

GW - 190

**GENERAL
CORRESPONDENCE**

YEAR(S):
2000 - 1995



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone X

Personal

E-Mail X

Time: 10am

Date: January 10, 2000

Originating Party: Wayne Price-OCD

Other Parties: Jo Ann Cobb- BJ Services Tele: 281-357-2572, Fax 281-357-2585, E-mail jcobb@bjservices.com

Subject: Discharge Plan Renewal Notice for the following Facilities:

GW-190 Artesia Yard expires 06/13/2000

GW-___ Name expires

GW-___ Name expires

GW-___ Name expires

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion: Left Message on Voice Mail: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with \$50.00 filing fee for the above listed facilities.

Conclusions or Agreements:

Signed:  _____

CC: E-Mail + FAX

Price, Wayne

From: Price, Wayne
Sent: Monday, January 10, 2000 10:14 AM
To: 'jcobb@bjservices.com'
Subject: Discharge Plan renewal notice

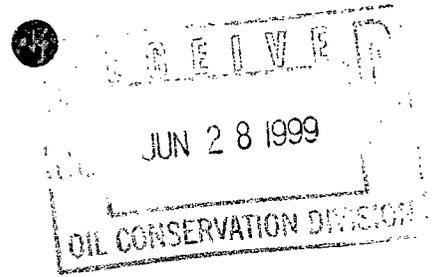
Dear Jo Ann: Attached is a renewal notice for your Artesia facility GW-190. If you have any questions please call.



dphot.doc

1415 Louisiana, Suite 2500
Houston, TX 77002

Tel: (713) 759-0999
Fax: (713) 308-3886



June 24, 1999

Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

12988-014



Environmental Engineering & Consulting

**Subject: Groundwater Monitoring Activities
Former Fuel Island Area: MW-6
BJ Services Artesia Facility
Eddy County, New Mexico**

Dear Mr. Price:

On May 6, 1999, Brown and Caldwell gauged monitor well MW-6 at the former fuel island area of the subject facility for the presence of phase separated hydrocarbons (PSH). The gauging of monitor well MW-6 was performed to evaluate the need to install a hydrophobic recovery device, as recommended in the April 1, 1999 Groundwater Sampling and Analysis Report for the former Fuel Island Area.

During the January 1999 sampling event, a PSH layer measuring 0.02 feet was identified in monitor well MW-6. The PSH layer was removed from well MW-6 prior to groundwater sampling. Groundwater results for the fuel island area monitoring wells (MW-5, MW-6, and MW-7) were submitted to the NMOCD on April 1, 1999.

During the May 6, 1999 gauging of MW-6, PSH was observed only as a sheen. Based on this observation, the installation of a hydrophobic hydrocarbon recovery filter to recover PSH was determined to be unnecessary.

In the April 1, 1999 report submitted to the NMOCD, Brown and Caldwell recommended performing the second of two scheduled annual sampling events for the former Fuel Island Area in January 2000. This letter reiterates this recommendation, as the quantity of PSH in MW-6 appears to be minimal at this time.

If you have any questions regarding the information presented herein, please contact me at (713) 759-0999.

Sincerely,

BROWN AND CALDWELL

Timothy L. Jenkins
Project Manager

BROWN AND CALDWELL

Richard L. Rexroad, P.G.
Principal in Charge

TLJ:RLR:uak

cc: NMOCD - Artesia District Office
Rick N. Johnson (BJ Services Company, U. S. A.)
BJ Services Company, U.S.A. - Artesia District Facility



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

**OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 827-7131**

March 24, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-524

Mr. Mike Wiggins
BJ Services Company
2401 Sivley,
Artesia, NM 88210

**Re: BJ Services Co.
Artesia NM, Wash Rack Sludge Waste Stream**

Dear Mr. Wiggins:

The New Mexico Oil Conservation Division (OCD) has received the BJ Services Company (BJ) request to extend the life of the sampling analysis of the wash rack sludge waste stream. BJ's current wash rack sludge waste stream sample analysis is hereby approved until **June 13, 2000**, the expiration of the current Artesia facility discharge plan. If any changes or modifications are made to the Artesia BJ facility prior to this date a new waste analysis will be required prior to any waste disposal. New sample analysis on the above referenced waste stream will be required for this waste to be disposed of after June 13, 2000.

Disposal of this waste stream at an OCD approved surface waste management facility (711 facility) will require the 711 facility to submit a C-138, generator certificate of waste status, a copy of the analytical report for the wash rack sludge collected on January 14, 1998, and a copy of this approval letter.

Please be advised that this approval does not relieve BJ of liability should their operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve BJ of responsibility for compliance with other federal, state or local laws and/or regulations.

If there are any questions, please call me at (505) 827-7153.

Sincerely,

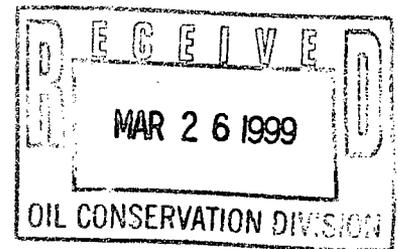
Martyne J. Kielling
Environmental Geologist

xc: Hobbs OCD Office
Artesia OCD Office

1415 Louisiana Suite 2500
Houston, TX 77002

Tel: (713) 759-0999
Fax: (713) 308-3886

March 23, 1999



Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

12988-014

**BROWN AND
CALDWELL**

Environmental Engineering & Consulting

**Subject: Groundwater Sampling Activities
Acid Dock Area: MW-3
BJ Services Artesia Facility
Eddy County, New Mexico**

A handwritten signature or set of initials, possibly "WJ", written in dark ink.

Dear Mr. Price:

On February 25, 1999, Brown and Caldwell attempted the rehabilitation of MW-3 using power augering techniques. The well was drilled out to a depth of 5 feet below grade, at which point the rehabilitation effort was not successful. Based on the previous correspondence with your office dated January 23, 1999, Brown and Caldwell installed a replacement well in the immediate vicinity of the original MW-3 (within 3 feet). A well completion diagram for the replacement well, MW-3A, is included as Attachment 1. Sampling of the replacement well is currently scheduled for April 1999. The groundwater sample will be analyzed for the parameters requested in your letter dated December 16, 1998. NMOCD correspondence which applies to this project is included as Attachment 2. Brown and Caldwell permanently plugged the existing MW-3 well after the replacement well, MW-3A, was completed.

Note that wells MW-2, MW-4 and MW-3A will be slated for plugging and abandonment if final closure status is granted, based on analytical results. If you have any questions regarding the information presented herein, please contact me at (713) 759-0999.

Sincerely,

BROWN AND CALDWELL

A handwritten signature in cursive script that reads "Timothy L. Jenkins".

