

NM1 - 8

APPROVALS

YEAR(S):

2010



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Jim Noel
Cabinet Secretary

Karen W. Garcia
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



September 15, 2010

Craig Schmitz
T-n-T Environmental, Inc.
HCR 74 Box 113
Lindrith, New Mexico 87029

**RE: Request for Approval to Apply a Successive Lift
T-n-T Environmental, Inc.
Permit NM-1-008 (Evaporation Ponds and Landfarm)
Location: SE/4 of Section 7 and SW/4 of Section 8 (evaporation ponds) and the SW/4
SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of 8 (landfarm), Township 25
North, Range 3 West, NMPM
Rio Arriba County, New Mexico**

Dear Mr. Schmitz:

The Oil Conservation Division (OCD) has reviewed T-n-T Environmental, Inc.'s (T-n-T) request, dated September 13, 2010 to grant approval to apply an additional six-inch lift to the following cell(s): **Cell 8.**

Based upon the analytical results provided, the OCD hereby grants T-n-T approval to apply an additional six-inch lift of contaminated soils to the above referenced landfarm cells. T-n-T shall ensure that the application of an additional six-inch lift of contaminated soils to the above referenced landfarm cells does not exceed the maximum thickness of two feet or 3000 cubic yards per acre limit as specified in 19.15.36.15 NMAC. Note, that with the addition of successive lifts T-n-T must initiate treatment zone monitoring and resume vadose zone monitoring. The vadose zone monitoring depth must be adjusted to reach the 2-3 foot zone below the original native ground surface.

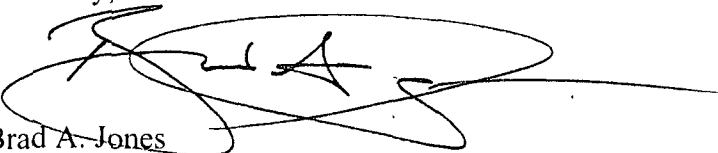
Please be advised that approval of this request does not relieve T-n-T of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve T-n-T of its responsibility to comply with any other applicable governmental authority's rules and regulations.



Mr. Schmitz
T-n-T Environmental, Inc.
Permit NM-1-008
September 15, 2010
Page 2 of 2

