

**REMEDIATION  
PLAN  
&  
CLOSURE  
REPORT**



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

December 27, 1996

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

Mr. Danny Claburn  
District Mgr.  
Black Warrior Wireline Corp. (BWWC)  
P.O. Box 66  
Hobbs, New Mexico 88241

Re: Closure report for old yard at 800 S. Leach St. Hobbs, NM.

Dear Mr. Claburn,

The New Mexico Oil Conservation Division (NMOCD) is in receipt of closure report dated December 16, 1996 for the above referenced facility.

**The closure report submitted is hereby approved. Please note the NMOCD reserves the right to require additional information and/or actions if required by our NMOCD Environmental Bureau.**

Please be advised that NMOCD approval does not relieve (BWWC) of liability should remaining contaminates pose a future threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (BWWC) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

A handwritten signature in cursive script that reads "Wayne Price".

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor  
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe  
attachments-Closure report for Santa Fe NMOCD files.

BLACK WARRIOR WIRELINE CORPORATION  
4920 Lovington Highway  
P.O. Box 66  
Hobbs, New Mexico 88240

December 16, 1996

Mr. Wayne Price  
New Mexico Oil Conservation Division  
P.O. Box 1980  
Hobbs, New Mexico 88241-1980

DOB HOBBS  
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Dear Mr. Price:

This brief summary accompanies documentation for the closure of the site at, 800 S. Leach, Hobbs, New Mexico.

As per your letter dated, January 10, 1996, to Mr. Frank Beers, item's one and three; the contaminated soils that were stocked piled and the miscellaneous solid waste; were combined and classified. After they were classified, Pate Trucking was hired to haul this waste to Parabo Inc., in Eunice, N.M..

Item two, the "Sludge" remaining in the sump was tested on 12/29/95, at which time the ignitability was found at less than 140 deg. After conferring with Mr. Frank Sanchez, with the New Mexico Environment Department, permission was obtained to treat the sump to raise the ignitability. After the treatment was completed, the sump waste was retested with results finding the ignitability greater than 140 deg. The sump waste was then classified and the sludge removed to Parabo Inc., in Eunice, N.M..

When the clean up was completed, Western Environmental was asked to run soil analysis and norm readings with nothing if significance recorded.

Sincerely,



Danny Claburn  
District Manager

P.O. Box 1816  
Hobbs, New Mexico 88241



Phone (505) 392-5021  
Fax (505) 397-2597

Nov. 29, 1996

Mr. Danny Claburn  
District Manager

Black Warrior Wireline Corp.  
P.O. Box 66  
Hobbs, New Mexico 88241

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**RE: Closure report for old yard at 800 S. Leach**

Dear Mr. Claburn:

Western Environmental would like to take this time to thank you and Black Warrior for the chance to be of service again. The following is a brief summary of the clean up operations, to include the work plans, analysis, letters and documentation that should address the concerns of the NMOCD.

1) The impacted or stained surface soils of the yard and any gun shrapnel or debris was excavated and placed on plastic to be classified. There was 36 cyds. of impacted material total. Once this material was classified and approved for disposal by the NMOCD, it was then hauled to Parabo Inc. located in Eunice, N.M. A norm survey was also taken of the site, with nothing of concern being found. Final TPH test were also done to insure that all the impacted soils had been addressed.

2) The sump located inside the shop area was sampled for classification. The results were submitted to the NMOCD for approval to dispose of as non-hazardous waste. Once approval was received, there was 10 bbl. of liquid/sludge taken to Parabo Inc. in Eunice, N.M. The contents of the sump was removed by using a vacuum truck and a steam cleaner. Once the sump was empty it was steamed to insure that all contents were removed.

**NOTE:** Refer to attached documentation for more information.

Page two

This summary and the following documentation should provide information to show that Black Warrior has addressed the areas of concern for closure of this site, the old yard at 800 S. Leach Hobbs, N.M., in accordance with the NMOCD guidelines for closure of this site.

If you have any questions or need additional information in regards to this matter please call at any time (505) 392-5021

Sincerely,

A handwritten signature in black ink, appearing to read 'Allen Hodge', written in a cursive style.

Allen Hodge  
VP Operations  
Western Environmental Consultants

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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

January 10, 1996

Mr. Frank Beers  
Black Warrior Wireline Corp.  
4920 Lovington Hwy.,  
P.O. 66  
Hobbs, New Mexico 88240

NOCD HOBBS  
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Reference: Facility closure of old yard located at 800 S.  
Leech St.-Hobbs.

Dear Mr. Beers,

Please find enclosed the following documents to aid you in your facility closure:

1. "Guidelines for Remediation of Leaks, Spills and Releases."
2. List of NMOCD permitted "Surface Waste Management Facilities".
3. "EPA Waste Classification list".

It is the New Mexico Oil Conservation Division's (NMOCD) understanding that you are closing the facility located at 800 S. Leech St. and your new location will be at 4920 Lovington Hwy. Hobbs, New Mexico.