Timothy L. Jenkins
Project Manager

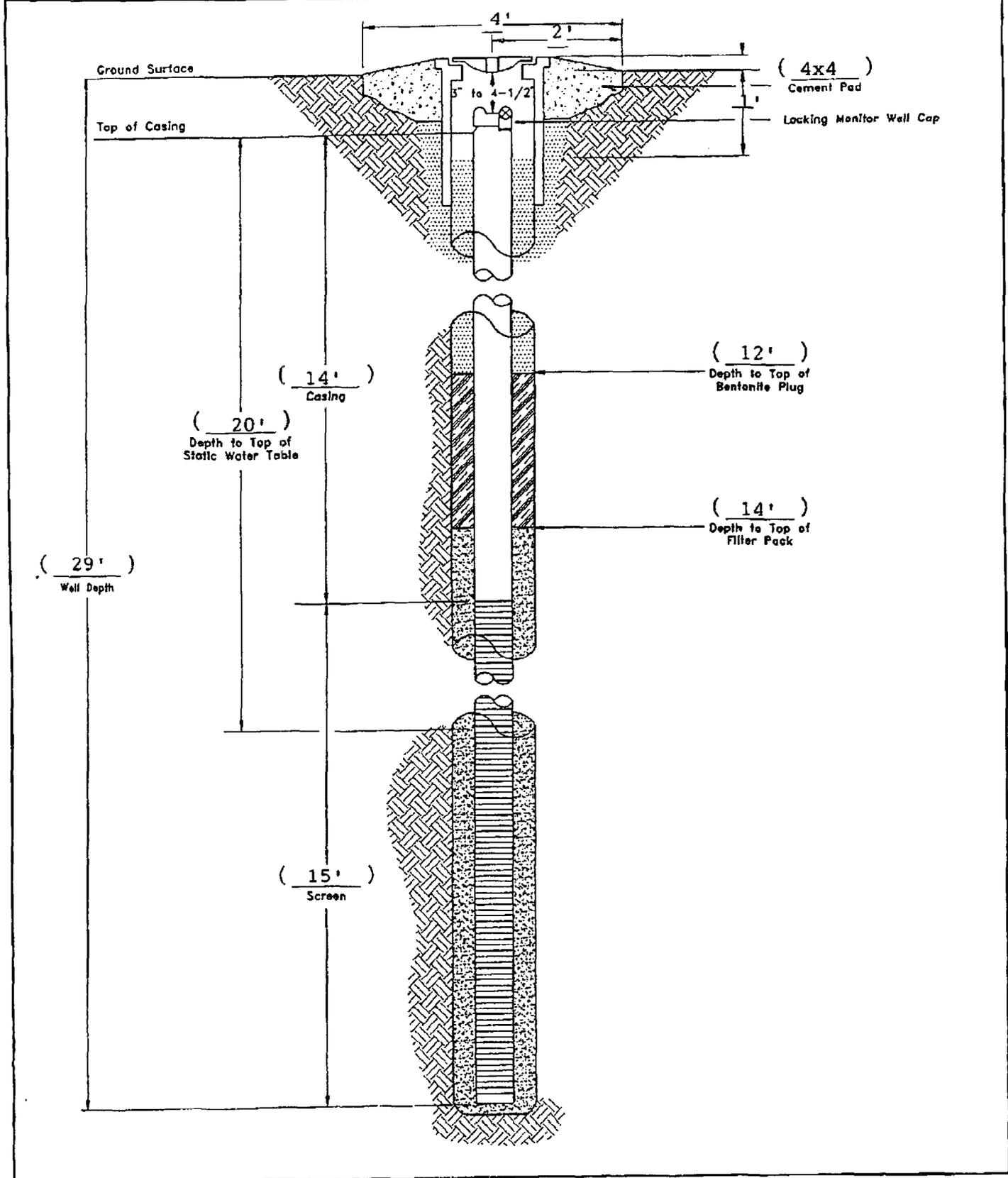
TLJ:uak

cc: NMOCD – Artesia District Office
Rick N. Johnson (BJ Services Company, U. S. A.)
Rick Rexroad (Brown and Caldwell)

ATTACHMENT 1

Well Completion Diagram: MW-3A

Company Drilled for: Brown and Caldwell		 RHINO ENVIRONMENTAL SERVICES, INC. 1 (800) 762-0241		Flush Mount Monitor Well Diagram	
Location: BJ Yard located in Artesia, New Mexico					
Job Number: RH-99-AH-03		Installation Date: 2-24-99		Monitor Well Number: MW-3A	
Depth: 29'	Bore Size: 7.75"	Casing Size: 4" Sch-40	Casing Elevation:	Screen Size: 4" Sch-40	Top of Water Elevation: 20'



Company Drilled for: Brown and Caldwell		 RHINO ENVIRONMENTAL SERVICES, INC. 1 (800) 762-0241		Drilling Log	
Location: B J Yard located in Artesia, New Mexico		Well/Bore Number: MW-3A	Date Drilled: 2-24-99	Driller: A. Hodge	Logged By: A. Hodge
Drilling Method: Hollow Stm. Aug.	Depth of Boring: 30'	Depth of Well: 29'	Length of Casing: 14'	Length of Screen: 15'	
Bore Diameter: 7.75"	Casing Diameter: 4" Sch-40	Screen Diameter: 4" Sch-40	Slot Size: 0.010"	Well Material: Sch-40 PVC	

0	Calache Pad	Blind	N/A	Cement from 12'	0
5	Red to brown silty clay with some sand and small gravel	nø		back to surface	5
10		sample			10
15	Tan silty sandy clay with some small gravel	taken			15
20				Current log	20
25				Bentonite plug	25
30	Well TD @ 29.0'			Top of screen @ 15'	30
35				Top of sand @ 14'	35
40					40
45					45
50					50
55					55
60					60
65					65
70					70
75					75
80					80
85					85
90					90
95					95
100					100
105					105



ATTACHMENT 2

Applicable Correspondence from the NMOCD

**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7121**Certified Mail**
Return Receipt NO. Z 357 870 112

December 16, 1998

Mr. Rick N. Johnson
BJ Services Company, U.S.A. (BJSC)
8701 New Trails Drive
The Woodlands, Texas 77381Subject: Groundwater Sampling Activities
Acid Dock Area: MW-3
BJ Services Artesian Facility
Eddy County, New Mexico

Dear Mr. Johnson:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the letter dated November 04, 1998 submitted on behalf of BJSC by Brown and Caldwell concerning an alternative to sampling MW-3 due to it being damaged. **Your request is hereby denied and NMOCD will require the following actions and conditions in order to make a proper determination for closure in the future.**

1. Please provide a groundwater potentiometric surface map for the former acid dock area. Once developed please submit this map with a plan to install a new monitor well to replace the old MW-3. This well should be located directly down-gradient and as close as possible to the original source of contamination.
2. Initial groundwater sampling analysis for this monitor well shall include volatiles (Method 8060), Semi-volatiles (Method 8270), PAH's (Method 8310), WQCC Metals, General Chemistry (PH, TDS, Conductivity, Major Cations and Anions).
3. Please include a plan to locate and permanently plug the old MW-3 well.

Please submit for NMOCD approval a plan to address the above items by February 15, 1998. NMOCD can allow additional time for a good cause shown when requested in writing.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Environmental Bureau

cc: NMOCD-Artesian District

file: O/wp/bjartmw3

**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

January 23, 1999

**Certified Mail
Return Receipt NO. P 288 259 093**

Mr. Rick N. Johnson
BJ Services Company, U.S.A. (BJSC)
8701 New Trails Drive
The Woodlands, Texas 77381

Subject: Groundwater Sampling Activities
Acid Dock Area: MW-3
BJ Services Artesia Facility
Eddy County, New Mexico

Dear Mr. Johnson:

New Mexico Oil Conservation Division (NMOCD) is in receipt of your letter dated January 18, 1999 submitted by Brown and Caldwell. The Well rehabilitation/Replacement and Sampling/Analysis Plan is hereby approved.

Please be advised that NMOCD approval of this plan does not relieve BJSC of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve BJSC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Wayne Price".

Wayne Price-Environmental Bureau

cc: OCD Artesia

file: O/envr./word/wa./artmw3



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 23, 1999

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BJ Services Company, U.S.A. (BJSC)
8701 New Trails Drive
The Woodlands, Texas 77381

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file: O/envr./word/wa./artmw3



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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2040 South Pacheco Street
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January 23, 1999

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8701 New Trails Drive
The Woodlands, Texas 77381

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file: O/envr./word/wa./artmw3



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 23, 1999

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Return Receipt NO. P 288 259 093

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8701 New Trails Drive
The Woodlands, Texas 77381

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cc: OCD Artesia

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NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
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January 23, 1999

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Wayne Price-Environmental Bureau

cc: OCD Artesia

file: O/envr../word/wa../artmw3

B R O W N A N D
C A L D W E L L

January 18, 1999



Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

12988-014

Subject: Groundwater Sampling Activities
Acid Dock Area: MW-3
BJ Services Artesia Facility
Eddy County, New Mexico

Dear Mr. Price:

In your letter of December 16, 1998, you requested BJ Services to:

- 1) Develop a potentiometric surface map with a proposed location for a replacement well for MW-3 as close as possible to the original source of contamination.
- 2) Perform initial groundwater sampling and analysis for VOC's, SVOC's, PAH's, WQCC Metals and General Chemistry; and,
- 3) Develop a plan to locate and permanently plug the existing MW-3 well.

Brown and Caldwell has reviewed your suggestions. The requested 10/21/98 potentiometric surface map is provided as Attachment 1. We have also included a copy of the 9/1/97 groundwater gradient map as Attachment 2 for your use. Review of this information indicates that existing MW-3 is optimally located for evaluation of impact associated with the former Acid Dock. Brown and Caldwell therefore proposes the following actions:

- 1) Attempt to rehabilitate MW-3 using hand auger and/or power augering techniques. If rehabilitation efforts are successful, Brown and Caldwell will collect a groundwater sample from MW-3 for the parameters presented in our report dated April 8, 1998, and subsequently approved by the NMOCD (i.e., BTEX and SVOCs by Methods 8020 and 8270, respectively).
- 2) If rehabilitation efforts for MW-3 are not successful, Brown and Caldwell will install a replacement well in the immediate vicinity of the original MW-3 (within 3 feet). Brown and Caldwell will then sample the well for the parameters requested in your letter dated December 16, 1998.