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

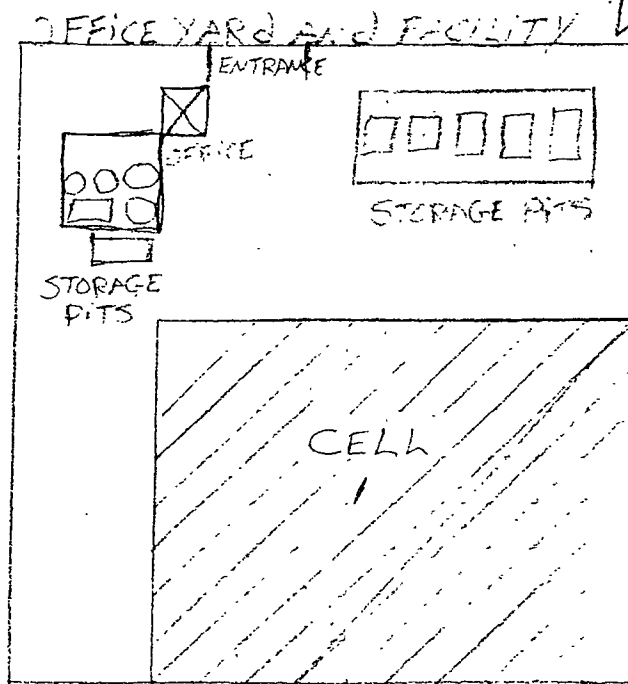
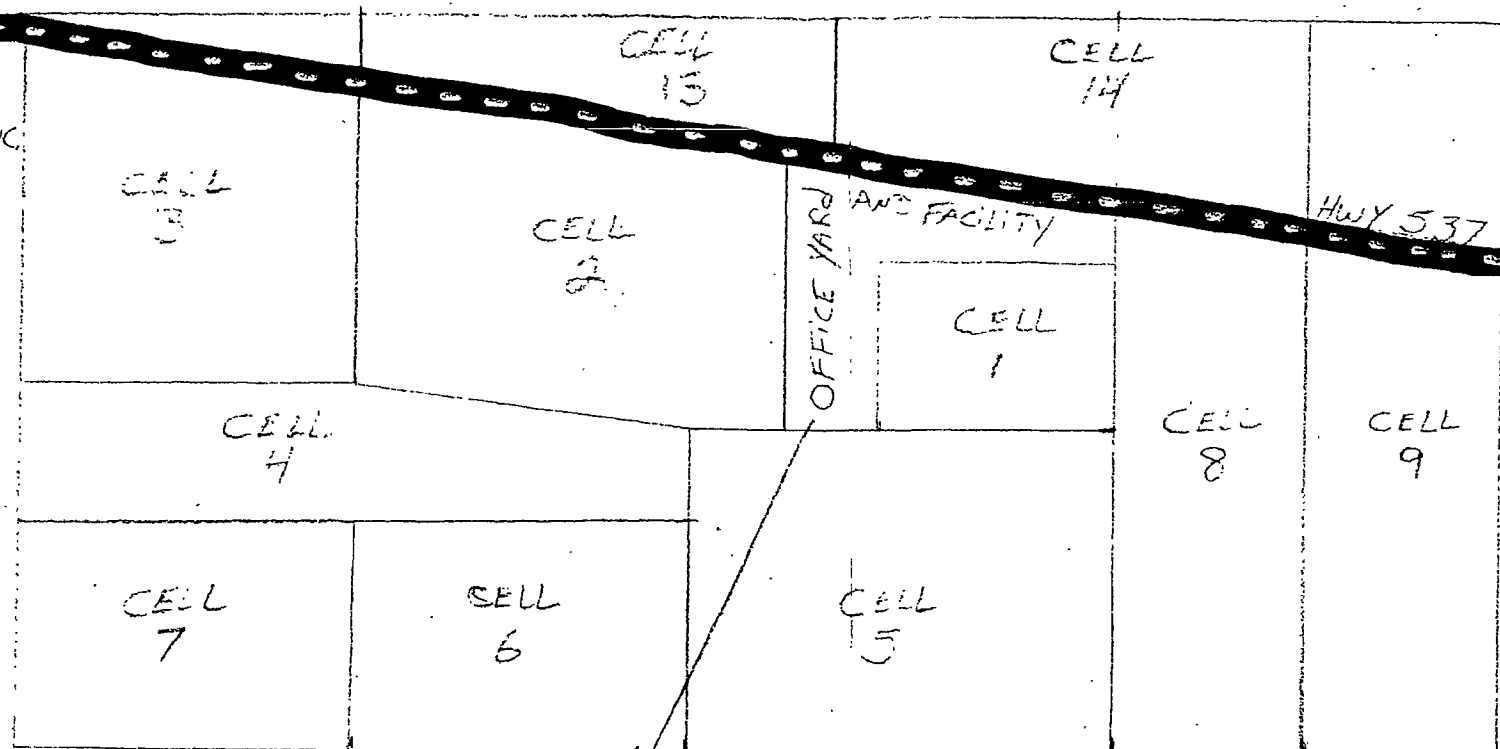
BAJ/baj

Attachment: Facility Map (Date: 2010)