Per our site visit and your request I have noted and included the following recommendations for you concerning the proper closure of this facility.

1. All contaminated soils and miscellaneous solid waste (i.e. gun shrapnel, Misc. trash etc.) remaining on site should be classified and disposed of properly. The final clean-up levels should be pursuant to the NMOCD "Guidelines" (attached).

It is my understanding that you wish to dispose of the Solid Waste at one of the NMOCD permitted disposal facilities. Therefore, I have included a list of these facilities that are located in the NMOCD District I for your reference.

2. The "Sludge" remaining in the sump should be classified and disposed of properly.



3. Please provide documentation or information pertaining to the contaminated soils that were stocked piled on site on how and where they were disposed of.
4. During our site visit you indicated you will supply information to the effect that Black Warrior Wireline has documentation to verify that no Radio-Active materials or wastes were left behind.

Please note that any disposal of waste should be approved by the NMOCD prior to disposal. Also please note that if any of the waste turns out to be classified as hazardous per EPA RCRA definitions then you must contact the New Mexico Hazardous & Radioactive Material Bureau located in Santa Fe, New Mexico (1-505-827-1557).

If you have any questions please do not hesitate to call or write, and please note the NMOCD appreciates your voluntary compliance in this matter.

Sincerely yours,



Wayne Price-Environmental Engineer

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cc: Jerry Sexton-District I Supervisor  
Roger Anderson-Environmental Bureau Chief Santa Fe, NM  
David Hooten-City of Hobbs Environmental Mgt.

attachments-3



NM GENERAL CONTRACTORS LIC. #55535  
TX DRILLING LIC. #5005M  
NM DRILLING LIC. #WD 1349

P.O. BOX 5890 ★ HOBBS, NM 88241

PHONE (505) 392-6167 ★ FAX (505) 397-6085

February 15, 1996

Mr. Danny Claburn  
District Manager

Black Warrior Wireline Corp.  
P.O. Box 66  
Hobbs, New Mexico 88241

**RE: Work Plan for Remediation of Surface Soils  
Former Black Warrior Wireline Facility  
800 South Leach, Hobbs, New Mexico**

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Mr. Claburn:

Environmental Spill Control, Inc. (ESC) is pleased to present this work plan to remediate an area of surface staining previously identified at the former Black Warrior Wireline facility located at 800 South Leach, Hobbs, New Mexico. It is our understanding that the surface staining is the result of down hole logging and well perforation activities associated with the operation of an oil field service company. The potential contaminants of concern are low level concentrations of petroleum hydrocarbons and metals.

The New Mexico Oil Conservation Division (NMOCD) regulates disposal of non-domestic wastes resulting from the oil field service industry. In addition, the NMOCD administers all Water Quality Act regulations pertaining to surface and ground water except sewage for the oilfield service industry. This authority includes the disposition of non-domestic, non-hazardous wastes at oil field facilities.

#### **Scope of Work**

- 1) Conduct a radiation survey using a portable radiation detector (Ludlum Model 19 Micro R Meter) to measure background radiation as well as any radiation emitted from the facility grounds or equipment.
- 2) Excavate the surface soils containing any observed potential contamination. Since the impacted area appears limited to the near surface soils, excavation will consist of scraping/removing the soil in 3 to 6-inch layers to minimize the volume of waste generated (estimated volume is approximately 12 cubic yards). The excavated soils will be stockpiled at an on-site location pending waste characterization and disposal. The soils will be staged on and covered with plastic to prevent the potential spread of contamination.
- 3) Collect four soil samples of the excavated area for total petroleum hydrocarbon (TPH) analysis to verify that the remaining surface soils at the site contain TPH levels below (NMOCD) clean up guidelines for spills/releases. Should the TPH concentrations in the remaining soils exceed NMOCD levels, an additional 6-inch thick layer of soil will be removed and stockpiled.

BWWIL.SAM



4) Collect a composite sample of the excavated material for laboratory analysis. The purpose of the composite sample is to characterize the excavated material for waste classification in accordance with RCRA Subtitle C regulations. The sample will be analyzed for TPH, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), eight RCRA metals, and solid waste characteristics (ignitability, corrosivity, reactivity, and toxicity).

5) Should the analytical results from the sample of excavated material record levels of individual compounds that exceed EPA maximum concentration levels (MCLs) for toxicity characteristics, a sampling plan to verify the soils remaining in the excavated area are below MCL levels will be developed. This plan will include the collection of a minimum of two soil samples from randomly selected locations within the excavated area. In order to minimize costs, the samples will be analyzed for only the compounds that exceeded MCL levels.

6) Should the analytical results record individual compound concentrations below EPA listed MCLs, the tested materials will be considered a non-hazardous waste generated at an oil field facility. The materials will be transported to a NMOCD permitted commercial waste disposal facility. Each load of material will be accompanied by a manifest in accordance with Section 711 of the New Mexico Solid Waste Management Regulations.

