) ON SITE FACILITIES ARE LOCATED ON TOPO MAP.

- (C)(1)(A)(2) CONCRETE PIT BUILT 1989. SIZE 8'X8'X8' = 3800 GALS. INTEGRITY TESTED ON AN ANNUAL BASIS.

EXHIBIT E

EXHIBIT E

PROPOSED MODIFICATIONS IX

DRUM STORAGE:

ALL FULL OR PARTIALLY USED DRUMS WILL BE STORED ON AN IMPERMEABLE PAD (CONCRETE OR ASPHALT) WITH A DOUBLE LAYER OF 12 MIL PLASTIC AND WITH CURBING. ALL EMPTY DRUMS WILL BE STORED ON THEIR SIDES WITH BUNGS LINED UP ON A HORIZONTAL PLANE. EMPTY DRUMS WILL BE STORED ON AN IMPERMEABLE PAD (CONCRETE OR ASPHALT) WITH A DOUBLE LAYER OF 12 MIL PLASTIC AND WITH CURBING.

BUCKETS, SACKS AND ETC.:

ALL CHEMICALS IN CONTAINERS SUCH AS SACKS OR BUCKETS WILL BE STORED ON AN IMPERMEABLE PAD WITH CURBING.

EXISTING PIT:

THE FLUID IN THE EXISTING PIT WILL BE DISPOSED OF IN AN APPROVED MANNER. THE PIT WILL THEN BE PLUGGED TO PROPERLY PROTECT ANY GROUND WATER CONTAMINATION. THE FLOOR DRAINS WILL BE PLUGGED AND THE EXISTING LINES ISOLATED. ALL OF THIS WILL BE DONE WITH PRIOR APPROVAL OF THE OCD.

BLENDING PLANT:

THE BLENDING PLANT WILL BE REVISED TO PERMIT THE COMPLETE SEPARATION OF WATER SOLUBLE CHEMICALS AND OIL SOLUBLE CHEMICALS. ALL PRODUCTS WILL BE SAVED IN SEPARATE DRUMS AND BE RECYCLED.

LAB:

ALL PRODUCTION SAMPLES WILL BE RETURNED TO THE FIELD INSTALLATION. MOST OF THE TESTING IS DONE IN THE FIELD.

ZERO WASTE:

THESE MODIFICATIONS WILL RESULT IN A FACILITY OF ZERO WASTE. ALL PRODUCTS WILL BE RECYCLED THRU THE BLENDING PROCEDURE.

PROPOSED TIME SCHEDULE:

THE ABOVE MODIFICATIONS WILL START IMMEDIATELY AND WILL CONTINUE IN A RESPONSIBLE MANNER UNTIL ALL ARE COMPLETED. WE PROPOSE A TIME TO COMPLETE ALL THE ABOVE MODIFICATIONS OF ONE YEAR OR MAY 1, 1996.

EXHIBIT F

EXHIBIT F
INSPECTION MAINTENANCE AND REPORTING
PART X

INSPECTION :

THE ENVIRO-CHEM FACILITY OPERATES ON AN 10-12 HR ,
6 DAY PER WEEK SCHEDULE. ALL CONTAINERS, DRUMS,
TANKS, BUCKETS AND ETC. ARE TO BE VISUALLY INSPECTED
EACH WORK DAY. THE PLANT MANAGER WILL CORRECT
ANY LEAKING OR DAMAGED CONTAINER AS SOON AS
POSSIBLE. THESE INSPECTIONS WILL BE RECORDED
WEEKLY. THE OCD WILL BE NOTIFIED OF ANY LEAK OR
SPILL PURSUANT TO OCD RULE 116. TWO COPIES OF
OCD FORM " NOTIFICATION OFSPILLS, LEAKS,..."
WILL BE SUBMITTED TO HOBBS DISTRICT OFFICE.

CONTAINMENT:

THE TOPO MAP INDICATES THAT RAIN WATER WILL BE
DIVERTED FROM THE FACILITY TO STORM DRAINAGE
AREAS ALONG THE STREET. ALL THE CHEMICAL STORAGE
AREAS ARE TO BE ELEVATED ABOVE GRADE FROM THE
SURROUNDING AREA. THE STORAGE PADS ARE CURBED
AND ARE LINED WITH 12 MIL PLASTIC TO PREVENT THE
CHEMICAL FROM LEACHING THROUGH THE PAD AND
CONTAMINATING THE SOIL. ANY SPILL LEAVING THE FACILITY
IS EXTREMELY UNLIKELY.