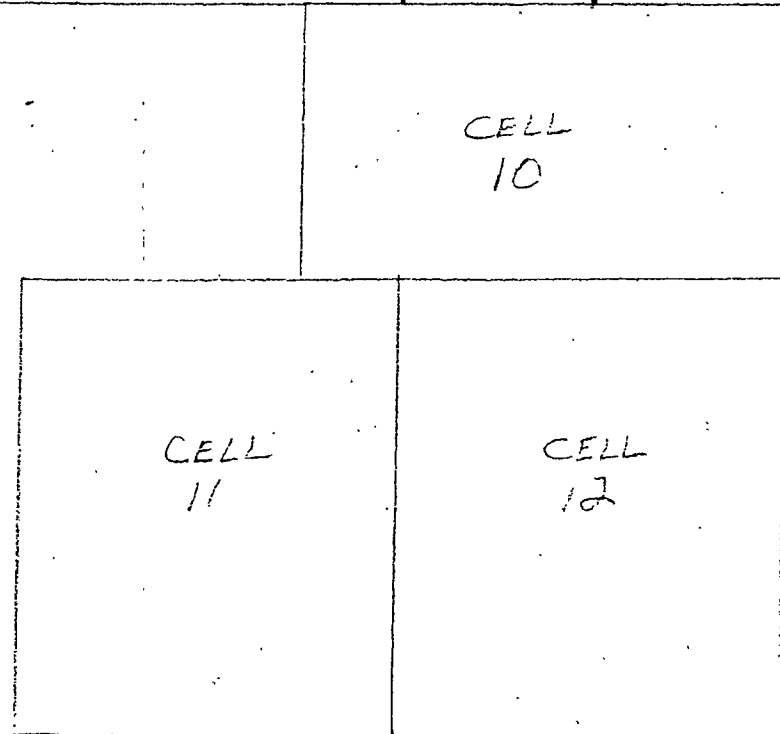
cc: OCD District III Office, Aztec

T-N-T ENVIRONMENTAL INC.
70 COTTON RD
LAWRENCE, KS 66044

LAND FARM MAP
PERMIT #MM-01-0008
SEC. 5 & 8 T2EN R3W



DATE 2010



Jones, Brad A., EMNRD

From: Lutisha Schmitz [schmitzent@yahoo.com]
Sent: Wednesday, September 15, 2010 4:15 PM
To: Jones, Brad A., EMNRD
Subject: Chain of Custody
Attachments: chain of custody.pdf

Brad,
Here is the information you asked for.
Thank you,
Craig Schmitz
T-n-T Environmental



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

September 02, 2010

CRAIG SCHMITZ
T-N-T ENVIRONMENTAL
70 OJITO ROAD
LINDRITH, NM 87029

RE: LANDFARM

Enclosed are the results of analyses for samples received by the laboratory on 08/24/10 9:45.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

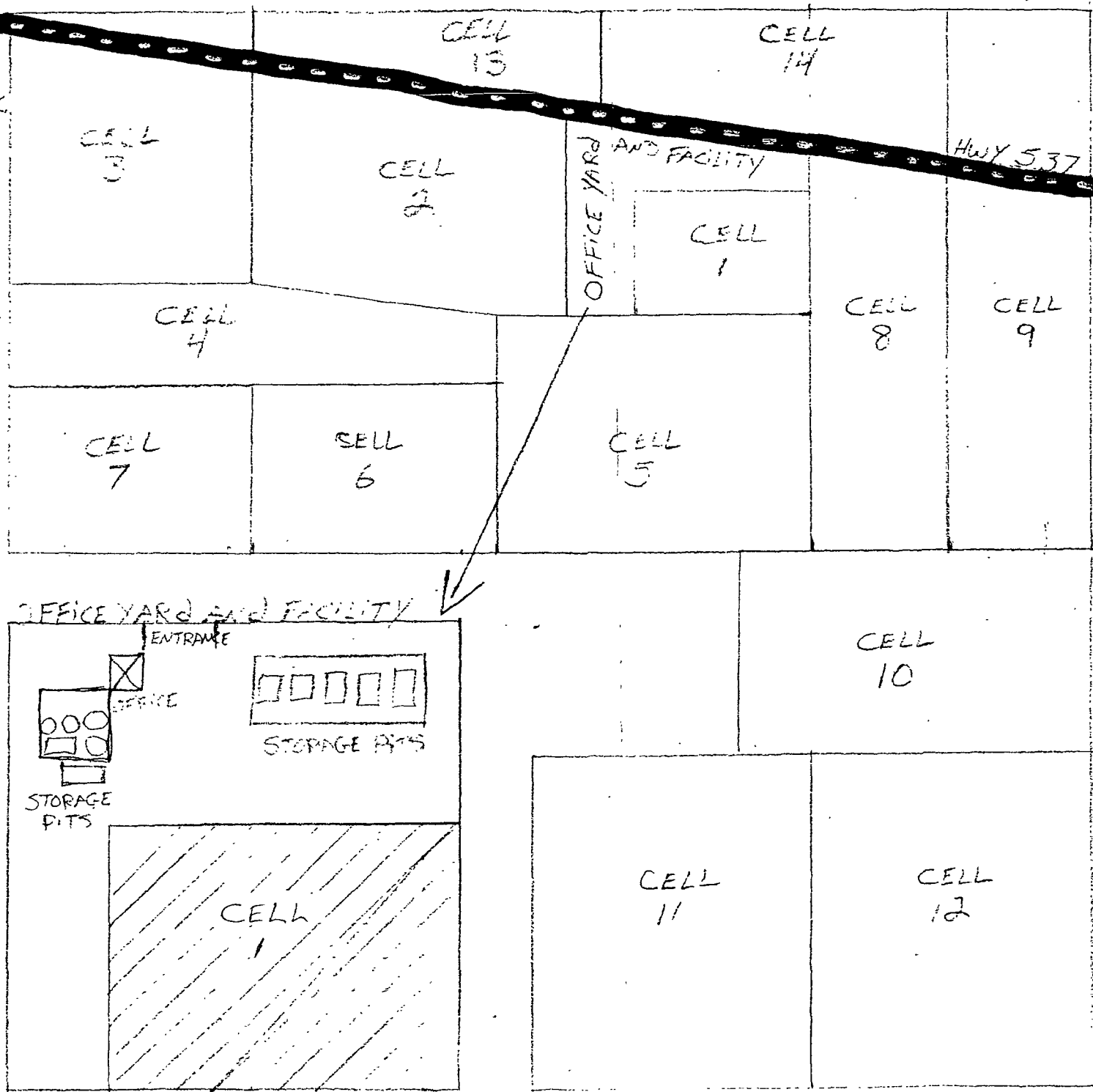
This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene
Lab Director/Quality Manager