#### Estimated Costs

<u>Item-Description</u>	<u>Cost/Unit</u>	<u>Total Cost</u>
1) Perform a radiation survey of the facility		\$ 250.00
2) Excavate and stage material using a backhoe (12 cubic yards).	\$43.00/hour	\$ 344.00
3) Laborer to assist excavation and staging	\$15.50/hour	\$ 124.00
4) Sample excavated area for TPH (4 samples). Sample excavated material for TPH (1 sample)	\$50.00/spl	\$ 250.00
5) Sample excavated material for TCLP VOC, SVOC, metals, and characteristics (includes one hour sampling/chain-of-custody time and laboratory analysis of one soil sample).	\$925.00/spl	\$ 957.00
6) Plastic to stage excavated material on.		\$ 50.00
7) Transport 12 cubic yards to the Parabo Disposal Facility (12 yard dump truck and backhoe)	\$42.00/hour	\$ 126.00
7) Disposal Fees	\$14.00/cyd	\$ 168.00
<b>ESTIMATED COST</b>		<b>\$2,269.00</b>
<b>NEW MEXICO GROSS RECEIPTS TAX</b>		<b>\$ 136.14</b>
<b>TOTAL ESTIMATED COST</b>		<b>\$2,405.14</b>

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The above costs assume the waste is non-hazardous and the total volume of material is 12 yards. Any additional services performed outside the scope of work will be billed at the above listed rates. We estimate the scope of work will take approximately 3 weeks to complete (eight hours for on-site work, approximately 15 days to receive analytical results, 4 days to obtain approval for disposal from NMOCD, and 1 day to dispose of excavated material).

Should excavation operations identify additional concerns outside the scope of work, approval from a representative of Black Warrior Wireline prior to performing any additional services.

Should the waste be characterized as a hazardous waste, a work plan to remediate the area and dispose of the excavated material (including manifest and transport) will be developed and submitted for your approval prior to performing the work.

ESC appreciates this opportunity to provide you with our professional services. Please do not hesitate to contact us for further information or questions regarding this work plan.

Respectfully,  
**Environmental Spill Control, Inc.**



F. Wesley Root  
Division Manager  
Hydrology/Geology

cc: Mr. Allen Hodge

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# WESTERN ENVIRONMENTAL CONSULTANTS

P.O. Box 1816  
Hobbs New, Mexico 88240  
(505) 392 - 5021

## NORM SURVEY

DATE: 11/29/96  
CLIENT: Black Warrior Wireline  
SUPERVISOR: A. Hodge

FACILITY: Old Yard 800 S. Leach  
Order by: Danny Claburn

	BACKGROUND	TEST	LOCATION
TEST NO. 1	8.7 mr/hr	9.1 mr/hr	North East corner of yard
TEST NO. 2	8.7 mr/hr	9.8 mr/hr	North West corner of yard
TEST NO. 3	8.7 mr/hr	9.3 mr/hr	South East corner of yard
TEST NO. 4	8.7 mr/hr	10.3 mr/hr	South West corner of yard
TEST NO. 5	8.7 mr/hr	10.4 mr/hr	Center of yard area
TEST NO. 6	8.7 mr/hr	9.7 mr/hr	Office area
TEST NO. 7	8.7 mr/hr	11.6 mr/hr	Shop area

Comments: This survey was done on the old yard located at 800 S. Leach Hobbs, NM. Nothing of concern or high readings were found. The background reading was taken off site around the site fence.

EQ. USED: Victoreen model # 190 SIN.# 360  
re.cal date 02/07/97

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OFFICE

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\* CALLED ALLEN HODGE, THE SYMBOL "M"  
IS THERE A 10<sup>-6</sup>

12/07/96

# WESTERN ENVIRONMENTAL CONSULTANTS

P.O. Box 1816  
Hobbs New, Mexico 88240  
(505) 392 - 5021

## SOIL ANALYSIS REPORT

DATE: 11/29/96  
CLIENT: Black Warrior Wireline  
SUPERVISOR: A. Hodge  
Sample Matrix: Soil

FACILITY: Old Yard 800 S. Leach  
Test Method: EPA 418.1  
Order No.: Danny Claburn  
SAMPLE RECEIVED: Intact on site

	TPH		DEPTH	LOCATION
SAMPLE NO. 1:	127	PPM	0-6"	Composite of yard
SAMPLE NO. 2:		PPM		
SAMPLE NO. 3:		PPM		
SAMPLE NO. 4:		PPM		
SAMPLE NO. 5:		PPM		
SAMPLE NO. 6:		PPM		
SAMPLE NO. 7:		PPM		
SAMPLE NO. 8:		PPM		
SAMPLE NO. 9:		PPM		
SAMPLE NO. 10:		PPM		

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COMMENTS: This sample was a five point composite sample taken for the old yard located at 800 S. Leach Hobbs, NM. This sample was taken to insure that all the impacted soils had been addressed, for closure of this site.