January 18, 1999
Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Page 2

- 3) Locate and permanently plug the existing MW-3 well if rehabilitation efforts are not successful. Note that wells MW-2, MW-4 and the MW-3 replacement well (or the rehabilitated MW-3) will be slated for plugging and abandonment if final closure status is granted, based on analytical results.

We believe the above recommendations will satisfy the requirements and intent of the NMOCD. If you find these recommended actions satisfactory, Brown and Caldwell is prepared to assist our client in preparing a Well Rehabilitation/Replacement and Sampling/Analysis Plan for the Artesia, NM facility for submittal to your office for NMOCD approval.

If you have any questions regarding the information presented herein, please contact me at (713) 759-0999.

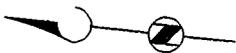
Sincerely,

BROWN AND CALDWELL

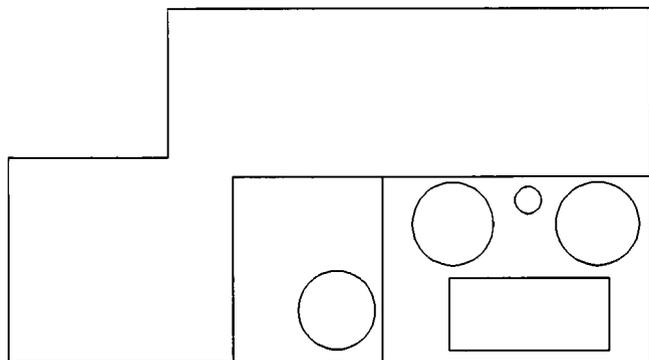


Timothy L. Jenkins
Project Manager

cc: NMOCD – Artesia District Office
Rick N. Johnson (BJ Services Company, U. S. A.)
Rick Rexroad (Brown and Caldwell)

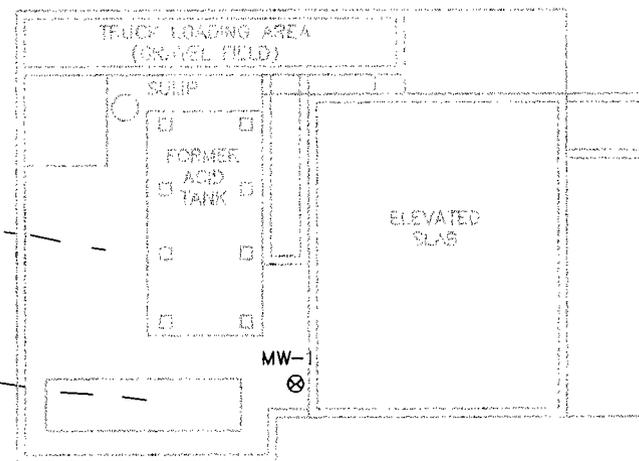


NEW ACID DOCK



MW-3

FORMER ACID DOCK

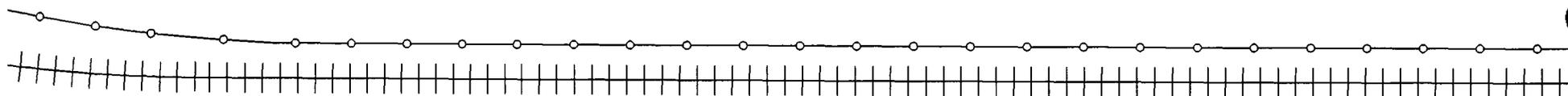


79.0

MW-2
79.11

80.0

MW-4
80.29



P:\12988\F12988005 01-14-99 CK

BROWN AND CALDWELL
HOUSTON, TEXAS

LEGEND

- MW-3 MONITOR WELL
- FENCELINE
- 80.0 GROUNDWATER ELEVATION
- GROUNDWATER FLOW DIRECTION

0 15 30



SCALE 1" = 30'

DRAWN BY: CK DATE 1/99

CHK'D BY: DATE

APPROVED: DATE

TITLE
MONITOR WELL LOCATIONS

CLIENT
BJ SERVICES COMPANY, U.S.A.

SITE LOCATION
ARTESIA, NEW MEXICO

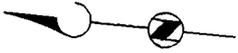
DATE
01/20/98

PROJECT NUMBER
2988.009

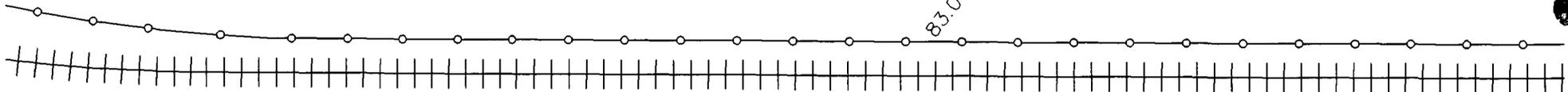
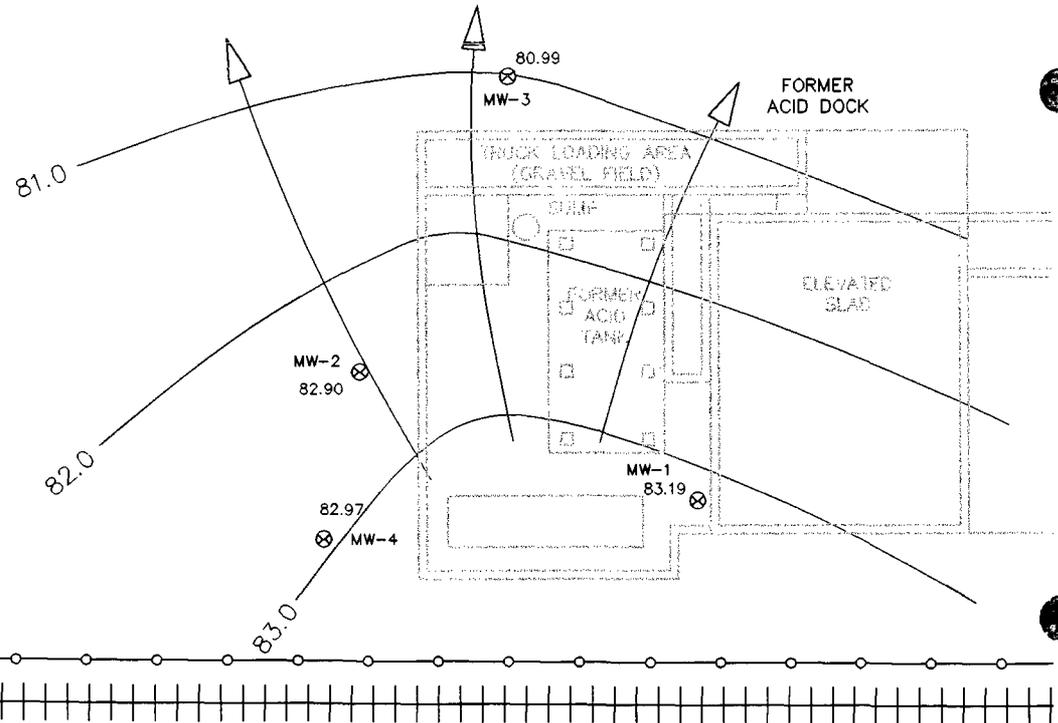
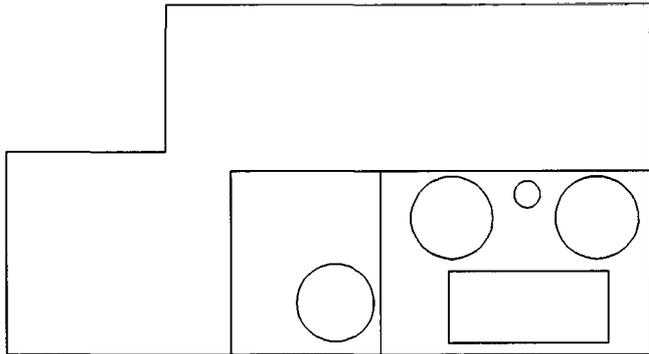
ATTACHMENT
1

SUBMITTED: _____ DATE: _____
PROJECT MANAGER

APPROVED: _____ DATE: _____
BROWN AND CALDWELL



NEW ACID DOCK



P:\12988\F12988006 01-14-99 CK

BROWN AND CALDWELL
HOUSTON, TEXAS

SUBMITTED: _____ DATE: _____
PROJECT MANAGER

APPROVED: _____ DATE: _____
BROWN AND CALDWELL

LEGEND

- MW-3 MONITOR WELL
- FENCELINE
- 83.0 GROUNDWATER ELEVATION
- GROUNDWATER FLOW DIRECTION

0 15 30



SCALE 1" = 30'

DRAWN BY: CK DATE 1/99

CHK'D BY: _____ DATE: _____

APPROVED: _____ DATE: _____

TITLE GROUNDWATER GRADIENT MAP
SEPTEMBER 1, 1997

CLIENT BJ SERVICES COMPANY, U.S.A.