EXHIBIT G

EXHIBIT G

SPILL/LEAK PREVENTION AND REPORTING PROCEDURES

PART XI

THE BLENDING PLANT AND LIQUID TRANSFER SYSTEM IS DESIGNED TO KEEP SPILLS AT A MINIMUM. THE PLANT OPERATOR MUST USE PROPER SAFEGUARDS DURING FILLING, EMPTYING AND CIRCULATING OPERATIONS. THE PLANT OPERATOR IS THOROUGHLY FAMILIAR WITH ALL THE EQUIPMENT AND THAT ALL CONNECTIONS ARE PROPERLY MADE UP AND TIGHT. BEFORE MAKING ANY TRANSFER THE OPERATOR WILL ASCERTAIN THAT THE TRANSFER WILL NOT CAUSE AN OVERFLOW. BEFORE BREAKING ANY CONNECTIONS THE PLANT OPERATOR WILL BE CERTAIN THAT ALL VALVES ARE PROPERLY CLOSED AND LINES ARE CLEAR TO PREVENT ANY SPILL FROM THE LINE. IN THE BLENDING PROCESS THE OPERATOR WILL USE CAUTION IN THE MIXING OPERATION TO PREVENT ALL SPILLS.

SHOULD A SPILL OCCUR THE PERSON FINDING THE SPILL WILL TAKE IMMEDIATE ACTION TO CONTAIN THE SPILL. BAGS OF ABSORBENT, SHOVELS, RAKES, AND EMPTY DRUMS ARE LOCATED IN THE WAREHOUSE FACILITY. AFTER TAKING ACTION TO CONTAIN THE SPILL THE MANAGER WILL BE NOTIFIED OF THE LOCATION AND EXTENT OF THE SPILL.

DEPENDING ON THE SIZE AND NATURE OF THE SPILL ACTION WILL BE TAKEN AS FOLLOWS:

MINOR SPILLS: THE SPILL WILL BE RECOVERED WITH ABSORBENT MATERIAL SUCH AS HAY, FULLERS EARTH, OR NEUTRALIZING MATERIAL. THE ABSORBENT MATERIAL WILL BE COLLECTED FOR INCINERATION, BURIAL OR DISPOSAL IN AN APPROVED MANNER. SINCE THIS IS NOT A SIGNIFICANT SPILL THE OCD WILL NOT BE NOTIFIED.

MAJOR SPILLS: THE SPILL WILL BE PUMPED INTO EMPTY DRUMS. THE PORTION OF SPILL WHICH CANNOT BE RECOVER BY PUMP WILL BE RECOVERED BY ABSORBENT MATERIAL SUCH AS HAY, FULLERS EARTH, OR NEUTRALIZING MATERIAL. THE ABSORBENT MATERIAL WILL BE COLLECTED FOR INCINERATION, BURIAL OR DISPOSAL IN AN APPROVED MANNER. SINCE THIS IS A SIGNIFICANT SPILL THE OCD WILL BE NOTIFIED PURSUANT TO OCD RULE 116 AND THE NECESSARY FORMS WILL BE FILED WITH THE HOBBS DISTRICT OFFICE

IF THE SPILL IS A FLAMMABLE MATERIAL THE MANAGER SHALL DECIDE IF THE FIRE DEPARTMENT WILL BE NOTIFIED. THIS DETERMINATION SHALL BE BASED UPON THE VOLUME OF THE SPILL AND THE POTENTIAL FOR IGNITION.

EXHIBIT H

EXHIBIT H

SITE CHARACTERISTICS

PART XII

1. NO STREAMS, CANALS OR GROUND WATER DISCHARGES WITHIN ONE MILE OF THE FACILITY. WATER WELLS WITHIN GENERAL AREA ARE FOR DOMESTIC USE.

* 2. GROUND WATER IS FROM "OGALLALA" AT DEPTH OF ^{50'} ~~150 FT.~~ THIS IS THE WATER SOURCE FOR THE CITY OF HOBBS AND IS GOOD POTABLE WATER ~~WITH LOW SALT CONTENT.~~

Per State Engineer Data (NMAO files)

with a TDS 100 mg/l.

3 TOP SOIL 5'
CALICHE 5-40'
SAND AND SHALE 40-75'
WATER SAND 75-150'
ANHYDRITE AND LIME 150-290'
RED BED 290-450'

Per Bill Olson Contamination Data.

3b "OGALLALA" AQUIFER
3c SANDSTONE
3d WATER SAND 75-150'. TOP OF RED BED @290'.

