

1R - 288

**GENERAL
CORRESPONDENCE**

YEAR(S):

CLOSED



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

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

NMOCD INTER-OFFICE CORRESPONDENCE

TO: Roger Anderson-Environmental Bureau Chief
From: Wayne Price-Environmental Engineer
Date: Feb 9, 1996
Reference: "Old Standard Welding Service Co. Yard"
Eunice, NM.
Subject: Proposed Clean-up

Comments:

Dear Roger,

Please find enclosed the most recent NMOCD District I documentation pertaining to the cleaning up and disposing of solid waste located at the above mentioned facility.

Please note I had previously sent you correspondence pertaining to this facility. That correspondence was named "Old service co. yard located at 1310 ave. O Eunice NM behind R.G. Gunn Co." I had included a field report and pictures. **Please note it is the same facility.**

The Sims Pipeline Co. is planning on purchasing this property. One of their Employees a Mr. Don Blair is handling the transaction. He is also a Councilman for the City of Eunice. The City of Eunice presently has a committee to address clean-up's of properties such as this.

Mr. Blair has sampled the soil for TCLP hazardous toxicity characteristics. He is in the process of running the remaining characteristics (RCI), and is running TPH on the soils.

Please review the "File of Old Standard Welding Yard" meeting held Feb 8, 1996 (attached) for this documentation. I have also included the previous file information.

Per NMOCD District I best of historical knowledge it appears that most of this material is Exempt Oilfield waste. However, there is some speculation that some "UST" soils were disposed of here and there might be an old pit now covered.



Please note the city of Eunice is anxious to remove this waste and get it out of town so as not to expose it's citizens. It has been noted upon a number of cases that children have been playing in this area.

Therefore if all of the analytical work reflects that this material is RCRA non-hazardous, I recommend that we allow Sims pipeline to remove this material as mentioned in the meeting held on Feb. 8, 1996. I think it is in the best interest of the citizens of Eunice, NM.

I believe that this contaminated soil should be classified as RCRA Exempted Material.

I base this on the new ruling issued in the EPA530-K-95-003 May 1995 pages 14 and 15 concerning mixtures of exempt and non-exempt waste.

Jerry Sexton and I would greatly appreciate your expertise and comments on this issue.

Sincerely yours,



Wayne Price-Environmental Engineer

cc: Jerry Sexton-District I Supervisor
Gary Wink-NMOCD Field Rep. II

attachments-2



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

NMOCD INTER-OFFICE CORRESPONDENCE

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TO: File of Old Standard Welding Yard
Eunice NM BLK 4, N. Eunice Addition.

From: Wayne Price-Environmental Engineer *Wayne Price*

Date: Feb. 8, 1996

Reference: Office visit by Don Blair
Councilman of City of Eunice.

Attending: Jerry Sexton-NMOCD
Wayne Price_NMOCD

Subject: Disposal of stocked piled soils and trash.

Comments:

Mr. Blair delivered TCLP results of stocked piled soils (attached). Results indicated the soils are Non-Hazardous per the TCLP portion of the sample tested.

Recommended to Mr. Blair that in order to determine if material is classified as hazardous waste he should also run RCI component of hazardous characteristics.

Also understand that they will be proposing to dispose of soils on Floyd Sims Ranch roads. Therefore, I recommend that they run TPH analysis EPA 418.1 or Modify 8015 to determine the relative threat to public health, fresh water and the environment per our NMOCD guidelines.

The trash that is located on site will be segregated and disposed of as common trash. The scrap metal and empty drums are going to be sent to Hobbs Iron & Metal for recycling.

When remaining test results are obtained Mr. Blair will submit all pertinent documentation to the NMOCD District Supervisor for final approval.

Mr. Blair pointed out that this will benefit the Eunice City general public. The citizens are concerned because this area is open to the public and children have been playing in this area.

cc: Jerry Sexton-NMOCD District I Supervisor
Gary Wink-NMOCD Field Rep. II
Roger Anderson-Environmental Bureau Chief
Don Blair-City of Eunice
Gary Blocker-NMED UST Hobbs Office

attachments-1

Note: Additional recommendations not discussed during meeting:

1. Recommend to screen soils with OVA analyzer for (BTEX) using a PID, and a RSI (Radiation Survey Instrument) for Naturally Occurring Radioactive Material.
2. Perform an audit on property to determine if "old disposal pit existed".