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

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

PHONE (505) 326-4668 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

### FINAL ANALYSIS REPORT

Company: Environmental Spill Control, Inc.  
Address: PO Box 5890  
City, State: Hobbs, NM 88240  
Project ID: Black Warrior Wireline  
Location: 800 S. Leech  
Sampled by: AH  
Sample Type: Soil  
Sample #1: Soil in Yard

Date: 03/11/96  
Lab#: H2435

Date: 02/29/96  
Sample Condition: intact

\*\*\*\*\*

#### TCLP SEMIVOLATILES

PARAMETER	RESULT 1
Pyridine	<0.004
1,4-Dichlorobenzene	<0.004
o-Cresol	<0.004
m,p-Cresol	<0.008
Hexachloroethane	<0.004
Nitrobenzene	<0.004
Hexachloro-1,3-butadiene	<0.004
2,4,6-Trichlorophenol	<0.004
2,4,5-Trichlorophenol	<0.004
2,4-Dinitrotoluene	<0.004
Hexachlorobenzene	<0.004
Pentachlorophenol	<0.004

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#### TCLP INORGANICS (Leachate)

PARAMETER	RESULT 1	EPA LIMIT	UNITS
Arsenic	<0.1	5	ppm
Silver	<0.1	5	ppm
Barium	1.6	100	ppm
Cadmium	<0.1	1	ppm
Chromium	<0.1	5	ppm
Mercury	<0.001	0.2	ppm
Lead	<0.1	5	ppm
Selenium	<0.1	1	ppm

#### HAZARDOUS WASTE CHARACTERIZATION

PARAMETER	RESULT 1	UNITS
Ignitability (Pensky-Martens Closed Cup)	>140	F
Corrosivity (pH)	8.90	
Reactivity-S	7.0	
Reactivity-CN	> 0.02	mg/kg

METHODS: HWC - EPA SW 846-7.3, 7.2, 1010

Manuel Garbalena  
Manuel Garbalena

3/16/96  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

**FINAL ANALYSIS REPORT**

Company: Environmental Spill Control, Inc. Date: 03/11/96  
Address: PO Box 5890 Lab#: M2435  
City, State: Hobbs, NM 88240  
Location: Black Warrior Wireline 800 S. Leech Hobbs, NM  
Sampled by: AH Date: 02/28/96  
Sample Type: Soil in Yard Sample Condition: intact

\*\*\*\*\*

**TCLP VOLATILES**

<u>PARAMETER</u>	<u>RESULT</u>
Benzene	<0.001
Carbon tetrachloride	<0.001
Chlorobenzene	<0.001
Chloroform	<0.001
1,2-Dichloroethane	<0.001
1,1-Dichloroethylene	<0.001
Methyl ethyl ketone	<0.001
Tetrachloroethylene	<0.001
Trichloroethylene	<0.001
Vinyl chloride	<0.001

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METHOD: TCLP VOLATILES - EPA SW 846-8260,1311

Manuel Garbalena

3/14/96  
Date

PHONE: (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

Telephone 392-6167 FAX 397-5085

[illegible]

CERTIFICATE OF WASTE STATUS  
NON-EXEMPT WASTE MATERIAL

ORIGINATING LOCATION: BLACK WARRIOR WIRELINE

SOURCE: SUMP SLUDGE

DISPOSAL LOCATION: SUNDANCE SERVICES - PARABO FACILITY

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3.

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I, the undersigned as the agent for BLACK WARRIOR WIRELINE  
concur with the status of the waste from the subject site.

Name DANNY CLABURN

Title/Agency DISTRICT MANAGER/BWWC

Address \_\_\_\_\_

Signature

Danny Claburn

Date

MARCH 21, 1996



5/28/96 3/28/96

District I - (505) 393-6161  
P.O. Box 1940  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

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-13  
Originated 4/18/95  
Submit Origin:  
Plus 1 Cop  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator BLACK WARRIOR WIRELINE
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site HOBBS FACILITY
2. Management Facility Destination SUNDANCE SERVICES PARABO FACILITY	6. Transporter PATE TRUCKING
3. Address of Facility Operator P.O. BOX 1737 EUNICE	8. State N.M.
7. Location of Material (Street Address or ULSTR) 800 S. LEECH HOBBS	N.M. 88241
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

THE FOLLOWING ANALYTICAL IS FOR CONTAMINATED SOIL AT BLACK WARRIOR'S HOBBS FACILITY. THIS WASTE WAS GENERATED BY NORMAL OPERATIONS OF BUSINESS. THIS BUSINESS WAS AT THIS LOCATION FOR MORE THAN 15 YEARS. I HAVE INCLUDED A CERTIFICATE OF WASTE STATUS, ALONG WITH THE CHAIN OF CUSTODY FOR YOUR REVIEW. SUNDANCE SERVICES WOULD LIKE APPROVAL TO ACCEPT THIS MATERIAL AT OUR PARABO FACILITY.

