GW - 199

GENERAL CORRESPONDENCE

YEAR(S):

2001 - 1998

GW-199

Price, Wayne

[redacted]

From: Price, Wayne

Sent: Tuesday, January 16, 2001 4:17 PM

To: 'Paul Brodin'

Cc: Williams, Chris

Subject: RE: Champion-Hobbs water well sampling

Approved!

From: Paul Brodin[SMTP:pbrodin@enercon.com]

Sent: Tuesday, January 16, 2001 1:47 PM

To: WPrice@state.nm.us

Cc: ralph.corry@champ-tech.com

Subject: Champion-Hobbs water well sampling

Mr. Price,

In response to your e-mail to Ralph Corry on December 21, 2000 I will be in Hobbs tomorrow (Jan. 17, 200 to sample the water well at the residence adjacent to Champion to the south. Per your instructions the samples will be analyzed for WQCC Metals and General Chemistry. Analytical results will be submitted to NM Oil Conservation Division as soon as they are available, no later than Jan. 31, 2001.

If you have any questions please feel free to reach me at (713) 941-0401 or by e-mail at pbrodin@enercon.com. Thank you.

Sincerely,

Paul Brodin

Enercon Services, Inc.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone X_____
Personal _____
E-Mail __X_____ ralph.corry@champ-tech.com

Time: 11/2/00 1:57 PM
Originating Party: **Wayne Price-OCD**

Other Parties: **Ralph Corry-Champion**

Subject: **Discharge Plan Renewal Notice for the following Facilities:**

GW- 199	**Champion-Hobbs**	**expires**	**May 01, 2001**
GW-___	**Name**	**expires**	
GW-___	**Name**	**expires**	
GW-___	**Name**	**expires**	

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with $50.00 filing fee for the above listed facilities.

Conclusions or Agreements:

Signed: Wayne Price

CC:

Price, Wayne

From: System Administrator[SMTP:postmaster@champ-tech.com]
Sent: Thursday, November 02, 2000 2:10 PM
To: WPrice@state.nm.us
Subject: Delivered: Champion Discharge Plan Renewal Notice

Champion Discharge
Plan Renewal Notice

<<Champion Discharge Plan Renewal Notice>> Your message

To: 'ralph.corry@champ-tech.com'
Subject: Champion Discharge Plan Renewal Notice
Sent: Thu, 2 Nov 2000 15:06:24 -0600

was delivered to the following recipient(s):

Corry,Ralph on Thu, 2 Nov 2000 15:10:07 -0600

Price, Wayne

From: Price, Wayne
Sent: Thursday, October 19, 2000 2:33 PM
To: 'Mike Amabisco'
Cc: ralph.corry@champ-tech.com
Subject: RE: Champion Hobbs Deadline Extension

Approved!

From: Mike Amabisco[SMTP:mamabisco@enercon.com]
Sent: Thursday, October 19, 2000 2:37 PM
To: Price, Wayne
Cc: ralph.corry@champ-tech.com
Subject: Champion Hobbs Deadline Extension

In regards to our phone conversation this morning, we request an extension to the Site Investigation Report (SIR) submittal date for the Champion Technologies Hobbs facility. Technical difficulties pertaining to the analytical results have delayed the final report from Millennium Laboratories. In light of this delay we request that the SIR submittal date be extended to November 10, 2000. This extra time will allow us to evaluate the complete set of analytical data. We appreciate your consideration of our request.

Champion Technologies

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. Z 301 018 305

August 14, 2000

Mr. Wayne Price
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: Teleconference on 8/10/00 Regarding Revisions of Abatement Plan Proposal (AP-14)

Dear Mr. Price:

On August 10, 2000 Mr. Mike Amabisco of Enercon Services, Inc. and myself had a conference call with Mr. Bill Olson of the New Mexico Oil Conservation Division and you. The agenda of the conference call addressed the conditions and revisions pertaining to the revision of the Abatement Plan Proposal (AP-14). The following conditions were agreed upon during the conference call:

1. All soil samples will be screened using an organic vapor meter (OVM). Any samples indicating concentrations exceeding 100 parts per million (ppm) will be analyzed for BTEX constituents using EPA Method 8021B. This analysis will be in addition of what has been previously approved.

2. The analytical metals suite for soils will be expanded to include WQCC metal which are arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, copper, iron, manganese, and zinc. A minimum of three soil samples will be submitted for metals analyses from each boring in Areas 2, 3, and 4. These samples will be collected at shallow, middle, and bottom depths of each boring. Additional samples may be submitted if stained soil is encountered.

3. Soil samples in Areas 2, 3, and 4 that are analyzed for WQCC metals will also be analyzed for general chemistry parameters which include fluoride, calcium, potassium, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate total dissolved solids, nitrates, and a anion/cation balance.

4. Samples collected from the bottom of borings in Area 1 will be analyzed for total petroleum hydrocarbons using analytical Method 418.1.

5. Synthetic Precipitation Leaching Procedure (SPLP) will be removed from the proposed plan.

6. Groundwater samples will be analyzed for volatile organic compounds using EPA Method 8260. Analyses for semi-volatile organic compounds will not be required for groundwater samples.

7. The general chemistry analytical suite for groundwater samples will include fluoride, calcium, potassium, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate total dissolved solids, nitrates, and a anion/cation balance. The pH and conductivity will be recorded during sample activities using a water quality meter.

8. Submittal date of the Site Investigation Report will be 60 days from the date of final approval of Abatement plan Proposal (AP-14).

If you should have any questions please contact me at (281) 431-2561.

Sincerely,

Ralph Corry

Ralph Corry
Environmental Specialist

Cc: Mr. Chris Williams/NMOCD Hobbs

Price, Wayne

From: System Administrator[SMTP:postmaster@champ-tech.com]
Sent: Monday, August 21, 2000 2:39 PM
To: Price, Wayne
Subject: Delivered: Champion AP-14 revisions

Champion AP-14
revisions

<<Champion AP-14 revisions>> Your message

To: 'RALPH.CORRY@CHAMP-TECH.COM'
Subject: Champion AP-14 revisions
Sent: Mon, 21 Aug 2000 15:23:57 -0500

was delivered to the following recipient(s):

Corry,Ralph on Mon, 21 Aug 2000 15:39:08 -0500

Price, Wayne

From: Price, Wayne
Sent: Monday, August 21, 2000 2:23 PM
To: 'RALPH.CORRY@CHAMP-TECH.COM'
Subject: Champion AP-14 revisions

Dear Mr. Correy:

The NMOCD is in receipt of your letter Via E-mail dated August 14, 2000, certified receipt No. Z 301 018 305. The NMOCD approves of the revisions to the Abatement Plan. Please note that all other commitments made by Champion shall be implemented!

Please be advised that NMOCD approval of this revision does not relieve Champion of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Champion of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Champion Technologies

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431 1655

CERTIFIED RETURN RECEIPT NO. Z 301 018 305

August 14, 2000

Mr. Wayne Price
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: Teleconference on 8/10/00 Regarding Revisions of Abatement Plan Proposal (AP-14)

Dear Mr. Price:

On August 10, 2000 Mr. Mike Amabisco of Enercon Services, Inc. and I had a conference call with Mr. Bill Ellis of the New Mexico Oil Conservation Division and you. The agenda of the conference call addressed the conditions and revisions pertaining to the revision of the Abatement Plan Proposal (AP-14). The following conditions were agreed upon during the conference call:

1. All soil samples will be screened using an organic vapor meter (OVM). Any samples indicating concentrations exceeding 100 parts per million (ppm) will be analyzed for BTEX constituents using EPA Method 8021B. This analysis will be in addition of what has been previously approved.

2. The analytical metals suite for soils will be expanded to include WQCC metal which are arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, copper, iron, manganese, and zinc. A minimum of three soil samples will be submitted for metals analyses from each boring in Areas 2, 3, and 4. These samples will be collected at shallow, middle, and bottom depths of each boring. Additional samples may be submitted if stained soil is encountered.

3. Soil samples in Areas 2, 3, and 4 that are analyzed for WQCC metals will also be analyzed for general chemistry parameters which include fluoride, calcium, potassium, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate total dissolved solids, nitrates, and a anion/cation balance.

4. Samples collected from the bottom of borings in Area 1 will be analyzed for total petroleum hydrocarbons using analytical Method 418.1.

5. Synthetic Precipitation Leaching Procedure (SPLP) will be removed from the proposed plan.

6. Groundwater samples will be analyzed for volatile organic compounds using EPA Method 8260. Analyses for semi-volatile organic compounds will not be required for groundwater samples.

7. The general chemistry analytical suite for groundwater samples will include fluoride, calcium, potassium, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate total dissolved solids, nitrates, and a anion/cation balance. The pH and conductivity will be recorded during sample activities using a water quality meter.

8. Submittal date of the Site Investigation Report will be 60 days from the date of final approval of Abatement plan Proposal (AP-14).

If you should have any questions please contact me at (281) 431-2561.

Sincerely,

Ralph Corry
Environmental Specialist

Cc: Mr. Chris Williams/NMOCD Hobbs

EFLE: cont - RALPH CORRY/MIKE ANABISE

Champion Chemical-Hobbs
3 pm 8/10/00

Area I run TPH in addition of proposed at bottom of hole.

Borings:

Change PID screen from 250ppm to 100 ppm Area (2,3,4)
If over 100ppm will collect sample for BTEX and TPH(418.1)

Metals will be collected surface/middle/bottom of all borings + any visual. Area (2,3,4)

Monitor Wells:

Water samples will be 8260, Metals, Gen Chem, (semi-vols take out)

Extension:

60 days from OCD approval of proposed change, Champion to send

Champion Technologies

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

Certified Return Receipt No. Z 301 018 304

August 4, 2000

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: Response to NMOCD Letter,
Dated July 10, 2000

Dear Mr. Anderson:

Champion Technologies, Inc. (Champion) is in receipt of New Mexico Oil Conservation Division's (NMPCD) letter regarding revisions to the Abatement Plan Proposal (AP-14), dated June 29, 2000. After reviewing the letter and requested conditions for final approval of the Abatement Plan Proposal, Champion is not in full agreement with the requested conditions and proposes the following revisions to NMOCD's conditions:

1. *All soil samples submitted for laboratory confirmation shall be analyzed for constituents listed in the abatement plan proposal, and shall include Benzene, Toluene, Ethlybenzene, and total Xylene (BTEX method 8021), Total Petroleum Hydrocarbons (TPH method 418.1) and New Mexico Water Quality Control Commission (WQCC) metals, and General chemistry parameters as listed in 40 CFR 136.3.*

Champion proposes the following revisions to the aforementioned conditions:

a) Using field-screening methods to determine when samples should be analyzed using BTEX method 8021B. All soil samples will be screened in the field using an organic vapor monitor (OVM). Any samples showing concentrations of 250 parts per million (ppm) or more using the OVM, will be analyzed using BTEX Method 8021B.

b) Analyzing for TPH compounds in samples collected from areas II, III and IV, in accordance with the Abatement Plan Proposal. Champion does not propose TPH analyses for Area I, since earlier investigations indicate the concerns in this area are limited to metals, sulfates, and chlorides.

c) Analyzing for WQCC metals suite (i.e. arsenic, barium, cadmium, chromium, lead, total mercury, selenium, silver, copper, iron, manganese, and zinc.). Analysis for these constituents will be conducted on the sample collected from the bottom of each boring in Areas II, III, and IV. Since the purpose of metals analyses in the soil is to determine potential of impact to groundwater and a more extensive metal suite than previously proposed, Champion requests metal analysis other than at the bottom of the borings be omitted from the Abatement Plan Proposal. It is also proposed the WQCC metals suite replace metals suite I for the background samples.

2. *No less than 48 hours after the well(s) are developed, groundwater from all monitor well(s) shall be purged, sampled and analyzed for Volatile Organics (EPA method 8260), Semi-Volatile Organics (EPA method 8270), General chemistry, total dissolved solids, pH (EPA method CFR 40 136.3) and New Mexico Water Quality Control Commission (WQCC) metals, all using EPA approved methods and quality assurance/quality control (QA/QC) procedures.*

a) Champion requests that analyzing groundwater samples for volatile and semi-volatile organic compounds be omitted from the groundwater sampling suite. Groundwater samples collected previously by NMOCD showed all results for volatile and semi-volatile organic compounds below the method detection limits. It is Champions opinion, further groundwater analysis for volatile and semi-volatile organic compounds is unwarranted at this time.

b) Champion will analyze groundwater samples from the proposed monitoring wells for WQCC metals (i.e. arsenic, barium, cadmium, lead, total mercury, selenium, silver, copper, iron, manganese, and zinc).

c) Further resolution is required on what aspects of general chemistry need to be analyzed. Champion looks to NMOCD for further guidance on this issue.

The NMOCD's latest comments and conditions took us by surprise. In the pervious reviews and comments of the Abatement Plan Proposal by NMOCD, none of the above mentioned conditions were addressed. We would like to arrange a teleconference at your earliest convenience to further discuss and resolve these issues. In light of the need for further discussion we would like to request an extension of the final report submission for 60 days past agreement of conditions. We will be contacting you to schedule a teleconference. If you have any questions, please contact me at (281) 431-2561.

Sincerely,

Ralph Corry

Ralph Corry
Environmental Specialist

Price, Wayne

From: Price, Wayne
Sent: Friday, July 28, 2000 5:03 PM
To: 'Corry,Ralph'
Subject: RE: Abatement Plan AP-14; Champion Technologies, Inc. NM Facility

Approved!

From: Corry,Ralph[SMTP:Ralph.Corry@champ-tech.com]
Sent: Friday, July 28, 2000 2:54 PM
To: Price, Wayne
Cc: Grahmann, Nick; Anderson, Roger; braddockjr@aol.com; tgmorrison@aol.com; mdavis4188@aol.com
Subject: Abatement Plan AP-14; Champion Technologies, Inc. NM Facility

Champion Technologies, Inc. will do the electromagnetic geophysical survey on August 3&4 beginning at 8:00AM at our Hobb's facility. If there are any questions, please contact me at 281-431-2561.

Ralph Corry

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 10, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: 5051 5550

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Re: ABATEMENT PLAN AP-14
Champion's Hobbs, NM Facility

Dear Mr. Corry:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Champion Technologies, Inc. (Champion) letter and revised Abatement Plan Proposal dated June 29, 2000 for Champion's Hobbs facility located at 4001 S. Highway, Hobbs New Mexico. The Stage 1 Abatement Plan i.e. (Investigation Plan) is hereby approved with the following conditions:

1. All soil samples submitted for laboratory confirmation shall be analyzed for constituents listed in the abatement plan proposal, and shall include Benzene, Toluene, Ethlybeneze, and total Xylene (BTEX method 8021), Total Petroleum Hydrocarbons (TPH method 418.1) and New Mexico Water Quality Control Commission (WQCC) metals, and General chemistry parameters as listed in 40 CFR 136.3.

2. Champion shall complete the new monitor well(s) as follows:

   a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.

   b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.

   c. A 2-3 foot bentonite plug shall be placed above the gravel pack.

d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.

e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.

f. The well(s) shall be developed after construction using EPA approved procedures.

3. No less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for Volatile Organics (EPA method 8260), Semi-Volatile Organics (EPA method 8270), General chemistry, total dissolved solids, pH (EPA method CFR 40 136.3) and New Mexico Water Quality Control Commission (WQCC) metals, all using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

4. All wastes generated during the investigation shall be disposed of at an OCD approved facility.

5. Champion shall submit the results of the investigation to the OCD Santa Fe Office **by September 15, 2000** with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:

a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.

b. A geologic/lithologic log and well completion diagram for each bore hole or monitor well.

c. A water table potentiometric map showing the location of the leaks and spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.

d. Isopleth maps for contaminants of concern which were observed during the investigations.

e. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.

f. The quantity and disposition of all recovered product and/or wastes generated.

6. Champion will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

Please be advised that NMOCD approval of this plan does not relieve Champion of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Champion of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please contact Wayne Price of my staff at (505) 827-7155.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/wp

cc: OCD Hobbs Office

ENERCON SERVICES, INC.
An Employee Owned Company

8866 Gulf Freeway
Suite 380
Houston, TX 77017
(713) 941-0401
Fax: (713) 941-0402

June 29, 2000

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87605

Subject: **Revised Abatement Plan Proposal (AP-14)**
Champion Technologies
Hobbs, New Mexico Facility

Dear Mr. Anderson:

Please find enclosed two (2) copies of the *Champion Technologies, Inc., 4001 South Highway 18, Hobbs, New Mexico Revised Abatement Plan Proposal.* The revised plan addresses the deficiencies and issues stated in your letter, dated May 25, 2000. If you have any questions or comments pertaining to the Revised Abatement Plan Proposal, please contact Mr. Ralph Corry of Champion Technologies, Inc. at (281) 431-2561.

Sincerely,

ENERCON SERVICES, INC.

Michael Amabisco
Project Manager

CHAMPION TECHNOLOGIES, INC.
4001 SOUTH HIGHWAY 18
HOBBS, NEW MEXICO

REVISED ABATEMENT PLAN PROPOSAL

June 29, 2000

Submitted to: Champion Technologies, Inc.
3130 FM 521
Fresno, Texas 77545

Prepared by: Enercon Services, Inc.
8866 Gulf Freeway, Suite 380
Houston, TX 77017

CHAMPION TECHNOLOGIES, INC.
4001 SOUTH HIGHWAY 18
HOBBS, NEW MEXICO

REVISED ABATEMENT PLAN PROPOSAL

June 29, 2000

Submitted to: Champion Technologies, Inc.
3130 FM 521
Fresno, Texas 77545

Prepared by: Enercon Services, Inc.
8866 Gulf Freeway, Suite 380
Houston, TX 77017

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1.0 OBJECTIVES

Enercon Services, Inc. (Enercon) has been retained to prepare an Abatement Plan Proposal (APP) for the Champion Technologies, Inc. (Champion) facility located at 4001 South Hwy. 18 in Hobbs, New Mexico. This APP is prepared pursuant to the Notice of Violation issued by the New Mexico Oil Conservation Division (NMOCD) on April 26, 1999.

This APP will focus on determining the nature and extent of potentially hazardous waste contamination in the soil on site, and evaluating the potential of groundwater impact on site.

The APP describes the procedures that will be used to evaluate the potential impact at the site. The APP contains the following:

1. A detailed description of the site;

2. A site and project background;

3. A detailed sampling plan;

4. A schedule for implementation of the APP and submittal of a Site Investigation Report (SIR) that will be an addendum to the APP; and

5. A description of the contents of the SIR.

The objective of the project is to investigate and evaluate any potential soil and groundwater contamination on the site, pursuant to New Mexico Water Quality Control Commission Regulations 20NMAC 6.2 4106.C. This objective will be accomplished through the following activities:

1. Reviewing relevant documents to the site and vicinity; and

2. Developing and executing a soil-sampling program in the area near the warehouse to identify any potential impact to the site.

3. Installing monitoring wells, collect and analyze groundwater samples to identify any potential impact to the groundwater.

4. Investigate potential former pond and pit area on southwest portion of the site.

The data obtained from the site investigation will be used to present recommendations, if warranted, for future investigations and remedial actions at the site. A work plan for any further investigations that may be deemed necessary, based on the results of the site assessment, will be prepared as an addendum to this APP.

Project Contacts

The following is a reference list of project contacts:

Client:	Champion Technologies, Inc. Mr. Melvin Davis (281) 431-2561
Champion Technologies Project Manager:	Mr. Ralph Corry (281) 431-2561
Enercon Services, Inc. Project Manager:	Mr. Michael Amabisco (713) 941-0401

2.0 SITE DESCRIPTION AND BACKGROUND

2.1 Site Location and Description

The Champion facility's physical address is 4001 South Highway 18 in Hobbs, New Mexico. The location of the property is NE/4 of SE/4, Section 15, Township 19 South, Range 38 East, West Hobbs Quadrangle (Appendix A, Figure 1.)

The Champion facility stores and distributes chemicals for the petroleum industry. The property is rectangular in shape, approximately 500 feet by 640 feet, or an estimated 7 acres. The facility consists of an office building, manufacturing, and storage areas, as well as parking and undeveloped areas (Appendix A, Figure 2.). The site is enclosed by a fence, with a gate along South Highway 18. The facility uses a septic system for sanitary purposes and water is supplied by an on site domestic well. The site is generally flat with a slight gradient in the westerly direction. There are no bodies of surface water on the site.

The facility is bordered by the highway on the east side, residential and undeveloped property to the south, undeveloped land on the west side, and an oil field service company to the north.

2.1.1 Regional Geologic Setting

The geology of the Southern High Plains of Texas and New Mexico consists of the Tertiary Ogallala Formation which is overlain by Quaternary eolian, fluvial, and lacustrine sediments. The Quaternary deposits range in age from 1.4 million years old to recent, and extend to a maximum depth of 80 feet below ground surface regionally. The Tertiary Ogallala Formation contains coarse fluvial conglomerates, sandstone, and fine-grained eolian siltstone and clay. The depositional environment of the Ogallala Formation and overlying Quaternary deposits produce overlapping alluvial fans. Exposed along dry riverbeds in the region, the Quaternary alluvium deposits consist of sands, silts, and gravels. Locally, a resistant calcitic layer known as caprock overlies the

Ogallala Formation. The caprock is exposed along the northwestern portion of Lea County.

2.1.2 Regional Hydrogeology

The Ogallala aquifer is the primary drinking water and irrigation source for the Southern High Plains of Texas and Eastern New Mexico. The Ogallala aquifer occurs within the Tertiary Ogallala Formation which is composed of terrigenous sediments such as sands, gravels, and finer sediments. The aquifer is covered by Quaternary deposits and unconformably overlies Cretaceous, Triassic, and Permian rocks. Water table elevations approximately parallel the regional land surface, which dips southeasterly. The general hydraulic conductivity (K) for the aquifer is approximately 200 gal/day/ft^2 with a porosity of 43% and a specific yield of 23% for fined grained sands. However, at the time of this abatement plan proposal, the local hydraulic conductivity, storativity, and transmissivity have not been determined at the site.

2.2 SITE BACKGROUND

2.2.1 Site History and Usage

Champion Technologies, Inc. has occupied the 4001 South Highway location for approximately 30 years. In that time, the site has been used for the distribution of chemicals used in the petroleum industry.

Previous soil sampling was performed 1996 in connection with modification to the septic system. Soil sampling was also performed in April 1998 in regards to removal of contaminated soils near drum storage areas and product tanks. All actions were addressed and approved by the New Mexico Environmental Department (Appendix G).

In 1995 a new water well was constructed at the site. Water quality samples were collected and analyzed. Analytical results from the sampling are included in Appendix B. Results showed elevated concentrations of chloride and total dissolved solids.

On December 8, 1998, the NMOCD conducted an inspection at the Hobbs facility. During the inspection, department personnel collected a soil sample from a "yellow stained" area and a water sample from a faucet inside one of the buildings. Analytical results from these samples showed concentrations of lead, chromium, manganese, nickel, chloride, and soluble sulfates that exceeded groundwater standards. The soil sample analytical results also showed detected concentrations of polyaromatic hydrocarbon compounds.

In a letter dated December 29, 1999 from the NMOCD, several areas of alleged buried waste were identified. Each of these areas is addressed below. Areas are shown in Appendix A, Figure 3.

1. Old UST Area. The UST in this area was removed prior to 1985, and prior to RCRA UST regulations. No documentation pertaining to this removal exists.

2. Old Pit Area on South Side of Warehouse. Champion has no knowledge of a pit area in this location. No known past waste activities are known to have taken place in this area. To further investigate the possibility of potential buried waste in this area, Champion proposes to use electromagnetic geophysical methods to evaluate the presence of metallic buried waste.

3. Old Pit Area on West Side of the Warehouse. Further investigation of this area (Area 2) is proposed and detailed in Section 3.1.

4. Areas Around the Bulk Tank Area. These two areas have been remediated in the past. Champion is currently reviewing archived files to retrieve documentation of the cleanup to be submitted to NMOCD. If the files cannot be found, the area will be investigated and a plan will be submitted to NMOCD.

5. Lab Septic System. The septic system has been identified and is shown in Figures 2, 3, and 4. Previous samplings from the septic system area are discussed in Section 2.2.5. The proposed plan to evaluate potential impact to groundwater from the septic system is included in Section 5.0

6. Old Pit Area with Buried Drums. To further evaluate this area (Area 3) a soil boring to 25 feet bgs will be advanced. Investigation details for Area 3 are in Section 3.4.

2.2.2 Chemical List

Chemicals of primary concern in regards to the APP are stored on the site. A list of stored chemicals is included in Appendix A, Table 1.

2.2.3 Summary of Soil Sample Analytical Results

On December 8, 1998 the NMOCD collected a soil sample from a yellow stained area. A summary of detected concentrations is presented in Appendix A, Table 2. The location of the sample collection was reportedly 105 feet west of the concrete pad adjacent to the warehouse and 71 feet south of the north fence line.

2.2.4 Summary of Groundwater Sample Analytical Results

On December 8, 1998 the NMOCD collected a water sample from a faucet in the break room in the office building. A summary of detected concentrations is presented in Appendix A, Table 3.

2.2.5 Past Investigations and Incidences

Three investigations have been conducted on the Hobbs site. Two of the investigations pertained to the septic system, with the third pertaining to the cleanup of minor releases on site. Previous sample locations are shown in Appendix A, Figure 4.

Both soil and groundwater samples were collected for the septic area. Analytical results showed detectable concentrations of total petroleum hydrocarbons, arsenic, barium, chromium, and lead. Analytical results are included in Appendix G.

