

**GW - 278**

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**INSPECTIONS &  
DATA**

**OCD ENVIRONMENTAL BUREAU**  
**SITE INSPECTION SHEET**

DATE: 5-13-02 Time: 2 PM

Type of Facility: Refinery  Gas Plant  Compressor St.  Brine St.  Oilfield Service Co.   
Surface Waste Mgt. Facility  E&P Site  Crude Oil Pump Station   
Other  \_\_\_\_\_

Discharge Plan: No  Yes  DP# GW-278

FACILITY NAME: KEY-CARLSBAD FACILITY  
PHYSICAL LOCATION: GPS 32° 26' 18" Sec N / 109° 11' 10.8" W  
Legal: QTR \_\_\_\_\_ QTR \_\_\_\_\_ Sec \_\_\_\_\_ TS \_\_\_\_\_ R \_\_\_\_\_ County EDDY CO.

OWNER/OPERATOR (NAME) KEY ENERGY-  
Contact Person: ROYCE CROWELL Tele:# \_\_\_\_\_

MAILING  
ADDRESS: \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
Owner/Operator Rep's: \_\_\_\_\_

OCD INSPECTORS: D PRICE E MARTIN R. BAYLESS

1. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

\_\_\_\_\_ OK \_\_\_\_\_

2. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

\_\_\_\_\_ OK \_\_\_\_\_

3. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

FUEL ISLAND TANK NEEDS CONTAINMENT

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

OK

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

OK

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

OK

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

OK

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? Yes No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES  NO  IF NO DETAIL BELOW.

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO  YES  IF YES DESCRIBE BELOW! Undetermined

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

GOOD

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

NA - OK

12. Does the facility have any other potential environmental concerns/issues?

NONE

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

14. ANY WATER WELLS ON SITE? NO  YES  IF YES, HOW IS IT BEING USED?

Miscellaneous Comments:

Number of Photos taken at this site: 11 attachments-

DC P00144-154

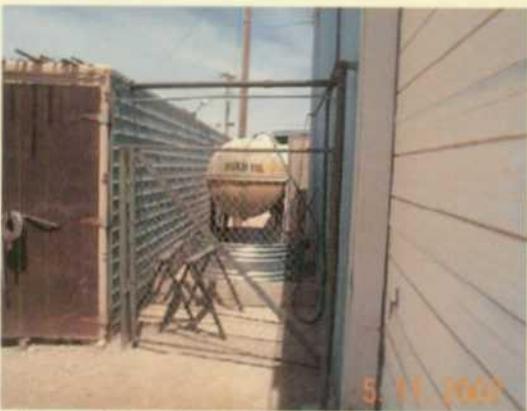
Note: Photo dates are wrong should be 5/13/02



Picture #1- Fresh water and KCL loading area.



Picture #4- Propane storage area.



Picture #2 - Used oil tank.



Picture #5- Frac tank wash-out pit. Inspecting leak detector.



Picture #3- Fuel tank area-needs proper containment.



Picture #6 - Concrete wash-out pit with secondary containment and leak detection.

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OCD Discharge Plan Inspection: By: W Price, E Martin, R Bayless

May 13, 2002

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Picture #7 – Chemical tank storage area.



Picture #8- Same as above.



Picture #9- Office and shop.

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Picture #1- Fresh water and KCL loading area.



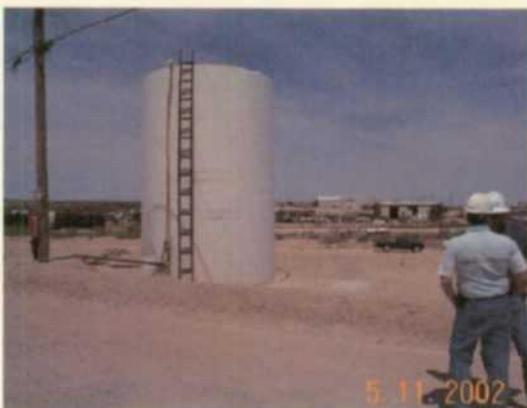
Picture #4- Propane storage area.