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MAY 1 1996  
OIL CONSERVATION  
OFFICE

RECEIVED  
MAR 28 1996  
OIL CONSERVATION  
OFFICE

Estimated Volume 15 YARDS cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE: Donna L. Roach TITLE: OFFICE MANAGER DATE: 03-22-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: DONNA L. ROACH TELEPHONE NO. (505) 394-2511

(This space for State Use)

APPROVED BY: <u>[Signature]</u>	TITLE: <u>Field FS/SH</u>	DATE: <u>3/28/96</u>
APPROVED BY: <u>[Signature]</u>	TITLE: <u>GEOLOGIST</u>	DATE: <u>4/30/96</u>

BILL TO

*Black Warrior*CONTRACT  
NUMBERFIELD  
ORDER  
NUMBER

No 14351

A.F.E.  
NUMBER

DATE

5-13-96

REQ. OR  
PURCHASE ORDER  
NUMBER

ORDERED BY

DELIVERED  
FROM*yard*

TO

*Parabo*

LOCATION

WELL OR  
RIG NO.*yard*TRUCK OR  
UNIT NO.*95*

CAPACITY

*12*AMOUNT  
HAULED*36*TIME  
OUT*1:00*TIME  
IN*6:00*

AM

*PM*HOURS  
CHGD.*5*

DELIVERED BY

*BA+DT*

DESCRIPTION

O HR.

O BBL.

RATE

AMOUNT

*hauled off contaminated  
soil to parabo**9th, 9th**50*  
*42.00**210.00**Disposal**36*  
*18.00**648.00**Thank You!*

TOP GAUGE

BOTTOM GAUGE

SET DATE

RELEASE DATE

*858.00*

HIGHWAY MILES

LOADED

UNLOADED

TERMS:

TAX

*51.48*

NET TOTAL

*909.48*

AUTHORIZED BY:

OPERATOR OR DRIVER

*Ray Payne*

Thank You

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NM GENERAL CONTRACTORS LIC. #55535  
TX DRILLING LIC. #5005M  
NM DRILLING LIC. #WD 1349

P.O. BOX 5890 ★ HOBBS, NM 88241  
PHONE (505) 392-6167 ★ FAX (505) 397-5085

February 15, 1996

Mr. Danny Claburn  
District Manager  
Black Warrior Wireline Corp.  
P. O. Box 66  
Hobbs, New Mexico 88241

**RE: Treatment Procedures for Shop Sump  
Former Black Warrior Wireline Facility  
800 South Leach, Hobbs, New Mexico**

Mr. Claburn:

Environmental Spill Control, Inc. (ESC) would like to thank you for the chance to be of service to you and your company. The following is an outline of how we treated the contents of the sump located at the former Black Warrior Wireline facility located at 800 South Leach, Hobbs, New Mexico. Sump treatment procedures were initiated after receiving authorization to proceed from yourself. It is our understanding that you received verbal approval to treat the contents of the sump from Mr. Frank Sanchez with the New Mexico Environmental Hazardous and Radioactive Waste Division in Santa Fe prior to authorizing ESC to proceed.

Black Warrior requested approval to treat the sump after the analytical results of a TCLP profile recorded concentrations below EPA maximum concentration levels (MCLs) for toxicity characteristics with the exception of ignitability. The sample was analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), eight RCRA metals, and solid waste characteristics (ignitability, corrosivity, reactivity, and toxicity). The purpose of the sample was to characterize the pit contents for waste classification in accordance with RCRA Subtitle C regulations.

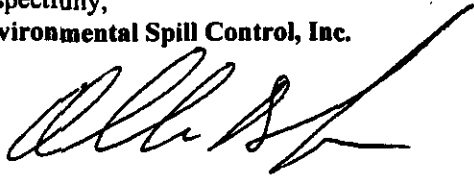
The purpose of the sump treatment procedure was to raise the flash point of the sump contents above 140 degrees Fahrenheit in order to allow the contents to be classified as non-hazardous in accordance with RCRA Subtitle C regulations. The sump treatment procedures used by ESC consisted of agitating the sump contents by spraying five gallons of a product named Bio-Sept, which is a biodegradable surfactant, into the sump using a steam cleaner. After treatment, a grab sample of the pit contents was obtained and submitted to the laboratory for ignitability analysis.

BWWIL.SAM

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ESC appreciates this opportunity to provide you with our professional services. Please do not hesitate to contact us for further information.

Respectfully,  
Environmental Spill Control, Inc.

A handwritten signature in black ink, appearing to read "Allen Hodge", with a long, sweeping horizontal stroke extending to the right.