The third investigation involved the excavation and removal of soil from four separate areas on site. The areas were sampled for volatile and semi-volatile organic compounds after the excavation. All areas were below analytical detection limits. The removal report is included in Appendix G.

A review of available aerial photographs of the Hobbs area was conducted. Available aerial photographs of the area were not extensive. Photographs from 1949, 1954, and 1967 were found and reviewed. The 1967 photograph showed a possible pond in the southwest portion of the site (Area 3), and a pit near a structure (Area 2). More recent photographs were not available. Aerial photographs are included in Appendix G.

3.0 SOIL SAMPLE LOCATIONS AND RATIONALE

3.1 Electromagnetic Survey

An electromagnetic survey will be conducted over the entire site. The objective of the survey is to identify any potential buried drums and metallic utilities. Sample locations may be adjusted to investigate any subsurface anomalies discovered during the survey.

3.2 Background Samples

Three background samples will be collected. These samples will be collected from areas on the site that have not have been impacted by any facility operation activities. These samples will be collected from the ground surface to 1-foot bgs. Analyses for each sample location are summarized in Appendix A, Table 4. These sample locations will be backfilled with native material. Proposed soil sample locations are shown in Appendix A, Figure 5.

3.3 Area 1

One set of soil samples will be collected in the yellow stained area (Area 1), which is approximately 100 feet west of the concrete pad associated with the warehouse building. Five locations will be sampled in the yellow stained and surrounding area. Sample locations will be placed to delineate the lateral extent of potential soil impact. Soil samples will be collected at 0 to 1 foot below ground surface (bgs) and 2 to 3 feet bgs. The soils on the site are characterized by sands, silts, and caliche. The caliche and silt materials are likely to impede the migration of any potential surface impact, so samples

will be collected at a maximum depth of 3-foot bgs. Proposed soil locations are shown in Appendix A, Figure 5.

3.4 Area 2

Soil samples will also be collected in the area adjacent to the warehouse concrete slab (Area 2). A total of nine (9) locations will be sampled in this area. Six (6) locations will be sampled in the alleged "old pit area", and three (3) locations approximately 10 feet outside the alleged pit area. Samples will be collected at 5-foot intervals from the ground surface to a maximum 25 feet bgs. Analyses for each sample location are summarized in Appendix A, Table 4. These sample locations will be backfilled with bentonite. Proposed soil sample locations are shown in Appendix A, Figure 5.

3.5 Area 3

One boring will be placed in this area. Samples will be collected at 5-feet bgs and 25 feet bgs. Analyses for each sample location are summarized in Appendix A, Table 4. These sample locations will be backfilled with bentonite. Proposed soil sample locations are shown in Appendix A, Figure 5.

3.6. Area 4

Two borings will be placed in this area. One boring will be made on the north side of the tank area and one boring will be near the southeast corner of the tank area. Samples will be collected at 5-foot intervals from ground surface to a maximum of 25 feet bgs.

4.0 SOIL SAMPLING PROCEDURES AND EQUIPMENT

4.1 Sample Collection Technique

Background samples will be collected using a decontaminated trowel.

Soil samples in Areas 1, 2, and 3 will be collected using a hollow-stem auger drill rig and a decontaminated split-spoon sampler. Samples will be collected from 0 to 3 feet bgs in Area 1 and 0 to 25 feet bgs in Areas 2 and 3. These depths are optimal depths for each zone and may not be attainable due to bedrock, cobbles, gravels, or other obstructions preventing the sampler from reaching the target depth. All depth intervals sampled will be recorded on the Field Data Form (Appendix E). Samples will be collected in accordance with ASTM Standard D 4700-91: *Standard Guide for Sampling From the Vadose Zone* (Appendix D), as well as the procedures described below.

- In Area 1 the sampling device will be advanced to a maximum depth of 3 feet bgs. The split-spoon sampler will be removed and opened. An organic vapor meter (OVM) will be used to screen the sample.

- In Areas 2 and 3, the sampler will be advanced to a maximum depth of 25 feet bgs. A continuous core sampler will be used and advanced in 5-foot intervals. The split-spoon sampler will be removed and opened. An oragnic vapor meter (OVM) will be used to screen the sample.

- Soil samples will be placed in 8-oz. glass jars, sealed, labeled, and placed in a cooler prior to laboratory delivery.

- A Field Data Form (Appendix E) will be utilized at each sample location, and completed during sample preparation.

- Three duplicate samples will be collected.

4.2 Soil Sample Identifier

All soil samples will be assigned a unique sample identifier. Each identifier will be comprised of a numeric sample location, a four number depth descriptor, and an alpha character sample type descriptor. The components of the sample designations are described below.

- *Sample Location*. This component consists of a single number unique to each sample location. These numbers will start at 1, and increase sequentially at each sample location.

- *Sample Depth Zone*. The sample depth descriptor consists of four numbers. The first two numbers signify the top of the sample zone (feet bgs), and the last two numbers signify the bottom of the sample zone (feet bgs).

- *Sample Type*. The letter designation and its associated sample type are as follows:

  -A unique

  -B duplicate/replicate

  -C equipment blank

For example, the designation of a unique sample collected at Location No. 9 from 14 to 15 feet bgs would be 9-1415-A.

4.3 Equipment Decontamination

All field sampling equipment and sample preparation equipment will be decontaminated between samples using a non-phosphatic detergent wash, tap water rinse, and a deionized water rinse and the guidance given in ASTM Standard D 5088-90: *Standard Practice for Decontamination of Field Equipment Used at Nonradioactive Waste Sites* (Appendix E).

5.0 MONITORING WELL INSTALLATION AND GROUNDWATER SAMPLING

5.1 Monitoring Well Installation

To evaluate the potential impact to ground water, five monitoring wells will be installed on the site (Appendix A, Figure 5). The monitoring wells will be placed in the following locations: northwest corner of the property; southeast corner of the bulk tank area; down-gradient of the septic tank; southeast corner of the property and near the southeast corner of the office building. The following describes the monitoring well installation procedures and specifications:

- Wells will be drilled using an air-rotary drilling method. Wells will be drilled to an approximate depth of 80 feet bgs.

- Approximately 15 feet of screen will be installed in the well with 10 feet of screen below the water table level, and 5 feet above the water table level. Screen placement will be determined in the field by the field geologist. Screening zones will be based on field observations and logging data.

- The well will be constructed with Schedule 40 PVC casing and screen.

- Screened zones will have appropriate filter pack placed in a matter to avoid any bridging. Wells will be properly sealed with bentonite and cement grout.

- The wells will have surface completions that will protect the well from any damage or unauthorized access.

5.2 Monitoring Well Purging

Monitoring well activities will include the following:

- A measuring point will be established on the well casing as a consistent measuring point. Each well will be sounded three times for depth to water.

- Wells will be purged with a decontaminated submersible pump.

- A minimal volume of water will be purged, taking into consideration the stabilization of pH. electrical conductance (EC), and oxidation reduction potential (ORP) over at least two to three casing volumes.

- Purge pumping may possibly draw the water down to a level that the pump will shut off due to lack of water. If this occurs, the well will be allowed to recover to 80% of the original static water level, or for 24 hours before samples will be collected.

- The rate of purging will be calculated and recorded.

- Purge water will be containerized and stored until analytical results are evaluated.

5.3 Groundwater Sampling Techniques

In order to ensure that proper groundwater samples are collected, the following procedures will be followed:

- Groundwater samples will be collected with disposable bailers and nylon cord. The bailer and cord will be disposed of after the sample has been collected.

- Samples will be placed in laboratory supplied, clean containers. Each container will be marked with the sample designation, date and time, sampler's initials, and required analysis.

- Samples will be placed in a cooler after collection and kept chilled until delivered to the laboratory.

5.4 Groundwater Sample Identifiers

Groundwater samples will have the following sample identifiers:

- Monitoring Well 1 - MW1

- Monitoring Well 2 - MW2

- Monitoring Well 3 - MW3

- Monitoring Well 4 – MW 4

- Monitoring Well 5 – MW 5

5.5 Groundwater Sampling Frequency

The initial groundwater samples will be collected approximately two weeks after the monitoring well installation. The need for further sampling or sampling frequency will be determined after review and evaluation of the initial results.

6.0 SAMPLE ANALYSIS AND HANDLING

6.1 Soil Sample Analytical Methods

Background soil samples collected on the site will be analyzed for the constituents listed below:

- Lead, chromium, manganese, nickel (Metals Suite 1)

- Chlorides and soluble sulfates.

Analytical methods used for soil samples will be in accordance with USEPA SW-846 prescribed or comparable methodologies. The constituents to be analyzed and the appropriate analytical methods to be used are summarized in Appendix A, Table 4, and analytical protocols are included in Appendix D.

Soil samples collected in Area 1 will be analyzed for the constituents listed below.

- Lead, chromium, manganese, nickel (Metals Suite 1)

- Chlorides and soluble sulfates.

Additionally, soil samples collected at 3 feet bgs will be analyzed using EPA Method 8270 (Semivolatile Organic Compounds).

Soil samples collected in Areas 2 and 3 will be analyzed for the constituents listed below.

- Barium, chromium, and lead (Metals Suite 2), SW-846 EPA Method 6010

- Total petroleum hydrocarbons (TPH), using EPA Method 418.1

In addition to analyzing samples for total metals, samples collected at 25 feet bgs will be analyzed for Metals Suite 2 using SW-846 EPA Method 1312/6010 (Synthetic Precipitation Leaching Procedure). Also the two samples with the highest OVM readings will be analyzed for BTEX constituents using SW-846 EPA Method 8021B.

The laboratory project manager (LPM) will be responsible for analytical results, sample tracking, sample container order, courier requests, turnaround time requests, and explanation of reports. The LPM will also be responsible for tracking the analytical work of the project throughout the laboratory and ensuring the efficient transition of samples through sample control.

6.2 Groundwater Sample Analytical Methods

Groundwater samples collected from the monitoring wells will be analyzed for chromium, chloride, and total dissolved solids (TDS) (Table 5).

6.3 Sample Containers, Preservatives and Shipping

The laboratory will provide sample containers and preservatives. All container preparation by the laboratory will be done in a designated area. Containers will be labeled to indicate the added preservative. Sample containers, preservatives, and holding times are

summarized in Appendix A, Table 4. Preparation is accomplished using the following Standard Operating Procedures (SOPs) for bottle preservation:

- The laboratory will provide bottles for analyses. These will be purchased from suppliers who certify the containers to have been cleaned by protocols as prescribed by the EPA.
- The laboratory will also provide coolers and applicable Chain-of-Custody forms.
- All sample containers will be delivered at least 1 day before sample collection.
- After a sample is collected and labeled, it will be stored in a plastic ice chest.
- All samples will be wrapped in plastic packing when necessary to avoid breakage, and will be clearly labeled and sealed to prevent tampering.
- All samples will have a label containing (at a minimum) the following information.
  - sample designation;
  - project name and number;
  - date and time of collection; and
  - Comments - These may include parameters to be analyzed.

6.4 Chain-of-Custody

Chain-of-custody procedures will include:

- Samples collected by field personnel will be accompanied by a Chain-of-Custody Record Form (Appendix E), which will include date and time of collection, container type, preservatives used, number of samples, sample descriptions, and others.
- Sample identification labels and Chain-of-Custody Records will be completed with waterproof ink, and placed in a waterproof bag for shipment.
- Chain-of-Custody documentation will be completed at each sample location prior to sampling at the next site.
- The integrity of the samples will be examined, and the final signature on the Chain-of-Custody Form will be completed by a receiving agent of the selected laboratory.

6.5 Quality Assurance/Quality Control (QA/QC)

Analytical methods and Standard Operating Procedures, in accordance with EPA will be consistently maintained by the laboratory to satisfy the required level of QA/QC protocol. One solid sample will be subjected to duplicate or replicate analysis. One equipment blank from soil sampling equipment will be submitted for analysis.

All of the samples will be analyzed under a QC package which includes a case narrative, field identification/laboratory sample number cross-reference summary, analytical results, method blank results, laboratory control sample recoveries, matrix spike/spike duplicate recoveries, and Chain-of-Custody Record.

6.6 Data Management

Field and laboratory data management, data review, protocols, and procedures are provided to create a centralized working system and to maintain data quality. The following includes a discussion of field and laboratory data management and data review.

Field Data Management. Field data and completed Chain-of-Custody Forms will be completed in the field for each sampling location. These records will be produced, copied, and filed under the appropriate site location nomenclature for each selected site location. The Field Manager will forward these forms to the Project Manager at the conclusion of each sampling round.

The following field documentation will be completed.

- Completed field data forms, and Chain-of-Custody forms (Appendix F); and
- Samples will be described in the field according to procedures established in this document.

Laboratory Data Management. Analytical results and QC data relating to analytical precision and accuracy will be obtained from the laboratory. Laboratory data forms will specify sampling location and method of analysis. Chain-of-Custody Forms will be filed with the laboratory reports.

Data Review. Field data will be reviewed for measurements collected during sampling, order of sample collection, and the observations and notes recorded during the course of the sampling day. Laboratory data forms will be reviewed for the completion of required measurements, including parameter results, limits of detection, and dilution factors. Validity of both the field and laboratory data will be determined by evaluating the completeness of the data for the required parameters as documented on the Chain-of-Custody Form. The following data will also be reviewed.

- use of EPA or SW methods with detection limits below aquifer standards, where applicable;

- chemical data of control matrix blanks, control matrix spikes, standards, control matrix duplicates; and

- confirmation of sample analyses within specific holding times.

7.0 SITE SAFETY HEALTH PLAN

Enercon personnel will review the Site Safety Health Plan (SSHP) prior to initiation of the sampling events. The SSHP for conducting this APP is on file at the Enercon office in Houston and is attached here as Appendix F. A copy of this plan will be maintained on site during sampling activities.

8.0 SCHEDULE

Enercon anticipates that the NMOCD will require approximately 3 weeks to review and approve the APP. A schedule for the implementation of the site investigation is included in Appendix A, Table 6. The NMOCD will be notified at least 5 days in advance of any investigative work that will be performed at the site.

9.0 REPORTING

A SIR outlining the results of the soil and groundwater sampling, as well as the findings from the water well inventory survey will be submitted to the NMOCD as per the schedule presented in Section 7.0. The SIR will include the following:

1. Discussion of review of regulatory files related to the site and vicinity;

2. Field methods and procedures;

3. Soil and groundwater analytical results, QA/QC results;

4. Copies of Chain-of-Custody records;

5. Site plan showing the final locations of the soil and groundwater sampling locations;

6. Findings and recommendations for remedial/closure activities at the site.

10.0 REFERENCES

University of Texas Bulletin #3232, Geology of Texas, Austin, TX 1932

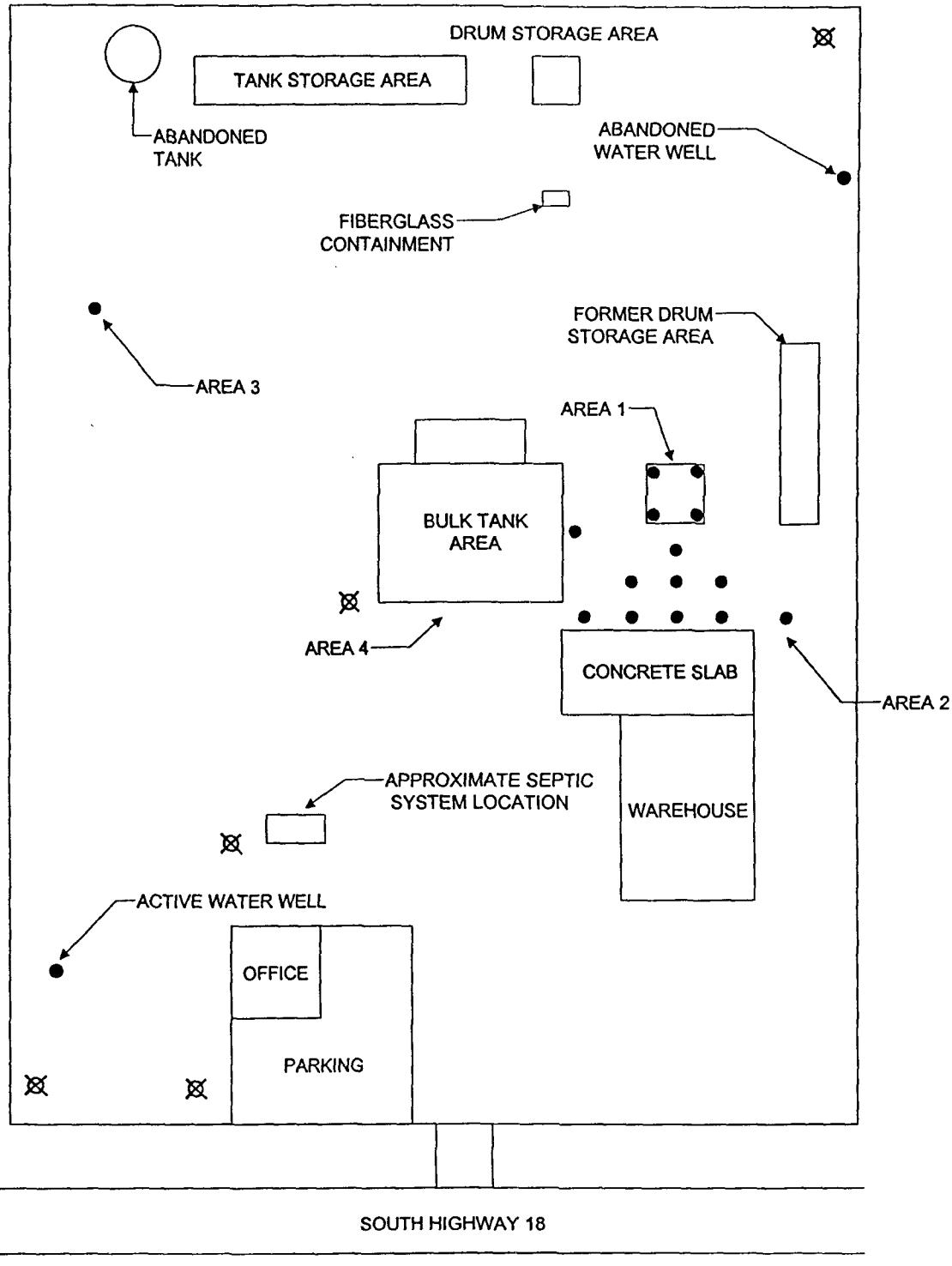
USEPA. *Preparation of Soil Sampling Protocols: Sampling Techniques and Strategies.* Office of Research and Development, Washington, D.C. 1992. EPA/600/R-92/128.

USEPA. *Soil Screening Guidance. User's Guide.* Office of Emergency and Remedial Response. Washington, D.C. 1996. EPA/540/R-96/018.

USEPA. *Test Methods for Evaluating Solids Waste, Physical/Chemical Methods.* Publication SW-846, 1996

APPENDIX A

FIGURES AND TABLES



● = SOIL SAMPLE LOCATIONS

⊠ = *MONITORING WELL LOCATIONS*

0 60' 0" 100' 0" 200' 0"

W
S N
E

ENERCON SERVICES, INC.

FIGURE 5
PROPOSED SOIL SAMPLE AND MONITORING WELL LOCATIONS
CHAMPION TECHNOLOGIES, INC.

PROJECT NO.: ES-444 DATE:3/23/00 BY:JLP

Table 5. Summary of Groundwater Sample Identifiers and Analysis
Champion Technologies, Inc., Hobbs, New Mexico

Sample ID	Constituents	Test Method	Container	Preservative	Hold Time
MW-1	Chromium	6010/7000	1-L plastic	Ice	180 days
MW-2	Chloride	EPA 300.0			28 days
MW-3	TDS[1]	EPA 160.1			7 days
MW-4					
MW-5					

Notes:
1 Total dissolved solids

Table 6. Anticipated Schedule, Implementation of Site Investigation Champion Technologies, Inc. Hobbs, New Mexico		
Item	**Description**	**Schedule**
1	Submittal of Revised Abatement Plan Proposal to New Mexico Energy, Minerals, & Natural Resources Department	June 30, 2000
2	Approval of Revised Abatement Plan Proposal by New Mexico Energy, Minerals, & Natural Resources Department	July 7, 2000
3	Conduct Geophysical Survey	July 17, 2000
3	Conduct Soil Sampling and Monitoring Well Installation, Hobbs, New Mexico	August 7, 2000
4	Groundwater Sampling, Hobbs, New Mexico	August 28, 2000
5	Submit SIR to New Mexico Energy, Minerals, & Natural Resources Department	October 23, 2000

Price, Wayne

From: System Administrator[SMTP:postmaster@champ-tech.com]
Sent: Tuesday, May 30, 2000 1:44 PM
To: Price, Wayne
Subject: Delivered: Abatement Plan

Abatement Plan

<<Abatement Plan>> Your message

To: 'RALPH.CORRY@CHAMP-TECH.COM'
Subject: Abatement Plan
Sent: Tue, 30 May 2000 12:31:29 -0500

was delivered to the following recipient(s):

Corry,Ralph on Tue, 30 May 2000 14:44:58 -0500

Price, Wayne

From: Price, Wayne
Sent: Tuesday, May 30, 2000 11:31 AM
To: 'RALPH.CORRY@CHAMP-TECH.COM'
Subject: Abatement Plan

Dear Ralph:

Please find enclosed a letter that was sent on the 25th of May. Please note in the letter the second paragraph where it reads "OCD does not have regulatory authority for the over **site...."** the word site should have been *"sight".*

Also we recommend you make the commitments in letter form so you do not have to amend the large document. The sooner you respond the quicker we can get started. As soon as I receive your amended proposal via letter I well approve within 10 days unless some emergency prevents.

Champ14.doc

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 25, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 5789

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Re: Abatement Plan Proposal (AP-14)
Champion's Hobbs, NM Facility GW-199

Dear Mr. Corry:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Champion Technologies, Inc.'s (Champion) revised Abatement Plan Proposal (AP-14) dated March 24, 2000 submitted by Enercon Services, Inc. The plan cannot be approved at this time because the planned Objective Item 1.0 of the proposal was quoted as *"This APP will focus on determining the nature and extent of potentially hazardous waste contamination in the soil on site, and evaluating the potential of groundwater impact on site"* and item *1.0-5. "The objectives of the site investigation are to evaluate the nature, extent and degree of potentially hazardous waste impacts to the site, if any."*

Please be aware the OCD does not have regulatory authority for the over site of a hazardous waste investigation or clean-up project. OCD recommends that Champion contact the New Mexico Environment –Hazardous Waste and Radioactive Bureau concerning hazardous waste issues.

In addition to the above problem, the OCD has reviewed the document and requires the following additions and/or changes to be made to the plan.

1. Change the main objective to read in part "Investigate for soil and groundwater contamination pursuant to New Mexico Water Quality Control Commission Regulations 20 NMAC 6.2 4106.C."

2. The OCD will require total values on all soil and groundwater analysis, not extraction methods 1311 (TCLP) or 1312 (SPLP) as proposed.

3. The initial groundwater monitor wells shall only be completed to a depth sufficient to hold 15 feet of slotted screen, in which 10 feet shall be below the water table level and 5 feet above the water table level.

4. OCD will require two additional monitor wells; one, to be located as close as possible to the old water well that presently is under the bulk tank pad. The other one to be located in the northwest part of the yard.

5. OCD will require an electromagnetic geophysical survey of the entire property.

Therefore, please amend the proposal to include the above additions and/or changes, and then submit to OCD by June 25, 2000.

Once OCD has received the amended plan as requested above, then OCD will issue approval in an expeditious manner. If you have any questions please do not hesitate to contact me at 505-827-7155.

Sincerely,

Wayne Price

Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office

ENERCON SERVICES, INC.
An Employee Owned Company

8866 Gulf Freeway
Suite 380
Houston, TX 77017
(713) 941-0401
Fax: (713) 941-0402

March 24, 2000

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87605

Subject: **Revised Abatement Plan Proposal (AP-14)**
Champion Technologies
Hobbs, New Mexico Facility

Dear Mr. Anderson:

Please find enclosed two (2) copies of the *Champion Technologies, Inc., 4001 South Highway 18, Hobbs, New Mexico Revised Abatement Plan Proposal.* The revised plan addresses the deficiencies and issues stated in your letter, dated December 29, 1999. If you have any questions or comments pertaining to the Revised Abatement Plan Proposal, please contact Mr. Ralph Corry of Champion Technologies, Inc. at (281) 431-2561.

Sincerely,

ENERCON SERVICES, INC.

Michael Amabisco
Project Manager

Price, Wayne

From: Price, Wayne
Sent: Friday, March 17, 2000 4:50 PM
To: 'Ralph Corry'
Subject: RE: ABATEMENT PLAN AP-14

Approved!

From: Ralph Corry[SMTP:Ralph.Corry@champ-tech.com]
Sent: Sunday, March 12, 2000 10:04 PM
To: Price, Wayne
Subject: ABATEMENT PLAN AP-14

THIS IS TO REQUEST AN EXTENSION OF THE DEADLINE ON OUR PLAN FROM MARCH 15 UNTIL MARCH 24 IF POSSIBLE. THE REASON FOR THIS RQUEST IS THAT THE CONSULTANT IS USING LEE WILSON AS THE HYDROGEOLOGIST AND MORE TIME IS NEEDED BY HIM. IN ADDITION, WE ARE STILL HAVING PROBLEMS OBTAINING AREA PHOTOS. THE ONES AT UNIV. OF NEW MEXICO ONLY GO UP TO 1960. THANK-YOU. RALPH CORRY.