ARDINAL LABORATORIES

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

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

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

TCLP ANALYSIS REPORT

Company: Floyd Sims Pipeline
Address: P.O. Box 789
City, State: Eunice, NM 88231

Date: 11/20/95
Lab #: H2276

Project Name: Old Standard Welding Yard
Location: Block 4, N. Eunice Addition
Sampled by: DB
Sample Type: Soil

Date: not given
Sample Condition: Intact
Units: ppm

Sample ID: Block 4, N. Eunice Addition

TCLP ORGANICS

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Pyridine	<0.002	5.00
o-Cresol	<0.002	200
m,p-Cresol	<0.004	200
Hexachloroethane	<0.002	3.00
Nitrobenzene	<0.002	2.00
Hexachloro-1,3-butadiene	<0.002	0.500
2,4,6-Trichlorophenol	<0.002	2.00
2,4,5-Trichlorophenol	<0.002	400
2,4-Dinitrotoluene	<0.002	0.130
Hexachlorobenzene	<0.002	0.130
Pentachlorophenol	<0.002	100
Vinyl chloride	<0.001	0.20
1,1-Dichloroethylene	<0.001	0.70
Methyl ethyl ketone	<0.001	200
Chloroform	<0.001	6.00
1,2-Dichloroethane	<0.001	0.50
Benzene	<0.001	0.50
Carbon tetrachloride	<0.001	0.50
Trichloroethylene	<0.001	0.50
Tetrachloroethylene	<0.001	0.70
Chlorobenzene	<0.001	100
1,4-Dichlorobenzene	<0.001	7.50

*RFC FROM DON BLAIR
JWC
N*

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Silver	<0.1	5.0
Arsenic	<0.1	5.0
Barium	0.2	100.0
Cadmium	<0.1	1.0
Chromium	<0.1	5.0
Mercury	<0.002	0.2
Lead	<0.1	5.0
Selenium	<0.1	1.0

RECEIVED
FEB 8 1996
JULI HUBBS
OFFICE

METHODS: TCLP ORGANICS - EPA 8260/8270
METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000
METHODS: HWC - EPA SW 846

Mitch Irvin

Mitch Irvin

11/20/95

Date

NMOCD Inter-Correspondence

To: Roger Anderson-Environmental Bureau Chief
From: Wayne Price-Environmental Engineer District I
Date: Dec. 29, 1995

Wayne Price

Reference: Old Service Co. Yard located at 1310 Ave. O Eunice NM. behind R.G.Gunn Co.

Subject: Knowledge and Contents of District I File.

Comments:

Dear Roger,

Per your request, please find enclosed the contents of our file on this piece of property. Also enclosed is recent pictures of the facility.

History of this facility is as follows:

Original owners -unknown at this time.
Standard Welding & Const Co.
Standard Welding Co. ESOP
Unclaimed-Mortgage held by Lea Co. St. Bank.
Part of property was sold to RG Gunn thur an auction.

According to RG Gunn and Manola, employees, there is an old pit that has been covered. The present owners of Gunn Inc. are worried about children playing in the contaminated soils, trash, etc.

Mr. Gunn indicated that he borrowed Chevron's Radiation Survey Instrument and it indicated elevated levels.

One of the pictures I took reflect bicycle tires in the oily contaminated dirt.

Manola has suggested that someone should fence or post this property for health reasons.

For your information I understand that the City of Eunice has an active committee to clean-up old sites within the city of Eunice. At this time I do not know if they are involved with this piece of property.

cc: Jerry Sexton-District I Supervisor

Attachments- 7 pictures, 1-sketch

RECEIVED

DEC 2 9 1985
O.C.U. HUNTSVILLE
OFFICE

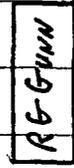
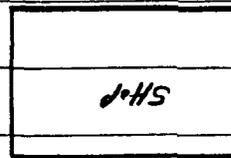
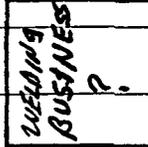
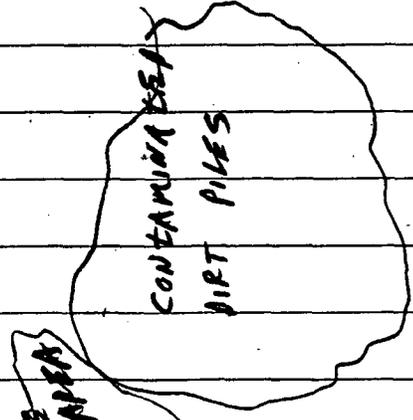
EUNICE N.M.

MAN

1611

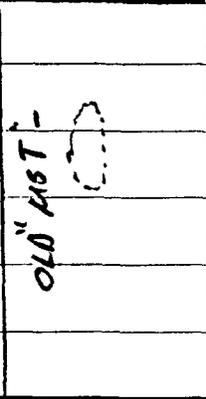
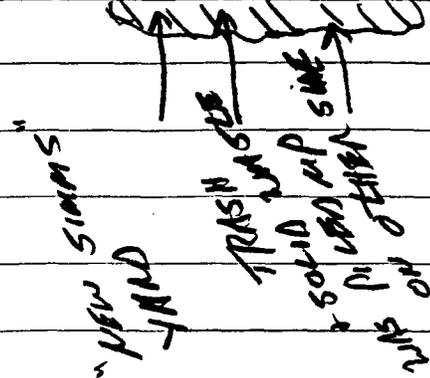
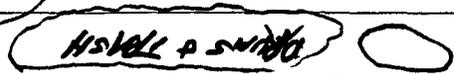
CHAPMAN BAR

SIMMS PIPELINE



1310 AVE O

AVE O



FROM: Wayne Price

TO: Roger Anderson

DATE: 01-03-96

TIME: 09:14

CC: Wayne Price

SUBJECT: Eunice NM - Old Service Co. Yard Waste

PRIORITY: 4

ATTACHMENTS:

Dear Roger,

Re: Eunice NM "Old Service Co. Yard" 1310 Ave. O "Waste".