Allen Hodge, REM  
Field Superintendent

cc: Mr. Wes Root

BWWIL.SAM

OLD HUBBS  
DEC 18 1996  
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GARY E. JOHNSON  
GOVERNOR

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



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

March 14, 1996

Danny Claburn  
District Manager  
Black Warrior Wireline Corp.  
P.O. Box 66  
Hobbs, NM 88241

Dear Mr. Claburn:

The New Mexico Environment Department (NMED) has received your fax in regards to treatment of the sump contents located at your 800 South Leach facility. Treatment of characteristically hazardous waste for ignitability is allowed under 40 CFR §265.201 (Special requirements for generators of between 100 and 1000 kg/mo that accumulate hazardous waste in tanks) provided that the waste is treated, rendered, or mixed before or immediately after placement in the tank system (i.e. sump) so that: (A) the resulting waste, mixture, or dissolution of material no longer meets the characteristic of ignitability as defined in §261.21, and (B) such treatment does not; (1) generate extreme heat or pressure, fire or explosion, or violent reaction; (2) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion; (4) damage the structural integrity of the device containing the waste; or (5) through other like means that threaten human health or the environment pursuant to §265.17(b).

As per OCD's request, I am notifying you with this letter that the sump contents no longer appear to meet the characteristic for ignitability. If you have any questions, please contact Mr. Frank Sanchez of my staff at (505) 827-1558.

Sincerely,

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

cc: Wayne Price, OCD Hobbs Field Office

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MAR 15 1996  
HOBBS FIELD OFFICE



**BLACK WARRIOR WIRELINE CORP.**

P. O. Box 66  
Hobbs, New Mexico 88240  
505-393-6325

January 15, 1995

To: Controlled Recovery Inc.  
1601 North Turner ste 211  
Hobbs, New Mexico, 88240

From; Black Warrior Wireline Corp  
P.O. Box 66  
Hobbs, New Mexico 88240

Dear Donna;

Per our conversation this date this is a request to recieve a permit to have the sump system at 800 south leech in Hobbs, New Mexico pumped out.

Enclosed you will find the test results done thur Environmental spill control, Inc by Cardinal Laboratories in Hobbs, New Mexico.

Upon issuing a permit we plan to hire Pate Trucking to dispose of the contence of the sump. The volume of the sump system is approxmately 75 barrels. It is about half full at the present time. This system was used to clean our wireline units and tools that were run in oil wells to preform our services.

If you require any additional information for this permit please call me . Thank you for your help in this matter.

Sincerely;

*Frank Beers*

Frank Beers  
District Manager  
B.W.W.C.  
Hobbs, New Mexico 88240  
505-392-4992

OLD FILE  
DEC 1  
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**BLACK WARRIOR WIRELINE CORP.**

P.O. Box 66  
Hobbs, New Mexico 88240  
505-393-6325

March 21, 1996

Sundance Services, Inc.  
Parabo Facility  
P.O. Box 1737  
Eunice, N.M. 88231  
Attn: Donna Roach

Dear Ms. Roach,

This letter is in reference to non-exempt waste from sump pit at 800 S. Leech, Hobbs, N.M. that previously belonged to Black Warrior Wireline Corp. The sump collected run off water from the exterior wash rack, the shop floor, and the shop wash basin. Certain chemicals in small quantities would drain into the sump in the course of washing the field equipment as well as any other chemicals or hydrocarbon products as may have been spilled on the shop floor in the general course of operations. The total amount of waste water should be between 15 and 20 barrells and the transport company should be Pate Trucking. If there are any questions or clarifacations needed, please contact Danny Claburn (Hobbs District Manager, Black Warrior Wireline Corp.) at (505) 392-4992 or fax questions to (505) 392-7102. Thank you for your time and consideration.

Sincerely,

*Danny Claburn*  
Danny Claburn  
District Manager

DC/rjh

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

Energy Minerals and Natural Resources Department

Oil Conservation Division

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

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'96 APR 12 AM 8 52

Submit Origin:  
Plus 1 Cop  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator BLACK WARRIOR WIRELINE
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site HOBBS FACILITY
2. Management Facility Destination SUNDANCE SERVICES PARABO FACILITY	6. Transporter PATE TRUCKING
3. Address of Facility Operator P.O. BOX 1737 EUNICE, N.M.	8. State N.M.
7. Location of Material (Street Address or ULSTR) 800 S. Leech HOBBS, N.M. 88231	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.	
All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

The following analytical is for sump waste from Black Warrior's Hobbs Facility. This waste was generated from run off water from the exterior wash rack, the shop floor, and the shop wash basin. Certain chemicals in small quantities would drain into the sump in the course of washing the field equipment as well as any other chemicals or hydrocarbon products that may have spilled onto the shop floor. In previous testing the ignitability level was above EPA limits. I have included a letter from the Environment Department allowing the generator to treat this waste to bring the ignitability level to EPA levels. I have also included a certificate of waste status and chain of custody for your review. Sundance Services would like approval to accept this material at the Parabos Facility.