Price, Wayne

From: Price, Wayne
Sent: Tuesday, February 15, 2000 9:01 AM
To: 'ralph.corry@champ-pech.com'
Subject: Champion Hobbs yard GW-199

The extension requested in your letter dated 2/19/00 for the Abatement Plan AP-14 is hereby approved. The new date is March 15, 2000.

Champion Technologies

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. Z 301 018 402

February 9, 2000

Mr. Roger Anderson
New Mexico – Oil Conservation Division
2040 South Pacheco
P.O. Box 6429
Santa Fe, NM 87505-5472

Subject: Third Notice of Deficiency
Letter dated December 29, 1999
Abatement Plan AP-14
Hobbs, NM Facility

Dear Mr. Anderson:

At this time, Champion Technologies, Inc. (CTI) is working on the deficiencies noted in your letter dated December 29, 1999. However, to help us with the site geology and hydrogeology, CTI has contracted a consultant to do this investigation. He will be working with Enercon Services, our project consultant for Hobbs.

In order to complete the study of the site, I am requesting an extension of the deadline from February 15, 2000 to March 15, 2000 so the records can be reviewed more thoroughly.

Sincerely yours,

Ralph Corry

Ralph Corry
Environmental Specialist

RC/ms

CC: Clarence Meyer
Nick Grahmann
Mel Davis

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone _____
Personal __X____
E-Mail _____

Time: 1:30 pm
Date: February 02, 2000

Originating Party: **Mel Davis, Ralph Corry & Bob Honea**

Other Parties: **Wayne Price, Bill Olson & Roger Anderson**

Subject: **Champion Technologies- Hobbs Yard GW-199**

Discussion:

Discussed Third NOD letter dated December 29, 1999. Champion has recently obtained services of a consulting hydrologist to assist them in their investigation.

Conclusions or Agreements:

Champion will request an extension via E-Mail.

Signed: Wayne Price

CC:

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone __X___
Personal _____
E-Mail _____

Time: 3:30 pm
Date: January 18, 2000

Originating Party: Mel Davis & Ralph Corry- Champion Technologies, Inc.

Other Parties: **Roger Anderson& Wayne Price-OCD**

Subject: **Third NOD letter Dated 12/29/99**

Discussion:

Champion requested to have meeting concerning items in letter.

Conclusions or Agreements:

Champion will call and set-up meeting in Santa Fe for Feb 1 or 2.

Signed:

CC:

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 29, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 274 520 737

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Re: THIRD NOTICE OF DEFICIENCY
ABATEMENT PLAN AP-14
Champion ' s Hobbs, NM Facility

Dear Mr. Corry:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Champion Technologies, Inc.'s (Champion) letter and Abatement Plan Proposal (AP-14) dated November 29, 1999 for the Champion Hobbs, New Mexico facility. In order for a Stage 1 Abatement Plan to be administratively complete the plan needs to address the information as listed in New Mexico Water Quality Control Commission (WQCC) Regulation 20 NMAC 6.2.4106 C. Below you will find the specific deficiencies in the November 29, 1999 proposal along with the NMOCD's requirements.

1. Champion failed to submit a plan for NMOCD approval to determine the history and nature of all discharges, removals, remediations and storage and/or discovery of waste or water contaminants at the Hobbs facility. The plan shall include all records of investigation reports, spills, clean-up activities and reports, disposal activities, aerial photos, site photos, water well closures, underground tank removals, pit closures, and any other information that will determine as to how waste and/or water contaminants might have been handled, disposed and/or spilled onsite. Please submit this plan for NMOCD approval.

2. The Site Safety Health Plan appears to be a plan used for an Arizona Smelter. Please submit a Site Safety Health Plan specific for the Champion Hobbs facility.

3. The site maps supplied were not dimensionally scaled and some prominent features were missing such as the exact location of the lab septic system, all active and any abandoned water wells, and any soil contaminated areas. Please submit this information.

4. Champion's plan did not include a sufficient number of borings and monitor wells to properly define the site geology and hydrogeology, the vertical and horizontal extent and magnitude of vadose-zone and ground-water contamination, subsurface hydraulic parameters including hydraulic conductivity, transmissivity, storativity, and rate and direction of contaminant migration. Please submit this information.

In addition, the New Mexico Environment Department has received documentation in the form of a complaint identifying locations of buried wastes on Champion's Hobbs yard. The NMOCD has marked a copy of Champions' Figure 3 submitted in the Abatement Plan Proposal indicating where the waste was buried, previously remediated, and/or unreported releases had occurred. Please address each location referenced on the attached Figure 3. and amend your Stage 1 Abatement Plan Proposal to include investigation of these areas.

Champion is hereby required to submit the above information by February 15, 2000.

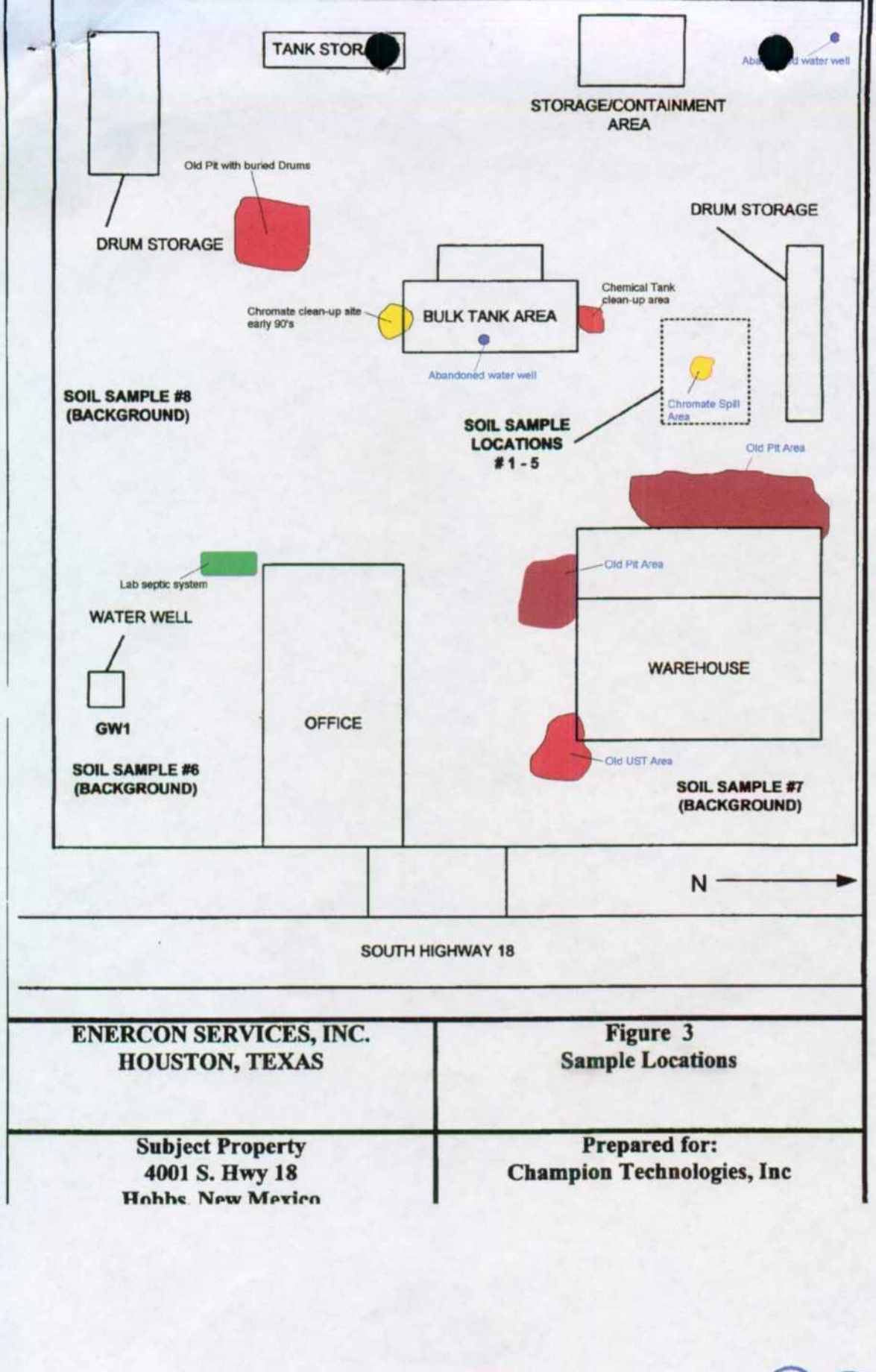
If you have any questions or comments, please contact me at (505) 827-7155 or Wayne Price of my staff at (505) 827-7154.

Sincerely,

Roger Anderson
Environmental Bureau Chief

cc: Chris Williams, NMOCD Hobbs District Office

attachments-1



Note: Color Annotations added by NMOCD 12/29/99.

ENERCON SERVICES, INC. **HOUSTON, TEXAS**	**Figure 3** **Sample Locations**
Subject Property **4001 S. Hwy 18** **Hobbs, New Mexico**	**Prepared for:** **Champion Technologies, Inc**

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OFFICE OF THE SECRETARY
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-5950

Jennifer A. Salisbury
CABINET SECRETARY

PRESS RELEASE

For Immediate Release:
December 16, 1999

Contact:
René Parker 827-1377

Champion Technologies, Inc. Submits Plan to Investigate Contamination

Champion Technologies Inc. has submitted a Stage One Abatement Plan for its facility located at 4001 south Highway 18, Hobbs, New Mexico. The Oil Conservation Division (OCD) required the plan after its environmental inspectors found soil samples collected at the facility contained chromium in excess of US EPA hazardous levels and other materials that exceeded the state ground water standards or are listed on the state toxic pollutants list. Analytical results from groundwater samples collected also revealed the presence of chromium in the groundwater.

The Abatement Plan was required and submitted pursuant to Section 74-6-10.1 of the New Mexico Statues and Water Quality Control Commission (WQCC) Regulation 4104(20NMAC 6.2.4104).

The purpose of the Stage One Abatement Plan is to design and conduct a site investigation that will adequately define site conditions, and provide the data necessary to select and design an effective cleanup option. Any necessary cleanup plans will be based on information gathered in the investigation and will be included as proposals in a Stage Two Abatement Plan that will be submitted to the OCD for approval. Any interested person may obtain further information from the Oil Conservation Division by calling Mr. Roger Anderson (505-827-7152) or writing to the New Mexico Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico 87505. The Stage One Abatement Plan may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday or at the Oil Conservation Division office located at 1625 N. French Drive Hobbs, New Mexico.

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NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

October 26, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-140

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

RE: SECOND NOTICE OF DEFICIENCY
ABATEMENT PLAN AP-14

Dear Mr. Corry:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Champion Technologies, Inc.'s (Champion) letter dated August 23, 1999 concerning the Stage 1 Abatement Plan (AP-14) for Champion's Hobbs, New Mexico facility. This correspondence states that Champion believes their June 22, 1999 Stage 1 Abatement Plan is complete and requested that NMOCD specify the deficiencies in Champion's plan. In order for a Stage 1 Abatement Plan to be administratively complete the plan needs to address the information as listed in New Mexico Water Quality Control Commission (WQCC) Regulation 20 NMAC 6.2.4106 C. As stated in the NMOCD's August 12, 1999 Notice of Deficiency, Champions June 22, 1999 Stage 1 Abatement Plan does not contain all of this information. Below you will find the specific deficiencies in the June 22, 1999 proposal along with the NMOCD's requirements.

1. **The plan does not contain descriptions of the site, including a site map, and of site history including the nature of the discharge and a summary of previous investigations pursuant to 20 NMAC 6.2.4106.C.1.**

   a. The NMOCD requires that Champion submit a plan to determine the history and nature of all discharges, removals, remediations and storage and/or discovery of waste or water contaminants at the Hobbs facility. The plan shall include all records of investigation reports, spills, clean-up activities and reports, disposal activities, aerial photo's, site photos, water well closures, underground tank removals, pit closures, and any other information that will determine as to how waste and/or water contaminants might have been handled, disposed and/or spilled onsite.

b. The NMOCD requires that Champion submit a detailed engineered site map showing the location of all significant features including property lines, above and below grade utilities, buildings, pads, sumps, existing and former underground tanks, existing and former water wells, existing or closed Class V wells, septic systems, any pit(s) known to have been on site, areas where waste or water contaminants were disposed of or buried, areas where waste was stored and/or remediated, areas where spills occured and areas of any prior site remediation.

2. **The plan does not contain a proposal to define the site geology and hydrogeology, the vertical and horizontal extent and magnitude of vadose-zone and ground-water contamination, subsurface hydraulic parameters including hydraulic conductivity, transmissivity, storativity, and rate and direction of contaminant migration, inventory of water wells inside and within one (1) mile from the perimeter of the three-dimensional body where the standards set forth in Section 4103.B are exceeded, and location and number of such wells actually or potentially affected by the pollution pursuant to NMAC 6.2.4106.C.2.** The NMOCD requires that Champion submit a proposal to conduct the above investigations.

3. **The plan does not contain a monitoring program, including sampling stations and frequencies pursuant to 20 NMAC 6.2.4106.C. 3.** The NMOCD requires that Champion submit a proposed monitoring plan for all monitor wells, onsite water wells, and any off-site wells.

4. **The plan does not contain a quality assurance plan for all soil and ground water investigation work to be conducted pursuant to 20 NMAC 6.2.4106.C. 4.** The NMOCD requires that Champion submit the quality assurance (QA) and quality control (QC) protocol and methodology on how all soil and ground water samples will be collected, preserved and analyzed.

5. **The plan does not contain a site health and safety plan for all work to be performed pursuant to 20 NMAC 6.2.4106.C. 5.** The NMOCD requires that Champion provide a site safety and health plan for the sampling activity and a plan to address protection of public health and the environment during the course of the abatement process.

6. **The plan does not contain a schedule for all stage 1 abatement plan activities, including the submission of a detailed final site investigation report pursuant to 20 NMAC 6.2.4106.C.6.** The NMOCD requires that Champion submit such a schedule.

Champion is hereby required to submit the above information by November 29, 1999. Failure to submit the information will result in a compliance order being issued pursuant to Section 74-6-10, NMSA 1978 requiring compliance with WQCC regulations and may include imposition of civil penalties.

If you have any questions or comments, please contact me at (505) 827-7152 or Wayne Price of my staff at (505) 827-7154.

Sincerely,

Roger Anderson
Environmental Bureau Chief

RCA/wco

cc: Chris Williams, NMOCD Hobbs District Office

Champion Technologies, Inc.

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. [Z 266 064 734]

August 23, 1999

Mr. Roger Anderson
New Mexico – Oil Conservation Division
2040 South Pacheco
P.O. Box 6429
Santa Fe, NM 87505-5472

Subject: Notice of Deficiency - Letter dated August 12, 1999
Abatement Plan AP-14
Hobbs, NM Facility

Dear Mr. Anderson:

Champion Technologies, Inc. received your Notice of Deficiency letter dated August 12, 1999. Champion Technologies, Inc. believes the June 22, 1999 Abatement Plan for Champion's Hobbs, NM facility is correct.

In our conversation in early July, your office had indicated that any deficiencies would be addressed by your office. Please indicate exactly the additional information needed.

If there are any questions, please call me at 281-431-2561.

Sincerely yours,

Ralph Corry

Ralph Corry
Environmental Specialist
Environmental, Health and Safety Department

RC/rn

CC: Braddock, Rick
Childs, Allan
Davis, Mel
Edwards, Mike
Finley, Richard
Hainebach, Charlie
Meyer, Clarence
Moran, Mike
Morrison, Tommy
OCD – Hobbs, NM office

C:\My Documents\DataRC\Correspondence\RC99-099.doc

Champion Technologies

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

CERTIFIED

Z 266 064 734

MAIL

RETURN RECEIPT REQUESTED

MR. ROGER ANDERSON
NEW MEXICO - OIL CONSERVATION DIVISION
2040 SOUTH PACHECO
P.O. BOX 6429
SANTA FE, NM 87505-5472

SEP - 1

First Notice
Second Notice
Return

87502-6429

Oil Conservation Division
1625 N. French Dr.
Hobbs, NM 88240

Memo

To: Wayne Price

From: Donna Williams

Date: 08/19/99

Re: FYI

Wayne,

Chris told me to send you these forms on Champion and let you handle it. I am not sure that you kept a copy of your rejection notice. So I am enclosing a copy of that as well as a C-141, which I was going to send back to Champion. They used the wrong form. Also there were no analyticals to accompany the C-141 of verification that the fluids were non-hazardous.

Thank you,

Donna

Donna Williams

Environmental Engineer Specialist

DISTRICT I
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO APPROPRIATE DISTRICT OFFICE IN ACCORDANCE WITH RULE 116 PRINTED ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR	Champion Technologies, Inc.				ADDRESS 10665 4001 S. Hwy 18		TELEPHONE # 505-393-7726
REPORT OF	FIRE	BREAK	SPILL ✓	LEAK ✓	BLOWOUT	OTHER*	
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* Oilfield Treatment Facility

FACILITY NAME: Champion Technologies, Inc.

LOCATION OF FACILITY Qtr/Qtr Sec. or Footage	SEC.	TWP.	RGE.	COUNTY
NE/4 SE/4	15	19S	38E	LEA

DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK: South Hwy 18 - 1.7 Miles to Hobbs

DATE AND HOUR OF OCCURRENCE	DATE AND HOUR OF DISCOVERY
N.D.	1997

WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQUIRED	IF YES, TO WHOM
		✓	✓	N.A.

BY WHOM	DATE AND HOUR
N.A	N.A

TYPE OF FLUID LOST	QUANTITY OF LOSS	VOLUME RECOVERED
Oilfield Treatment Fluids	≈ 25 Gal	4 Drums including dirt

DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO	QUANTITY
		✓	N.A

IF YES, DESCRIBE FULLY**
N.A.

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**
Inadequate secondary containment. Added additional secondary containment.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**
Several areas at Facility affected. Removed contaminated soil, Sampled area to show it was cleaned.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*
				Semi-Industrial

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
			✓				

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**
N.D

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Ralph Carry PRINTED NAME AND TITLE Ralph Carry Environmental Specialist DATE 8/7/97

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS (as of 3-1-91)

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond is which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

DISTRICT I
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO APPROPRIATE DISTRICT OFFICE IN ACCORDANCE WITH RULE 116 PRINTED ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR: Champion Technologies, Inc.						ADDRESS: 4001 S. Hwy 18, Hobbs	TELEPHONE #: 505-393-7726
REPORT OF	FIRE	BREAK	SPILL ✓	LEAK		BLOWOUT	OTHER*
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER*: Oilfield Treatment Facility

FACILITY NAME: Champion Technologies, Inc.

LOCATION OF FACILITY Qtr/Qtr Sec. or Footage	SEC.	TWP.	RGE.	COUNTY
NE/4 SE/4	15	19S	38E	LEA

DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK: South Hwy 18 - 1.7 Miles to Hobbs

DATE AND HOUR OF OCCURRENCE	DATE AND HOUR OF DISCOVERY
N.D	1998 - 1999

WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQUIRED	IF YES, TO WHOM
		✓	✓	N.A

BY WHOM	DATE AND HOUR
N.A	N.A

TYPE OF FLUID LOST	QUANTITY OF LOSS	VOLUME RECOVERED
Oilfield Treanent Fluids	≈ 6 Drums	12 Drums

DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO	QUANTITY
		✓	N.A

IF YES, DESCRIBE FULLY**
N.A.

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**
This is from drums of chemicals that were cut open to remove chemical and absorbent/dirt was used to pick up any residues during the process.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**
This was done in Secondary Containment so no product contaminated the ground.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*
				Semi-industrial

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
			✓				

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**
N.D

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Ralph Corry
PRINTED NAME AND TITLE Ralph Corry Environmental Specialist
DATE 8/9/99

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS (as of 3-1-91)

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

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(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

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(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

Champion Technologies, Inc.

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. [P 388 412 295]

August 10, 1999

Oil Conservation Division
District I
P.O. Box 1980
Hobbs, NM 88241-1980

Subject: Discharge Plan GW-199, NMD986674869

Dear Mr. Sir or Madam:

Find enclosed two forms for non-hazardous waste at our facility in Hobbs, NM. I have forwarded copies of each to the OCD, Santa Fe office as required.

Should you have any questions, please contact me at the above listed phone number/address.

Sincerely,

Ralph Corry

Ralph Corry,
Environmental Specialist
Environmental, Health and Safety Department

RC/rn

Cc: Rick Braddock
Allan Childs
Mel Davis
Mike Edwards
Tommy Morrison

TO: Company/Operator_____
By: NMOCD Rep._____
Date:_____

REJECT NOTICE

Please Note Your Attached C-141 Report(s) has been rejected because of the following reason(s); Please make corrections and resubmit within 15 days unless otherwise allowed or marked for a longer time period.

Note: Failure to contact NMOCD or to re-submit within time allowed may result in a Notice of Violation being issued.

____ **Wrong form, please find new C-141 enclosed.**

____ **Incorrect or inaccurate information submitted: see comments below.**

____ **"Initial" or "Final" check box was not marked.**

____ **Missing Information; see comments below.**

____ **Wrong Operator !** Operators are responsible to submit C-141 for all leaks & spills on their leases and/or properties under their control. Second and third party responsibility is between operator and those parties.

____ **Improper Disposal of Oilfield Waste without NMOCD approval:**

____Road spreading without NMOCD approval.
____Land farming without permit or NMOCD approval.
____Burying of Oilfield Waste without NMOCD approval.
____Off-site disposal without NMOCD approval
____ Building roads, berms/dykes out of Contaminated Soils without NMOCD approval.

____ **Not Signed.**

____ **NMOCD Can not accept your C-141 as a "Final" report at this time. Please do one of the following;**

_____Submit a Site Corrective Action Plan for NMOCD approval within _____days.

_____Please Describe in detail what Clean-up Action was taken and area affected. If none taken explain why?

_____Please Describe in detail what Remediation action will be taken? If none planned please explain why?

_____Please Describe what Remediation clean-up levels will be achieved? If none planned please indicate why?

_____Operator has indicated off-site disposal, please indicate where waste was disposed of?

____ Was Vertical Extent of contamination Checked? If Yes please provide information. If No please provide Explanation?

____ Please provide Vertical extent of contamination within _____days. Please sample for one or more of the following: TPH_____, BTEX_____, Chlorides_____, Other_____: Please provide at what depth the analysis was taken.

Comments:

_____
_____
_____
_____

Please Re-Submit C-141 or information requested and include a copy of this reject notice to:

New Mexico Oil Conservation Div
District I Office
P.O. 1980
Hobbs, NM 88241

file:wp/rejform

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C- 141
Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary)

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date: Phone:	Conditions of Approval:	Attached ☐

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

(a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;

(b) an unauthorized release of any volume which:

(i) results in a fire;

(ii) will reach a water course;

(iii) may with reasonable probability endanger public health; or

(iv) results in substantial damage to property or the environment;

(c) an unauthorized release of natural gases in excess of 500 mcf; or

(d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

(1) Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, Immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73...2-1-96; A, 3-15-97]

(2) Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]

116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A.19). [3-15-97]

Champion Technologies, Inc.

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. [P 388 412 309]

August 10, 1999

Oil Conservation Division
Wayne Price
P.O. Box 2088
Santa Fe, NM 87504-2088

Subject: Discharge Plan GW-199, NMD986674869

Dear Mr. Price:

Find enclosed two forms for non-hazardous waste at our facility in Hobbs, NM. I have forwarded two copies of each to the OCD, Hobbs office as required.

Should you have any questions, please contact me at the above listed phone number/address.

Sincerely,

Ralph Corry

Ralph Corry,
Environmental Specialist
Environmental, Health and Safety Department

RC/rn

Cc: Rick Braddock
Allan Childs
Mel Davis
Mike Edwards
Tommy Morrison

DISTRICT I
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO APPROPRIATE DISTRICT OFFICE IN ACCORDANCE WITH RULE 116 PRINTED ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR	Champion Technologies, Inc.				ADDRESS	Hobbs 4001 S. Hwy 18	TELEPHONE # 505-393-7726
REPORT OF	FIRE	BREAK	SPILL ✓	LEAK ✓	BLOWOUT	OTHER*	
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* Oilfield Treatment Facility
FACILITY NAME:	Champion Technologies, Inc.						
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage	NE/4 SE/4				SEC. 15	TWP. 19S	RGE. 38E COUNTY LEA
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK	South Hwy 18 - 1.7 Miles to Hobbs						
DATE AND HOUR OF OCCURRENCE	N.D.				DATE AND HOUR OF DISCOVERY	1997	
WAS IMMEDIATE NOTICE GIVEN?	YES	NO ✓	NOT REQUIRED ✓		IF YES, TO WHOM	N.A.	
BY WHOM	N.A				DATE AND HOUR	N.A	
TYPE OF FLUID LOST	Oilfield Treatment Fluids				QUANTITY OF LOSS	≈ 25 Gal	VOLUME RECOVERED 4 Drums including dirt
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO ✓	QUANTITY	N.A			

IF YES, DESCRIBE FULLY**

N.A.

