NM1 - ___5

PART 35 REQUESTS

2016-2020

State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary David R. Catanach, Division Director Oil Conservation Division



October 11, 2017

Mr. John Volkerding Basin Disposal, Inc. 200 Montana Bloomfield, New Mexico 87413

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 6, 2017, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill (Permit SWM 052426/SWM 052433 SP). The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC (based upon the 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

06 October 2017

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 previous approval 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. Waste Management Request

Cc:

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



Basin Disposal Inc.

PO Box 100

Project Name:

Sump Lybrook Plant

Project Number: Project Manager: 03058-0003

Reported:

Aztec NM, 87410

Paul Gurule

05-Oct-17 15:47

5 Micron

F709001-04 (50Hd)											
		Reporting									
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes		
Corrosivity											
pH @25°C	7.16	-	pH Units	1	1740010	10/04/17	10/04/17	9045D/9040			

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envirotech-inc.com



Basin Disposal Inc.

Project Name:

Sump Lybrook Plant

PO Box 100

Project Number:

03058-0003

Reported:

Aztec NM, 87410

Project Manager: Paul Gurule

05-Oct-17 15:47

20 Micron P709061-05 (Solid)

Reporting									
Analyte	Result	Limit U	nits	Dilution	Batch	Prepared	Analyzed	Method	Notes
Corrosivity				•					
pH @25°C	8.26	pŀ	I Units	1	1740010	10/04/17	10/04/17	9045D/9040	· · · · · · · · · · · · · · · · · · ·

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From: Sent: To: Subject:

Phoenix TSC <wm@wmsolutions.com> Monday, September 11, 2017 9:01 AM

John Volkerding

[WMSolutions.com] 60 Day Expiration Notice for Profile 09652B (Basin Disposal Inc.)



60 Day Notice of Expiring Profile 09652B

Dear John Volkerding,

Your profile 09652B will expire in 60 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 ProfileSM Renewal Process many profile renewals can be completed in minutes! Your profile details are below:

Profile Number 09652B

Material Name

CARTRIDGE FILTERS -E&P Waste * OCD

Generator Name

Basin Disposal Inc.

Disposal Facility

San Juan County Landfill

Expiration Date

11/10/2017

Renewal Requirements:

Testing Parameter(s):

Corrosivity/pH

Additional Requirements:

2017 Current NM OCD approval.
 2017 Completed E&P
 Exempt/Non-ExemptChecklist

Would you like to renew profile 09652B?

YES, RENEW PROFILE »

No, Do Not Renew

Once we have received your response regarding your profile renewal, no further expiration reminders will be sent. For questions or assistance regarding your profile renewal, please contact your Technical Service Team at 602-437-3165 or at TSCPhoenix@wm.com.

Thank you for your business,

Phoenix TSC 222 S. Mill Avenue Tempe, AZ 85281 Phone: 602-437-3165 TSCPhoenix@wm.com You are receiving this message as a registered customer of WMSolutions.com.

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