Hold for corrected IGN TEST RESULTS.  
REC IGN TEST RESULT 7/14/96 OK JD 9/6/96

Estimated Volume 20 bbls. cy Known Volume (to be entered by the operator at the end of the waste) \_\_\_\_\_ cy  
SIGNATURE: Donna L. Roach TITLE: OFFICE MANAGER DATE: 04-03-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: DONNA L. ROACH TELEPHONE NO. (505) 394-2511

(This space for State Use)

APPROVED BY: [Signature] TITLE: Field Engineer DATE: 4/8/96  
APPROVED BY: [Signature] TITLE: Geologist DATE: 4/23/96





# 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

## CHEMICAL ANALYSIS OF WATER

Company : Western Environmental Consultants  
Address : 1533 Cordoba  
City/State : Hobbs, NM 88240  
Proj.Name : Black Warrior Wireline  
Location : S. Leech Hobbs NM

Lab #: H2403  
Date Received: 02/09/96  
Date Analyzed: 02/08/96

Sample type: Liquid

Units: mg/L

## HAZARDOUS WASTE CHARACTERIZATION

### PARAMETER

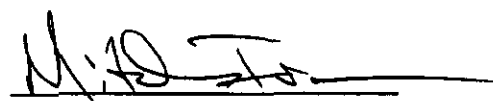
### RESULT 1

Ignitability  
(Pensky-Martens Closed Cup)

>140 F \*\*\*

\*\*\* With addition of BIOSEP FLUID

METHODS: HWC - EPA SW 846-7.3, 7.2, 1010

  
Mitch Irvin

2-9-96  
Date

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## FINAL ANALYSIS REPORT

Company: Western Environmental Consultants  
Address: 1588 Cordova  
City, State: Hobbs, New Mexico 88240

Date: 12/29/95  
Lab #: H2350-1

Project Name: Black Warrior Wireline  
Location: 800 S. Leech Hobbs, NM  
Sampled by: AH  
Sample Type: Soil  
Sample ID: Sump

Date: 12/22/95  
Sample Condition: Intact  
Units: ppm

## TCLP SEMIVOLATILES

PARAMETER	RESULT	EPA LIMIT
Pyridine	<0.002	5.0
1,4-Dichlorobenzene	<0.002	7.5
o-Cresol	0.020	200.0
m,p-Cresol	0.284	200.0
Hexachloroethane	<0.002	3.0
Nitrobenzene	<0.002	2.0
Hexachloro-1,3-butadiene	<0.002	0.5
2,4,6-Trichlorophenol	<0.002	2.0
2,4,5-Trichlorophenol	<0.002	400.0
2,4-Dinitrotoluene	<0.002	0.130
Hexachlorobenzene	<0.002	0.130
Pentachlorophenol	<0.002	100.0

METHOD: EPA SW 846-8270

Mitch Irvin  
Mitch Irvin

1/2/96  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

## FINAL ANALYSIS REPORT

Company: Western Environmental Consultants      Date: 12/29/95  
Address: 1588 Cordova      Lab #: H2350  
City, State: Hobbs, NM 88240

Project Name: Black Warrior Wireline  
Location: 800 South Leech  
Sampled by: AH      Date: 12/22/95  
Sample Type: Soil Sump      Sample Condition: Intact

Sample ID: Black Warrior Wireline      Units: ppm

## TCLP VOLATILES

<u>PARAMETER</u>	<u>RESULT</u>
Benzene	0.021
Carbon tetrachloride	<0.002
Chlorobenzene	<0.002
Chloroform	0.010
1,2-Dichloroethane	<0.002
1,1-Dichloroethylene	<0.002
Methyl ethyl ketone	<0.002
Tetrachloroethylene	<0.002
Trichloroethylene	<0.002
Vinyl chloride	<0.002
1,4-Dichlorobenzene	<0.002

METHOD: TCLP VOLATILES - EPA SW 846-8260,1311

Mitch Irvin  
Mitch Irvin

1/8/96  
Date



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

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

## METALS ANALYSIS REPORT

Company: Western Environmental Consultants      Date: 01/08/96  
Address: 1588 Cordoba      Lab #: H2350  
City, State: Hobbs, NM 88240  
  
Project Name: Black Warrior Wireline  
Location: 800 S. Leech  
Sampled by: TS      Date: 12/22/95  
Sample Type: Sludge from Sump      Sample Condition: intact  
  
Sample ID: Sump

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	1.2	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury *	<0.002	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: -EPA 1311/600/4-  
\*EPA 245.1

  
Mitch Irvin

  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

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

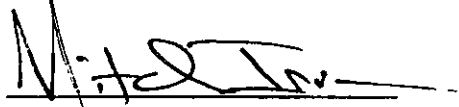
### TCLP ANALYSIS REPORT

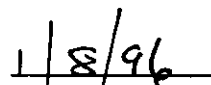
Company: Western Environmental Consultants      Date: 01/08/96  
Address: 1588 Cordoba      Lab #: H2350  
City, State: Hobbs, NM 88240  
Project Name: Black Warrior Wireline  
Location: 800 S. Leech  
Sampled by: AH      Date: 12/22/95  
Sample Type: Sludge      Sample Condition: intact  
Sample ID: Sump

