

NM1 - _____5_____

**PART 35
REQUESTS**

2011- 2015

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division



October 28, 2014

Mr. John Volkerding
Basin Disposal, Inc.
P.O. Box 100
Aztec, New Mexico 87410

RE: Determination Request of Non-Domestic Waste Status
Commercial Surface Waste Management Facility Permit NM1-005
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West
NMPM, San Juan County, New Mexico

Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated October 21, 2014, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill. The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC (review of the Corrosivity results) and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

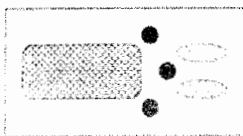
If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec



BASIN DISPOSAL, INC.

"SPECIALIZING IN DISPOSAL OF PRODUCED WATER AND DRILLING MUD

P.O. BOX 100 - AZTEC, NEW MEXICO 87410 - PHONE: (505) 334-3013

RECEIVED

2014 OCT 23 PM 2:59

21 October 2014

Brad Jones
EMNRD/OCD
Environmental Bureau
1220 South St. Francis Dr.,
Santa Fe, New Mexico 87505

RE: Non-Domestic Waste, Subsection (D), Paragraph 2 of Section 19.15.9.712 NMAC.

Dear Mr. Jones;

Paragraph C of 19.15.9.712 NMAC states:

"Waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility after testing and prior written authorization of the division. Before authorization is granted, copies of test results must be provided to the division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the division. In appropriate cases and so long as a representative sample is tested, the division may authorize disposal of a waste stream listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC without individual testing of each delivery."

Subsection D, Paragraph 2 (m) lists : Produced water filters must be tested for Corrosivity (and drained and then air-dried for at least 48 hours before testing).

Prior to injection of the produced water from Basin Disposal, the water is filtered through a set of 20um and a set of 5um filters. Basin Disposal requests permission to dispose of these filters at the San Juan County Regional Landfill operated by Waste Management.

The Corrosivity analysis of both the 5um and a 20um filters is attached for the OCD's review and approval.

The approval granted by the OCD November 7, 2011 on did not explicitly list an annual renewal requirement nor could I find a frequency specified in 19.15.9.712 NMAC, Waste Management has requested that the OCD review the attached analysis and provide an updated approval.

I thank you for your help and if you have any questions, please feel free to phone me at 334-3013 or 320-2840 or via email at jvolkerding@basindisposalinc.com

Sincerely;


John Volkerding
General Manager

Encl:

1. Envirotech Analysis
2. OCD Approval dated 12/13/2010
3. Waste Management Request

Cc:

1. Brandon Powell, OCD/Aztec, 1000 Rio Brazos, Aztec, NM 87410
2. File



Analytical Report

Report Summary

Client: Basin Disposal Inc.

Chain Of Custody Number: 17875

Samples Received: 10/13/2014 12:10:00PM

Job Number: 03058-0003

Work Order: P410047

Project Name/Location: Filters

Entire Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Tim Cain', is written over a horizontal line.

Date: 10/17/14

Tim Cain, Laboratory Manager

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filters
Project Number: 03058-0003
Project Manager: Basin Disposal Inc.

Reported:
17-Oct-14 12:48

Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
5mm	P410047-01A	Solid	10/10/14	10/13/14	Glass Jar, 4 oz.
20mm	P410047-02A	Solid	10/10/14	10/13/14	Glass Jar, 4 oz.

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Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filters
Project Number: 03058-0003
Project Manager: Basin Disposal Inc.

Reported:
17-Oct-14 12:48

5mm

P410047-01 (Solid)

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								

Cation/Anion Analysis

pH @21.3°C	8.16		pH Units	1	1442007	10/13/14	10/13/14	EPA 9045D		
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Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc.

5796 US Highway 64, Farmington, NM 87401

Three Springs • 65 Mercado Street, Suite 115, Durango, CO 81301

Ph (505) 632-0615 Fx (505) 632-1865

Ph (970) 259-0615 Fr (800) 362-1879

envirotech-inc.com

laboratory@envirotech-inc.com



Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filters
Project Number: 03058-0003
Project Manager: Basin Disposal Inc.

Reported:
17-Oct-14 12:48

20mm

P410047-02 (Solid)

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								

Cation/Anion Analysis

pH @21.4°C	8.23		pH Units	1	1442007	10/13/14	10/13/14	EPA 9045D		
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Basin Disposal Inc.
PO Box 100
Aztec NM, 87410

Project Name: Filters
Project Number: 03058-0003
Project Manager: Basin Disposal Inc.