* See Memo of conversation dated 5/1/95 @ 3:20 pm.

CONSULTATION DIVISION
REQUIRED

95 APR 27 AM 8 52

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 7:50 AM	Date 4/25/95
---	-----------------------------------	-----------------	-----------------

<u>Originating Party</u>	<u>Other Parties</u>
JOE SMITH - ENVUROCHEM - H-BBS NM 821 1/2 W MARLAND	

Subject HAZARDOUS WASTE DISPOSAL (SUMP LIQUID)

Discussion PROGRESS REPORT, JOE CONFIRMED IT'S HAZARDOUS WASTE, THEY HAVE CONTACTED NMED COPY MUCKLE ROY - HAZ WASTE DEPT.

Conclusions or Agreements JOE WILL CALL WHEN THEY SHIP MATERIAL off-site, I DO NOT HAVE TO BE THERE, PROCEED!

Distribution cc: J SEXTON
EMMY WIRTH
PAT SANCHEZ
ROGER ANDERSON

Signed

ENVIRONMENTAL CONSERVATION DIVISION
RECEIVED

FROM: Wayne Price

TO: Pat Sanchez
Roger Anderson

APR 12 1995 8 52

DATE: 04-12-95
TIME: 10:07

CC: Jerry Sexton
Wayne Price

SUBJECT: Enviro-Chem Hobbs Yard- Sump Waste
PRIORITY: 4
ATTACHMENTS: ENV-CH

Dear Pat,

Please find attached the minutes of meeting held with Mr. Joe Smith of Enviro-Chem. I have included this info for the Santa Fe files since Enviro-Chem has been requested to obtain a discharge plan.

If you have any questions or comments please do not hesitate to call or write.

Thanks!

STATE OF NEW MEXICO
NMOCD District I

INTER-OFFICE MEMO

To file: Enviro-Chem, Hobbs Yard

Date: April 12, 1995

Time:

Telephone call: _____ Meeting: X Other: _____

Person called or attending:

Joe Smith-Enviro-Chem

Wayne Price-NMOCD

REFERENCE: Minutes of Meeting

Subject: Shop-sump pit waste

Comments:

Joe Smith delivered a copy of the analytical results of the liquid contained in the sump (see attachments). The results of the test indicate the benzene levels to be 19.137 mg/l which exceeds the limit of .5 mg/l and therefore this waste appears to be hazardous by characteristics. However, I advised him to check with the laboratory to see if these valves would be considered hazardous.

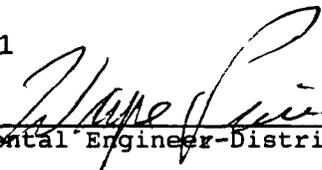
He indicated that they have contracted Van Water @ Rogers to dispose of the waste properly. Enviro-Chem is in contact with EPA in Dallas about obtaining a one-time provisional hazardous waste number.

I recommended that if the material is classified as hazardous waste that they should contact the New Mexico Environmental Department, Mr. Coby Muckleroy at 827-4308.

Mr. Smith indicated once all the liquid has been disposed of then they are going to close the concrete sump.

CC: Jerry Sexton-District I Supervisor
Roger Anderson-Environmental Bureau Chief
Pat Sanchez-Environmental Geologist
Jim Bullock-Enviro-Chem ES&H

attachments-1

Wayne Price 
NMOCD Environmental Engineer-District I



**ARDINAL
LABORATORIES**

PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

PHONE (505) 328-4889 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TELEFAX TRANSMITTAL

Telefax No: (505)393-2476

Please Deliver the Following Pages to:

Name: Joe Smith

Company: Envischem

Telefax No: 7-0042

From: Mike Fowler

Company: Cardinal

Total Number of Pages (incl. this page): 3

Date: 4-11 Time: _____

If Pages are not received or legible, please call:

(505) 393-2326

Comments: _____

SIM BULLOCK
ZIA DRILL - 397-3511

UAW VALER PAPER

rec upon copy much later on -
getting EPA one-time provision
close hung down

RECEIVED

APR 12 1995

JOE HOBBS
OFFICE



**ARDINAL
LABORATORIES**

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

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

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

CHEMICAL ANALYSIS OF WATER

Company : Envirochem
 City, St.: P.O. Box 668, Hobbs, NM
 Proj.Name: not given
 Location : not given