RECEIVED
AUG 1 1999
Environmental Bureau
Oil Conservation Division

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**

Inadequate secondary containment. Added additional secondary containment.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**

Several areas at Facility affected. Removed contaminated soil, Sampled area to show it was cleaned.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Semi-Industrial			
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY ✓	ROCKY	WET	DRY	SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

N.D

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Ralph Corry PRINTED NAME AND TITLE Ralph Corry Environmental Specialist DATE 8/9/99

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

DISTRICT I
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO APPROPRIATE DISTRICT OFFICE IN ACCORDANCE WITH RULE 116 PRINTED ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR	Champion Technologies, Inc.				ADDRESS	4001 S. Hwy 18 Hobbs	TELEPHONE # 505-393-7726
REPORT OF	FIRE	BREAK	SPILL ✓	LEAK	BLOWOUT	OTHER*	
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* Oilfield Treatment Facility

FACILITY NAME: Champion Technologies, Inc.

LOCATION OF FACILITY Qtr/Qtr Sec. or Footage	SEC.	TWP.	RGE.	COUNTY
NE/4 SE/4	15	19S	38E	LEA

DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK: South Hwy 18 - 1.67 Miles to Hobbs

DATE AND HOUR OF OCCURRENCE	N.D	DATE AND HOUR OF DISCOVERY	1998 - 1999

WAS IMMEDIATE NOTICE GIVEN?	YES	NO ✓	NOT REQUIRED ✓	IF YES, TO WHOM	N.A
BY WHOM	N.A			DATE AND HOUR	N.A
TYPE OF FLUID LOST	Oilfield Treanent Fluids			QUANTITY OF LOSS	≈ 6 Drums
				VOLUME RECOVERED	12 Drums

DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO ✓	QUANTITY N.A

IF YES, DESCRIBE FULLY**
N.A.

RECEIVED
AUG 1 1999
Environmental Bureau
Oil Conservation Division

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**
This is from drums of chemicals that were cut open to remove chemical and absorbent/dirt was used to pick up any residues during the process.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**
This was done in Secondary containment so no product contaminated the ground.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Semi-industrial

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY ✓	ROCKY	WET	DRY	SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**
N.D

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Ralph Corry PRINTED NAME AND TITLE Ralph Corry Environmental Specialist DATE 8/9/99

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

August 12, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 357 870 121

Mr. Ralph Corry
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Re: **Notice Of Deficiency**
ABATEMENT PLAN AP-14
Champion's Hobbs, NM Facility

Dear Mr. Corry:

The New Mexico Oil Conservation Division (NMOCD) has reviewed Champion Technologies, Inc.'s June 22, 1999 abatement plan for Champion's Hobbs, New Mexico facility. This document contains Champion's proposed stage 1 abatement plan for investigating the extent of soil and groundwater contamination.

The above referenced document is deficient because it does not contain all of the elements for a stage 1 investigation plan proposal as required by Water Quality Control Commission Regulation 20 NMAC 6.2. 4106.C. Enclosed is a copy for your reference.

Please submit the required information by August 30, 1999. If you require any further information or assistance please do not hesitate to write or call Wayne Price at (505-827-7155).

Sincerely Yours,

Roger Anderson
Environmental Bureau Chief

cc: OCD Hobbs office

permit; [12-1-95]

2. Land application of ground water contaminated with nitrogen originating from human or animal waste and not otherwise exceeding the standards of Section 3103.A of this Part and not containing a toxic pollutant as defined in Section 1101 of this Part, provided that it is done in compliance with a discharge plan approved by the secretary; [12-1-95]

3. Abatement of water pollution resulting from the withdrawal and decontamination or blending of polluted water for use as a public or private drinking-water supply, by any person other than a responsible person, unless the secretary determines that a hazard to public health may result; and [12-1-95]

4. Reasonable operation and maintenance of irrigation and flood control facilities. [12-1-95]

4106. ABATEMENT PLAN PROPOSAL.

A. Except as provided for in Section 4105 of this Part, a responsible person shall, within sixty (60) days of receipt of written notice from the secretary that an abatement plan is required, submit an abatement plan proposal to the secretary for approval. For good cause shown, the secretary may allow for a total of one hundred and twenty (120) days to prepare and submit the abatement plan proposal. [12-1-95]

B. Voluntary Abatement.

1. Any person wishing to abate water pollution in excess of the standards and requirements set forth in Section 4103 of this Part may submit a Stage 1 abatement plan proposal to the secretary for approval. Following approval by the secretary of a final site investigation report prepared pursuant to Stage 1 of an abatement plan, any person may submit a Stage 2 abatement plan proposal to the secretary for approval. [12-1-95]

2. Following approval of a Stage 1 or Stage 2 abatement plan proposal under Subsection B.1 of this Section, the person submitting the approved plan shall be a responsible person under this Subpart for the purpose of performing the approved Stage 1 or Stage 2 abatement plan. Nothing in this Section shall preclude the secretary from applying Section 1203.A.9 of this Part to a responsible person if applicable. [12-1-95]

C. Stage 1 Abatement Plan.

The purpose of Stage 1 of the abatement plan shall be to design and conduct a site investigation that will adequately define site conditions, and provide the data necessary to select and design an effective abatement option. Stage 1 of the abatement plan

may include, but not necessarily be limited to, the following information depending on the media affected, and as needed to select and implement an expeditious abatement option: [12-1-95]

1. Descriptions of the site, including a site map, and of site history including the nature of the discharge that caused the water pollution, and a summary of previous investigations; [12-1-95]

2. Site investigation workplan to define:

a. site geology and hydrogeology, the vertical and horizontal extent and magnitude of vadose-zone and ground-water contamination, subsurface hydraulic parameters including hydraulic conductivity, transmissivity, storativity, and rate and direction of contaminant migration, inventory of water wells inside and within one (1) mile from the perimeter of the three-dimensional body where the standards set forth in Section 4103.B are exceeded, and location and number of such wells actually or potentially affected by the pollution; and

b. surface-water hydrology, seasonal stream flow characteristics, ground-water/surface-water relationships, the vertical and horizontal extent and magnitude of contamination and impacts to surface water and stream sediments. The magnitude of contamination and impacts on surface water may be, in part, defined by conducting a biological assessment of fish, benthic macroinvertebrates and other wildlife populations. Seasonal variations should be accounted for when conducting these assessments. [12-1-95]

3. Monitoring program, including sampling stations and frequencies, for the duration of the abatement plan that may be modified, after approval by the secretary, as additional sampling stations are created; [12-1-95]

4. Quality assurance plan, consistent with the sampling and analytical techniques listed in Section 3107.B of this Part and with Section 1103 of the Water Quality Standards for Interstate and Intrastate Streams in New Mexico (20 NMAC 6.1), for all work to be conducted pursuant to the abatement plan; [12-1-95]

5. Site health and safety plan for all work to be performed pursuant to the abatement plan; [12-1-95]

6. A schedule for all Stage 1 abatement plan activities, including the submission of summary quarterly progress reports, and the submission, for approval by the secretary, of a detailed final site investigation report; and [12-1-95]

7. Any additional information that may be required to design and perform an adequate site investigation. [12-1-95]

July 7, 1999

Mr. Wayne Price
N.M. Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Wayne,

I am writing to clarify a comment on the chain of custody associated with Pinnacle Laboratories' Accession Number 812044. This corresponds to your project GW-199 (Champion-Hobbs).

The specific item on the chain of custody (COC) is a comment written by our sample custodian. This comment reads as follows: "1 soil sample rec'd wet, alternate soil sample used."

The confusion appears to be centered on the phraseology of the comment. Specifically, what is meant by alternate soil sample?

Again, referring to the COC, there were five (5) sample bottles submitted for the sample identified as 9812081209. There were five (5) tests slated and each bottle associated with this sample was prelabeled for this test. Since one bottle was clearly wet from a shipping mishap, one of the remaining four (4) sample bottles were used. This is what was meant by an alternate bottle.

It should be made clear that the four bottles collected on 12/08/98 and accepted by the laboratory (12/09/98) for analytical were used to accomplish all the required tasks.

If any further confusion remains on this phraseology, we would welcome any questions or comments.

Sincerely,

Mitch Rubenstein, Ph.D.
President/CEO

American Environmental Network (NM), Inc.

CHAIN OF CUSTODY

DATE: 12/08/98 PAGE: 1 OF 1

AEN NM Accession #: 812044

SHADED AREAS ARE FOR LAB USE ONLY

PLEASE FILL THIS FORM IN COMPLETELY.

PROJECT MANAGER:

COMPANY: NMOCD
ADDRESS: 2040 South PACHECO
SANTA Fe NM 87505
PHONE: 505-827-7155
FAX:
BILL TO: S.A.B
COMPANY:
ADDRESS:

ANALYSIS REQUEST

SAMPLE ID	DATE	TIME	MATRIX	LAB ID	Petroleum Hydrocarbons (418.1) TRPH	(MOD.8015) Diesel/Direct Inject	(M8015) Gas/Purge & Trap	8021 (BTEX)/8015 (Gasoline)	8021 (BTEX) ☐MTBE ☐TMB ☐PCE	8021 (TCL)	8021 (EDX)	8021 (HALO)	8021 (CUST)	504.1 EDB ☐ / DBCP ☐	8260 (TCL) Volatile Organics	8260 (Full) Volatile Organics	8260 (CUST) Volatile Organics	8260 (Landfill) Volatile Organics	Pesticides /PCB (608/8081)	Herbicides (615/8151)	Base/Neutral/Acid Compounds GC/MS (625/8270)	Polynuclear Aromatics (610/8310)	General Chemistry: OCD + BR	PH	Priority Pollutant Metals (13)	Target Analyte List Metals (23)	RCRA Metals (8)	RCRA Metals by TCLP (Method 1311)	Metals: OCD + CAT Ag's	* MIX & GRIND SOIL SAMPLE	NUMBER OF CONTAINERS
9812081151	12/08/98	11:51 AM	WATER	01													X				X	X	X						X		12
9812081209	12/08/98	12:09 PM	SOIL	02													X				X	X							X	*	5
Trip Blank	12/4	1245	AQ	03													X														1

PROJECT INFORMATION

PROJ. NO.: 92-199
PROJ. NAME: CHAMPION-HOBBS
P.O. NO.:
SHIPPED VIA:

SAMPLE RECEIPT

NO. CONTAINERS	18
CUSTODY SEALS	Y / N / NA
RECEIVED INTACT	Y / N
BLUE ICE/ICE	Y / N

PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS

(RUSH) ☐24hr ☐48hr ☐72hr ☐1 WEEK (NORMAL) X

CERTIFICATION REQUIRED: ☐NM ☐SDWA ☐OTHER

METHANOL PRESERVATION ( ) ICE +

COMMENTS: FIXED FEE ☐

* MIX + GRIND SOIL SAMPLE (METALS) BEFORE SAMPLING! SMALL YELLOW ROCKS TO BE GROUND-UP!
RETAIN SAMPLE UNTIL OCD NOTIFIES!
If soil sample recd wet, alternate soil sample used.

RELINQUISHED BY: 1.

Signature: Time: 3:00 PM
Printed Name: ZANDE PRICE Date: 12/08/98
Company: NMOCD

RECEIVED BY: 1.

Signature: Time:
Printed Name: Date:
Company:

RELINQUISHED BY: 2.

Signature: Time:
Printed Name: Date:
Company:

RECEIVED BY (LAB): 2.

Signature: Time: 0955
Printed Name: Date: 12/9/98
American Environmental Network (NM), Inc.

1/5/98 AEN Inc.: American Environmental Network (NM), Inc. • 2709-D Pan American Freeway, NE • Albuquerque, New Mexico 87107 • (505) 344-3777 • Fax (505) 344-4413

DISTRIBUTION: White - AEN, Canary - Originator

Sent by: PINNACLE LABS Jul-07-99 04:49pm from 3443777 page 2/2

Champion Technologies, Inc.

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. [Z 266 064 721]

June 22, 1999

Mr. Roger Anderson
New Mexico – Oil Conservation Division
2040 South Pacheco
P.O. Box 6429
Santa Fe, NM 87505-5472

Subject: Discharge Plan (GW-199) Inspection on 12/8/98
Abatement Plan

Dear Mr. Anderson:

The purpose of this letter is to submit Stage I of the Abatement Plan for our facility in Hobbs, NM.

Champion Technologies, Inc. operates an oilfield service company at this location. Champion Technologies, Inc. has been at this location for approximately 25 years. Prior to this, the location was a trucking company.

The Champion Technologies, Inc. Hobbs, N.M. Facility, is located approximately 1.7 miles south of Hobbs on Highway 18. The address for the facility is 4001 S. Hwy 18. It occupies a 7 acre rectangular plot on the west side of Highway 18. The surface of the grounds is mostly sand with some caliche and asphalt. The asphalt was left from the previous occupant of this plot.

The Site Plan Map follows the numbered description below for this facility.

Area 1 - Office

Area 2 - Cemented parking area

Area 3 - Cemented bulk tank area of chemicals

Area 4 - Cemented drum storage area for chemicals

Area 5 - Warehouse, office, and change area, with loading dock on east side

Area 6 - Empty drum storage area

Area 7 - Miscellaneous storage area for old tanks and equipment (no chemicals)

Area 8 - Cemented drum storage area for chemicals

Area 9 - Treating stock chemical with fiberglass secondary containment

Area 10 - Water well

Area 11 - Chemical loading area

The remainder of the grounds is used for equipment storage such as empty storage tanks and treater trucks. The facility is completely enclosed by a chain link fence with an entrance through a gate facing the highway or through the office building. The facility is bordered by the highway on the east side, unoccupied barren land on the west side, a residence and barren land on the south side, and another oilfield service company on the north side.

The grounds of the facility slop down slightly from east to west so that rainwater flows off the property near the northwest corner. There are no surface water bodies in the area or within 1 mile of the facility. Water for the area is supplied by well.

Previous soil investigation/sampling was performed for the septic tank lateral in 1996 and soil sampling/removal per NMED LOV in 1998. All violations cited by the NMED in 1998 were addressed as required.

The new water well was sampled for chlorides and TDS on April 4, 1995 for the OCD plan. In 1998 the chlorides and TDS were in the same range as now. It is our understanding that other wells in this area have been sampled by the OCD and the results should show that the TDS and chloride background levels are consistent with our well.

The yellow stained soil area which had excess chromium, according to OCD, will be resampled for EPA RCRA constituents for metals. In addition, lead, chromium, manganese, nickel, chloride and soluble sulfates that exceeded the standards for groundwater will be checked. The sampling shall consist of the following:

1) A grab sample on the surface at the stained areas.
2) A sample 12 inches underneath the soil at the same spot.
3) A sample 5 feet outside the area.
4) A background sample

An independent consultant will do the sampling and summary report. The consultant will be responsible for the site safety and health during sampling; however, Champion Technologies, Inc. will review all actions.

Champion Technologies, Inc. will inform the OCD five days in advance of any sampling to be done by the consultant.

If there are any questions, contact Mel Davis or myself at 281-431-2561.

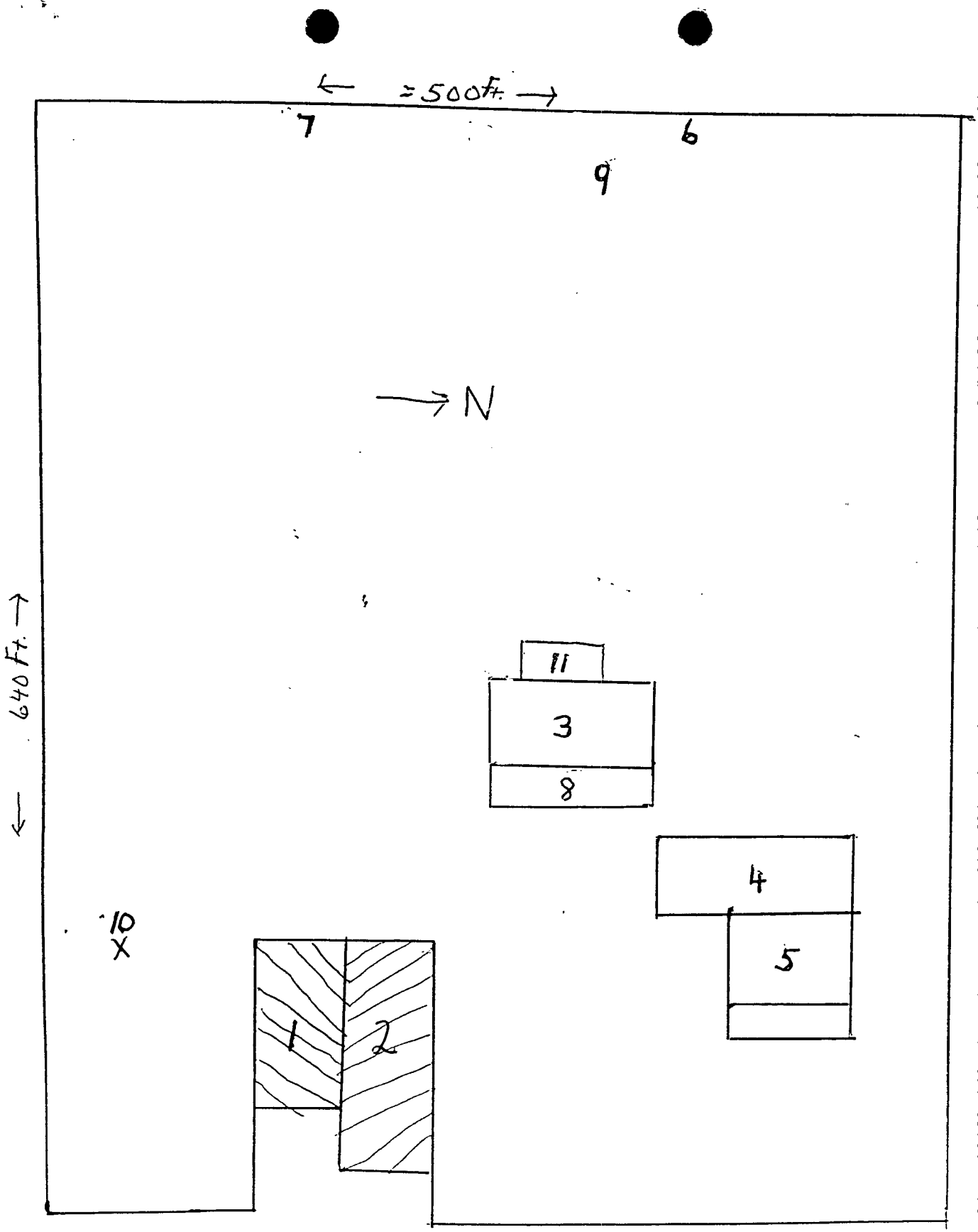
Sincerely yours,

Ralph Corry

Ralph Corry
Environmental Specialist
Environmental, Health and Safety Department

RC/rn

CC: Braddock, Rick
Childs, Allan
Davis, Mel
Edwards, Mike
Hainebach, Charlie
Meyer, Clarence
Moran, Mike
Morrison, Tommy



South Highway 18 → 1.7 Miles to Hobbs

Champion Technologies, Inc.

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. [Z 266 064 717]

June 15, 1999

Mr. Wayne Price
Energy, Minerals and Natural Resources Department
Oil Conservation Division (OCD)
2040 South Pacheco
P.O. Box 6429
Santa Fe, NM 87505-5472

Subject: Discharge Plan GW-199, Hobbs Facility

Dear Mr. Price:

Find enclosed a revised discharge plan (GW-199) for the Hobbs, NM facility. Also enclosed is a second copy as required. A copy has been forwarded to Mr. Gary Wink at your Division District Office in Hobbs as well.

If you should have any questions, please contact me at 281-431-2561.

Sincerely,

Ralph Corry

Ralph Corry
Environmental Specialist

RC/rn

Cc: Braddock, Rick (w/o enclosure)
Childs, Allan
Davis, Mel (w/o enclosure)
Edwards, Mike
Hainebach, Charlie (w/o enclosure)
Moran, Mike (w/o enclosure)
Morrison, Tommy
Meyer, Clarence

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES

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

I. TYPE: Oilfield Chemical Distribution Site

II. OPERATOR: Champion Technologies, Inc.

ADDRESS: P.O. Box 2187, Hobbs, NM 88240

CONTACT PERSON: Tommy Morrison PHONE: (505) 393-7726

III. LOCATION: NE/4 SE/4 Section 15 Township 19S Range 38E
Submit large scale topographic map showing exact location.

IV. Attach the name and address of the landowner of the disposal facility site.
(Does not apply to this facility)

V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks of the facility. (See Write-Up)

VI. Attach a description of all materials stored or used at the facility.
(See Write-Up)

VII. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
(See Write-Up)

VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
(See Write-Up)

IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
(Does not apply to this facility)

X. Attach a routine inspection and maintenance plan to ensure permit compliance.
(See Write-Up)

XI. Attach a contingency plan for reporting and clean-up of spills or releases.
(See Write-Up)

XII. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
(Does not apply to this facility)

XIII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
(See Write-Up)

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

Name: Ralph Corry Title: Environmental Specialist

Signature: Ralph Corry Date: 6/15/99

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

Well
Drill Hole
Oil Well
Well
Gravel Pits
Gravel Pit
Radio Tower
Belvue Ch
Aldersgate Ch
Bel Aire Ch
Memory Gardens (Cem)
Drive-In Theater
Memorial Park (Cem)
Bel Aire Shopping Center
Sanger Sch
WT
County Hospital
Broadmoor Shopping Center
Green Acres Park
Radio Tower (WEW)
HOBBS
OIL FIELD
Humble Park
Bensing Park
Jefferson Sch
Will Rogers Sch
City Park
City Hall
Houston Jr High Sch
PO
Trailer Park
Faith Chapel
Bender Park
Refinery
Edison Sch
Southern Heights Sch
Radio Tower
Gravel Pits
Heizer Park
Substa
Heizer Jr High Sch
Gravel Pit
Well
Well
RM 3601
Radio Tower
Drill Hole
Drill Hole
Pumping Sta
Drill Hole
Drill Hole
Wells
PIPELINE
SAN ANDRES DR
PENNINGTON ST
GRIMES ST
COLEMAN
COCHRAN
TURNER
LEECH
HOUSTON
BENDER BLVD
MARLAND BLVD
SCHARBAUER ST
SNYDER ST
BROADWAY
MAIN ST
TEMPLE ST
SANGER ST
LORENE DR
BERRY DR
TEXAS-NE
SEMINOLE, TEXAS 29 MI
LAMESA, TEXAS 72 MI
(HOBBS EAST) 5349 LINE
630 000 FEET
42'30"
40'
T 18 S
T 19 S
CHAMPION TECHNOLOGIES HOBBS, N.M.

CHAMPION TECHNOLOGIES, INC.
HOBBS, N.M., - SITE PLAN
(SECTION V)

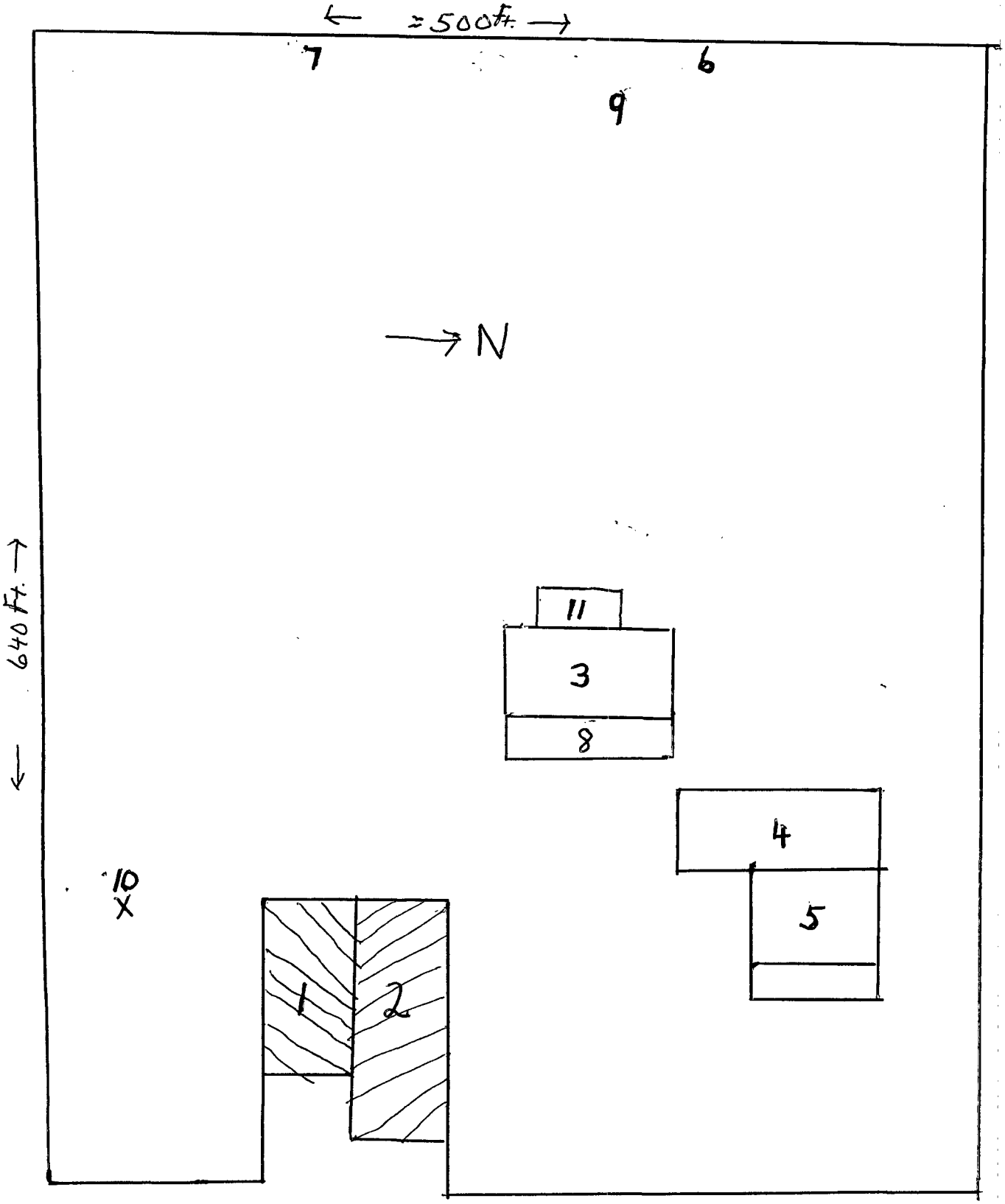
The Champion Technologies, Inc. Hobbs, N.M. Facility, is located approximately 1.7 miles south of Hobbs on Highway 18. The address for the facility is 4001 S. Hwy 18. It occupies a 7 acre rectangular plot on the west side of Highway 18. The surface of the grounds is mostly sand with some caliche and asphalt. The asphalt was left from the previous occupant of this plot.