SITE LOCATION ARTESIA, NEW MEXICO

DATE 01/14/99

PROJECT NUMBER 2988.09

ATTACHMENT 2



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

Certified Mail
Return Receipt NO. Z 357 870 112

December 16, 1998

Mr. Rick N. Johnson
BJ Services Company, U.S.A. (BJSC)
8701 New Trails Drive
The Woodlands, Texas 77381

Subject: Groundwater Sampling Activities
Acid Dock Area: MW-3
BJ Services Artesia Facility
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Dear Mr. Johnson:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the letter dated November 04, 1998 submitted on behalf of BJSC by Brown and Caldwell concerning an alternative to sampling MW-3 due to it being damaged. **Your request is hereby denied and NMOCD will require the following actions and conditions in order to make a proper determination for closure in the future.**

1. Please provide a groundwater potentiometric surface map for the former acid dock area. Once developed please submit this map with a plan to install a new monitor well to replace the old MW-3. This well should be located directly down-gradient and as close as possible to the original source of contamination.
2. Initial groundwater sampling analysis for this monitor well shall include volatiles (Method 8060), Semi-volatiles (Method 8270), PAH's (Method 8310), WQCC Metals, General Chemistry (PH, TDS, Conductivity, Major Cations and Anions).
3. Please include a plan to locate and permanently plug the old MW-3 well.

Please submit for NMOCD approval a plan to address the above items by February 15, 1998. NMOCD can allow additional time for a good cause shown when requested in writing.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Environmental Bureau

cc: NMOCD-Artesia District

file: O/wp/bjartmw3

B R O W N A N D
C A L D W E L L

NOV 12 1998

November 4, 1998

Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

12988-014

**Subject: Groundwater Sampling Activities
 Acid Dock Area: MW-3
 BJ Services Artesia Facility
 Eddy County, New Mexico**

Dear Mr. Price:

On October 21, 1998, Brown and Caldwell conducted a site visit to perform one-time, annual sampling of monitor well MW-3, in accordance with directives of the Oil Conservation Division of the New Mexico Energy, Minerals and Natural Resources Department (NMOCD), as summarized in the September 1997 Groundwater Sampling Report (Brown and Caldwell, April 8, 1998) for the facility. The sampling of this well was not performed when it was discovered that the well had been damaged and was plugged with sand and gravel 8 feet below the surrounding grade. Efforts to dislodge the obstruction were not successful.

As an alternative to sampling MW-3, Brown and Caldwell proposes to sample groundwater utilizing nearby MW-2 which is downgradient and sidegradient of the former Acid Dock Area (see Figure 1, attached). Groundwater samples collected from MW-2 will be analyzed for BTEX and SVOCs by EPA Methods 8020 and 8270, respectively.

If you have any questions regarding the information presented herein, please contact me at (713) 759-0999.

Sincerely,

BROWN AND CALDWELL

Richard Rexroad for

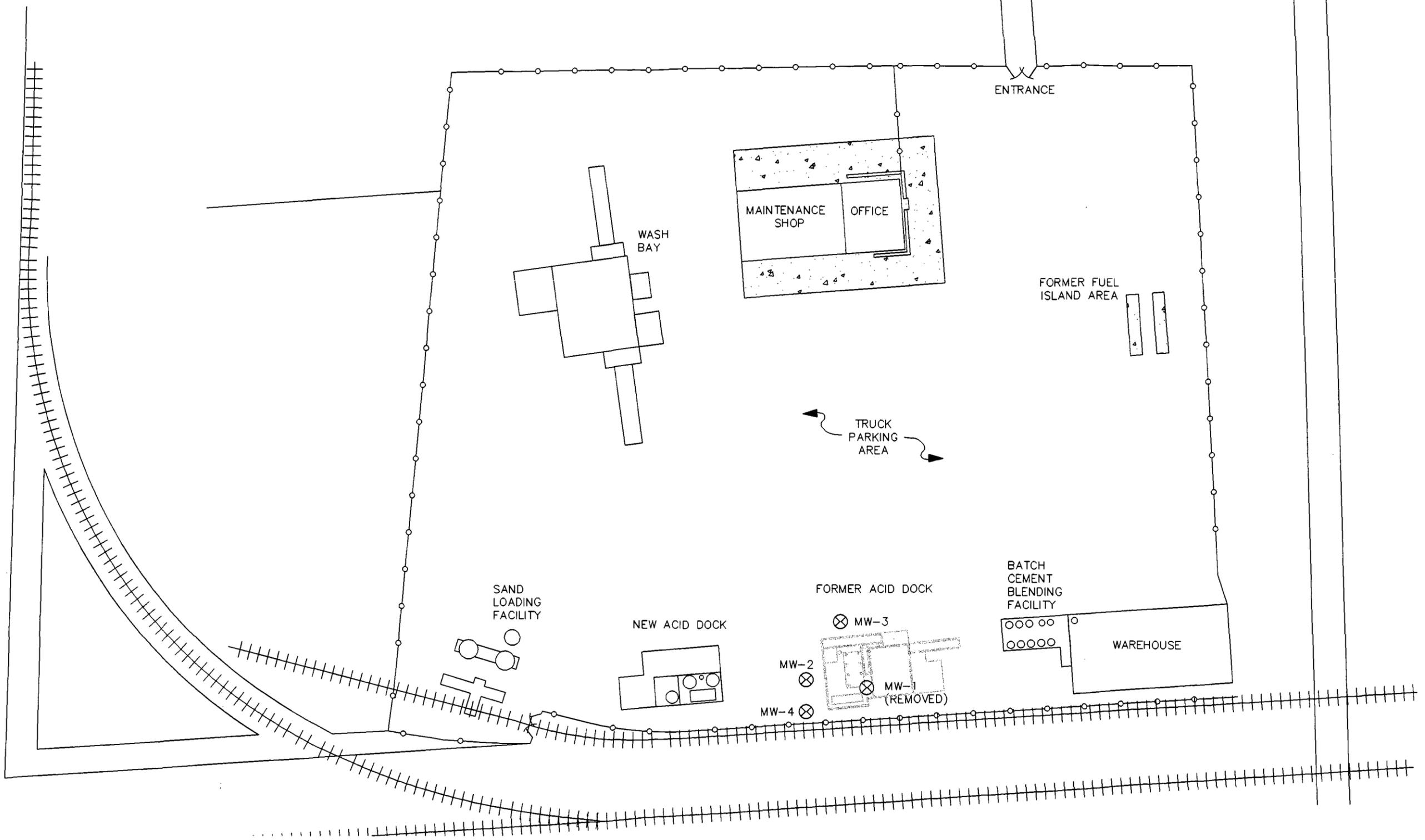
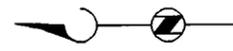
Timothy L. Jenkins
Project Manager

cc: NMOCD – Artesia District Office
 Rick N. Johnson (BJ Services Company, U. S. A.)
 Rick Rexroad (Brown and Caldwell)

\\BCHOU01\PROJECTS\WP\BJSERV\2988\0601.doc

Environmental Engineering And Consulting • Analytical Services

1415 LOUISIANA, SUITE 2500, HOUSTON, TX 77002
(713) 759-0999 FAX (713) 759-0952



P:\12988\1298800902 03-04-98 JR

BROWN AND CALDWELL
HOUSTON, TEXAS

SUBMITTED: _____ DATE: _____
PROJECT MANAGER
APPROVED: _____ DATE: _____
BROWN AND CALDWELL

0 50 100
SCALE: 1" = 100'
DRAWN BY: JR DATE 3/98
CHK'D BY: _____ DATE _____
APPROVED: _____ DATE _____

LEGEND

MW-1 MONITOR WELL LOCATIONS

CONCRETE DRIVES, APRON

TITLE	SITE PLAN		DATE	03/04/98
CLIENT	BJ SERVICES COMPANY, U.S.A.		PROJECT NUMBER	12988.009
SITE	ARTESIA, NEW MEXICO		FIGURE NUMBER	2



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 827-7131

May 14, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-259-066

Ms. Jo Ann Cobb
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

**RE: Fuel Island Soil and Ground Water Assessment
Artesia Facility
Eddy County, New Mexico**

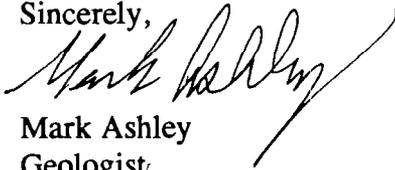
Dear Ms. Cobb:

The New Mexico Oil Conservation Division (OCD) has completed a review of the BJ Services Company, U.S.A. (BJ) letter dated April 21, 1998. This report was submitted by Brown and Caldwell on behalf of BJ. It contains an alternate ground water monitoring program for MW-5, MW-6, MW-7. Based on the information received, the BJ request is approved.