Lab #: H2004
 Date Received: 4/6/95
 Date Analyzed: 4/7/95
 4/10/95

Sample 1 : Shop - Sump Pit

Units: mg/L

<u>PARAMETER</u>	<u>RESULT 1</u>
pH	4.16
Hardness (CaCO ₃)	4,050
Calcium (CaCO ₃)	2,250
Magnesium (CaCO ₃)	1,800
Sulfate (SO ₄ ⁻)	3,500
Chloride (Cl ⁻)	9,400
Total Dissolved Solids	1,242
Total Alkalinity	nil
Bicarbonate	nil
Carbonate	nil
Conductivity (umhos/Cm)	25,100

RECEIVED

APR 12 1995
 UCD HOBBS
 OFFICE


 Michael R. Fowler

4/10/95
 Date



**ARDINAL
LABORATORIES**

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

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

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

TPH/BTEX ANALYSIS REPORT

Company: Envirochem
Address: P.O. Box 668
City, State: Hobbs, NM 88240

Date: 4/11/95
Lab #: H2004

Project Name: not given
Location: not given
Sampled by: JS
Analyzed by: HN
Sample Type: Water

Date: not given Time: not given
Date: 4/7-10/95 Time: various
Sample Condition: Intact

Units: mg/L

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	Shop-Sump Pit	385.6	19.137	1.906	1.592	2.162	5.947	6.240

QC Recovery	41.9	0.943	0.830	0.897	0.879	0.863	0.910
QC Spike	40.6	0.878	0.873	0.867	0.862	0.853	0.867
Accuracy	103.2%	107.4%	95.1%	103.5%	102.0%	101.2%	105.0%
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

RECEIVED

APR 12 1995

UCD HOBBS
OFFICE

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

Michael R. Fowler
Michael R. Fowler

4/11/95
Date

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



January 31, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-631

Mr. Joe Smith
ENVIRO-CHEM
921 W. Marland Blvd
Hobbs, NM 88240

**RE: Discharge Plan Requirement
Hobbs Facility
Lea County, New Mexico**

Dear Mr. Smith:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for the Hobbs Facility located in Lea County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.P of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

Oil Conservation
827-7131

Mr. Joe Smith
January 31, 1995
Page 2

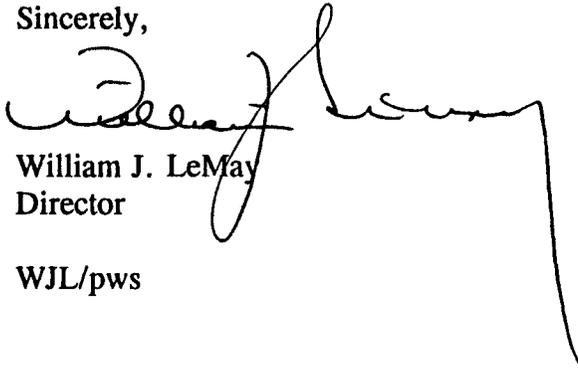
A copy of the regulations have been provided for your convenience. Also provided is an OCD guideline for the preparation of discharge plans at oil & gas service companies. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan 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 one thousand, three hundred and eighty (\$1380) dollars for oil & gas service companies. The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

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

If there are any questions on this matter, please feel free to contact Patricio Sanchez at 827-7156 or Roger Anderson at 827-7152.

Sincerely,



William J. LeMay
Director

WJL/pws

XC: OCD Hobbs Office

Z 765 962 631



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	Mr. Joe Smith
Street and No.	921 W. Markland BLVD - Enid
P.O., State and ZIP Code	Hobbs NM
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

STATE OF NEW MEXICO
NMOCD District I

INTER-OFFICE MEMO

* To file: Enviro-Chem Chemical blend plant and warehouse.
821 1/2 Marland
Hobbs, NM 88241
Tele# 505-393-2893

Bus. Office located 921 W. Marland
P.O. 668
Hobbs, NM
Tele # 505-393-1917

Date: December 14, 1994
Time: 9:00 am

Telephone call: _____ Meeting: _____ Other: XX Site Visit

Person called or attending:

Joe Smith - Enviro-Chem Manager
Mike Malone-Enviro-Chem blender and yard man

Wayne Price- NMOCD

REFERENCE: Request to dispose of sump liquids.

Subject: Site Visit

Comments:

Enviro-Chem is a small chemical company which blends and warehouses Oilfield production and drilling chemicals. They also have one treater truck that operates out of this yard and a delivery truck.

The warehouse consist of an office, small lab, garage, storage area, and blend plant with associated equipment, all located inside of the warehouse. The outside is fenced and contains a concreted bulk chemical storage area complete with curbs. The rest of the yard is dirt.