The Site Plan Map following this description of the facility is numbered and should be referenced with this write-up.

Area 1 -	Office
Area 2 -	Cemented parking area
Area 3 -	Cemented bulk tank area of chemicals
Area 4 -	Cemented drum storage area for chemicals
Area 5 -	Warehouse, office, and change area, with loading dock on east side
Area 6 -	Empty drum storage area
Area 7 -	Miscellaneous storage area for old tanks and equipment (no chemicals)
Area 8 -	Cemented drum storage area for chemicals
Area 9 -	Treating stock chemical with fiberglass secondary containment
Area 10 -	Water well
Area 11 -	Chemical loading area

The remainder of the grounds is used for equipment storage such as empty storage tanks and treater trucks. The facility is completely enclosed by a chain link fence with an entrance through a gate facing the highway or through the office building. The facility is bordered by the highway on the east side, unoccupied barren land on the west side, a residence and barren land on the south side, and another oilfield service company on the north side.

The grounds of the facility slop down slightly from east to west so that rainwater flows off the property near the northwest corner. There are no surface water bodies in the area or within 1 mile of the facility. Water for the area is supplied by well.



South Highway 18 → 1.7 Miles to Hobbs

Production Chemicals Stored at the Facility (Section VI)

Description of chemicals

Cortrons: Corrosion inhibitors for the oilfield that normally consist of Imadazolines, amines, fatty acids, and various organic solvents. Sometimes the solvent is water. The organic solvents are usually mixed alcohols or heavy aromatic naphthas.

Scortrons: Combination scale and corrosion inhibitors that normally consist of the same things found in corrosion with the addition of phosphonates, amides, and bisulfites.

Gyptrons: Scale treating compounds for the oilfield that are used either to prevent scale from forming or removing it. This line normally consists of products based on water soluble phosphonates either in the neutralized or unneutralized form.

Emulsotrons: Chemicals for treating oilfield oil and water emulsions will normally consist of surfactants in an organic solvent such as heavy aromatic naphtha.

Flexoils: Paraffin treating compounds for the oilfield. Normally consists of high molecular weight polymers in an organic solvent such as xylene, toluene, or heavy aromatic naphtha.

Flotrons: Paraffin treating compounds for the oilfield that generally consist of surfactants in either aqueous or organic solvent. Solvents for organic blends are heavy aromatic naphtha or xylene, etc. Aqueous blends consist of water, methanol, or isopropanol as the solvent system.

Gas Treat: Amine based chemicals for treating sour gas.

Foamatrons: Blends much like Surfatrons chemistry.

Defoamers: Organic solvent based chemicals for preventing or removing foam problems in the oilfield.

Bactrons: Bacteriocides for treating oilfield corrosion problems. These normally consist of aldehyde or quaternary amine chemistry.

Cleartrons: Used for water clarification in the oilfield to remove residual amounts of oil from water. These chemicals normally consist of polymers in an aqueous solvent system.

Xylene & Han: Oil base hydrocarbons used as solvents in oilfield chemical treatment mixtures.

Methanol & IPA: Alcohol used as solvents in oilfield treatment mixtures.

Following this site plan description is a list of chemicals found in Areas 3, 4 and 8. There are no chemicals stored in the warehouse. All chemicals for the facility are stored in areas 3, 4 and 8.

Area 3

HOBBS BULK CHEMICAL

Chemical Name	Tank Size	Tank Type
Emulsotron XT-810	4,000 Gallon	Steel
Emulsotron X-79885	4,000 Gallon	Steel
Xylene	4,000 Gallon	Steel
Cortron R-2437	4,000 Gallon	Steel
Surfatron DN-89	4,000 Gallon	Steel
Flotron M-43	4,000 Gallon	Steel
Cortron R-2264	4,000 Gallon	Steel
Scortron G-38	4,000 Gallon	Steel
Cortron R-2239	4,000 Gallon	Steel
Fresh Water	3,000 Gallon	Poly
Cortron RN-211	3,000 Gallon	Poly
Cortron R-129	4,000 Gallon	Steel
Scortron GR-99	3,000 Gallon	Poly
Cortron RN-219	3,000 Gallon	Poly
Cortron R-129	4,000 Gallon	Steel

Area 4 & 8

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
20003	Gyptron TC-30			
20030	Gyptron TSD			
20045	Gyptron T-130			
20051	Gyptron T-133			
20054	Gyptron T-138			
20144	Gyptron TA-13			
20173	Gyptron T-96			
20176	Gyptron T-57			
20179	Gyptron T-59			
20180	Gyptron T-67			
20190	Gyptron T-115			
20191	Gyptron T-114			
20198	Gyptron T-131			
20199	Gyptron T-124			
20224	Gyptron T-144			
20242	Gyptron T-156			
20253	Gyptron TA-25			
20262	Gyptron T-160			
20280	Gyptron T-186			
20309	Gyptron T-85			
20321	Gyptron T-219			
20338	Gyptron T-242			
20346	Gyptron T-249			
20838	Gyptron T-164			
22117	Gyptron T-120			
20363	Gyptron T-275			
20373	Gyptron T-315			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
10033	Cortron R-2255			
10172	Cortron R-2302			
10190	Cortron R-2314			
10348	Cortron RN-165			
10362	Cortron RH-147			
10480	Cortron RN-178			
10564	Cortron R-2263			
10565	Cortron R-2264			
10642	Cortron RN-187			
10647	Cortron R-2400			
10654	Cortron R-2392			
10694	Cortron RU-189			
10696	Cortron RN-206			
10770	Cortron RN-99			
10785	Cortron R-228			
10965	Cortron RU-160			
10979	Cortron RU-178			
11045	Cortron R-2438			
11048	Cortron R-2440			
11069	Cortron RU-206			
11073	Cortron RU-205			
11080	Cortron Q-28			
11082	Cortron RN-217			
11083	Cortron RP-100			
11113	Cortron RU-216			
11129	Cortron RN-234			
11141	Cortron R-2473			
11149	Cortron RN-240			
11150	Cortron RN-241			
11158	Cortron RU-231			
11163	Cortron R-2479			
11231	Cortron RPA-627			
11245	Cortron R-2485			
11288	Cortron RN-319			
11166	Cortron R-2478			
	Cortron RU-142			
10074	Cortron RH-67			
	Cortron RU-258			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
80961	Emulsotron X-435			
85395	Emulsotron X-733			
80001	Emulsotron X-512			
80005	Emulsotron X-690			
80007	Emulsotron X-690S			
80067	Emulsotron X-185			
80075	Emulsotron XA-42			
80221	Emulsotron X-203			
80251	Emulsotron XA-34			
80421	Emulsotron X-283			
80485	Emulsotron X-242			
80729	Emulsotron X-318			
80782	Emulsotron X- 690B5			
80798	Emulsotron X- 512B5			
80869	Emulsotron X- 299B5			
80251	Emulsotron XA-34			
81089	Emulsotron X-690SB3			
81109	Emulsotron X-453			
81253	Emulsotron XA34B3			
81334	Emulsotron XZ-409			
81375	Emulsotron XM-418			
81576	Emulsotron X-787			
81598	Emulsotron X-805			
85087	Emulsotron X-839			
85394	Emulsotron XA-807			
86241	Emulsotron X-741			
88051	Emulsotron X-1021			
88076	Emulsotron X-1046			
88091	Emulsotron X-1060			
88177	Emulsotron X-1115			
88241	Emulsotron X-1161			
88255	Emulsotron X-1172			
88388	Emulsotron X-1329			
88567	Emulsotron X-1216			
	Emulsotron XF-421/MN53			
85286	Emulsotron X-965			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
60038	Defoamer V-111			
60052	Defoamer V-26			
60056	Defoamer VDF-127			
60084	Defoamer V-134			
60119	Defoamer V-57			
70025	Bactron K-24			
70002	Bactron K-31			
85221	Cleartron ZB167			
85224	Cleartron ZB-168			
85379	Cleartron ZB-199			
85435	Cleartron ZB-206			
88391	Cleartron ZB-196			
	HAN	1		
	CODE – 7	5		
	TEG-	6		
	EG			
	IPA			
	METHANOL			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
40136	Surfatron DN-87			
50000	Surfatron DN-71			
50001	Surfatron DP-61			
50006	Surfatron DT-28			
50149	Surfatron DP-85			
50152	Surfatron DN-89			
50180	Surfatron DN-98			
50182	Surfatron DN-100			
50206	Surfatron DQ-60			
50220	Surfatron DT-72			
50221	Surfatron DT-73			
50231	Surfatron DP-99			
50241	Surfatron DN-115			
50245	Surfatron DP-104			
50262	Surfatron DT-78			
50514	Surfatron S-27			
60056	Surfatron DP77MX			
60084	Surfatron DP-63			
60119	Surfatron DN-83			
50183	Surfatron DN-101			
60007	Surfatron DW			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
40007	Scortron GV-50			
40057	Scortron G-39			
40088	Gas Treat GT-102			
40098	Scortron G-42			
40121	Scortron GR-104			
40136	Scortron GR-114			
40144	Gas Treat GT-115			
40158	Scortron GR123			
40174	Gas Treat GT-136			
40305	Scortron GR-72			
60056	Scortron GR-100			
60084	Scortron GR-85			
60119	Scortron GR-89			
40306	Scortron GR-99			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
30033	Flotron M-78			
30067	Flotron M-157			
30087	Flexoil FM-150			
30147	Flexoil FM-74			
30170	Flexoil FM-94			
30183	Flexoil FM-102			
30185	Flotron M-145			
30203	Flotron MG-51			
30215	Flotron M-152			
30219	Flexoil FM-116			
40136	Flotron M-154			
60056	Flotron M-118			
60084	Flotron MN-53			
60119	Flotron M-136			
90009	XYLENE			
	Flotron M-115			

HOBBS FACILITY WASTE DISPOSAL
(Section VII and VIII)

Domestic sewage that is generated from this site is from the office and warehouse areas. Sewage from these two building flows into an underground septic tank which is dispersed into the ground through lateral lines. The sewage that flows into the septic system is nothing more than what would be disposed from a household.

On an intermittent basis, some products may become obsolete or off-spec at the facility. If the Hobbs facility cannot reuse these products, some will be shipped to the Odessa Plant to be reused in a finished product. The same is true for the material generated when cleaning the empty drums in the empty drum storage area.

If a material cannot be used in Odessa, then some may be sucked up by our treater trucks at Hobbs and used alongside our corrosion treatment in the oilfield. This material is the Mix Treatment Fluids.

From time to time, a small percentage of the material cannot be used in the field or at Odessa, then it becomes a waste. A determination is then made to decide if the waste is hazardous or non-hazardous based on testing and process knowledge. Most hazardous waste generated at Hobbs will be due to waste being corrosive and/or flammable.

Also waste is generated from floor sweepings and de minimis spills in which absorbent is used to clean up the spill. As above, a determination of hazardous/non-hazardous is then made.

Most waste generated at Hobbs will be shipped to CRS in Hobbs, Rhineco in Arkansas, or WCS in Andrews, Texas for storage/treatment/disposal.

ROUTINE INSPECTION AND MAINTENANCE PLAN
(Section X)

Bulk Tank Area: Visual inspection of tanks, valves, piping, and pumps twice weekly. Any leaks should be corrected immediately if possible. If problem calls for outside assistance, Emergency Coordinator will be notified immediately so that corrective action can be taken ASAP.

Drum Storage Area: Drum area is visually inspected on a daily basis. All drums are stored on a cemented diked containment area. Inspections follow the same inspection routine as the bulk tank area. Should a leak be detected, the drum will be placed inside a temporary fiberglass containment box and redrummed or overpacked. All leaks will be reported immediately to the Emergency Coordinator. Drums will always be checked for weak spots (rusted areas) or for the possibility of leaking.

Remainder of Plant Grounds: The remainder of the plant will be inspected daily to make sure that there are not any chemicals left in open top drums or containers. To prevent rain water from filling these open top or cut off containers and thus possibly spilling chemical onto the ground, Champion Technologies, Inc. will simply invert these containers so that they will not hold fluids. In order to do this tough, the containers must be empty when inverted. Another remedy to this situation is to cover the open top containers with a tarp or plastic.

SPILL/LEAK PREVENTION AND REPORTING PROCEDURES
CONTINGENCY PLAN
(Section XI)

The Hobbs facility handles chemicals in bulk and in drum quantities. The bulk tanks are set in a cemented, curbed area to handle leakage or spills within the curbed area. Should a leak occur in the piping or in one of the bulk tanks, it can normally be controlled by shutting off valves or by transferring chemical to another tank or truck for temporary storage. Champion Technologies, Inc. has personnel that observe this area everyday.

Loading of the bulk tanks is through hoses and fittings from a bulk truck. The connection to the bulk tanks is located inside the curbed area. The truck connection is not. Normal procedure calls for a bucket or pail to be placed under the truck connection to catch any leaks.

Drummed chemicals are stored both on cement and the ground. Some are stored on wooden pallets and some are not. While it is known that this is not the best possible way to handle these drummed chemicals, Champion Technologies, Inc. believes that future site plans will remedy the current situation. These plans call for building a new cemented, diked area, so that the bulk tank farm can be transferred onto it. The old, or present curbed area, could then be used to store the drummed chemicals. A more immediate remedy would be to make sure all chemicals are at least stored on wooden or possibly drainage pallets to contain leaks and get them off the ground.

EMERGENCY COORDINATOR

The emergency coordinator for the Hobbs facility is Tommy Morrison who is also the District Manager for the Hobbs District. While Mr. Morrison is frequently away from the site to take care of company business, he can still be reached by car phone or beeper. His office has on file (hard copy) a MSDS for every chemical stored on its site. He also has access to a computer MSDS if needed. The coordinator is familiar with this plan and the appropriate response should a significant leak or spill of a hazardous chemical occur. He also has the authority to commit the resources necessary to carry out the plan or response. Whenever there is an imminent or actual emergency situation, the emergency coordinator will immediately:

1. Evaluate the situation and stop the leak or spill if it can be done without risk to health and well being.
2. If it is a small leak or spill that can be handled by the Champion Technologies, Inc. personnel on site, then it should be removed by shovel or the appropriate equipment and absorbent.
3. If the spill or leak is considered a significant one and judged to be a threat to the surrounding area, outside help should be called in with heavy equipment to build earthen berms to contain any runoff.
4. Determine if the RQ of the material has been reached and if it has endangered the health and well being of the public or the environment.
5. Contact Champion Technologies, Inc.'s Environmental, Health and Safety Department for help or to report the incident.
6. Notify the appropriate Local, State, and National authorities (agencies), including the OCD Director at (505) 827-7131.
7. After spill or leak has been stopped, begin steps to remediate affected areas.

HOBBS, NEW MEXICO

4001 South Hwy. 18, 88240, District 30
(505) 393-7726

EMERGENCY NUMBER Request for Fire, Sheriff, and Paramedics	**911**
LEPC Lea County 300 North Turner Hobbs, NM 88240 Attn: David Hooten	**(505) 397-9231**
FIRE DEPARTMENT Hobbs Fire Department 301 East White Street Hobbs, NM 88240	**911** **(505) 397-7252**
HOSPITAL: Columbia Lea Regional Hospital 5419 Lovington Hwy. Hobbs, NM 88240	**(505) 392-6581**
NATIONAL RESPONSE CENTER	**(800) 424-8802**
EMERGENCY RESPONSE CENTER	
CHEMTREC	**(800) 424-9300**
CHEMICAL REFERRAL CENTER	**(800) 262-8200**
PLANT/DISTRICT CONTACTS:	
Tommy Morrison	
Mike Edwards	**(505) 392 1230**
SUGGESTED LOCAL NUMBERS:	
Vacuum Truck: Pool Service Key Trucking	**(505) 392 2577** **(505) 397-4994**
Wrecker: P&W Wrecker	**(505) 393-3715**

MISCELLANEOUS SITE INFORMATION
(Section XIII)

The well record for the latest water well that was drilled at the Hobbs facility is attached to this plan. It shows that after you drill 1 foot you reach caliche, and the driller's log shows caliche for the next 20 feet. While caliche is not cement, it is a fairly hard and impermeable surface itself. A spill or leak is not going to penetrate far if attended to properly. Caliche can also act as an absorbent because of the clays that are intermixed.

There are many water wells in the immediate area of the Hobbs facility. All water is supplied by well in the surrounding area and there are residences and other companies located nearby. All wells are used by the entity that owns the well. It is not for public supply. The well for the Hobbs facility pumps water from a depth of 44 to 133 feet that consists primarily of sand and sandstone. An analysis of the well water is attached. A chemical spill or leak would have to penetrate more than 40 feet of caliche and sandstone to reach the ground water. If this plan is followed, the Hobbs facility should hardly ever be a threat to contaminate ground water.

Flooding is not a problem. Stormwater normally exits the property as quickly as it accumulates. Sometimes it does rain hard enough to have standing water on the property, but this is not to say that the property is flooding. The only reason that Champion Technologies, Inc. might want to take measures to control runoff is in case there is a significant spill or leak from an onsite tanker or in the bulk tank farm area. This would only apply in the situation where there is rain and a large amount of chemical on the ground or in a diked area that might run over onto the ground.

The Hobbs facility is actually a very simple operation. There are no surface impoundments, pits, or areas where fluids are allowed to evaporate from the ground. With some facility improvements in the near future, such as the construction of a new cemented diked containment area and the plugging of the two (2) non functional water wells, the Hobbs operation will essentially eliminate most of the possibilities for seepage contamination. It is also believed that groundwater contamination is reduced to nil if this plan is followed and good prevention common sense is used by the Hobb's personnel.

P. O. BOX 1468
MONAHANS, TEXAS 79756
PH. 943-3234 OR 563-1040

Martin Water Laboratories, Inc.

709 W. INDIANA
MIDLAND, TEXAS 79701
PHONE 683-4521

RESULT OF WATER ANALYSES

TO: Mr. Robert Middleton
P. O. Box 2187, Hobbs, NM 88240

LABORATORY NO. 495145
SAMPLE RECEIVED 4-24-95
RESULTS REPORTED 4-26-95

COMPANY Champion Technologies, Inc. LEASE
FIELD OR POOL
SECTION BLOCK SURVEY COUNTY Lea STATE NM
SOURCE OF SAMPLE AND DATE TAKEN:
NO. 1 Drinking water - taken @ Hobbs laboratory.
NO. 2
NO. 3
NO. 4
REMARKS:

CHEMICAL AND PHYSICAL PROPERTIES	NO. 1	NO. 2	NO. 3	NO. 4
Specific Gravity at 60° F.	1.0025			
pH When Sampled				
pH When Received	7.00			
Bicarbonate as HCO_3	244			
Supersaturation as $CaCO_3$				
Undersaturation as $CaCO_3$				
Total Hardness as $CaCO_3$	520			
Calcium as Ca	168			
Magnesium as Mg	24			
Sodium and/or Potassium	138			
Sulfate as SO_4	86			
Chloride as Cl	376			
Iron as Fe	0.04			
Barium as Ba				
Turbidity, Electric				
Color as Pt				
Total Solids, Calculated	1,036			
Temperature °F.				
Carbon Dioxide, Calculated				
Dissolved Oxygen,				
Hydrogen Sulfide	0.0			
Resistivity, ohms/m at 77° F.	6.11			
Suspended Oil				
Filtrable Solids as mg/l				
Volume Filtered, ml				
Nitrate, as N	1.4			

Results Reported As Milligrams Per Liter

Additional Determinations And Remarks The undersigned certifies the above to be true and correct to the best of his knowledge and belief.

Form No. 3

By
Waylan C. Martin, M.A.

Depth in Feet		Thickness in Feet	Color and Type of Material Encountered
From	To		
0	1	1	Top Soil
1	21	20	Caliche
21	23	2	SaNDSTONE
23	44	21	Caliche & Sandy Clay
44	120	76	Sand & Sandstone Stringers
120	124	4	Sandstone
124	138	14	Sand & Gravel

Revised June 1972

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

) Owner of well Jim Spradley Owner's Well No. _____
Street or Post Office Address P.O. Box 2187
City and State Hobbs, N.M. 88240

ell was drilled under Permit No. L-10,322 and is located in the:

a. _____ ¼ SE ¼ ~~NW~~ NE¼ ¼ SE ¼ of Section ~~17~~ 15 Township 19S Range 38E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in Lea County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in the _____ Grant.

) Drilling Contractor Alan Eades License No. WD-1044

ddress 1200 E. Bender, Hobbs, N.M. 88240

illing Began 4-13-93 Completed 4-13-93 Type tools Rotary Size of hole 8 in.

evation of land surface or _____ at well is _____ ft. Total depth of well 133 ft.

ompleted well is [X] shallow [ ] artesian. Depth to water upon completion of well 44 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet From	Depth in Feet To	Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
44	133	89	Sand & Sandstone Stringers Sandstone, Sand & Gravel	35

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet Top	Depth in Feet Bottom	Length (feet)	Type of Shoe	Perforations From	Perforations To
5 3/4	160psi				133		113	133

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet From	Depth in Feet To	Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by:

_____
State Engineer Representative

No.	Depth in Feet Top	Depth in Feet Bottom	Cubic Feet of Cement
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received May 7, 1993 Quad _____ FWL _____ FSL _____

File No. L-10,322 Use D & S Location No. 19.38.15.42424

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES

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

I. TYPE: Oilfield Chemical Distribution Site

II. OPERATOR: Champion Technologies, Inc.

ADDRESS: P.O. Box 2187, Hobbs, NM 88240

CONTACT PERSON: Tommy Morrison PHONE: (505) 393-7726

III. LOCATION: NE/4 SE/4 Section 15 Township 19S Range 38E
Submit large scale topographic map showing exact location.

IV. Attach the name and address of the landowner of the disposal facility site.
(Does not apply to this facility)

V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks of the facility. (See Write-Up)

VI. Attach a description of all materials stored or used at the facility.
(See Write-Up)

VII. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
(See Write-Up)

VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
(See Write-Up)

IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
(Does not apply to this facility)

X. Attach a routine inspection and maintenance plan to ensure permit compliance.
(See Write-Up)

XI. Attach a contingency plan for reporting and clean-up of spills or releases.
(See Write-Up)

XII. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
(Does not apply to this facility)

XIII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
(See Write-Up)

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

Name: Ralph Corry Title: Environmental Specialist

Signature: Ralph Corry Date: 6/15/99

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

Aldersgate Ch
Bel Aire Ch
Memory Gardens (Cem)
Drive-In Theater
Drill Hole
Oil Well
Well
Gravel Pits
Memorial Park (Cem)
BENDER BLVD
Radio Tower
Bel Aire Shopping Center
Sanger Sch
WT
Belvue Ch
DR
LORENE
HOBBS
Gravel Pit
County Hospital
LLANO ST
Broadmoor Shopping Center
Green Acres Park
SANGER ST
SAN ANDRES DR
BERRY DR
PENNINGTON ST
GRIMES ST
DRIVE
COLEMAN ST
Humble Park
Bensing Park
Jefferson Sch
SCHARBAUER ST
Will Rogers Sch
City Park
SNYDER ST
City Hall
Houston Jr High Sch
PO
BROADWAY
COCHRAN ST
TURNER ST
MARLAND BLVD
Trailer Park
Faith Chapel
Bender Park
OIL FIELD
Refinery
ROJANA ST
Edison Sch
MAIN ST
HOUSTON ST
TEXAS ST
Southern Heights Sch
TEMPLE ST
LEECH ST
Radio Tower
Gravel Pits
PIPELINE
Substa
Heizer Park
Heizer Jr High Sch
Gravel Pit
Well
BM 3601
R Tr
Drill Hole
Pumping Sta
Wells
TEXAS-NE
SEMINOLE TEXAS 29 MI
LAMESA TEXAS 72 MI
(HOBBS EAST) 5349 LINE
630 000 FEET
42'30"
CHAMPION TECHNOLOGIES HOBBS, N. M.