Please be advised that OCD approval does not relieve BJ of liability should it later be found that contamination exists which could pose a threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

If BJ has any questions, please call me at (505) 827-7155.

Sincerely,



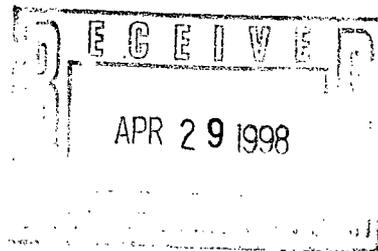
Mark Ashley
Geologist

xc: OCD Artesia Office

P 288 259 066	
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BROWN AND
CALDWELL

April 21, 1998



Mr. Mark Ashley
State of New Mexico
Energy, Minerals, and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

2988-09

**Subject: BJ Services Facility – Artesia, New Mexico
Fuel Island Soil and Groundwater Assessment**

Dear Mr. Ashley:

Thank you for reviewing BJ Services "Final Soil and Groundwater Assessment Report" of March 24, 1998, and your subsequent letter response dated April 2, 1998. In your letter response, the NMOCD granted closure of the Fuel Island Area on the condition that groundwater monitoring be conducted for MW-5, MW-6, and MW-7 at the time of each discharge plan renewal (approximately once every 5 years). As an alternative to this time frame, which appears to be unlimited in scope, Brown and Caldwell suggests that a groundwater monitoring program be performed annually for two years, with the first event scheduled for January 1999 (approximately one year from the initial sampling event). As requested in the NMOCD letter of April 2, 1998, groundwater samples collected during these annual events would be analyzed for BTEX by EPA Method 8020. Pending results of these groundwater monitoring events, BJ Services would propose either final closure of the Fuel Island Area or continued monitoring.

Thank you for considering this alternate plan for groundwater monitoring. If you have any questions, please do not hesitate to contact me at (713) 646-1138.

Very truly yours,

BROWN AND CALDWELL

A handwritten signature in black ink, appearing to read "Timothy L. Jenkins". The signature is fluid and cursive.

Timothy L. Jenkins
Associate Engineer

SAMPLE MONITORING
UNTIL NEXT
RENEWAL, THEN
PLUG.

cc: NMOCD Artesia District Office
Jo Ann Cobb, BJ Services Company, U.S.A.
Rick N. Johnson, BJ Services Company, U.S.A.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 2, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-259-049

Ms. Jo Ann Cobb
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

**RE: Fuel Island Soil and Ground Water Assessment
Artesia Facility
Eddy County, New Mexico**

Dear Ms. Cobb:

The New Mexico Oil Conservation Division (OCD) has completed a review of the BJ Services Company, U.S.A. (BJ) "Final Soil and Ground Water Assessment Report" dated March 24, 1998. This report was submitted by Brown and Caldwell on behalf of BJ. It contains a summary of activities performed to date and a request for final closure at the former fuel island area.

The above referenced report is approved with the following condition:

1. At future discharge plan renewals MW-5, MW-6 and MW-7 will be sampled for BTEX using EPA approved methods.

Please be advised that OCD approval does not relieve BJ of liability if contamination exists which is beyond the scope of the report or if the activities failed to adequately determine the extent of contamination related to BJ's activities. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

If BJ has any questions, please call me at (505) 827-7155.

Sincerely,

Mark Ashley
Geologist

xc: OCD Artesia Office

P 288 259 049

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PS Form 3800, April 1995



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 21, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-259-008

Ms. Jo Ann Cobb
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

RE: Fuel Island Area Report/Work Plan
Artesia Facility
Eddy County, New Mexico

Dear Ms. Cobb:

The New Mexico Oil Conservation Division (OCD) has completed a review of BJ Services' (BJ) "Fuel Island Area Field Activities Report" dated January 8, 1998. This document, received via fax on January 16, 1998, was submitted by Brown and Caldwell on behalf of BJ. It contains activities performed to date and proposed future actions for ground water investigation at the BJ Services Artesia facility.

The above referenced report/work plan is approved with the following conditions:

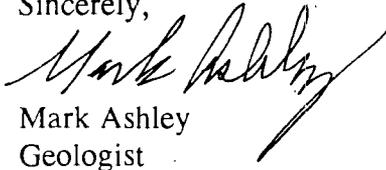
1. A minimum of one monitor well installed upgradient and a minimum of two monitor wells installed downgradient from the fuel island area.
2. Monitor wells will be constructed with:
 - a. A minimum of fifteen feet of well screen, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
 - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug will be placed above the gravel pack.

- d. The remainder of the hole will be grouted to the surface with cement containing 5% bentonite.
3. All wastes generated will be disposed of at an OCD approved site.
4. Ground water from the monitor wells will be sampled and analyzed for concentrations of BTEX, polynuclear aromatic hydrocarbons, and 8 RCRA metals using EPA approved methods.
5. BJ will submit a report on the investigation to the OCD by March 23, 1998. The report will include a description of the actions performed and the results of all sampling activities. The report will also include recommendations for future actions based on the results of ground water sampling.
6. BJ will notify the OCD Artesia District Office at least 72 hours in advance of all activities.
7. All original documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve BJ of liability if contamination exists which is beyond the scope of the report/work plan or if the activities fail to adequately determine the extent of contamination related to BJ's activities. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

If BJ has any questions, please call me at (505) 827-7155.

Sincerely,



Mark Ashley
Geologist

xc: OCD Artesia Office

P 288 259 008

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PS Form 3800, April 1995

BROWN AND CALDWELL

Unless otherwise indicated or obvious from the nature of the transmittal, the information contained in this facsimile message is confidential information intended for the use of the individual or entity named below. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us at the telephone number listed. Thank you.

January 16, 1998

FAX TRANSMITTAL COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGES TO:

Name: Mark Ashley Company: NMOCD

City: Santa Fe, NM FAX No: (505) 827-8177

THIS TRANSMITTAL IS BEING SENT FROM:

Name: Tim Jenkins
User ID:
Job No: 2988-09

Return originals: Yes No
Stamp: Yes No
Staple: Yes No

SPECIAL INSTRUCTIONS/REMARKS:

This fax serves as the 72-hour notice of the well installation and sampling activities at BJ Services Company, U.S.A. Artesia District Facility, near the Fuel Island Area, pending your final approval. Well installation is tentatively scheduled for Thursday January 22, 1998, with sampling to occur the following day, tentatively Friday, January 23, 1998. Please advise as to the required well installation requirements and the parameters you would like to have analyzed for groundwater characterization.

If you have any questions regarding these activities, please contact me at 713-646-1138.

*NOTIFIED RAY SMITH
ABOUT ACTIVITIES
ON 1-21-98
3:15pm MJ*

*VERBAL FOR MW'S
1-16-98
MJ
TO TIM JENKINS*

NUMBER OF PAGES BEING TRANSMITTED INCLUDING COVER SHEET: 6

January 8, 1998

Mr. Mark Ashley
State of New Mexico
Energy, Minerals, and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

2988-14

**Subject: BJ Services Artesia District Facility
Fuel Island Area Field Activities Report**

Dear Mr. Ashley:

This letter is to confirm the actions agreed upon orally between Brown and Caldwell, a consultant to BJ Services Company, U.S.A. (BJ Services), and the New Mexico Oil Conservation Division (NMOCD). The field activities performed to date and the proposed future actions to be taken by BJ Services are summarized below.

Field Activities Performed to Date

On October 7, 1997, Brown and Caldwell, under contract with BJ Services, advanced several test trenches within the curbed area of a former Fuel Island Area (FIA) at BJ Services Artesia District Facility, as prescribed in the Closure Plan dated June 30, 1997. Soil samples from these test trenches were submitted to a laboratory and analyzed for BTEX and TPH, the results of which indicated the presence of TPH-impacted soil to a depth of 4 feet below ground surface.

From November 18, 1997 through 22, 1997, the soil within the curbed area was excavated to a depth of approximately 8 feet. The east end of the FIA was excavated to depth of 15 feet because visible staining and elevated photoionization device (PID) readings were observed. A sample was collected at a depth of 15 feet from the east end, and submitted to a laboratory for analysis (East-15). A floor composite sample (FIA-FC8) was collected for comparison to the NMOCD action levels established in the June 30, 1997 Closure Plan. The laboratory results for the FIA have been summarized in Table 1 below.