T-N-T ENVIRONMENTAL INC.
7005 TO RD
LINDSEY, WY 82502

LAND FARM MAP
TRACT # 21-01-0008
SEC. 5 & 8 T21N R3W



DATE 2010

T-n-T Enviromental
HCR 74 Box 113
Lindrith, N.M. 87029

9/13/2010
RECEIVED OCD

2010 SEP 15 P 1:08

Oil Conservation Division
Attn: Brad Jones
1220 S. St. Francis
Santa Fe, N.M. 87505

Dear Brad Jones

Enclosed are the lab results of cell #8. We are asking for approval to clear and add another lift to this cell. These samples were taken using a five point composite method.

Thanks

Craig Schmitz

**Analytical Results For:**

T-N-T ENVIRONMENTAL
CRAIG SCHMITZ
70 OJITO ROAD
LINDRITH NM, 87029
Fax To: (575) 774-9116

Received: 08/24/2010
Reported: 09/02/2010
Project Name: LANDFARM
Project Number: LANDFARM
Project Location: NOT GIVEN

Sampling Date: 08/16/2010
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: CELL #8 TREATMENT (H020704-05)**BTEX #0218****mg/kg****Analyzed By: CK**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/27/2010	ND	0.835	83.5	1.00	2.08	
Toluene*	<0.050	0.050	08/27/2010	ND	0.885	88.5	1.00	0.968	
Ethylbenzene*	<0.050	0.050	08/27/2010	ND	0.933	93.3	1.00	0.570	
Total Xylenes*	<0.150	0.150	08/27/2010	ND	2.75	91.6	3.00	0.441	

Surrogate: 4-Bromofluorobenzene (PTL) 101 % 30-130

Chloride, SM4500Cl-B**mg/kg****Analyzed By: NM**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/24/2010	ND	416	104	400	3.77	

TPH #015M**mg/kg****Analyzed By: AB****QM-07**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/01/2010	ND	171	85.6	200	4.59	
DRO >C10-C28	85.3	10.0	09/01/2010	ND	207	103	200	7.76	

Surrogate: 1-Chlorooctane 111 % 70-130

Surrogate: 1-Chlorooctadecane 103 % 70-130

Cardinal Laboratories***=Accredited Analyte**

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Celey D. Keene, Lab Director/Quality Manager

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Tuesday, September 14, 2010 2:44 PM
To: 'Lutisha Schmitz'
Subject: T-n-T Environmental Inc. NM-1-008
Attachments: 2010 9-14 additional lift app Cells 1 and 3.pdf

Craig,

Attached you will find a copy of OCD's approval for T-n-T Environmental, Inc. to accept an additional 6-inch lift of petroleum hydrocarbon-contaminated soils for landfarm cells 1 and 3. A hardcopy has been placed in the mail.

Also as we discussed by phone, the background sampling for the proposed new landfarm cells 13 and 14 was incomplete. Please confirm and verify that the correct laboratory method is utilized and all of the required constituents have been tested pursuant to 19.15.36.15 NMAC. Please verify, confirm, and demonstrate that the new proposed cells (13 and 14) are also within the permitted facility boundary. If they are not, then you will have to apply for a modification to your existing permit.

As for your question regarding the continued sampling of BTEX and Chlorides within the treatment zone (soils to be remediated)... Yes, the continued sampling and analysis is required. Due to the sampling protocol and the size of the landfarm cell, there may be "hot" areas that were not tested when the 5 point composite sample was obtained. The continued sampling will allow you to identify areas that require additional remediation.

If you have any questions regarding any of the items addressed above, please do not hesitate to contact me.

Brad

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Lutisha Schmitz [<mailto:schmitzent@yahoo.com>]
Sent: Monday, September 13, 2010 3:07 PM
To: Jones, Brad A., EMNRD
Subject: e-mail contact

Brad

Thanks for the visit this morning.