There is one large concrete sump that is used to collect all their liquid waste. The concrete sump is approximately 9'x 9'x 8' (deep). This sump receives all of the blend plant waste water, drum rinsate, lab waste, "de minimis" leaks and spills etc. This sump is not connected to the city sewer system (POTW) and does not have secondary containment.

The office bathroom is connected to the city sewer system.

The following raw chemicals were noted to be on site in bulk; xylene, toluene, HAD (high aromatic solvent-naphtha), methanol, IPA, lactol. Many other various chemical intermediates were located in drums stored outside, some on pallets.

Empty drums were stored outside on dirt areas.

Rainwater inside of the dike is used as treater truck flush water.

Solid waste is disposed of into a dumpster owned by Waste Management Co.

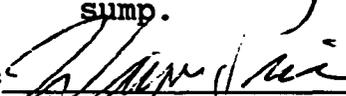
Please see attached sketch for reference.

CONCLUSION: After reviewing the different waste streams that are disposed of in the sump, it appears this sump waste would be classified as RCRA NON-EXEMPT. Also the fact that toluene a " Listed RCRA Waste " is used on site might also classify this waste hazardous.

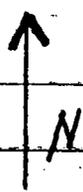
RECOMMENDATIONS:

Advised Mr. Smith that in order to dispose of this waste in an NMOCD permitted facility Enviro-Chem would have to sample and test the waste material in the sump to determine if it is a characteristic hazardous waste and make a determination if any RCRA " Listed Waste" has been disposed of into the sump.

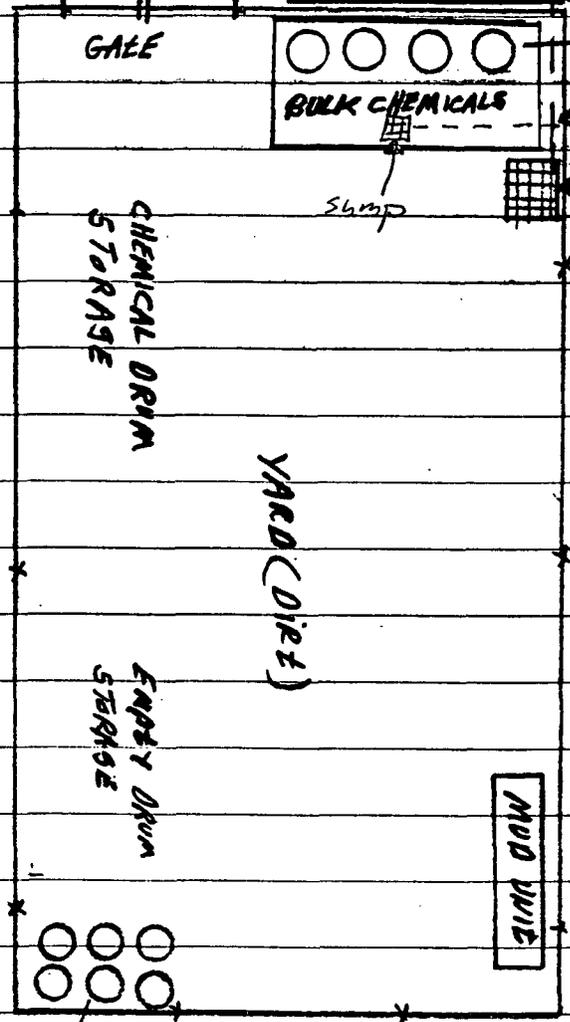
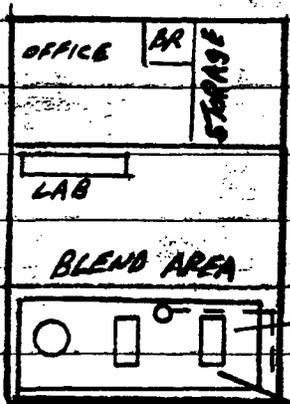
I also gave him a copy of a NMOCD service company check list in order to assist him in his operations. I also advised him that non-exempt waste cannot be disposed of into a Class II salt water disposal well. Mr. Smith will call when he gets the analytical results back from sampling the sump.

Wayne Price 
NMOCD Environmental Engineer-District I
cc: Jerry Sexton-District I Supervisor
Roger Anderson - Environmental Bureau Chief
Joe L. Smith - Enviro-Chem

MARLAND STREET



WAREHOUSE →



BAR BINS

EVNRO - CHEM - WAREHOUSE / BLEND	
821 1/2 W MARLAND - HOBBS LN	
57 x 1	
Photo/ass	NHCO 12/19/99