CHAMPION TECHNOLOGIES, INC.
HOBBS, N.M., - SITE PLAN
(SECTION V)

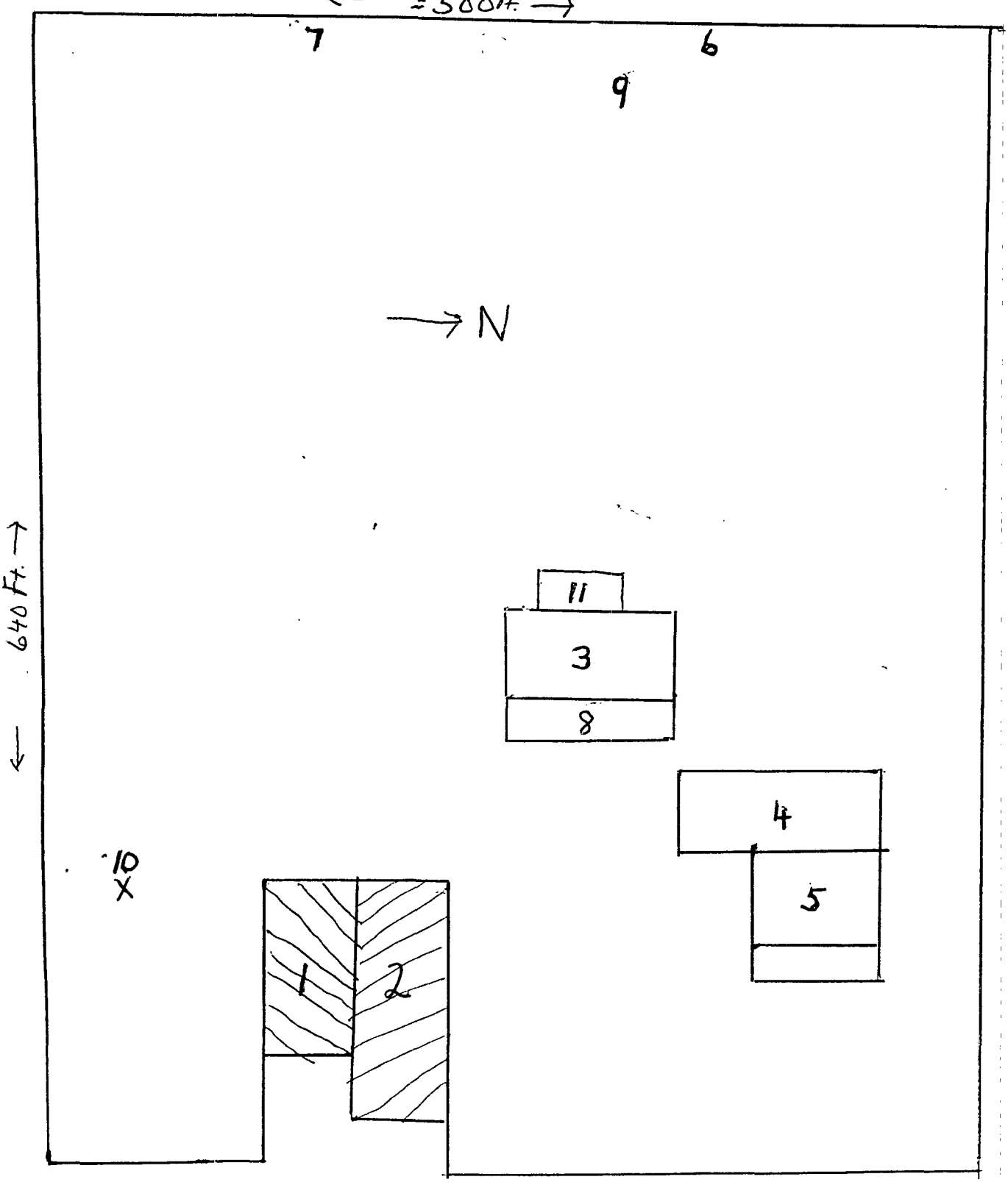
The Champion Technologies, Inc. Hobbs, N.M. Facility, is located approximately 1.7 miles south of Hobbs on Highway 18. The address for the facility is 4001 S. Hwy 18. It occupies a 7 acre rectangular plot on the west side of Highway 18. The surface of the grounds is mostly sand with some caliche and asphalt. The asphalt was left from the previous occupant of this plot.

The Site Plan Map following this description of the facility is numbered and should be referenced with this write-up.

Area 1 -	Office
Area 2 -	Cemented parking area
Area 3 -	Cemented bulk tank area of chemicals
Area 4 -	Cemented drum storage area for chemicals
Area 5 -	Warehouse, office, and change area, with loading dock on east side
Area 6 -	Empty drum storage area
Area 7 -	Miscellaneous storage area for old tanks and equipment (no chemicals)
Area 8 -	Cemented drum storage area for chemicals
Area 9 -	Treating stock chemical with fiberglass secondary containment
Area 10 -	Water well
Area 11 -	Chemical loading area

The remainder of the grounds is used for equipment storage such as empty storage tanks and treater trucks. The facility is completely enclosed by a chain link fence with an entrance through a gate facing the highway or through the office building. The facility is bordered by the highway on the east side, unoccupied barren land on the west side, a residence and barren land on the south side, and another oilfield service company on the north side.

The grounds of the facility slop down slightly from east to west so that rainwater flows off the property near the northwest corner. There are no surface water bodies in the area or within 1 mile of the facility. Water for the area is supplied by well.



South Highway 18 → 1.7 Miles to Hobbs

Production Chemicals Stored at the Facility (Section VI)

Description of chemicals

Cortrons: Corrosion inhibitors for the oilfield that normally consist of Imadazolines, amines, fatty acids, and various organic solvents. Sometimes the solvent is water. The organic solvents are usually mixed alcohols or heavy aromatic naphthas.

Scortrons: Combination scale and corrosion inhibitors that normally consist of the same things found in corrosion with the addition of phosphonates, amides, and bisulfites.

Gyptrons: Scale treating compounds for the oilfield that are used either to prevent scale from forming or removing it. This line normally consists of products based on water soluble phosphonates either in the neutralized or unneutralized form.

Emulsotrons: Chemicals for treating oilfield oil and water emulsions will normally consist of surfactants in an organic solvent such as heavy aromatic naphtha.

Flexoils: Paraffin treating compounds for the oilfield. Normally consists of high molecular weight polymers in an organic solvent such as xylene, toluene, or heavy aromatic naphtha.

Flotrons: Paraffin treating compounds for the oilfield that generally consist of surfactants in either aqueous or organic solvent. Solvents for organic blends are heavy aromatic naphtha or xylene, etc. Aqueous blends consist of water, methanol, or isopropanol as the solvent system.

Gas Treat: Amine based chemicals for treating sour gas.

Foamatrons: Blends much like Surfatrons chemistry.

Defoamers: Organic solvent based chemicals for preventing or removing foam problems in the oilfield.

Bactrons: Bacteriocides for treating oilfield corrosion problems. These normally consist of aldehyde or quaternary amine chemistry.

Cleartrons: Used for water clarification in the oilfield to remove residual amounts of oil from water. These chemicals normally consist of polymers in an aqueous solvent system.

Xylene & Han: Oil base hydrocarbons used as solvents in oilfield chemical treatment mixtures.

Methanol & IPA: Alcohol used as solvents in oilfield treatment mixtures.

Following this site plan description is a list of chemicals found in Areas 3, 4 and 8. There are no chemicals stored in the warehouse. All chemicals for the facility are stored in areas 3, 4 and 8.

Area 3

HOBBS BULK CHEMICAL

Chemical Name	Tank Size	Tank Type
Emulsotron XT-810	4,000 Gallon	Steel
Emulsotron X-79885	4,000 Gallon	Steel
Xylene	4,000 Gallon	Steel
Cortron R-2437	4,000 Gallon	Steel
Surfatron DN-89	4,000 Gallon	Steel
Flotron M-43	4,000 Gallon	Steel
Cortron R-2264	4,000 Gallon	Steel
Scortron G-38	4,000 Gallon	Steel
Cortron R-2239	4,000 Gallon	Steel
Fresh Water	3,000 Gallon	Poly
Cortron RN-211	3,000 Gallon	Poly
Cortron R-129	4,000 Gallon	Steel
Scortron GR-99	3,000 Gallon	Poly
Cortron RN-219	3,000 Gallon	Poly
Cortron R-129	4,000 Gallon	Steel

Area 4 & 8

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
20003	Gyptron TC-30			
20030	Gyptron TSD			
20045	Gyptron T-130			
20051	Gyptron T-133			
20054	Gyptron T-138			
20144	Gyptron TA-13			
20173	Gyptron T-96			
20176	Gyptron T-57			
20179	Gyptron T-59			
20180	Gyptron T-67			
20190	Gyptron T-115			
20191	Gyptron T-114			
20198	Gyptron T-131			
20199	Gyptron T-124			
20224	Gyptron T-144,			
20242	Gyptron T-156			
20253	Gyptron TA-25			
20262	Gyptron T-160			
20280	Gyptron T-186			
20309	Gyptron T-85			
20321	Gyptron T-219			
20338	Gyptron T-242			
20346	Gyptron T-249			
20838	Gyptron T-164			
22117	Gyptron T-120			
20363	Gyptron T-275			
20373	Gyptron T-315			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
10033	Cortron R-2255			
10172	Cortron R-2302			
10190	Cortron R-2314			
10348	Cortron RN-165			
10362	Cortron RH-147			
10480	Cortron RN-178			
10564	Cortron R-2263			
10565	Cortron R-2264			
10642	Cortron RN-187			
10647	Cortron R-2400			
10654	Cortron R-2392			
10694	Cortron RU-189			
10696	Cortron RN-206			
10770	Cortron RN-99			
10785	Cortron R-228			
10965	Cortron RU-160			
10979	Cortron RU-178			
11045	Cortron R-2438			
11048	Cortron R-2440			
11069	Cortron RU-206			
11073	Cortron RU-205			
11080	Cortron Q-28			
11082	Cortron RN-217			
11083	Cortron RP-100			
11113	Cortron RU-216			
11129	Cortron RN-234			
11141	Cortron R-2473			
11149	Cortron RN-240			
11150	Cortron RN-241			
11158	Cortron RU-231			
11163	Cortron R-2479			
11231	Cortron RPA-627			
11245	Cortron R-2485			
11288	Cortron RN-319			
11166	Cortron R-2478			
	Cortron RU-142			
10074	Cortron RH-67			
	Cortron RU-258			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
80961	Emulsotron X-435			
85395	Emulsotron X-733			
80001	Emulsotron X-512			
80005	Emulsotron X-690			
80007	Emulsotron X-690S			
80067	Emulsotron X-185			
80075	Emulsotron XA-42			
80221	Emulsotron X-203			
80251	Emulsotron XA-34			
80421	Emulsotron X-283			
80485	Emulsotron X-242			
80729	Emulsotron X-318			
80782	Emulsotron X- 690B5			
80798	Emulsotron X- 512B5			
80869	Emulsotron X- 299B5			
80251	Emulsotron XA-34			
81089	Emulsotron X-690SB3			
81109	Emulsotron X-453			
81253	Emulsotron XA34B3			
81334	Emulsotron XZ-409			
81375	Emulsotron XM-418			
81576	Emulsotron X-787			
81598	Emulsotron X-805			
85087	Emulsotron X-839			
85394	Emulsotron XA-807			
86241	Emulsotron X-741			
88051	Emulsotron X-1021			
88076	Emulsotron X-1046			
88091	Emulsotron X-1060			
88177	Emulsotron X-1115			
88241	Emulsotron X-1161			
88255	Emulsotron X-1172			
88388	Emulsotron X-1329			
88567	Emulsotron X-1216			
	Emulsotron XF-421/MN53			
85286	Emulsotron X-965			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
60038	Defoamer V-111			
60052	Defoamer V-26			
60056	Defoamer VDF-127			
60084	Defoamer V-134			
60119	Defoamer V-57			
70025	Bactron K-24			
70002	Bactron K-31			
85221	Cleartron ZB167			
85224	Cleartron ZB-168			
85379	Cleartron ZB-199			
85435	Cleartron ZB-206			
88391	Cleartron ZB-196			
	HAN	1		
	CODE – 7	5		
	TEG-	6		
	EG			
	IPA			
	METHANOL			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
40136	Surfatron DN-87			
50000	Surfatron DN-71			
50001	Surfatron DP-61			
50006	Surfatron DT-28			
50149	Surfatron DP-85			
50152	Surfatron DN-89			
50180	Surfatron DN-98			
50182	Surfatron DN-100			
50206	Surfatron DQ-60			
50220	Surfatron DT-72			
50221	Surfatron DT-73			
50231	Surfatron DP-99			
50241	Surfatron DN-115			
50245	Surfatron DP-104			
50262	Surfatron DT-78			
50514	Surfatron S-27			
60056	Surfatron DP77MX			
60084	Surfatron DP-63			
60119	Surfatron DN-83			
50183	Surfatron DN-101			
60007	Surfatron DW			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
40007	Scortron GV-50			
40057	Scortron G-39			
40088	Gas Treat GT-102			
40098	Scortron G-42			
40121	Scortron GR-104			
40136	Scortron GR-114			
40144	Gas Treat GT-115			
40158	Scortron GR123			
40174	Gas Treat GT-136			
40305	Scortron GR-72			
60056	Scortron GR-100			
60084	Scortron GR-85			
60119	Scortron GR-89			
40306	Scortron GR-99			

HOBBS DRUM INVENTORY

IBM#	CHEMICAL NAME	DRUMS ON HAND	SUGGESTED ON HAND	LONG HAUL DUE
30033	Flotron M-78			
30067	Flotron M-157			
30087	Flexoil FM-150			
30147	Flexoil FM-74			
30170	Flexoil FM-94			
30183	Flexoil FM-102			
30185	Flotron M-145			
30203	Flotron MG-51			
30215	Flotron M-152			
30219	Flexoil FM-116			
40136	Flotron M-154			
60056	Flotron M-118			
60084	Flotron MN-53			
60119	Flotron M-136			
90009	XYLENE			
	Flotron M-115			

HOBBS FACILITY WASTE DISPOSAL
(Section VII and VIII)

Domestic sewage that is generated from this site is from the office and warehouse areas. Sewage from these two building flows into an underground septic tank which is dispersed into the ground through lateral lines. The sewage that flows into the septic system is nothing more than what would be disposed from a household.

On an intermittent basis, some products may become obsolete or off-spec at the facility. If the Hobbs facility cannot reuse these products, some will be shipped to the Odessa Plant to be reused in a finished product. The same is true for the material generated when cleaning the empty drums in the empty drum storage area.

If a material cannot be used in Odessa, then some may be sucked up by our treater trucks at Hobbs and used alongside our corrosion treatment in the oilfield. This material is the Mix Treatment Fluids.

From time to time, a small percentage of the material cannot be used in the field or at Odessa, then it becomes a waste. A determination is then made to decide if the waste is hazardous or non-hazardous based on testing and process knowledge. Most hazardous waste generated at Hobbs will be due to waste being corrosive and/or flammable.

Also waste is generated from floor sweepings and de minimis spills in which absorbent is used to clean up the spill. As above, a determination of hazardous/non-hazardous is then made.

Most waste generated at Hobbs will be shipped to CRS in Hobbs, Rhineco in Arkansas, or WCS in Andrews, Texas for storage/treatment/disposal.

ROUTINE INSPECTION AND MAINTENANCE PLAN
(Section X)

Bulk Tank Area: Visual inspection of tanks, valves, piping, and pumps twice weekly. Any leaks should be corrected immediately if possible. If problem calls for outside assistance, Emergency Coordinator will be notified immediately so that corrective action can be taken ASAP.

Drum Storage Area: Drum area is visually inspected on a daily basis. All drums are stored on a cemented diked containment area. Inspections follow the same inspection routine as the bulk tank area. Should a leak be detected, the drum will be placed inside a temporary fiberglass containment box and redrummed or overpacked. All leaks will be reported immediately to the Emergency Coordinator. Drums will always be checked for weak spots (rusted areas) or for the possibility of leaking.

Remainder of Plant Grounds: The remainder of the plant will be inspected daily to make sure that there are not any chemicals left in open top drums or containers. To prevent rain water from filling these open top or cut off containers and thus possibly spilling chemical onto the ground, Champion Technologies, Inc. will simply invert these containers so that they will not hold fluids. In order to do this tough, the containers must be empty when inverted. Another remedy to this situation is to cover the open top containers with a tarp or plastic.

SPILL/LEAK PREVENTION AND REPORTING PROCEDURES
CONTINGENCY PLAN
(Section XI)

The Hobbs facility handles chemicals in bulk and in drum quantities. The bulk tanks are set in a cemented, curbed area to handle leakage or spills within the curbed area. Should a leak occur in the piping or in one of the bulk tanks, it can normally be controlled by shutting off valves or by transferring chemical to another tank or truck for temporary storage. Champion Technologies, Inc. has personnel that observe this area everyday.

Loading of the bulk tanks is through hoses and fittings from a bulk truck. The connection to the bulk tanks is located inside the curbed area. The truck connection is not. Normal procedure calls for a bucket or pail to be placed under the truck connection to catch any leaks.

Drummed chemicals are stored both on cement and the ground. Some are stored on wooden pallets and some are not. While it is known that this is not the best possible way to handle these drummed chemicals, Champion Technologies, Inc. believes that future site plans will remedy the current situation. These plans call for building a new cemented, diked area, so that the bulk tank farm can be transferred onto it. The old, or present curbed area, could then be used to store the drummed chemicals. A more immediate remedy would be to make sure all chemicals are at least stored on wooden or possibly drainage pallets to contain leaks and get them off the ground.

EMERGENCY COORDINATOR

The emergency coordinator for the Hobbs facility is Tommy Morrison who is also the District Manager for the Hobbs District. While Mr. Morrison is frequently away from the site to take care of company business, he can still be reached by car phone or beeper. His office has on file (hard copy) a MSDS for every chemical stored on its site. He also has access to a computer MSDS if needed. The coordinator is familiar with this plan and the appropriate response should a significant leak or spill of a hazardous chemical occur. He also has the authority to commit the resources necessary to carry out the plan or response. Whenever there is an imminent or actual emergency situation, the emergency coordinator will immediately:

1. Evaluate the situation and stop the leak or spill if it can be done without risk to health and well being.

2. If it is a small leak or spill that can be handled by the Champion Technologies, Inc. personnel on site, then it should be removed by shovel or the appropriate equipment and absorbent.

3. If the spill or leak is considered a significant one and judged to be a threat to the surrounding area, outside help should be called in with heavy equipment to build earthen berms to contain any runoff.

4. Determine if the RQ of the material has been reached and if it has endangered the health and well being of the public or the environment.

5. Contact Champion Technologies, Inc.'s Environmental, Health and Safety Department for help or to report the incident.

6. Notify the appropriate Local, State, and National authorities (agencies), including the OCD Director at (505) 827-7131.

7. After spill or leak has been stopped, begin steps to remediate affected areas.

HOBBS, NEW MEXICO

4001 South Hwy. 18, 88240, District 30
(505) 393-7726

EMERGENCY NUMBER Request for Fire, Sheriff, and Paramedics	**911**
LEPC Lea County 300 North Turner Hobbs, NM 88240 Attn: David Hooten	**(505) 397-9231**
FIRE DEPARTMENT Hobbs Fire Department 301 East White Street Hobbs, NM 88240	**911** **(505) 397-7252**
HOSPITAL: *Columbia Lea Regional Hospital* 5419 Lovington Hwy. Hobbs, NM 88240	**(505) 392-6581**
NATIONAL RESPONSE CENTER	**(800) 424-8802**
EMERGENCY RESPONSE CENTER	
CHEMTREC	**(800) 424-9300**
CHEMICAL REFERRAL CENTER	**(800) 262-8200**
PLANT/DISTRICT CONTACTS:	
Tommy Morrison	
Mike Edwards	**(505) 392 1230**
SUGGESTED LOCAL NUMBERS:	
Vacuum Truck: Pool Service Key Trucking	**(505) 392 2577** **(505) 397-4994**
Wrecker: P&W Wrecker	**(505) 393-3715**

MISCELLANEOUS SITE INFORMATION
(Section XIII)

The well record for the latest water well that was drilled at the Hobbs facility is attached to this plan. It shows that after you drill 1 foot you reach caliche, and the driller's log shows caliche for the next 20 feet. While caliche is not cement, it is a fairly hard and impermeable surface itself. A spill or leak is not going to penetrate far if attended to properly. Caliche can also act as an absorbent because of the clays that are intermixed.

There are many water wells in the immediate area of the Hobbs facility. All water is supplied by well in the surrounding area and there are residences and other companies located nearby. All wells are used by the entity that owns the well. It is not for public supply. The well for the Hobbs facility pumps water from a depth of 44 to 133 feet that consists primarily of sand and sandstone. An analysis of the well water is attached. A chemical spill or leak would have to penetrate more than 40 feet of caliche and sandstone to reach the ground water. If this plan is followed, the Hobbs facility should hardly ever be a threat to contaminate ground water.

Flooding is not a problem. Stormwater normally exits the property as quickly as it accumulates. Sometimes it does rain hard enough to have standing water on the property, but this is not to say that the property is flooding. The only reason that Champion Technologies, Inc. might want to take measures to control runoff is in case there is a significant spill or leak from an onsite tanker or in the bulk tank farm area. This would only apply in the situation where there is rain and a large amount of chemical on the ground or in a diked area that might run over onto the ground.

The Hobbs facility is actually a very simple operation. There are no surface impoundments, pits, or areas where fluids are allowed to evaporate from the ground. With some facility improvements in the near future, such as the construction of a new cemented diked containment area and the plugging of the two (2) non functional water wells, the Hobbs operation will essentially eliminate most of the possibilities for seepage contamination. It is also believed that groundwater contamination is reduced to nil if this plan is followed and good prevention common sense is used by the Hobb's personnel.

P. O. BOX 1468
MONAHANS, TEXAS 79756
PH. 943-3234 OR 563-1040

Martin Water Laboratories, Inc.

709 W. INDIANA
MIDLAND, TEXAS 79701
PHONE 683-4521

RESULT OF WATER ANALYSES

TO: Mr. Robert Middleton
P. O. Box 2187, Hobbs, NM 88240

LABORATORY NO. 495145
SAMPLE RECEIVED 4-24-95
RESULTS REPORTED 4-26-95

COMPANY Champion Technologies, Inc. LEASE

FIELD OR POOL

SECTION BLOCK SURVEY COUNTY Lea STATE NM

SOURCE OF SAMPLE AND DATE TAKEN:

NO. 1 Drinking water - taken @ Hobbs laboratory.

NO. 2

NO. 3

NO. 4

REMARKS:

CHEMICAL AND PHYSICAL PROPERTIES	NO. 1	NO. 2	NO. 3	NO. 4
Specific Gravity at 60° F.	1.0025			
pH When Sampled				
pH When Received	7.00			
Bicarbonate as HCO_3	244			
Supersaturation as $CaCO_3$				
Undersaturation as $CaCO_3$				
Total Hardness as $CaCO_3$	520			
Calcium as Ca	168			
Magnesium as Mg	24			
Sodium and/or Potassium	138			
Sulfate as SO_4	86			
Chloride as Cl	376			
Iron as Fe	0.04			
Barium as Ba				
Turbidity, Electric				
Color as Pt				
Total Solids, Calculated	1,036			
Temperature °F.				
Carbon Dioxide, Calculated				
Dissolved Oxygen,				
Hydrogen Sulfide	0.0			
Resistivity, ohms/m at 77° F.	6.11			
Suspended Oil				
Filtrable Solids as mg/l				
Volume Filtered, ml				
Nitrate, as N	1.4			

Results Reported As Milligrams Per Liter

Additional Determinations And Remarks The undersigned certifies the above to be true and correct to the best of his knowledge and belief.

Form No. 3

By
Waylan C. Martin, M.A.

Revised June 1972

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

) Owner of well Jim Spradley Owner's Well No. _____
Street or Post Office Address P.O. Box 2187
City and State Hobbs, N.M. 88240

:ll was drilled under Permit No. L-10,322 and is located in the:

a. _____ ¼ SE ¼ ~~NW~~ NE¼ ¼ SE ¼ of Section ~~17~~ 15 Township 19S Range 38E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in Lea County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in the _____ Grant.

) Drilling Contractor Alan Eades License No. WD-1044

ldress 1200 E. Bender, Hobbs, N.M. 88240

illing Began 4-13-93 Completed 4-13-93 Type tools Rotary Size of hole 8 in.

evation of land surface or _____ at well is _____ ft. Total depth of well 133 ft.

ompleted well is [X] shallow [ ] artesian. Depth to water upon completion of well 44 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet From	Depth in Feet To	Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
44	133	89	Sand & Sandstone Stringers Sandstone, Sand & Gravel	35

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet Top	Depth in Feet Bottom	Length (feet)	Type of Shoe	Perforations From	Perforations To
5 3/4	160psi				133		113	133

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet From	Depth in Feet To	Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by:

_____
State Engineer Representative

No.	Depth in Feet Top	Depth in Feet Bottom	Cubic Feet of Cement
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received May 7, 1993

Quad _____ FWL _____ FSL _____

File No. L-10,322 Use D & S Location No. 19.38.15.42424

Depth in Feet		Thickness in Feet	Color and Type of Material Encountered
From	To		
0	1	1	Top Soil
1	21	20	Caliche
21	23	2	SaNDSTONE
23	44	21	Caliche & Sandy Clay
44	120	76	Sand & Sandstone Stringers
120	124	4	Sandstone
124	138	14	Sand & Gravel

Section 7. REMARKS AND ADDITIONAL INFORMATION

'83 FEB 7 AM 10 42

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Billy Wayne Eades

Driller

Billy Wayne Eades

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All [illegible]s, except Section 5, shall be answered as completely and accurate[illegible]ossible when any well is drilled, repaired or deepened. [illegible] this form is used as a plugging record, only Section 1(a) and Section [illegible] be completed.