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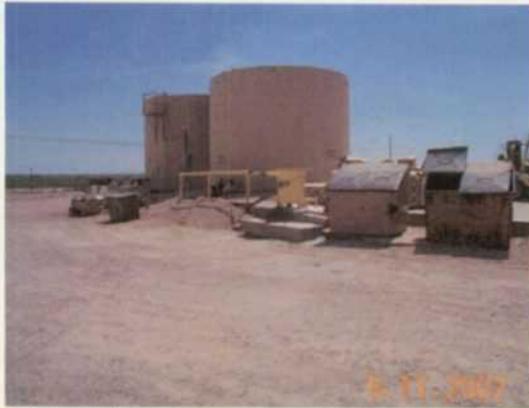


Picture #8- Same as above.



Picture #9- Office and shop.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log

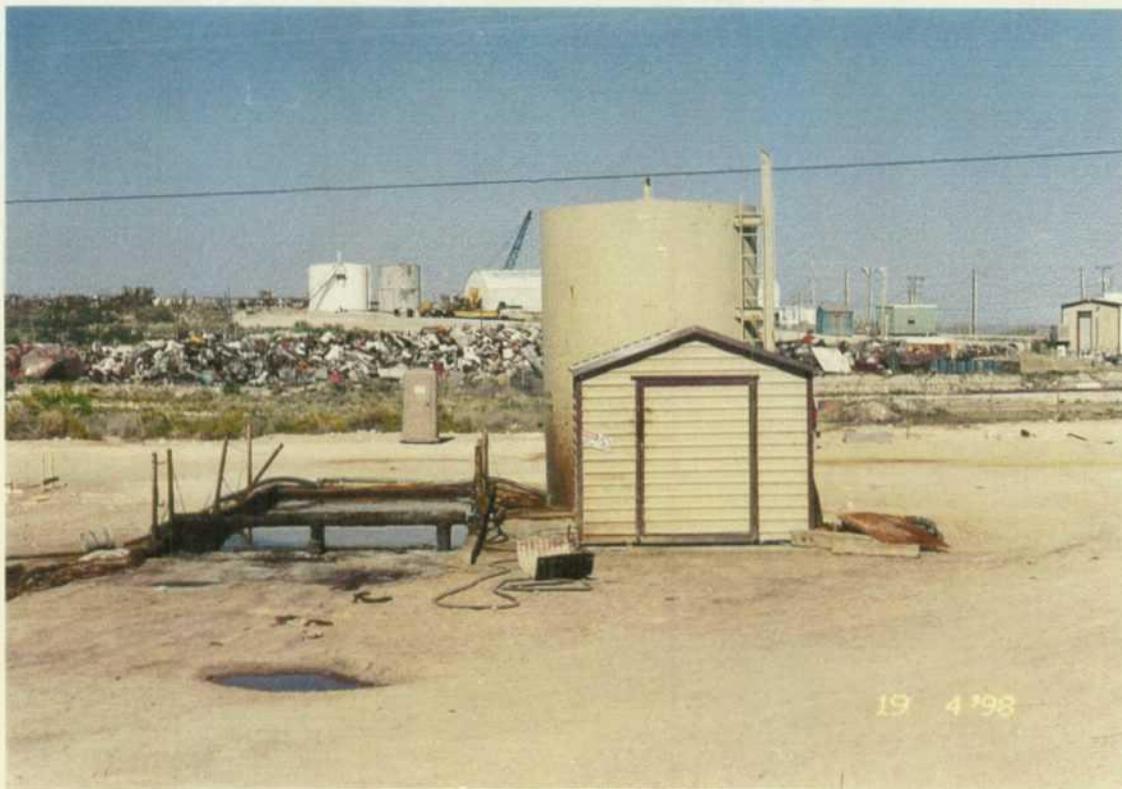


Photo Number: 1 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: Existing rinsate pit  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 4:30 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 2 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: Existing rinsate pit  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 4:55 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log