Craig Schmitz
T-n-T Environmental



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Jim Noel
Cabinet Secretary

Karen W. Garcia
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



September 14, 2010

Craig Schmitz
T-n-T Environmental, Inc.
HCR 74 Box 113
Lindrith, New Mexico 87029

**RE: Request for Approval to Apply a Successive Lift
T-n-T Environmental, Inc.
Permit NM-1-008 (Evaporation Ponds and Landfarm)
Location: SE/4 of Section 7 and SW/4 of Section 8 (evaporation ponds) and the SW/4
SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of 8 (landfarm), Township 25
North, Range 3 West, NMPM
Rio Arriba County, New Mexico**

Dear Mr. Schmitz:

The Oil Conservation Division (OCD) has reviewed T-n-T Environmental, Inc.'s (T-n-T) request, dated May 14, 2010 to grant approval to apply an additional six-inch lift to the following cells:
Cells 1 and 3.

Based upon the analytical results provided, the OCD hereby grants T-n-T approval to apply an additional six-inch lift of contaminated soils to the above referenced landfarm cells. T-n-T shall ensure that the application of an additional six-inch lift of contaminated soils to the above referenced landfarm cells does not exceed the maximum thickness of two feet or 3000 cubic yards per acre limit as specified in 19.15.36.15 NMAC. Note, that with the addition of successive lifts T-n-T must initiate treatment zone monitoring and resume vadose zone monitoring. The vadose zone monitoring depth must be adjusted to reach the 2-3 foot zone below the original native ground surface.

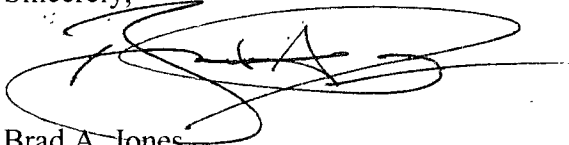
Please be advised that approval of this request does not relieve T-n-T of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve T-n-T of its responsibility to comply with any other applicable governmental authority's rules and regulations.



Mr. Schmitz
T-n-T Environmental, Inc.
Permit NM-1-008
September 14, 2010
Page 2 of 2

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad A. Jones', enclosed within a large, loopy oval shape.