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

CERT. MAIL P 288 259 119

Memorandum of Meeting or Conversation

Telephone __X__
Personal _____

Time: apprx. 2:15 pm
Date: June 14, 1999

Originating Party: Ralph Corry- Champion Technologies

Other Parties: Wayne Price, Roger Anderson- OCD

Subject: Hobbs Facility GW-199

Discussion:

Mr. Corry requested copies of recent OCD sampling results when available and indicated Champion is in the process of revising the original Discharge plan to include additional waste streams, Hazardous and non-hazardous waste generation points. Mr. Corry indicated they have recently generated approximately 25 additional drums of Hazardous waste from various product "heals" i.e. Mr. Corry wanted to know if he needed permission from OCD to dispose of Hazardous waste? Anderson & Price reiterated that Champion must deal with NMED-HRMB on all hazardous waste issues. Mr. Corry indicated Champion is working on abatement plan.

Conclusions or Agreements:

OCD will provide Champion copies of analysis when available and advised Champion to call NMED-HRMB on disposing the drums of hazardous waste. Champion must receive OCD approval before disposing of any non-hazardous oilfield waste.

Signed: Ralph Corry WAYNE PRICE

CC: Ralph Corry-Champion

RECORD OF COMMUNICATION	[XX] PHONE	[__] LETTER	[__] OTHER (Specify)
	TRACKING #	99008	
TO: COMPLAINT COORDINATOR	FROM: BUDDY JONES EPA REGION 6, 6PD-I	DATE:	5/24/99
		TIME:	7:00 AM

SUBJECT: CITIZENS COMPLAINT DATA COLLECTION FORM

COMPLAINT INFORMATION

NAME: [ ] CONFIDENTIAL [XX] ANONYMOUS

ADDRESS:

CITY:

STATE:

ZIP CODE

PHONE #:

FACILITY INFORMATION

FACILITY NAME:	Champion Technologies Chemical Co.
FACILITY LOCATION:	Hobbs, NM

CITIZEN CONCERN: (Brief summary or Letter Attached)

Message left on Voice Mail.

Caller stated he understands that there is a "on-going" investigation into Champion Technologies Chemical Co., Hobbs, NM. He stated that about 10 years ago, Champion Technologies buried a number of Hazardous Waste Drums about 10 to 12 feet deep in the northwest corner of their "Battery Yard".

Caller did not provide specific location of facility. However, RCRIS shows a Champion Technologies, Inc., Highway 18, Hobbs, Lea County, NM, if this is the same facility.

CONCLUSIONS, ACTION TAKEN OR REQUIRED:

PASS TO NMED.

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Fax Cover Sheet

Date: 5-27-99

To: Roger Anderson
Company: OCD
Phone: 7-7152
Fax: 7-8177

From: Mike LE Scouarnec 7-1509
Company: Hazardous & Radioactive Materials
Phone: (505) 827-1558

Pages including this cover page: 3

Comments: Anonymous Complaint from EPA Region III re: disposal of H.W. into ground.

Mike, Touch base with Roger & see what the status is. Inform him of this response. JT.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
MULTIMEDIA PLANNING AND PERMITTING DIVISION
RCRA INFORMATION MANAGEMENT (6PD-I)
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

FAX #: (214) 665-6762

(Please remove all staples. No double side copies will be faxed)

TO:	Mr. John Tymkowych
FAX #:	(505) 827-1833
BUSINESS #:	(505) 827-1508
TOTAL PAGES, INCLUDING COVER PAGE:	2
FROM:	**BUDDY JONES**
BUSINESS PHONE:	**(214) 665-8163**

COMMENTS: Attached is a copy of a complaint report which was received by our staff concerning possible hazardous waste activities. The Environmental Protection Agency would appreciate your investigating this matter. Please respond to this request regarding any actions taken or proposed. If you have any questions, please contact Buddy Jones at (214)665-8163.

PINNACLE LABORATORIES

Pinnacle Laboratories Inc.

CHAIN OF CUSTODY

DATE: _____ PAGE: 1 OF 1

PLI Accession #: 905079

SHADED AREAS ARE FOR LAB USE ONLY.

PLEASE FILL THIS FORM IN COMPLETELY.

PROJECT MANAGER: Bill Olson 5/21/99

COMPANY: ~~[illegible]~~ NMOCD

ADDRESS: ~~[illegible]~~

PHONE: ~~[illegible]~~

FAX: N/A

BILL TO: Wayne Price

COMPANY: OCD

ADDRESS: 2040 S. Pacheco

Santa Fe, NM 87505

ANALYSIS REQUEST

SAMPLE ID	DATE	TIME	MATRIX	LAB I.D.	Petroleum Hydrocarbons (418.1) TRPH	(MOD.8015) Diesel/Direct Inject	Sed + Fe by AA	(M8015) Gas/Purge & Trap	8021 (BTEX)/8015 (Gasoline) MTBE	8021 (BTEX) ☐ MTBE ☐ TMB ☐ PCE	8021 (TCL)	8021 (EDX)	8021 (HALO)	8021 (CUST)	504.1 EDB ☐ / DBCP ☐	8260 (TCL) Volatile Organics	8260 (Full) Volatile Organics	8260 (CUST) Volatile Organics	8260 (Landfill) Volatile Organics	Pesticides /PCB (608/8081/8082)	Herbicides (615/8151)	Base/Neutral/Acid Compounds GC/MS (625/8270)	Polynuclear Aromatics (610/8310/8270-SIMS)	General Chemistry:		Priority Pollutant Metals (13)	Target Analyte List Metals (23)	RCRA Metals (8)	RCRA Metals by TCLP (Method 1311)	Metals:		NUMBER OF CONTAINERS
[illegible]	[illegible]	11:00 a.m.	Water	01			X									2		3							1						1	1	8
TB	5/19/99	12:40	Water	02														1															1

PROJECT INFORMATION

PROJ. NO.: Water well

PROJ. NAME: [illegible] well

P.O. NO.:

SHIPPED VIA:

SAMPLE RECEIPT

NO. CONTAINERS	9
CUSTODY SEALS	Y / N / NA
RECEIVED INTACT	Y
BLUE ICE/ICE	6°C

PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS

(RUSH) ☐ 24hr ☐ 48hr ☐ 72hr ☐ 1 WEEK (NORMAL) ☒

CERTIFICATION REQUIRED: ☐ NM ☐ SDWA ☐ OTHER

METHANOL PRESERVATION ☐

COMMENTS: FIXED FEE ☐

[illegible]

RELINQUISHED BY: 1.	RELINQUISHED BY: 2.
Signature: [illegible] Time: [illegible]	Signature: [illegible] Time: 0920
Printed Name: [illegible] Date: [illegible]	Printed Name: William Olson Date: 5/21/99
Company: NMOCD See reverse side (Force Magure)	Company: NMOCD
RECEIVED BY: 1.	**RECEIVED BY: (LAB) 2.**
Signature: [illegible] Time: [illegible]	Signature: [illegible] Time: 0920
Printed Name: Date:	Printed Name: Sonia Lowell Date: 5/21/99
Company: [illegible]	Pinnacle Laboratories Inc.

(Force Majeure)
Pinnacle Laboratories will adjust the schedule and compensation under this AGREEMENT to the extent that Pinnacle's schedule and compensation are equitably adjusted by client.

COMMONLY REQUESTED GENERAL CHEMISTRY

ABV.	ANALYSES
ALK	Alkalinity (Bicarbonate+Carbonate)
NH3	Ammonia
BOD	Biochemical Oxygen Demand
BR	Bromide
Cl	Chloride
COD	Chemical Oxygen Demand
E.C.	Conductivity
CN	Cyanide, Total
F	Fluoride
N03	Nitrate
N02/N03	Nitrite/Nitrate
N02	Nitrite
TKN	Total Kjeldahl Nitrogen
O-G	Oil-Grease
PH	PH
TDS	Total Dissolved Solids
TSS	Total Suspended Solids
S04	Sulfate
S^{-2}	Sulfide
TOC	Total Organic Carbon
TOX	Total Organic Halide

SW846-UPDATE III DEFINITIONS (6/25/97)

Per EPA methods 8010, 8020, and 8240 have been deleted.
The following test codes and definitions replace these methods:

GC

New Method	Analysis
8021 (BTEX)	Formerly 8020 (BTEX) Compound List
8021 (TCL)	Formerly 8020/8010 Target Compound List
8021 (EDX)	BTEX + EDB, EDC
8021 (HALO)	Formerly 8010 Halogenated Compound List
8021 (CUST)	A partial/customer defined list

GCMS

New Method	Analysis
8260 (TCL)	Formerly 8240 Target Compound List
8260 (FULL)	Full 8260 Compound List
8260 (CUST)	A partial/customer defined list
8260 (LANDFILL)	NM Landfill (WQCC) list

TALS COMMONLY ANALYZED

PRIORITY POLLUTANT LIST (PP) • RCRA • TARGET ANALYTE LIST (TAL)

NAME	SYMBOL	LIST
Aluminum	Al	TAL
Antimony	Sb	PP,TAL
Arsenic	As	RCRA, PP, TAL
Barium	Ba	RCRA, TAL
Beryllium	Be	PP,TAL
Bismuth	Bi	
Boron	B	
Cadmium	Cd	RCRA, PP, TAL
Calcium	Ca	TAL
Chromium	Cr	RCRA, PP, TAL
Cobalt	Co	TAL
Copper	Cu	PP, TAL
Gold	Au	
Iron	Fe	TAL
Lead	Pb	RCRA, PP, TAL
Lithium	Li	
Magnesium	Mg	TAL
Manganese	Mn	TAL
Mercury	Hg	RCRA, PP, TAL
Molybdenum	Mo	
Nickel	Ni	PP, TAL
Potassium	K	TAL
Selenium	Se	RCRA, PP, TAL
Silicon	Si	
Silver	Ag	RCRA, PP, TAL
Sodium	Na	TAL
Strontium	Sr	
Sulfur	S	
Thallium	Tl	PP, TAL
Tin	Sn	
Titanium	Ti	
Uranium	U	
Vanadium	V	TAL
Zinc	Zn	PP, TAL

PINNACLE LABORATORIES

Pinnacle Laboratories Inc.

CHAIN OF CUSTODY

DATE: 5/4/99 PAGE: 1 OF 1

PLI Accession #: 905080

SHADED AREAS ARE FOR LAB USE ONLY.

PLEASE FILL THIS FORM IN COMPLETELY.

PROJECT MANAGER: Bill Olson NMOCD 5/4/99

COMPANY:

ADDRESS:

Hobbs NM 88240

PHONE:

FAX:

BILL TO:

COMPANY:

ADDRESS:

SAMPLE ID	DATE	TIME	MATRIX	LAB I.D.
				01
TB	5/3/99	1240	water	02

ANALYSIS REQUEST

Petroleum Hydrocarbons (418.1) TRPH	(MOD.8015) Diesel/Direct Inject	Gas+Diesel	(M8015) Gas/Purge & Trap	8021 (BTEX)/8015 (Gasoline) MTBE	8021 (BTEX) ☐ MTBE ☐ TMB ☐ PCE	8021 (TCL)	8021 (EDX)	8021 (HALO)	8021 (CUST)	504.1 EDB ☐ / DBCP ☐	8260 (TCL) Volatile Organics	8260 (Full) Volatile Organics	8260 (CUST) Volatile Organics	8260 (Landfill) Volatile Organics	Pesticides /PCB (608/8081/8082)	Herbicides (615/8151)	Base/Neutral/Acid Compounds GC/MS (625/8270)	Polynuclear Aromatics (610/8310/8270-SIMS)	General Chemistry:		Priority Pollutant Metals (13)	Target Analyte List Metals (23)	RCRA Metals (8)	RCRA Metals by TCLP (Method 1311)	Metals:		NUMBER OF CONTAINERS
		X									2	2							1	1					1	1	8
												1															1

PROJECT INFORMATION	
PROJ. NO.:	
PROJ. NAME:	
P.O. NO.:	
SHIPPED VIA:	

SAMPLE RECEIPT	
NO. CONTAINERS	9
CUSTODY SEALS	Y / N / NA
RECEIVED INTACT	Yes
BLUE ICE/ICE	6°C

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METHANOL PRESERVATION ☐

COMMENTS: FIXED FEE ☐

RELINQUISHED BY: 1.	RELINQUISHED BY: 2.
Signature: Time:	Signature: Time: 0930
Printed Name: Date:	Printed Name: Date: 5/4/99
Company: See reverse side (Force Magure)	Company: NMOCD
RECEIVED BY: 1.	**RECEIVED BY: (LAB) 2.**
Signature: Time:	Signature: Time: 0930
Printed Name: Date:	Printed Name: Date: 5/4/99
Company:	Pinnacle Laboratories Inc.

(Force Majeure)
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F	Fluoride
N03	Nitrate
N02/N03	Nitrite/Nitrate
N02	Nitrite
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TOX	Total Organic Halide

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Beryllium	Be	PP,TAL
Bismuth	Bi	
Boron	B	
Cadmium	Cd	RCRA, PP, TAL
Calcium	Ca	TAL
Chromium	Cr	RCRA, PP, TAL
Cobalt	Co	TAL
Copper	Cu	PP, TAL
Gold	Au	
Iron	Fe	TAL
Lead	Pb	RCRA, PP, TAL
Lithium	Li	
Magnesium	Mg	TAL
Manganese	Mn	TAL
Mercury	Hg	RCRA, PP, TAL
Molybdenum	Mo	
Nickel	Ni	PP, TAL
Potassium	K	TAL
Selenium	Se	RCRA, PP, TAL
Silicon	Si	
Silver	Ag	RCRA, PP, TAL
Sodium	Na	TAL
Strontium	Sr	
Sulfur	S	
Thallium	Tl	PP, TAL
Tin	Sn	
Titanium	Ti	
Uranium	U	
Vanadium	V	TAL
Zinc	Zn	PP, TAL

un

28 Pages $1.00

Post-it® Fax Note 7671 | Date | # of pages ▶
To Wayne Price | From Daniel R.
Co./Dept. OCD | Co. News-Sun
Phone # | Phone # 397-4558
Fax # | Fax # 393-5724

Company responds to notice

Champion: Waste storage violations being addressed

DANIEL RUSSELL
HOBBS NEWS-SUN

Champion Technologies has taken action to resolve a notice of violation letter the N.M. Oil Conservation Division sent the Houston-based firm on April 26.

The OCD listed 14 violations in the letter, including improper storage of hazardous waste drums and possible chemical spills involving chromium at Champion's yard in south Hobbs. The OCD found Champion in violation of its discharge plan requirements and the Water Quality Control Commission regulations.

Champion responded on May 10, the deadline set for taking corrective actions.

Most of the violations involved waste and chemical drums being stored without proper containment. Proper containment means the area lacked an adequate back-up system, such as a concrete pad and curbs, to contain any potential spill of hazardous materials.

"Since the inspectors' visit of December of 1998, Champion has added additional secondary containment to the facility for the drum storage area and this should address the majority of the NOV's cited in the April 1998 letter," Champion's environmental specialist Ralph Corry wrote.

Another area of violation listed by the OCD was yellow stained soil in the drum storage area that was found to contain chromium in

JOEL RAFKIN/HOBBS NEWS-SUN

es and grows some, but did not enter

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JOEL RAFKIN/HOBBS NEWS-SUN

res roses and grows some, but did not enter

y big business

AP PHOTO

former business partners were pioneers in fighting well blowouts and have watched the business evolve over the years.

ing well owners prevent crises before they happen.

Larry Flak, another vice president, added that most major oil companies no longer have blowout experts on staff, making them more reliant than ever on well-control specialists who offer a wide range of services.

Please see BLOWOUTS, Page 7

charge plan requirements and the Water Quality Control Commission regulations.

Champion responded on May 10, the deadline set for taking corrective actions.

Most of the violations involved waste and chemical drums being stored without proper containment. Proper containment means the area lacked an adequate back-up system, such as a concrete pad and curbs, to contain any potential spill of hazardous materials.

"Since the inspectors' visit of December of 1998, Champion has added additional secondary containment to the facility for the drum storage area and this should address the majority of the NOV's cited in the April 1998 letter," Champion's environmental specialist Ralph Corry wrote.

Another area of violation listed by the OCD was yellow stained soil in the drum storage area that was found to contain chromium in excess of the Environmental Protection Agency's Resource Conservation Recovery Act's hazardous levels, the OCD letter stated.

"The area shows some yellow stained pebbles but no ground discoloration. Champion does not use chrome at this site and the pebbles may have been present for years," Champion's response states. "... Further sampling is planned or in progress by Champion at this site."

Another violation listed by the OCD states there were "visual signs of leaks and spills" in a drum staging area that went unreported. Champion said this is not the case.

"This was residual chemical from diminimus drips during daily operations in this area, so therefore, no spill was reported. This area has been cleaned to improve appearances but does not pose an environmental problem," Champion's letter states.

Roger Anderson of the OCD's environmental bureau said OCD is sending a response to Champion with further questions.

Champion must still submit an abatement plan by June 25, defining how it plans to do any cleanup if contamination is found in the soil, Anderson said.

Readers can e-mail their comments to Daniel Russell at biznews@leaco.net or call him at 397-4556, ext. 138.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone __X___
Personal _____

Time: Approx. 3:30pm-3:50pm
Date: 5/13/99

Originating Party: Wayne Price, RC Anderson, and B. Olson-OCD

Other Parties: Ralph Corry, Mel Davis- Champion Tech. Inc.

Subject: Champion Tech. Inc. - Letter dated May 10, 1999, Discharge Plan (GW-199) Inspection on 12/8/98

Discussion:

OCD/Champion discussed the above response letter.

OCD had specific questions on the following:

OCD noted to Champion that "NO Containment" violations appeared to have been answered in their letter.

1.B. Lab Wastewater "retain" drums: OCD ask questioned how is this waste normally disposed of ? Champion indicated only the unused portion of the crude or produced water samples was being sent back to the field. Any portion that was tested was disposed of as lab waste at a RCRA TSDF.

All items concerning unreported leaks! Champion indicated they did not think that diminimus leaks had to be reported. OCD referred to WQCC reg's burden of proof is on Champion to prove they will not impact groundwater or be harmful to the environment. OCD noted that high levels of chrome were found in the soil sample. This should have been reported.
Champion ask if there is a spill reporting form ? OCD yes C-141.

4.B. Yellow Stained Soil Area:

Champion indicated they could not find any yellow stained soil as OCD indicated but did find yellow coated pebbles. They wanted to know if this was a grab or composite sample. OCD indicated it was a grab sample taken. Champion pointed out they have never used any products that contained chrome. However they heard a rumor that there was a clean-up of chrome on the property in 1990 or 1991. They are invistigated to try and

obtain information on this.

Champion had an inquiry about the soil sample being wet and an alternate sample. OCD noted point is valid and will check into. OCD pointed out that chrome contamination still is present and the abatement process will cover investigation og chrome.

Champion "samples being analyzed outside of the state vs NM risk levels"? OCD indicated they did not understand the question. Champion Mel Davis cleared this up by asking at what levels do the State of NM start being concerned about Chrome. OCD answered at WQCC standards of .05 ppm, soil sample collected was 1600 ppm which is 32,000 times the WQCC ground water standard.

Further sampling is planned or in progress? OCD pointed out to Champion that this will be covered in the Abatement process. OCD notified Champion not to dispose of any waste unless approved by Champion. Mr. Davis acknowledges.

Waste streams not being Identified in Discharge Plan? Champion admitted they were deficient in this area and were re-writing the discharge plan to cover these.

C. Water well sampling:

Champion wanted to know why there was a problem since Chlorides and TDS had always been above the levels. OCD pointed out they are above the NM ground water standards and will have to be investigated during the abatement process. OCD pointed out that Chrome was detected in the well and past correspondence revealed that chrome was detected above levels allowed. Champion could not find the 7/30/96 lab results taken by Champion's Mr. Allen Childs.

Champion wanted to know if they should stop drinking the water. OCD responded that we are not qualified health experts but made a recommendation for them to stop and to isolate the chrome soil area for protection of it's employees and surrounding area.

OCD notified Champion that we had information that indicated Champion had plugged a water well on site. Mr. Davis and Corry indicated they did not have any knowledge of this but they would have to check with their Hobbs personnel.

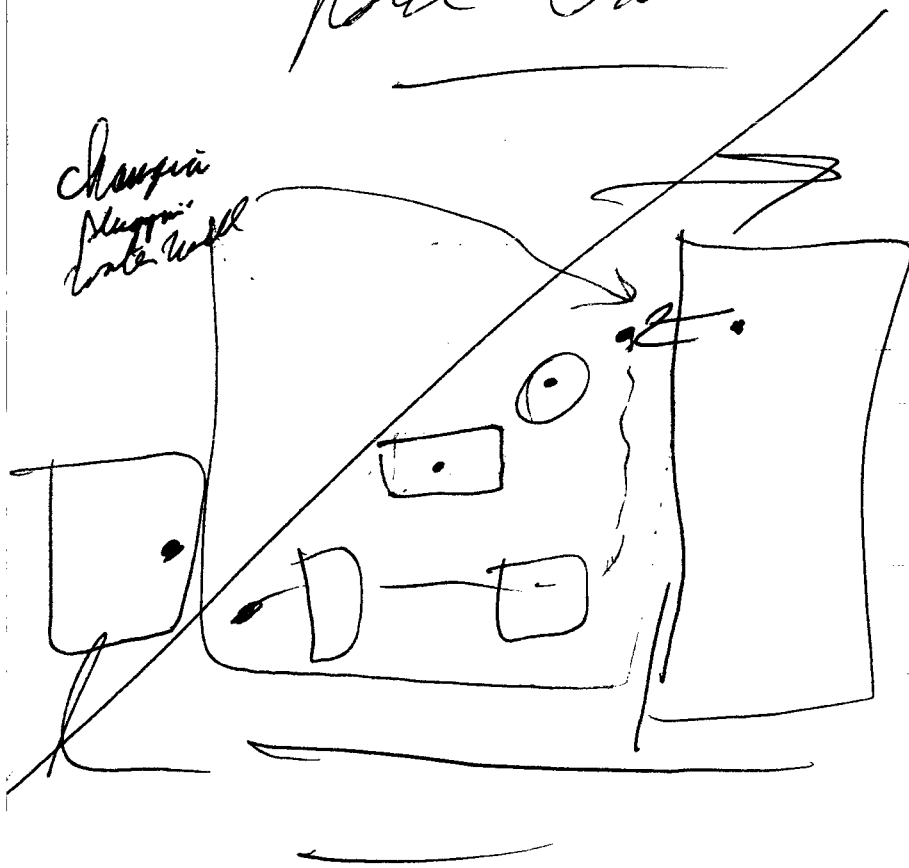
Conclusions or Agreements:

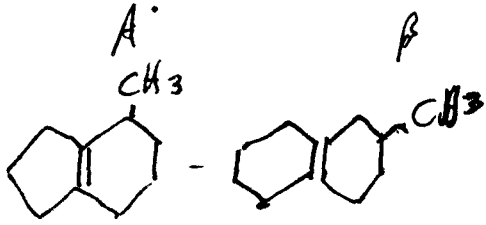
Champion will submit an abatement plan and not dispose of any waste unless approved by OCD. Champion was advised not to dig up any waste or plug any wells unless OCD is notified.
Champion's Mr. Mel Davis agreed!

Signed: _____

CC:

3 PM 5-4-99





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Champion Technologies, Inc.

P.O. BOX 450499
HOUSTON, TEXAS 77245-0499

Telephone (281) 431-2561
Fax (281) 431-1655

CERTIFIED RETURN RECEIPT NO. Z 266 064 403

May 10, 1999

Mr. Roger Anderson
New Mexico – Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Subject: Discharge Plan (GW-199) Inspection on 12/8/98

Dear Mr. Anderson:

The purpose of this letter is to reply to the NOV letter dated April 26, 1999 from NMOCD. Since the inspectors visit of December of 1998, Champion has added additional secondary containment to the facility for the drum storage area and this should address the majority of the NOV's cited in the April 1999 letter. The other violations have been addressed based on knowledge of the site.

All drums and tanks now have the secondary containment as required in the Discharge Plan.

1. **Laboratory Area:**

   A. A Hazardous Waste Drum is stored with no containment.

   Reply: This hazardous waste drum is no longer at the facility. It has been shipped to a permitted Treatment, Storage, Disposal Facility (TSDF) for disposal (V/CS). In the future, any waste generated will be stored with secondary containment.

   B. The lab wastewater "retain" drums are stored with no containment.

   Reply: These drums are not generated anymore since the laboratory at Hobbs is no longer operational. This material has been sent back to the field for use as stated in our discharge permit.

2. **Empty Drum Rinsate & Staging Area:**

   A. There were visual signs of leaks and spills in this process area that remain unreported.

Reply: This was residual chemical from diminimus drips during daily operations in this area, so therefore no spill was reported. This area has been cleaned to improve appearances but does not pose an environmental problem.

B. There was one drum not properly contained.

Reply: This drum has been moved to an area that has secondary containment.

3. <u>Slow Moving Product Drum Storage Area:</u>

There were several drums being stored with no containment.

Reply: Most of these drums were slow moving products and have been transferred to our facility in Midland. All other remaining drums were moved to an area that has secondary containment.

4. <u>Product Drum Storage Area:</u>

A. This area contained several drums of chemical product which were being stored with no containment.

Reply: These drums have been moved to an area that has secondary containment.