### HAZARDOUS WASTE CHARACTERIZATION

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Ignitability (Pensky-Martens Closed Cup)	95	F
Corrosivity, (pH)	6.70	
Reactivity-S	3.43	mg/kg
Reactivity-CN	No Reaction (<0.01)	ppm

METHODS: HWC - EPA SW 846-7.3, 7.2, 1010

  
Mitch Irvin

  
Date

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Office - (505) 393-6161  
P. O. Box 1940  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

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-1  
Originated 4/18

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator BLACK WARRIOR WIRELINE
Verbal Approval Received: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	5. Originating Site HOBBS FACILITY
2. Management Facility Destination CONTROLLED RECOVERY INC.	6. Transporter PATE TRUCKING
3. Address of Facility Operator P.O. BOX 369 HOBBS	8. State NEW MEXICO
7. Location of Material (Street Address or U.S. MAIL) 800 S LEECH, HOBBS, NEW MEXICO 88240	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

THE FOLLOWING ANALYTICAL IS FOR BLACK WARRIOR WIRELINE CORP'S HOBBS FACILITY. THE SUMP WASTE WAS GENERATED BY THEIR WIRELINE UNITS AND TOOLS THAT WERE RUN IN OIL WELLS TO PERFORM THEIR SERVICES. I HAVE INCLUDED A CERTIFICATE OF WASTE STATUS AND A CHAIN OF CUSTODY. CRI ASK FOR YOUR APPROVAL TO DISPOSE OF THIS MATERIAL AT OUR HALF WAY FACILITY.

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JAN 19 1996

WASTE MANAGEMENT  
OFFICE

DENIED

ANALYTICAL REFLECTS IGNITABILITY  
TO BE L 140°F

Estimated Volume 75 BBLs cy Known Volume (to be entered by the operator at the end of the haul) cy

SIGNATURE: Billie Charo TITLE: OFFICE MANAGER DATE: 01-15-96  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: BILLIE CHARO TELEPHONE NO. 505-393-1079

(This space for State Use)

APPROVED BY: _____	TITLE: _____	DATE: _____
APPROVED BY: _____	TITLE: _____	DATE: _____

S.C.C. 35434  
ICC MC # 259649

TRANSPORTS  
FRAC TANKS  
VAC TRUCKS

**PATE TRUCKING CO.**  
P.O. BOX 1008, HOBBS, N.M. 88241

PHONE (505) 397-6264

BILL TO

*Black Warrior Wireline*

CONTRACT  
NUMBER

A.F.E.  
NUMBER

REQ. OR  
PURCHASE ORDER  
NUMBER

FIELD  
ORDER  
NUMBER **Nº 14928**

DATE  
**5-13-96**

ORDERED BY

DELIVERED  
FROM

TO

*Parabo SWD*

LOCATION

WELL OR  
RIG NO.

TRUCK OR  
UNIT NO.

CAPACITY

AMOUNT  
HAULED

TIME  
OUT

AM  
PM

TIME  
IN

AM  
PM

HOURS  
CHGD.

DELIVERED BY

*63*

*85*

*10*

*8*

*AM*

*12*

*PM*

*4*

*VIT.*

DESCRIPTION

HR.

BBL.

RATE

AMOUNT

*pull sumps steam out  
Take to Parabo*

*UTub*

*4@ 53.00*

*212.00*

*Disposal*

*10@ 3.25*

*32.50*

*Jet-Out Truck*

*Jet-Out Fee*

*40.00*

*40.00*

*Thank You!*

TOP GAUGE

BOTTOM GAUGE

SET DATE

RELEASE DATE

HIGHWAY MILES

LOADED

UNLOADED

TERMS:

TAX

NET TOTAL

*284.50*

*14.00*

*301.50*

AUTHORIZED BY:

OPERATOR OR DRIVER

*Mike Rodgers*

x

Thank You

U.S. FEDERAL  
OFFICE  
DEC 11 1996  
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cc: NMOC  
ENVIRONMENTAL BUREAU  
SANTA FE -  
Att: ROGER ANDERSON

ENVIRONMENTAL DIVISION  
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NOV 21 1996

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 2:59 PM

Date 11/20/96

Originating Party

Other Parties

WAYNE PRICE - NMOC

392-4992

DAN CLAYBURN - (BWW)

BLACK WARRIOR WIRE LINE

Subject

OLD YARD 800 S LEECH ST HOBBS NM

Discussion

PROGRESS REPORT ON CLEAN-UP + CLOSURE REPORT

Conclusions or Agreements

BLACK WARRIOR WIRELINE WILL SUBMIT CLOSURE  
LETTER FOR NMOC APPROVAL BY DEC 20, 1996

Distribution

cc: JERRY SEXTON / ROGER ANDERSON  
DAN CLAYBURN - BWW

Signed