Subject: Additional Info on my letter dated Dec. 29, 1995.

Dear Roger,

I had a telephone conversation today with Gary Blocker NMED "UST" in Hobbs. Gary informed me that there is an old UST located on this site and he has been informed by other parties that some of the contaminated soils that are on site might be UST soils that have been dumped with oilfield waste.

Since no one owns the property they have not been able to find a responsible party at this time concerning the UST tank.

Also, he indicated there is an old underground hidden shooting range!!! on site??

=====

NMOCD Inter-Correspondence

To: Roger Anderson-Environmental Bureau Chief
From: Wayne Price-Environmental Engineer District I

W. Price

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cc: Jerry Sexton-District I Supervisor

Attachments- 7 pictures, 1-sketch

RECEIVED
DEC 29 1935
OLD HUBBY
OFFICE

EUNICE N.M.

N
↑

MAIN

1611 MAIN
CHARNICK
BAR

SIMAS PIPELINE

POSSIBLE
OLD PIT AREA

CONTAMINATED
DIRT PILES

WELDING
BUSINESS
?

SHIP

R & GUNN
1310 AVE D

AVE. D

DIRT & TRASH

"NEW SIMAS"
YARD

TRASH YARD
SOLID WASTE
PILLS UP SIDE
ON OTHER SIDE

OLD MIST

**NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT**

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Name WAYNE PRICE Date 12-1-75 Miles _____ District I
 Time of Departure 7 AM Time of Return 4 PM Car No. G 04

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature *Wayne Price*

YARD BEHIND P & G OIL CO. - EUNICE NM

TOOK PICTURES -

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

TYPE INSPECTION PERFORMED

INSPECTION CLASSIFICATION

NATURE OF SPECIFIC WELL OR FACILITY INSPECTED

- H = Housekeeping
- P = Plugging
- C = Plugging Cleanup
- T = Well Test
- R = Repair/Workover
- F = Waterflow
- M = Mishap or Spill
- W = Water Contamination
- O = Other

- U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SND, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)
- R = Inspections relating to Reclamation Fund Activity
- O = Other - Inspections not related to injection or The Reclamation Fund

- D = Drilling
- P = Production
- I = Injection
- C = Combined prod. inj. operations
- S = SND
- U = Underground Storage
- G = General Operation
- F = Facility or location
- M = Meeting
- O = Other

E - Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)



MEMORANDUM OF MEETING OR CONVERSATION



Telephone



Personal

Time

≈ 11:00 am

Date

12/29/95

Originating Party

WAYNE PRICE - NMCD

Other Parties

RG GUNN Employee - MANOLA
FONICE NM

Subject

OLD YARD BEHIND RG GUNN YARD LOCATED AT 1310 AVE
& BEHIND CHADWELL BAR 1611 MAIN - SOLID WASTE ON PROPERTY

Discussion

MANOLA INDICATED SOLID WASTE WAS THERE WHEN MR.
GUNN PURCHASED PROPERTY. SHE THOUGHT BANK OWNS.

MANOLA HAS CALLED NMED BECAUSE CHILDREN ARE PLAYING
IN.

SHE SAID THERE IS AN OLD PIT ALSO, NOW COVERED!
SHE INDICATED THAT MR. GUNN CHECK AREA FOR RAIN
FOUND ELEVATED LEVELS, THERE IS ALSO AN OLD "HSE".

Conclusions or Agreements

Distribution

Signed

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal

Time
~ 10:00 am

DATE
12-29-75

Originating Party

Other Parties

WAYNE PRICE - PMOED

SAM SPELLEN - POSSIBLE
LEASER

Subject

INQUIRY OF PROPERTY BEHIND [REDACTED] TOWN - EDUZZE V.M.

Discussion

MR. SPELLEN INDICATED THIS WAS THE OLD
STANDARD WELDING CO. - THEY ARE NOT A BUSINESS
BANK HAS MORTGAGE ON PROPERTY

Conclusions or Agreements

Distribution

Signed





RGG 2 of 7

RGGOWN

OLD YAMA

LWP

12-01-95

PHOTO. (B) 36+80 NNN-26RU 423



RGG 347

12-01-95

LWP

DLR 59 36+00 MNN-28RU 423



REG 7 of 7

12-01-75

LWP

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RGG 5 of 7

12-01-95

LAP





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REG 6
547
12-01-95
LWP





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SHOW IN CONTAMINATED
SOIL!

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REG 76 of 7

12-01-75

LWP