Brad A. Jones
Environmental Engineer

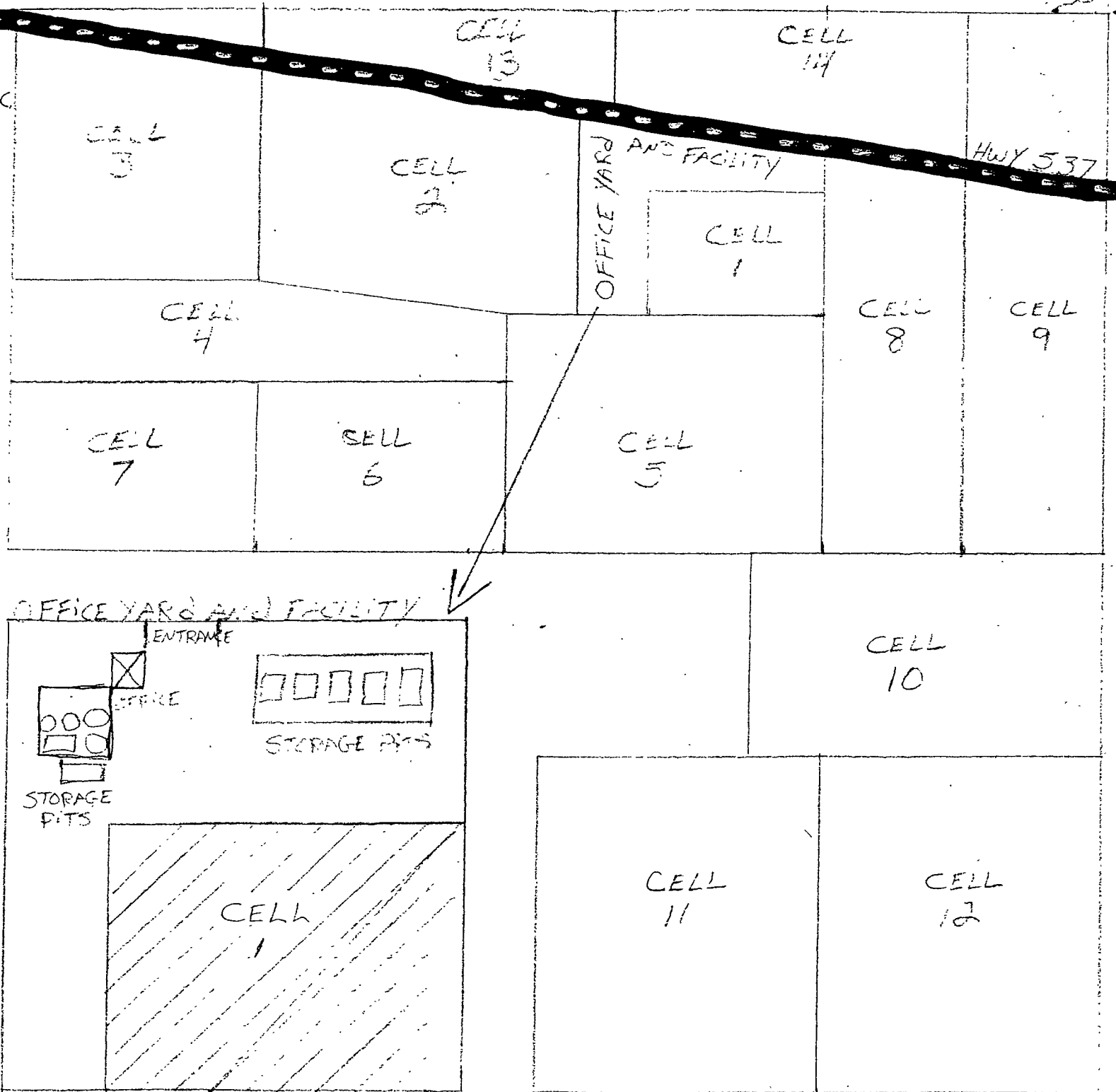
BAJ/baj

Attachment: Facility Map (Date: 2010)

cc: OCD District III Office; Aztec

T-MT ENVIRONMENTAL INC.
70 CITO RD
L. J. WITH LAND 3422

HAND FARM MAP
PERMIT NM-01-0008
SEC. 578 T2N R3W



DATE 2010

5/14/10

T-n-T Environmental
HCR 74 Box 113
Lindrith, NM 87029

RECEIVED OCD

2010 MAY 17 P 1:07

Oil Conservation Division
Attn: Brad Jones
1220 S. St. Francis
Santa Fe, NM 87505

Dear Brad Jones,

Enclosed are the lab results of cell # 1 & # 3. We are asking for approval to clear and add another lift to these cells. These samples were taken using a five point composite method. The TPH and the chloride results are new samples and the BTEX are from the 8/20/09 lab results.

Thanks

A handwritten signature in black ink, appearing to read 'Craig Schmitz', with a long horizontal flourish extending to the right.

Craig Schmitz



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
T-N-T ENVIRONMENTAL
ATTN: TONY SCHMITZ
70 OJITO RD.
LINDRITH, NM 87029
FAX TO (575) 774-9116

Receiving Date: 04/22/10
Reporting Date: 04/26/10
Project Number: NOT GIVEN
Project Name: LANDFARM
Project Location: NOT GIVEN

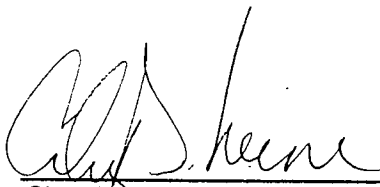
Sampling Date: 04/19/10
Sample Type: SOIL
Sample Condition: INTACT @ 14°C
Sample Received By: JH
Analyzed By: AB

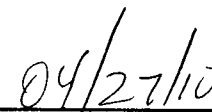
LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)
		04/24/10	04/24/10
H19729-13*	CELL #1 TREATMENT	<10.0	<10.0
H19729-14*	CELL #2 TREATMENT	<10.0	354
H19729-15	CELL #3 TREATMENT	<10.0	<10.0
H19729-16*	CELL #4 TREATMENT	<10.0	412
H19729-17*	CELL #5 TREATMENT	<10.0	983
H19729-18*	CELL #6 TREATMENT	<10.0	494
H19729-19*	CELL #7 TREATMENT	<10.0	260
H19729-20	CELL #8 TREATMENT	<10.0	260
Quality Control		569	571
True Value QC		500	500
% Recovery		114	114
Relative Percent Difference		4.2	0.6

METHOD: SW-846 8015 M

Not accredited for GRO/DRO.

*One or more TPH surrogates outside historical limits due to matrix interference.