B. Yellow Stained Soil Area:

Reply: The area shows some yellow stained pebbles but no ground discoloration. Champion does not use chrome at this site and the pebbles may have been present for years. The physical state of pebbles analyzed do not represent material at this site. A true test would be to do the TCLP on the pebbles as they are on the ground to determine leachable chrome, not grind and test. Champion does not use any of the chemicals listed in its products except for naphthalene. The analytical results of the 8270C test for acid and base extractables shows non detect for the organics and Champion believes this is the more representative analyses of the soil. It is puzzling as to why an alternative sample was used in place of the original soil sample. The "Chain of Custody" does not show two separate soil samples collected.. Since the samples were analyzed outside the state, it is unclear what are New Mexico's risk levels for groundwater protection. Further sampling is planned or in progress by Champion at this site.

5. **Waste Storage Area:**

There were seven unlabeled drums of waste located along the north fence line which were being stored with no containment.

Reply: These drums have been moved to an area that has secondary containment.

6. **Warehouse Area:**

A. Chemical product drums stored without proper containment, i.e., no curbs or berms.

Reply: These drums have been moved to an area that has secondary containment.

B. There were drums of contaminated absorbent materials, cut-up contaminated plastic buckets, drums of oily liquid waste with no identification, batteries and used oil filters found in the waste collection area inside of warehouse. These liquid and solid waste streams are not identified in the discharge plan application.

Reply: At this time, Champion is in the process of amending the discharge plan to include hazardous and non-hazardous waste. It should be noted that the batteries were on a shelf and not in a waste container. These batteries are backup for our equipment, and not waste. There should be, and supported in conversations with Hobbs site personnel, no oil filter in the waste container. Hobbs has service agreements with a local business to service automobiles and trucks (i.e., oil changes, etc.).

7. **Records Review:**

A. The records review revealed Champion generated seven drums of waste, three classified as hazardous and four as non-hazardous. The three hazardous waste drums were generated as a result of additional waste streams from the on-site laboratory not identified in the plan application. The four non-hazardous waste drums were generated as a result of releases in the yard area that remain unreported.

Reply: Champion is in the process of amending the discharge plan to include waste. Champion does generate non-hazardous and hazardous waste on an intermittent basis and the amended discharge plan will reflect this generation of waste.

C. Water Well Sampling

The new water well located in the southeast part of the yard was sampled and the analytical results confirmed the presence of Chlorides and Total Dissolved Solids (TDS) in excess of the WQCC standards and Chromium was just below standards.

Reply: The water sampled was from the same well as on the discharge plan in 1995. The total dissolved solids and chlorides are within the same range as in the plan.

If you should have any questions, please contact me at the above listed number.

Sincerely,

Ralph Corry

Ralph Corry
Environmental Specialist

RC/rn

Cc: Braddock, Rick
Childs, Allan
Davis, Mel
Edwards, Mike
Finley, Richard
Hainebach, Charlie
Moran, Mike
Morrison, Tommy
Myers, Clarence

NEWS-SUN

Serving Hobbs, Lea County and West Texas *32 Pages* $1.00

Firm cited for waste violations

DANIEL RUSSELL
HOBBS NEWS-SUN

The N.M. Oil Conservation Division sent a notice of violation letter to Champion Technologies Inc. on Monday stating the firm had 14 violations ranging from hazardous waste drums and possible chemical spills involving chromium at its yard in Hobbs.

The OCD found Champion in violation of its discharge plan requirements and the Water Quality Control Commission regulations.

The OCD's recent violation letter follows just weeks after the N.M. Environment Department notified Champion, a Houston-based firm, it had "adequately addressed" a notice of violation letter the Environment Department sent on Jan. 30, 1998.

Based on OCD's letter, Champion must now submit an abatement plan by June 25 in addition to making corrective actions by May 10, states the notice of violation from Roger Anderson of the OCD's Environmental Bureau.

The company can, however, appeal the notice of violation to the Water Quality Control Commission and eventually to District Court.

If a company fails to respond to a notice of violation of its discharge plan, Anderson said in an interview, it can result in monetary fines. A discharge plan is a permitting document used by the OCD to regulate facilities that have a potential of spills or leaks, Anderson said.

OCD environmental inspectors Wayne Price and Gary Wink visited the oilfield servicing company's plant on Dec. 8, 1998, located at 4001 Eunice Highway. Soil and water samples were taken.

Champion's attorney Clarence Meyer said he has only recently received the notice of violation from the OCD and could not comment on each item.

He said, however, the firm has an environmental group assigned to ensure compliance with regulations and deal with notices from regulatory agencies.

Most of the violations listed by OCD involved waste and chemical drums being stored without proper containment. Proper containment means the area lacked an adequate backup system, such as a concrete pad and curbs, to contain any potential spill of the hazardous materials.

"That has either been built or is in the process of being built," Meyer said, explaining the previous notice from the Environment Department covered the same problem.

The violation that will likely require an extensive excavation of the yard, according to Anderson, is the possible contamination of the soil and ground water with chromium.

Yellow stained soil in the drum storage area contains chromium in excess of Environmental Protection Agency's Resource Conservation

Please see CHAMPION, Page 5

Bingaman examines proposed plant site

MICHAEL MARESH
HOBBS NEWS-SUN

U.S. Sen. Jeff Bingaman was in Lea County Saturday to tour the proposed site for a uranium enrichment plant and meet with oilfield executives

Speaking at the Hobbs Country Club

JOEL RAFKIN/HOBBS NEWS-SUN

oposed AVLIS site Saturday. map showing the proposed :S facility and the new Lea iiles east of Eunice on the

l mean about 1,500 high-paying "If this site is approved, it will ge the entire base of the Permian ," Whitaker said.

ders can e-mail their comments to ael Maresh at education@leaco.net l him at 397-4556, ext. 137.

iana election

ke enjoyed a surprising, if brief, f political success 10 years ago joining the GOP. Despite his start, his candidacy this time /as quickly overshadowed and ly ignored by the other candi-. Polls showed him with less 10 percent support.

l, the election was seen as a test ke's oft-repeated theory that he below radar," meaning his sup-rs rarely admit their prefer- for him in polls.

Champion

from PAGE 1

Recovery Act's hazardous levels, according to Anderson's notice of violation letter. The notice of violation letter also states forms of lead, chromium, manganese, nickel, chloride and soluble sulfide were found to exceed the standards for ground water under the Water Quality Control Commission. The letter further states the presence of benzo pyrene, benzo fluorene, benzo fluoranthene, chrysene, dibenzo, anthracene, fluorene, naphthalene, pyrene and methylnaphthalene also were found in the samples.

"The results indicate spills and leaks have occurred and remain unreported," the violation letter states.

The alleged chromium contamination in the soil was "six times more than what's allowed" based on the soil samples taken, Price said in an interview.

There are different types of chromium and the OCD is unclear what type of chromium is at the site. One type, chromium VI, is often used for industrial purposes and at certain levels can be a carcinogen, according to a U.S. Department of Health and Human Services' Agency for Toxic Substances and Disease Registry publication.

"We don't know yet which it is," Anderson said in an interview. "We'll find that out when we get further along into the abatement plan."

A water sample of a well located on the southeast portion of the property confirmed the presence of chlorides and total dissolved solids in excess of the Water Quality Control Commission standards, the letter further states, but chromium was found at levels just below standards.

The OCD is still unclear how extensive or limited the chromium is in the soil and ground water, requiring more testing under the abatement plan. Anderson declined to speculate as to how the chromium got into the soil, explaining that further investigation is still needed.

'The results *indicate spills and leaks have occurred and remain unreported.'*

Violation letter

"We don't know yet," Anderson said. "We'll attempt to find the source."

Meyer said he too is unclear as to the source of the chromium, stating he believes Champion does not use chromium.

Chromium has been used in the oilfield as a corrosive inhibitor, Anderson said. In recent years, it has been used less, however, as the industry finds other chemicals to do the same job.

"There's still a little bit of chromium used downhole," Anderson said.

Any cleanup process, called an abatement plan, can include input from the public, Anderson said. The same abatement plan process has been used by Shell Exploration and Production's oil cleanup in the Hobbs Westgate residential subdivision, Price said.

An abatement plan under the N.M. Water Quality Act must spell out what action a company will take to remediate or protect the groundwater from contamination, Anderson said.

The N.M. Environment Department's notice to Champion was sent on Jan. 30, 1998. Champion was in violation of 19 regulations under the N.M. Hazardous Waste Management Regulations. Four of the Environment Department's listed violations were for failing to mark or label containers of waste. Other violations listed include failure to perform a hazardous waste determination on contaminated soil underneath and around a tank and failure to perform hazardous waste determination on drums containing waste.

Champion's spokesman recalled the notice of violation from the Environment Department, but did not have on hand the exact actions the company has taken in response.

"I believe we did," Meyer said. "I believe we did take some corrective action."

Meyer said he was not aware of the firm taking any soil or water samples at the Hobbs facility, although they may have been taken.

But Champion's actions have satisfied the Environment Department.

"Based on our review of the information obtained, NMED has determined that the violations cited in the referenced LOV (Letter of Violation) have been adequately addressed," states the Environment Department's letter, dated April 6, 1999, 20 days before OCD sent out its violation letter.

N.M. Environment Department spokesman Nathan Wade said inspectors from his department were unavailable last week to further explain what actions Champion has taken.

Both OCD and the Environment Department have joint jurisdiction in regulating companies such as Champion, Anderson explained. The OCD has authority to oversee any waste generated from the oilfield while the Environment Department is charged with regulating hazardous waste, such as chromium.

Anderson said his agency was aware of the Environment Department's notice of violation sent on Jan. 30, 1998, but did not know what resulting actions Champion took in response.

Readers can e-mail their comments to Daniel Russell at biznews@leaco.net or call him at 397-4556, ext. 138.

---

on in his office," Thomas said. A nittee will also be appointed to coordinate the city's census s.

ost of volunteers gathered by the us Bureau will also help get the out around Hobbs and encour-

using statistical sampling to determine the population count for congressional apportionment purposes. But sampling is not yet dead.

In addition to distributing the basic census form, which asks for income and ethnic information, the Census

viewed at La Tienda said they would be proud to stand up and be counted.

Interviewed with the help of an interpreter, the Montaño family asked, "¿Porque no?" They explained they are legal residents who immigrated from Mexico 19 years ago. Emigdio, a self-employed welder, his

1950. She was born in Del Rio, Texas; her family has lived in the U.S. since her great-grandparents' generation.

Only one family refused to give their

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone __X___
Personal _____

Time: 2:10 pm
Date: April 30, 1999

Originating Party: **Ralph Curry-Champion**

Other Parties: Wayne Price/Rc Anderson

Subject: Waste disposal-Hobbs Yard

Discussion:

Mr. Curry made an inquiry on proper procedure for disposing of waste.

Conclusions or Agreements:

OCD advised Mr. Curry to put his inquiry in writing for quality reasons.

Signed:

CC:

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, NM 87505
(505) 827-7133
Fax: (505) 827-8177

(PLEASE DELIVER THIS FAX) Fax 281-431-1655

To: CHAMPION TECHNOLOGIES - Attn RALPH CORRY

From: OCD

Date: 4/26/99

Number of Pages (Includes Cover Sheet) 5

Message: PER YOUR TELEPHONE REQUEST

COPY of "NOV"

If you have any trouble receiving this, please call:
(505) 827-7133

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 26, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. P 288 259 110

Mr. Charlie Hainebach-President
Champion Technologies, Inc.
P.O. Box 450499
Houston, Texas 77245

Subject: ***NOTICE of VIOLATION***

Re: Discharge Plan GW-199
Champion's Hobbs, NM Facility

Dear Mr. Hainebach:

New Mexico Oil Conservation Division (NMOCD) inspectors Wayne Price and Gary Wink conducted a Discharge Plan inspection on December 08, 1998 at the Champion Technology, Inc. (Champion) facility located at 4001 S. Highway, Hobbs New Mexico. The inspection consisted of a facility tour conducted by Champion personnel Tommy Morrison and Alan Childs and soil and water sampling conducted by Wayne Price and Gary Wink. Enclosed is a copy of the inspection report along with the analytical results of the sampling.

NMOCD finds Champion in violation of its Discharge Plan requirements and Section 3104 of the Water Quality Control Commission (WQCC) regulations (20 NMAC 6.2.3104) for the deficiencies listed below:

1. Laboratory Area:

   A. A Hazardous Waste Drum is stored with no containment.

      Violation of Requirement 3 (Drum Storage).

   B. The lab wastewater "retain" drums are stored with no containment.

      Violation of Requirement 3 (Drum Storage).

2. Empty Drum Rinsate & Staging Area:

A. There were visual signs of leaks and spills in this process area that remain unreported.

Violation of Requirement 4 (Process Area) and Violation of Requirement 12 (Spill Reporting).

B. There was one drum not properly contained.

Violation of Requirement 3 (Drum Storage).

3. Slow Moving Product Drum Storage Area:

There were several drums being stored with no containment.

Violation of Requirement 3 (Drum Storage)

4. Product Drum Storage Area:

A. This area contained several drums of chemical product which were being stored with no containment.

Violation of Requirement 3 (Drum Storage).

B. Yellow Stained Soil Area:

Analytical results from soil samples collected in this area contained Chromium in excess of EPA RCRA hazardous levels, Lead, Chromium, Manganese, Nickel, Chloride, and Soluble Sulfate that exceeded the Standards for Ground Water listed in WQCC Regulation 3103 (20 NMAC 6.2.3103), and the presence of Benzo(a) Pyrene, Benzo(b) Fluoranthene, Benzo(k) Fluoranthene, Chrysene, Dibenzo(a,h,) Anthracene, Fluorene, Naphthalene, Pyrene, 1-Methylnaphthalene, and Bis(2-Ethylhexyl) Phthalate which are Toxic Pollutants as defined in WQCC Regulation 1101.TT (20 NMAC 6.2 1101.TT). The results indicate spills and leaks have occurred and remain unreported.

Violation of Requirement 12 (Spill Reporting).

5. Waste Storage Area:

There were seven unlabeled drums of waste located along the north fence line which were being stored with no containment.

Violation of Requirement 3 (Drum Storage).

6. Warehouse Area:

A. Chemical product drums stored without proper containment, i.e., no curbs or berms.

Violation of Requirement 3 (Drum Storage).

B. There were drums of contaminated adsorbent materials, cut-up contaminated plastic buckets, drums of oily liquid waste with no identification, batteries and used oil filters found in the waste collection area inside of warehouse. These liquid and solid waste streams are not identified in the discharge plan application.

Failure to Disclose-Violation of Section 74-6-10.2.A(2), New Mexico Statutes Annotated 1978 as amended.

7. Records Review:

The records review revealed Champion generated seven drums of waste, three classified as hazardous and four as non-hazardous. The three hazardous waste drums were generated as a result of additional waste streams from the on-site laboratory not identified in the plan application. The four non-hazardous waste drums were generated as a result of releases in the yard area that remain unreported.

Failure to Disclose-Violation of Section 74-6-10.2.A(2), NMSA 1978 as amended, and Violation of Requirement 12 (Spill Reporting) and Requirement 2 (Champion Commitments).

Water Well Sampling:

The new water well located in the southeast part of the yard was sampled and the analytical results confirmed the presence of Chlorides and Total Dissolved Solids (TDS) in excess of the WQCC standards and Chromium was just below standards.

Champion is hereby required to respond by May 10, 1999 with actions taken to correct the above violations. In addition, NMOCD hereby requires Champion to submit an Abatement Plan pursuant to Section 74-6-10.1 of the New Mexico Statutes and WQCC Regulation 4104 (20 NMAC 6.2.4104) by June 25, 1999.

Failure to respond to this Notice of Violation may result in a compliance order being issued pursuant to Section 74-6-10, NMSA 1978, against Champion assessing penalties and requiring Champion to comply with the requested actions.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7152).

Sincerely Yours,

Roger C. Anderson
Environmental Bureau

cc: OCD Hobbs District
NMED-HRMB

attachments- Copy of filed inspection report, copy of analysis, copy of abatement reg's.

P.01

TRANSACTION REPORT

APR-28-99 WED 04:01 PM

DATE START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#
APR-28 03:57 PM	912814311655	2'22"	5	SEND	OK	

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 26, 1999

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RETURN RECEIPT NO. P 288 259 110

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P.O. Box 450499
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Sincerely Yours,

Roger C. Anderson
Environmental Bureau

cc: OCD Hobbs District
NMED-HRMB

attachments- Copy of filed inspection report, copy of analysis, copy of abatement reg's.

P.01

TRANSACTION REPORT

DEC-31-98 THU 01:27 PM

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#
DEC-31	01:26 PM	912814311655	58″	2	SEND	OK	

OIL CONSERVATION DIVISION

2040 South Pacheco
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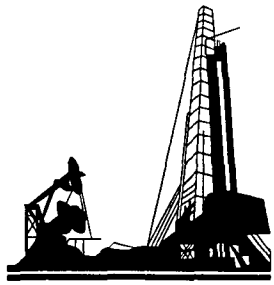
(505) 827-7133
Fax: (505) 827-8177



(PLEASE DELIVER THIS FAX) FAX 281-431-1655

To: RALPH CORRY - CHAMPION TECH.

From: WAYNE PRICE - OCD

Date: 12/31/98

Message: PER OUR TELEPHONE CON. ON 12/30/98.

PLEASE FIND ENCLOSED A COPY "IN PART" of

OCD FIELD INSPECTION REPORT CONDUCTED ON 12/08/98

COMPLETE REPORT WILL BE SENT WHEN COMPLETE!

If you have any trouble receiving this, please call:
(505) 827-7133

Sampling: OCD sampled the water from the new well. Sample was taken from office break room facet and ID# 9812081151. Another sample was collected from the yellow stained soil area and ID# 9812081209.

Records Review:

1. OCD requested information concerning any internal or external reporting of leaks, spills, releases, etc. Mr. Morrison indicated they have not had any leaks, spills, releases and no information was available.

2. OCD requested information concerning the NMED Notice of Violation, site assessment and clean-up activities. Mr. Morrison indicated he would have to get approval from his corporate office to provide that since it is a company policy. Mr. Morrison did provide a cover sheet and table of contents to the site assessment performed (attached).

3. OCD requested information pertaining to any waste generated as a result of any recent clean-ups. Mr. Morrison provided a copy of a letter dated 12/03/98 from Ralph Corry (Champion) to Mr. Mike Le Scouarnec of NMED-HRMB describing the analytical results of the seven waste drums and where they are to be disposed of.

Closing interview:

OCD instructed Mr. Morrison not to dispose of any NON-Hazardous Oil field Waste unless he receives permission from OCD.

All Waste that is classified as Hazardous, OCD instructed Mr. Morrison to deal with the NMED-HRMB.

OCD noted the following as possible deficiencies of their Discharge Plan.

1. **Drums were being stored without proper containment.**
2. **Failure to report pursuant to OCD Rule 116 & WQCC requirements.**
3. **Possible improper classification or identification of some waste streams.**

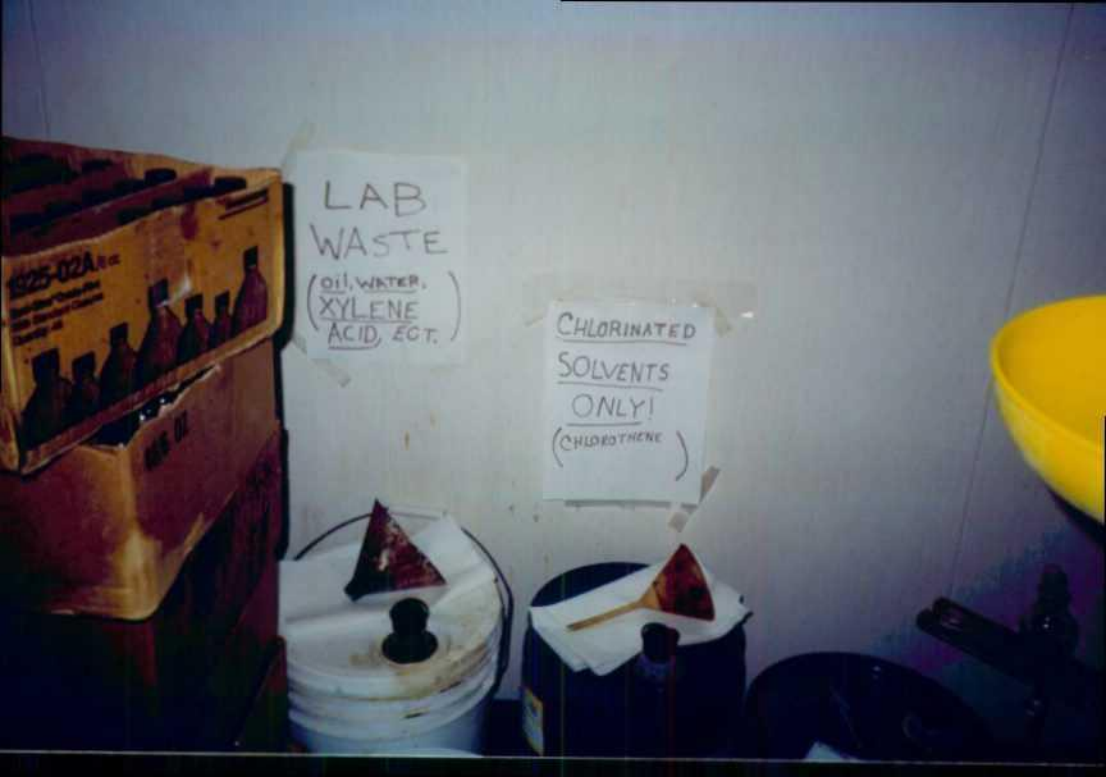
attachments-
1. **Photos Taken: enclosed with sketch of facility.**
2. Field notes & Chain-of-Custody info.
3. Champion Letter 12/03/98
4. Philip Services site assessment info.

CC: **Chris Williams-OCD District I**
Champion Tech. Inc.-Hobbs Facility


ABSOLUTELY !
NO HAZARDOUS
MATERIAL
DOWN DRAIN !
DAWN

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#1. LAB SINK


LAB
WASTE
(oil, WATER,
XYLENE
ACID, ECT.)
CHLORINATED
SOLVENTS
ONLY!
(CHLOROTHENE)

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#2. LAB AREA- WASTE

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#3. SW CORNER OF LAB BLDG.-HAZ WASTE DRUMS & LAB WASTE WATER DRUMS SHOWN TO THE RIGHT

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#4. TWO LAB WASTE WATER RETAIN DRUMS

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#5. EMPTY DRUM RINSE & STORAGE AREA -
VISUAL SOIL STAINS- LOOKING SW

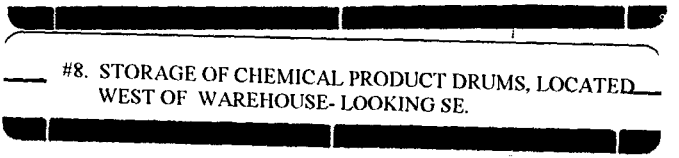
CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#6. FIELD TANK WASH-OUT AREA - LOOKING WEST

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#7. SLOW MOVING PRODUCT DRUMS ALONG THE NORTH PRO-PERTY LINE- LOOKING EAST.

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998



#8. STORAGE OF CHEMICAL PRODUCT DRUMS, LOCATED WEST OF WAREHOUSE- LOOKING SE.

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#9. STORAGE OF CHEMICAL PRODUCT DRUMS, LOCATED WEST OF WAREHOUSE- LOOKING SW

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#10. BULK TANK LOAD/UN-LOAD FACILITY- LOOKING NE

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#11. SEVEN DRUMS OF WASTE GENERATED AS A RESULT OF A RECENT NMED-HRMB INSPECTION- LOOKING NNE


ROPAK

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#12. INSIDE WAREHOUSE-WASTE COLLECTION AREA
LOOKING SOUTH


ROPAK

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#13. INSIDE WAREHOUSE-WASTE COLLECTION AREA
- LOOKING WEST

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#14. WAREHOUSE DRUM STORAGE AREA -LOOKING NORTH

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#15. OFFICE BREAK ROOM- COLLECTING WATER SAMPLES
SAMPLE ID# 9812081151

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#16. PRODUCT DRUM STORAGE AREA WEST OF WAREHOUSE- LOOKING WEST

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#17. PRODUCT DRUM STORAGE AREA WEST OF WAREHOUSE- LOOKING EAST

COLLECTED SAMPLE OF YELLOW STAINED SOIL.
SAMPLE ID # 9812081209

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#18. PRODUCT DRUM STORAGE AREA WEST OF WAREHOUSE- LOOKING NORTH-

#18. COLLECTED SAMPLE OF YELLOW STAINED SOIL. LOCATION APPROX. 105 FT FROM WEST EDGE OF WAREHOUSE CONCRETE PAD AND 71 FT SOUTH OF NORTH FENCE.

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#22 SAME AS 19&20

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#20 PICTURE SHOWS YELLOW STAINED SOIL & ROCKS SAMPLED HERE. LOCATION SAME AS PREVIOUS PICTURE.

SAMPLE POINT AREA SAME AS PREVIOUS

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#21 SAME AS 20.

CHAMPION TECH. INC. 4001 S. HWY. 18 Hobbs, NM 88240
BY: W PRICE & G WINK -OCD DATE: DEC 08, 1998

#19. PICTURE SHOWS YELLOW STAINED SOIL & ROCKS SAMPLED HERE. LOCATION SAME AS PREVIOUS PICTURE.