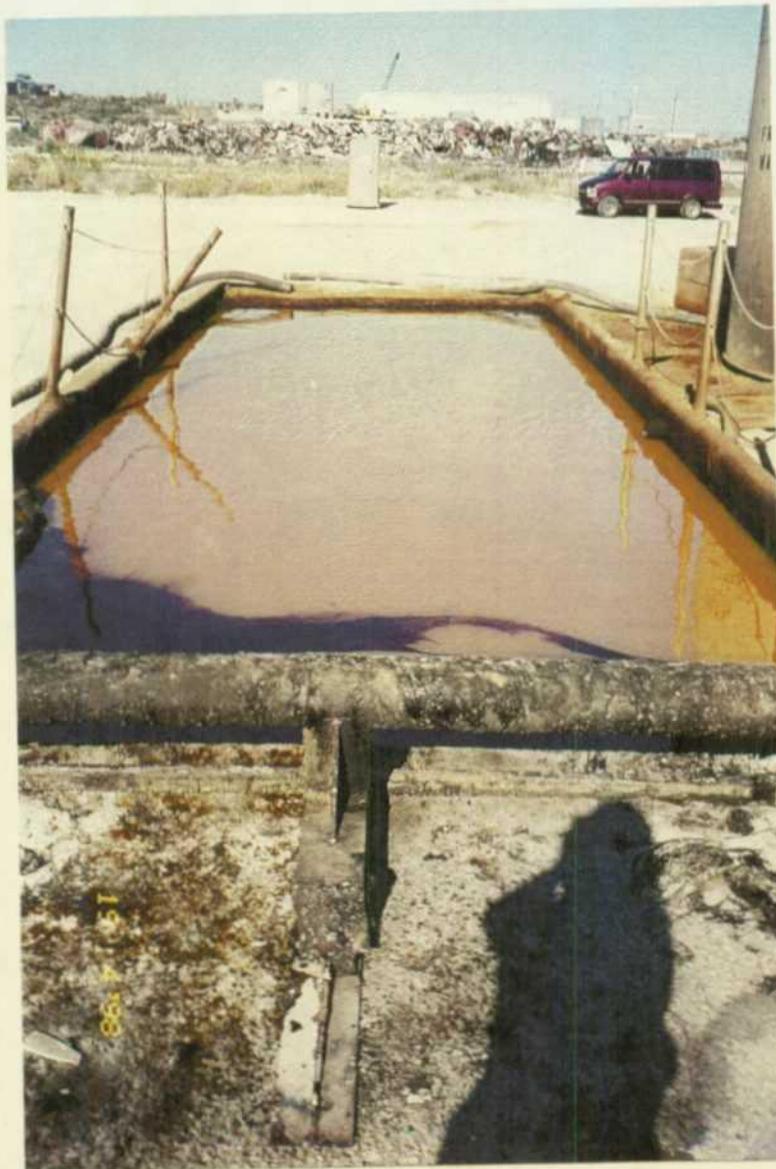


Photo Number: 3 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: Close-up of existing rinsate pit  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 4:57 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 4 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: New rinsate pit under construction  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 4:33 PM Weather: Sunny



Photo Number: 5 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: Close-up of rinsate pit under construction  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 4:58 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 6 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: Drum pad  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 5:30 PM Weather: Sunny



Photo Number: 7 Photographer: A. Garza  
Location: Rowland Trucking Company  
Subject: EM 31 electromagnetic survey  
City/County: Carlsbad State: NM  
Date: 04/22/98 Time: 1:30 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 8 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: EM 31 electromagnetic survey  
City/County: Carlsbad State: NM  
Date: 04/22/98 Time: 1:40 PM Weather: Sunny



Photo Number: 9 Photographer: N. Jones  
Location: Rowland Trucking Company  
Subject: Area with strongest electromagnetic reading  
City/County: Carlsbad State: NM  
Date: 04/20/98 Time: 5:45 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 10 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting equipment rinsate sample  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 12:20 PM Weather: Sunny



Photo Number: 11 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SL-01 & RTC-SL-01D  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 1:00 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 12 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SL-01 & RTC-SL-01D  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 1:00 PM Weather: Sunny



Photo Number: 13 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SL-01 & RTC-SL-01D  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 1:00 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 14 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SL-01 & RTC-SL-01D  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 1:00 PM Weather: Sunny



Photo Number: 15 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SS-02A,AD,B & BD  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 3:00 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 16 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SS-02A,AD,B & BD  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 3:00 PM Weather: Sunny

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Official Photograph Log



Photo Number: 17 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SS-02A,AD,B & BD  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 3:00 PM Weather: Sunny



Photo Number: 18 Photographer: L. Vega  
Location: Rowland Trucking Company  
Subject: Tetra Tech personnel collecting samples RTC-SS-03A & RTC-SS-03B  
City/County: Carlsbad State: NM  
Date: 04/22/08 Time: 4:55 PM Weather: Sunny