January 8, 1998
 Mr. Mark Ashley
 State of New Mexico
 Page 2

TABLE 1
Analytical Results (mg/kg)

Sample I.D.	Benzene	Toluene	Ethylbenzene	Xylene	TPH-DRO
East-12 (sidewall at East End)	0.200	0.390	2.10	1.90	11000
East-15 (toe of sidewall, East End)	0.019	0.0082	0.360	0.190	2500
FIA-FC8 (composite of remaining floor)	<0.001	<0.001	0.013	0.019	490
STKPL-FIA (stockpile sample for disposal)	0.017	0.038	1.10	1.10	7400

From December 11 through 12, 1997, Brown and Caldwell coordinated the removal and disposal of approximately 305 cubic yards of diesel-impacted material from the FIA. The soil was disposed at the Controlled Recovery, Inc. landfarm facility for UST-impacted soils, and is operated under the New Mexico Environmental Department. The excavation was then backfilled and compacted. Approval to backfill was verbally by the NMOCD on November 21, 1997. As part of this approval, possible TPH-impacted soil located beneath two 12 ft. by 60 ft. concrete slabs was left in place. This action was taken because the potential for contaminant migration is significantly reduced by the impervious cover provided by these slabs.

Proposed Future Actions

Groundwater beneath the facility has been identified at depths ranging from 13 to 30 feet below ground surface. Observations made during the deep excavation in the east end of the FIA indicated that groundwater is present at approximately 15 feet below grade. Based on the soil analytical results from this depth, we propose a groundwater evaluation as a condition for FIA closure.

The proposed groundwater evaluation will include installation of 3 monitor wells screened from 5 feet above the water table to 10 feet below the water table (see Figure 1). These wells will be located such that one well is upgradient and two are downgradient based on observed groundwater flow patterns to date. Groundwater samples will be analyzed for BTEX (Method 8020), PAH's (Method 8310), and 8 RCRA metals (Method 3050/6010/7000 Series).

The monitor wells will be sampled after installation, and approximately 6 and 12 months from the first sampling event. Based on the results, a site assessment and groundwater sampling report will be submitted to the NMOCD. If warranted, the report will request final closure of the FIA.

January 8, 1998
Mr. Mark Ashley
State of New Mexico
Page 3

We understand that no further excavation is required for the FIA at this time, and will notify the Oil Conservation Division regarding future activities as they may relate to the FIA. If you have any questions, please do not hesitate to contact me at (713) 646-1138.

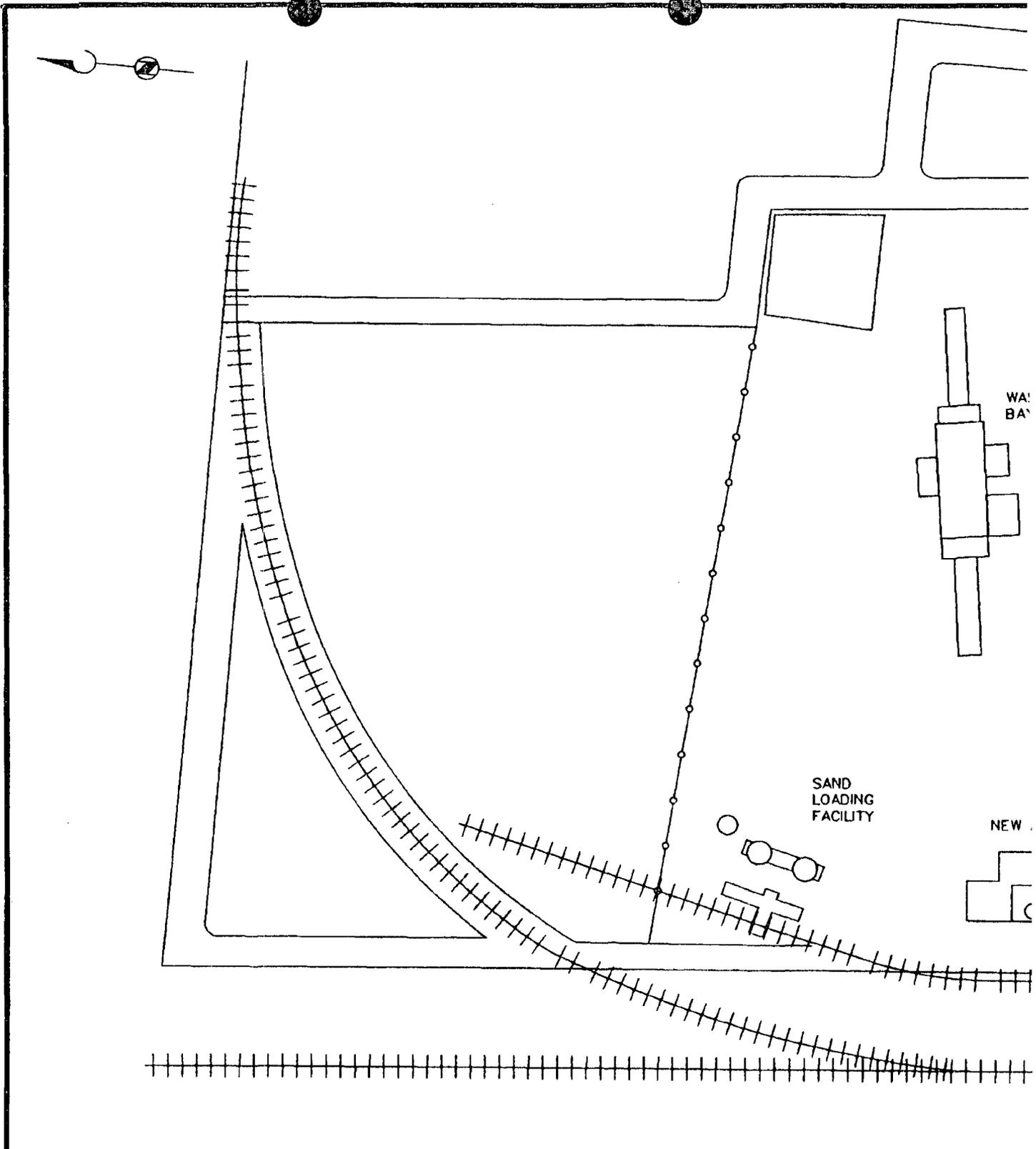
Very truly yours,

BROWN AND CALDWELL



Timothy L. Jenkins
Associate Engineer

cc: NMOCD Artesia District Office
Jo Ann Cobb, BJ Services Company, U.S.A.
Mike Wiggins, BJ Services Company, U.S.A.