Reported:
17-Oct-14 12:48

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference

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envirotech-inc.com
laboratory@envirotech-inc.com

CHAIN OF CUSTODY RECORD

17875

Client: Basin Disposal		Project Name / Location: Filters		ANALYSIS / PARAMETERS to															
Email results to: PGurulek@Basin-Disposal-Ind.com		Sampler Name:																	
Client Phone No.: 320-7499-		Client No.: 03058-0003																	
Sample No. / Identification	Sample Date	Sample Time	Lab No.	No. / Volume of Containers	Preservative		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE	Sample Cool	Sample Intact	
					HNO ₃	HCl													
Sam	10/10	7:00a	P410047-01	1-402 jar													X	X	
20mm	10/10	7:00a	P410047-02	1-402 jar													X	X	
Relinquished by: (Signature) <i>[Signature]</i>			Date	Time	Received by: (Signature) <i>[Signature]</i>			Date	Time										
Relinquished by: (Signature)					Received by: (Signature)														
Sample Matrix																			
Soil <input type="checkbox"/> Solid <input type="checkbox"/> Sludge <input type="checkbox"/> Aqueous <input type="checkbox"/> Other <input checked="" type="checkbox"/> Filters																			
<input type="checkbox"/> Sample(s) dropped off after hours to secure drop off area.																			

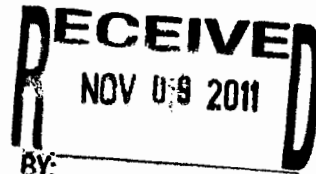


New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary



By: _____
November 7, 2011

Jami Bailey
Division Director
Oil Conservation Division



Mr. John Volkerding
General Manager
Basin Disposal, Inc.
P.O. Box 100
Aztec, New Mexico 87410

RE: Determination Request of Non-Domestic Waste Status
Commercial Surface Waste Management Facility Permit NM-1-005
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West
NMPM, San Juan County, New Mexico

Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated November 4, 2011, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill. The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC (review of the Corrosivity results) and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

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

cc: OCD District III Office, Aztec

John Volkerding

From: TSCPhoenix@wm.com
Sent: Saturday, October 11, 2014 5:15 AM
To: John Volkerding
Subject: [WMSolutions.com] 30 Day Expiration Notice for Profile 09652B



THINK GREEN:

OCTOBER, 11 2014

RE: 30 Day Notice of Expiring Profile 09652B

Dear John Volkerding,

Your profile **09652B** will expire in **30** days.

If you are no longer the contact for this material, please forward this notice to the appropriate person. At Waste Management we strive to make managing your profiles fast and easy. With our new Smart Profile[®] Renewal Process many profile renewals can be completed in minutes! Your profile details are below:

Profile Number 09652B

Material Name CARTRIDGE FILTERS

Generator Name Basin Disposal Inc.

Disposal Facility San Juan County Landfill

Expiration Date 11/10/2014

Renewal Requirements: New EZ Profile[™] is required.

Testing Parameter(s):

- Corrosivity/pH

Additional Comments:

- Current NM OCD approval.



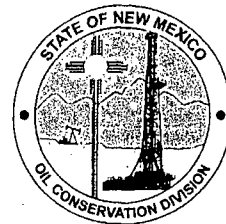
New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



November 7, 2011

Mr. John Volkerding
General Manager
Basin Disposal, Inc.
P.O. Box 100
Aztec, New Mexico 87410

RE: Determination Request of Non-Domestic Waste Status
Commercial Surface Waste Management Facility Permit NM-1-005
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West
NMPM, San Juan County, New Mexico


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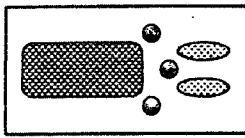
Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec



BASIN DISPOSAL, INC.

"SPECIALIZING IN DISPOSAL OF PRODUCED WATER AND DRILLING MUD"

P.O. BOX 100 - AZTEC, NEW MEXICO 87410 - PHONE: (505) 334-3013

RECEIVED OCD

2011 NOV -7 P 11:22

4 November 2011

Brad Jones
EMNRD/OCD
Environmental Bureau
1220 South St. Francis Dr.,
Santa Fe, New Mexico 87505

RE: Non-Domestic Waste, Subsection (D), Paragraph 2 of Section 19.15.9.712 NMAC.

Dear Mr. Jones;

Paragraph C of 19.15.9.712 NMAC states:

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Subsection D, Paragraph 2 (m) lists : Produced water filters must be tested for Corrosivity (and drained and then air-dried for at least 48 hours before testing).

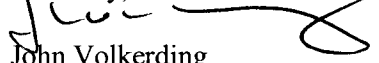
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The Corrosivity analysis of both the 5um and a 20um filters is attached for the OCD's review and approval.

The approval granted by the OCD December 13, 2010 on did not explicitly list an annual renewal requirement nor could I find a frequency specified in 19.15.9.712 NMAC, Waste Management has requested that the OCD review the attached analysis and provide an updated annual approval.