Chemist


Date

H19729 T TNT ENV

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



PHONE (575) 393-2326 • 101 E MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
T-N-T ENVIRONMENTAL
ATTN: TONY SCHMITZ
70 OJITO RD.
LINDRITH, NM 87029
FAX TO (575) 774-9116

Receiving Date: 04/22/10
Reporting Date: 04/30/10
Project Number: NOT GIVEN
Project Name: LANDFARM
Project Location: NOT GIVEN

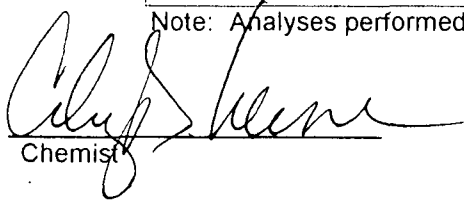
Analysis Date: 04/29/10
Sampling Date: 04/19/10
Sample Type: SOIL
Sample Condition: INTACT @ 14°C
Sample Received By: JH
Analyzed By: HM

LAB NUMBER	SAMPLE ID	Cl ⁻ (mg/kg)
H19729-13	CELL #1 TREATMENT	< 16
H19729-14	CELL #2 TREATMENT	32
H19729-15	CELL #3 TREATMENT	< 16
H19729-16	CELL #4 TREATMENT	96
H19729-17	CELL #5 TREATMENT	192
H19729-18	CELL #6 TREATMENT	96
H19729-19	CELL #7 TREATMENT	16
H19729-20	CELL #8 TREATMENT	< 16
H19729-21	CELL #9 TREATMENT	< 16
H19729-22	CELL #10 TREATMENT	64
H19729-23	CELL #11 TREATMENT	80
H19729-24	CELL #12 TREATMENT	32
Quality Control		500
True Value QC		500
% Recovery		100
Relative Percent Difference		< 0.1

METHOD: Standard Methods

4500-Cl/B

Note: Analyses performed on 1:4 w/v aqueous extracts.


Chemist


Date

H19729 T-N-T ENVIRO

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



ARDINAL LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
T-N-T ENVIRONMENTAL
ATTN: CRAIG SCHMITZ
HCR 74 BOX 113
LINDRITH, NM 87029
FAX TO (575) 774-9116

Receiving Date: 08/25/09
Reporting Date: 09/02/09
Project Owner: NOT GIVEN
Project Name: NOT GIVEN
Project Location: NOT GIVEN

Sampling Date: 08/20/09
Sample Type: SOIL
Sample Condition: COOL & INTACT @ 4°C
Sample Received By: NF
Analyzed By: AB/ZL/HM

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)	Cl* (mg/kg)
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ANALYSIS DATE:	TREATMENT ZONE	08/27/09	08/27/09	08/29/09	08/29/09	08/29/09	08/29/09	08/27/09
H18074-1	CELL #1 MONITORING ZONE	<10.0	1,040	<0.050	0.122	<0.050	<0.300	320
H18074-2	CELL #2 MONITORING ZONE	<10.0	1,120	0.079	0.090	0.083	<0.300	320
H18074-3	CELL #3 MONITORING ZONE	<10.0	566	<0.050	0.062	<0.050	<0.300	48
H18074-4	CELL #4 MONITORING ZONE	<10.0	2,050	<0.050	0.063	<0.050	<0.300	224
H18074-5	CELL #5 MONITORING ZONE	<10.0	3,670	<0.050	<0.050	<0.050	<0.300	416
H18074-6	CELL #6 MONITORING ZONE	<10.0	960	<0.050	<0.050	<0.050	<0.300	112
H18074-7	CELL #7 MONITORING ZONE	<10.0	445	<0.050	<0.050	<0.050	<0.300	256
H18074-8	CELL #8 MONITORING ZONE	<10.0	475	<0.050	<0.050	<0.050	<0.300	64
H18074-9	CELL #9 MONITORING ZONE	<10.0	269	<0.050	<0.050	<0.050	<0.300	16
H18074-10	CELL #10 MONITORING ZONE	<10.0	804	<0.050	<0.050	<0.050	<0.300	96
H18074-11	CELL #11 MONITORING ZONE	<50.0	2,110	<0.050	<0.050	<0.050	0.465	224
LABELED WRONG THESE ARE TREATMENT ZONES								
Quality Control		532	489	0.056	0.055	0.052	0.156	500
True Value QC		500	500	0.050	0.050	0.050	0.150	500
% Recovery		106	97.8	112	110	104	104	100
Relative Percent Difference		5.5	1.8	7.0	5.3	5.6	6.4	< 0.1

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8021B; Cl-: Std. Methods 4500-Cl-B

*Analyses performed on 1:4 w:v aqueous extracts. Reported on wet weight.