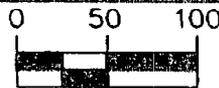


2988\F2988001 01-07-98 JR

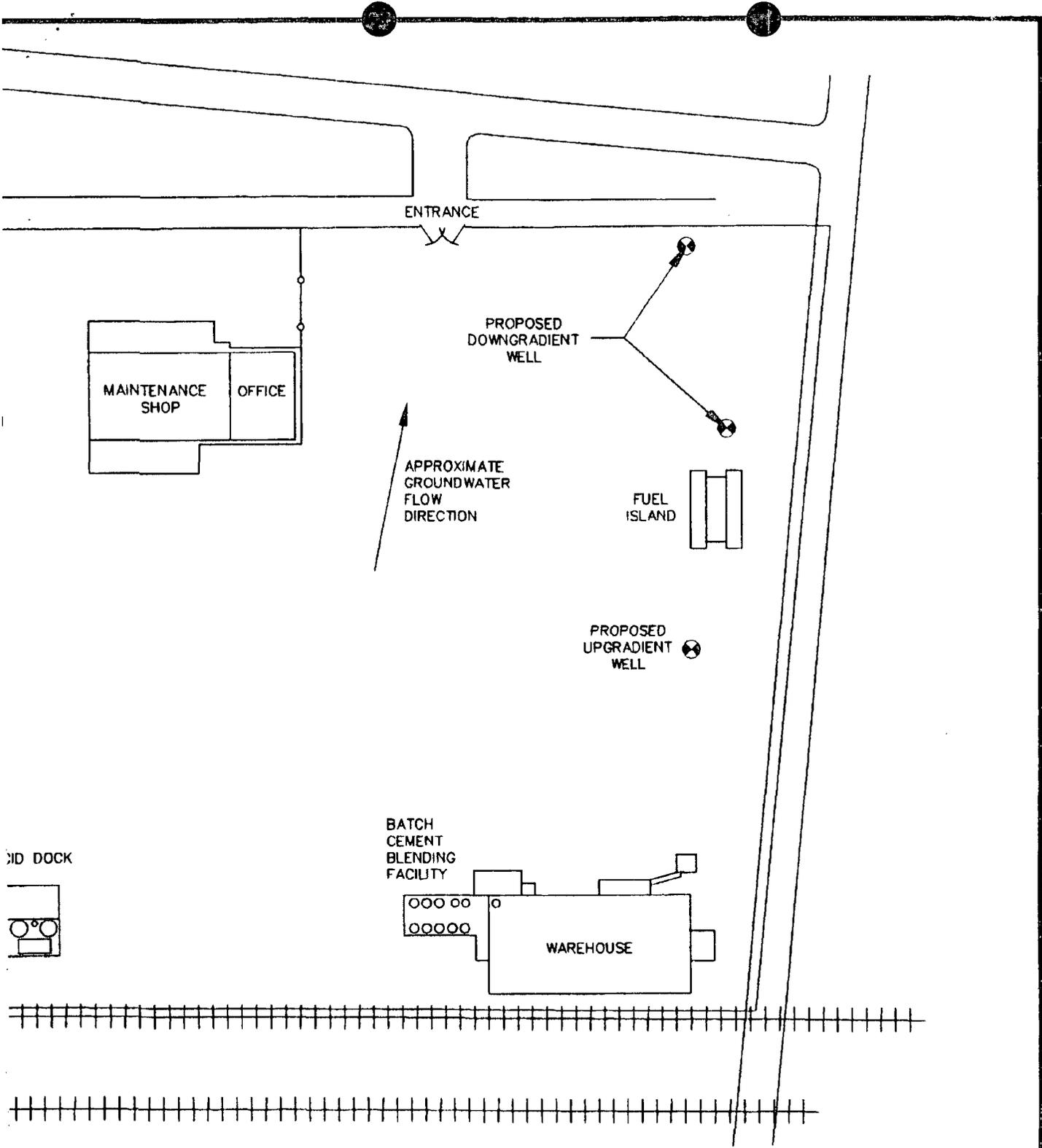
BROWN AND CALDWELL
HOUSTON, TEXAS

SUBMITTED: _____ DATE: _____
 PROJECT MANAGER

APPROVED: _____ DATE: _____



SCALE: 1" = 100'
 DRAWN BY: JR DATE 1/98
 CHK'D BY: _____ DATE _____



TITLE	PROPOSED MONITOR WELL LOCATIONS	DATE	01/06/98
CLIENT	BJ SERVICES COMPANY, U.S.A.	PROJECT NUMBER	2988.09
SITE		FIGURE NUMBER	

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 11:15am	Date 12-4-97
---	-----------------------------------	-----------------	-----------------

<u>Originating Party</u>	<u>Other Parties</u>
TIM JENKINS	MARK ASHLEY

Subject BT-ARRESTA - FUEL ISLAND REMEDIATION

Discussion TIM EXCAVATED TO APPROX. 15' & GOT TPH READINGS OF APPROX 11,000 PPM. THE EXCAVATION HAD WATER PRESENT IN IT THE NEXT MORNING. TIM WANTED GUIDANCE FROM THE OGD.

Conclusions or Agreements OGD GAVE VERBAL TO BACKFILL WITH CLEAN DIRT. THE CONTAMINATED SOILS WERE DISPOSED OF AT AN UNREG. WASTE LANDFARM SINCE THE SOILS WERE EXCLUSIVELY WASTE. THE OGD VERBALLY REQUIRED ONE UPGRADEMENT & TWO DOWNGRADEMENT MONITOR WELLS, AS WELL AS A REMEDIATION PLAN. BT WILL COMPLY

Distribution

Signed Mark Ashley

**BROWN AND
CALDWELL**

Unless otherwise indicated or obvious from the nature of the transmittal, the information contained in this facsimile message is confidential information intended for the use of the individual or entity named below. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us at the telephone number listed. Thank you.

October 3, 1997

FAX TRANSMITTAL COVER SHEET**PLEASE DELIVER THE FOLLOWING PAGES TO:**

Name: Mark Ashley

Company: NMDC

City: Santa Fe, NM

FAX No: 505-827-8177

THIS TRANSMITTAL IS BEING SENT FROM:

Name: Tim Jenkins

Return originals: Yes No

User ID:

Stamp: Yes No

Job No: 2988-09

Staple: Yes No **SPECIAL INSTRUCTIONS/REMARKS:**

Mark-

Please review this Closure Request Letter. As discussed in the letter, we plan on mobilizing to the site Tuesday morning of next week. Thank you for your attention to these site activities.

NUMBER OF PAGES BEING TRANSMITTED INCLUDING COVER SHEET: 7*Environmental Engineering And Consulting*

SUITE 2500, 1415 LOUISIANA, HOUSTON, TEXAS 77002

PHONE: (713) 759-0999 FAX: (713) 308-3886

October 3, 1997

Mr. Mark Ashley
State of New Mexico
Energy, Minerals, and Natural Resources Department
2040 South Pacheco
Santa Fe, New Mexico 87505

2988-09

Subject: BJ Services Artesia District Facility
Closure Request of Former Acid Dock Area

Dear Mr. Ashley:

Brown and Caldwell, under contract to BJ Services Company, U.S.A. (BJ Services), supervised the permanent removal of the Former Acid Dock Area (Acid Dock) and conducted a site assessment for the closure of the Acid Dock from August 25, 1997 through September 2, 1997. The site assessment was conducted in accordance with the "Closure Plan: Former Acid Dock Area and Former Fuel Island" (Closure Plan), submitted to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division (OCD) on June 30, 1997.

Brown and Caldwell, with Remedial Construction Services, Inc. as subcontractor, performed the site assessment to determine the potential for site soils/groundwater to have been impacted by the operation of the Acid Dock. The results of the site assessment were used for evaluating the need for further remediation and the type of closure best suited for the site.

Upon completion of excavation activities, confirmation samples were collected at the locations shown in Figure 1. The excavation was divided into six distinct zones. These zones were generally based on floor depth. For each zone, a floor composite sample and a discrete sample from each sidewall was collected and submitted to a laboratory for analysis. Each sample was analyzed for benzene, toluene, ethylbenzene, and xylene (BTEX by EPA SW-846 Method 0020), and TPH for diesel range organics (EPA SW-846, Method 8013 method). A summary of confirmation sample results is included as Table 1. The floor composite indicating the highest TPH (sample D-FC-11, TPH = 49 $\mu\text{g}/\text{kg}$) was analyzed for total metals. This analysis is included as Table 2.

Only one of the 21 samples collected (sample D-SDWL-W-9) indicated levels exceeding the NMOCD action levels established in the Closure Plan dated June 30, 1997. The sidewall sample, D-SDWL-W-9 was collected from a depth of 9 feet below grade on the west sidewall of zone D (total depth of 13 feet). The TPH level measured in this sample was 950 mg/kg , which is above the NMOCD remediation action level of 100 mg/kg . Excavation was halted on

Page 2

the west side of the Acid Dock due to the close proximity of a water main line running in the north-south direction approximately three feet west of the current sidewall. For this reason, additional excavation is not practical in the area of the elevated TPH sample. BTEX concentrations for all samples were below the NMOCD remediation action levels.

A groundwater assessment was conducted concurrently with the soil assessment and excavation activities. Existing monitor wells MW-1, MW-2, MW-3, and MW-4 were purged on September 1, 1997, and sampled on September 2, 1997. Samples collected from the monitor wells were analyzed for BTEX and semivolatiles by EPA Methods 8020 and 8270, respectively. Groundwater analytical results are summarized in Table 3, attached. There were no detectable concentrations for any of the chemicals analyzed in the downgradient well (MW-3). In the area where impacted soils were found (MW-1 area), the groundwater analytical results indicate that benzene, toluene, ethylbenzene, and xylenes were present at concentrations below the New Mexico Water Quality Control Commission groundwater standards. Of the semivolatiles analyzed, only naphthalene was present at a level above the NMWQCC groundwater standards (0.032 mg/L versus the NMWQCC standard of 0.030 mg/L). MW-1 and the surrounding impacted soils have been removed, and will no longer serve as a potential source for groundwater impact.