I thank you for your help and if you have any questions, please feel free to phone me at 334-3013 or 320-2840 or via email at jvolkerding@basindisposalinc.com

Sincerely;


John Volkerding
General Manager

Encl:

1. Envirotech Analysis
2. OCD Approval dated 12/13/2010

Cc:

1. Brandon Powell, OCD/Aztec, 1000 Rio Brazos, Aztec, NM 87410
2. File

**SUSPECTED HAZARDOUS
WASTE ANALYSIS**

Client:	Basin Disposal	Project #:	03058-0003
Sample ID:	20mm	Date Reported:	11-02-11
Lab ID#:	80154	Date Sampled:	10-26-11
Sample Matrix:	Solid	Date Received:	10-31-11
Preservative:		Date Analyzed:	11-01-11
Condition:	Intact	Chain of Custody:	12859

Parameter	Result
-----------	--------

CORROSIVITY: **Negative** **pH = 7.94**

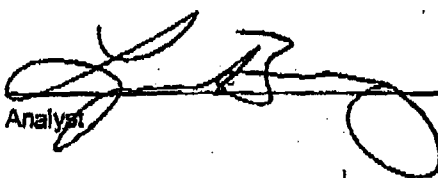
RCRA Hazardous Waste Criteria


Parameter	Hazardous Waste Criterion
-----------	---------------------------

CORROSIVITY: Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22.
(i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments: **Filters**


Analyst


Review

**SUSPECTED HAZARDOUS
WASTE ANALYSIS**

Client:	Basin Disposal	Project #:	03058-0003
Sample ID:	5mm	Date Reported:	11-02-11
Lab ID#:	60155	Date Sampled:	10-26-11
Sample Matrix:	Solid	Date Received:	10-31-11
Preservative:		Date Analyzed:	11-01-11
Condition:	Intact	Chain of Custody:	12859

Parameter	Result
-----------	--------

CORROSIVITY: **Negative** **pH = 8.07**

RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
-----------	---------------------------

CORROSIVITY: Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22.
(i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments: **Filters**

Analyst

Review

CHAIN OF CUSTODY RECORD

12859

Client: <u>Basin Disposal</u>			Project Name / Location: <u>Filters</u>			ANALYSIS / PARAMETERS																																											
Client Address: <u>200 Montrose</u>			Sampler Name: <u>Paul Borele</u>			<table border="1"> <tr> <td>TPH (Method 8015)</td> <td>BTEX (Method 8021)</td> <td>VOC (Method 8260)</td> <td>RCRA 8 Metals</td> <td>Cation / Anion</td> <td>PCI</td> <td>TCLP with H/P</td> <td>PAH</td> <td>TPH (418.1)</td> <td>CHLORIDE</td> <td><u>LOXASIVITY</u></td> <td></td> <td></td> <td>Sample Cool</td> <td>Sample Intact</td> </tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table>														TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	PCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE	<u>LOXASIVITY</u>			Sample Cool	Sample Intact															
TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	PCI															TCLP with H/P	PAH	TPH (418.1)	CHLORIDE	<u>LOXASIVITY</u>			Sample Cool	Sample Intact																					
Client Phone No.: <u>505-632-8936</u>			Client No.: <u>03058-0003</u> <u>For results to</u> <u>505-320-7499 - 505-632-2215</u>																																														
Sample No/ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative																																											
20mm	10-26-11	7:00am	60154	Soil Sludge																																													
Soil			60155	Soil Sludge																																													
				Soil Sludge																																													
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Relinquished by: (Signature)					Received by: (Signature)																																												



envirotech
Analytical Laboratory

5798 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor

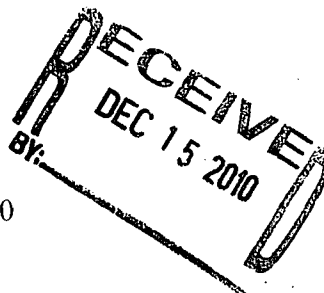
Jim Noel

Cabinet Secretary

Karen W. Garcia

Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



December 13, 2010

Mr. John Volkerding
General Manager
Basin Disposal, Inc.
P.O. Box 100
Aztec, New Mexico 87410

RE: Determination Request of Non-Domestic Waste Status
Commercial Surface Waste Management Facility Permit NM-1-005
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West
NMPM, San Juan County, New Mexico

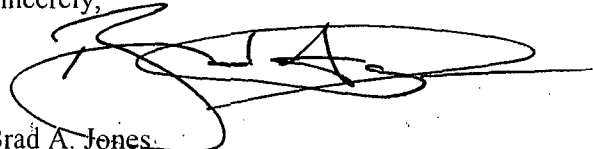
Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated December 9, 2010, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill. The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

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

cc: OCD District III Office, Aztec

Oil Conservation Division
1220 South St. Francis Drive • Santa Fe, New Mexico 87505
Phone (505) 476-3440 • Fax (505) 476-3462 • www.emnrd.state.nm.us/OCD