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE,
AND TOTAL XYLENES. Not accredited for GRO/DRO and Chloride.

Lab Director

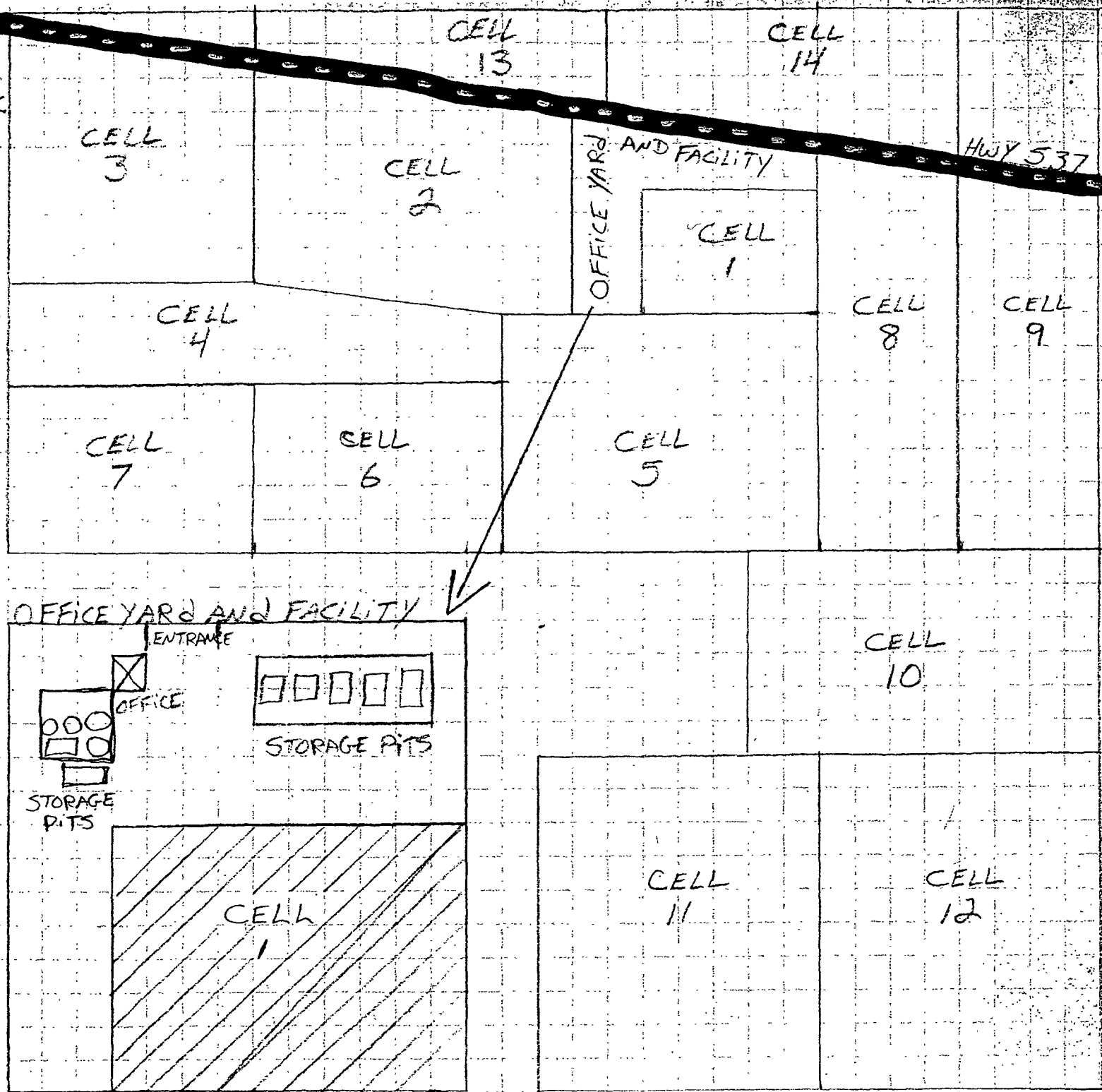
Date

H18074 TBCL TNT ENV

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. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

TENT ENVIRONMENTAL INC
70.00 TO RD
LINDRITH NM 87029

LAND FARM MAP
PERMIT NM-01-0008
SEC. 5 & 8 T25N R3W



DATE 2010