Approximately 550 cubic yards of impacted soil were excavated and stockpiled for disposal. The stockpile was sampled for TPH, volatility, corrosivity and ignitability, plus TCLP volatiles, semi-volatiles, and metals. The stockpile TPH concentration was measured as 357 mg/kg for the composite sample collected on September 2, 1997. The stockpiled soil profile was submitted to the NMOCD for approval in accordance with the permit held by Controlled Recovery, Inc. landfill facility in Hobbs, New Mexico. The soil has been approved for disposal by the NMOCD Hobbs and Artesia District Offices, and the NMOCD Santa Fe Office. Disposal is scheduled to begin next Tuesday, October 7, 1997.

BJ Services Company, U.S.A. requests closure of the Former Acid Dock Area, and accepts responsibility should groundwater become impacted (i.e., contaminant concentrations are identified above NMWQCC groundwater standards) from residual TPH-impacted soil in the area of the west sidewall. Although BJ Services accepts this responsibility, we do not feel that current site conditions pose a threat to groundwater.

Very truly yours,

Jo Ann Cobb
Manager, Safety and Environmental

cc: Mr. Robert N. Jennings, Brown and Caldwell
Mr. Mike Wiggins, BJ Services Company, U.S.A., Artesia District Facility

Table 1
Confirmation Soil Samples
Analytical Results

BJ Services Company, U.S.A.
Artesia, New Mexico

SAMPLE ID	TPH	Benzene	Toluene	Ethylbenzene	Xylenes	BTEX
A-FC-5	<4.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
A-SDWL-N-2	10	<0.0050	<0.0050	<0.0050	<0.0050	<0.020
A-SDWL-E-3	<4.0	<0.0010	<0.0010	<0.0010	0.0012	0.0012
A-SDWL-S-4	<4.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
B-FC-11	49	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
B-SDWL-N-7	<4.0	0.0011	<0.0010	<0.0010	0.0024	0.0035
B-SDWL-E-8	8	<0.0050	<0.0050	<0.0050	0.11	0.11
B-SDWL-S-8	<4.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
C-FC-16	6	<0.0010	<0.0010	<0.0010	0.0035	0.0035
C-SDWL-N-13	<4.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
C-SDWL-E-14	<4.0	<0.0010	0.0015	<0.0010	0.013	0.0145
C-SDWL-S-9	<4.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
D-FC-13	13	<0.0010	<0.0010	0.0015	0.015	0.0165
D-SDWL-W-9	950	0.27	<0.010	0.036	0.056	0.362
D-SDWL-S-8	<4.0	<0.0010	0.0021	<0.0010	0.0052	0.0073
E-SDWL-E-8	5.4	<0.010	<0.010	<0.010	<0.010	<0.040
F-SDWL-N-7	17	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
F-SDWL-N-6	5.3	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
F-SDWL-S-6	5.6	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
F-FC-7	6.8	<0.010	<0.010	<0.010	<0.010	<0.040
NW-CONF-TOE	<8.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
SE-CONF-SDWL	<8.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.020
SE-CONF-FLR	<8.0	<0.0010	<0.0010	<0.0010	<0.0010	<0.0040
NMOCDCleanup Goal	100	10		TOTAL BTEX:	50	0.362

Sample results are reported in mg/kg.

Table 2
Sample B-FC-11
RCRA Metals Analytical Results

BJ Services Company, U.S.A.
Artesia, New Mexico

Metal Analyzed	Total Concentration (mg/kg)	Estimated TCLP Concentration (5% of Total) (mg/L)	NMOC Regulatory Action Levels (mg/L)
Arsenic	<2	<0.1	<5
Barium	246	12.3	<100
Cadmium	<0.5	<0.025	<1
Chromium	9	0.45	<5
Lead	4.2	0.21	<5
Mercury	<0.1	<0.005	<0.2
Selenium	<0.5	<0.025	<1
Silver	<1	<0.05	<5

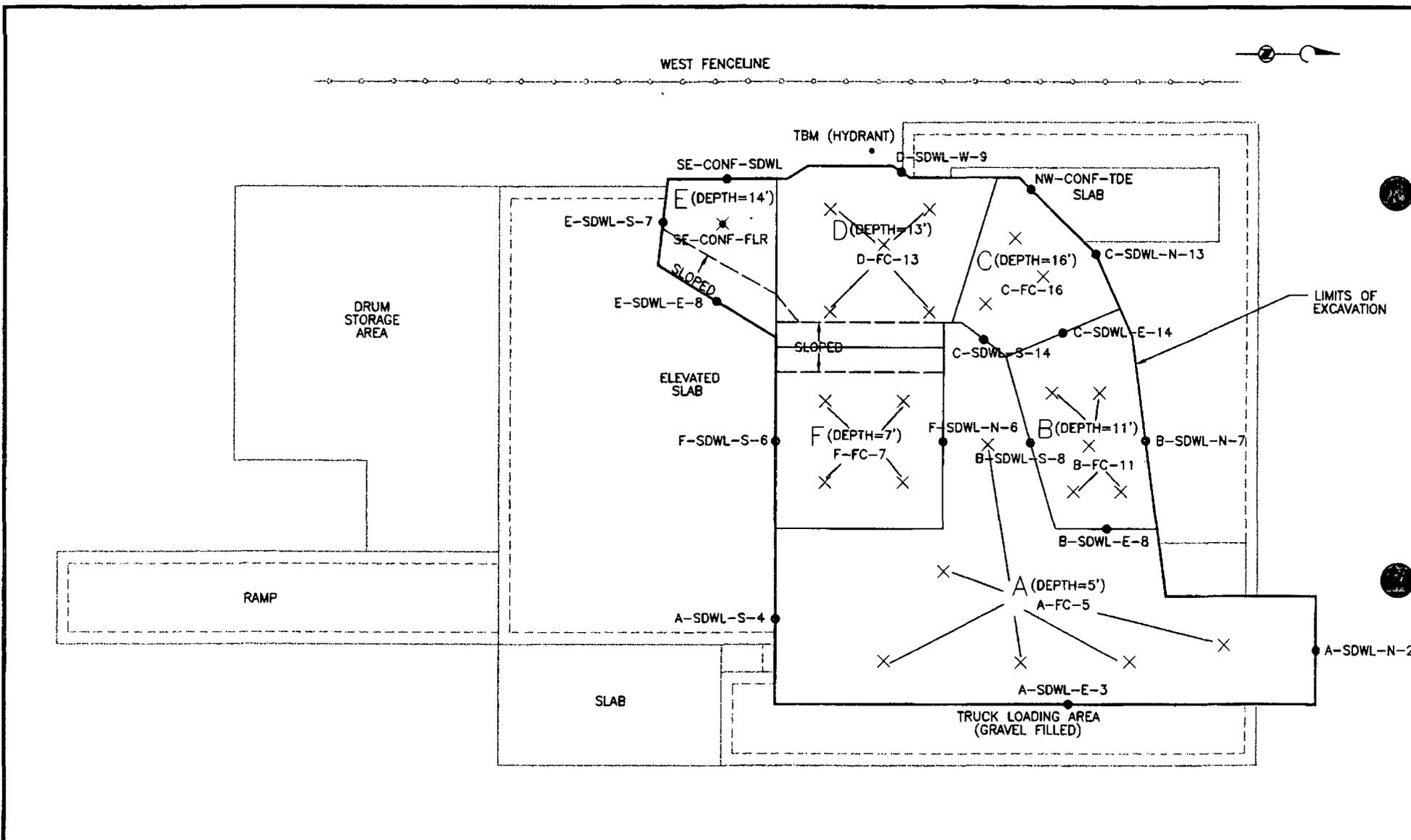
Table 3
Groundwater Sampling - September 2, 1997
Analytical Results

BJ Services Company, U.S.A.
Artesia, New Mexico

MONITOR WELL	MW-1	MW-2	MW-3	MW-4	Field Blank	NMWQCC Groundwater Standards
VOLATILES by Method 8020 (mg/L)						
Benzene	<0.0050	<0.0010	<0.0010	<0.0010	<0.0010	0.01
Toluene	0.470	<0.0010	<0.0010	<0.0010	<0.0010	0.75
Ethylbenzene	0.059	<0.0010	<0.0010	<0.0010	<0.0010	0.75
Total Xylenes	0.190	<0.0010	<0.0010	<0.0010	<0.0010	0.62
SEMIVOLATILES by Method 8270 (mg/L) ^(a)						
Dibenzofuran	0.012	<0.005	<0.005	<0.005	<0.005	NL
2-Methylnaphthalene	0.024	<0.005	<0.005	<0.005	<0.005	NL
4-Methyphenol	0.059	<0.005	<0.005	<0.005	<0.005	NL
Napthalene	0.032	<0.005	<0.005	<0.005	<0.005	0.03 ^(b)

^(a) Chemicals with concentrations below Practical Quantitation Limit (PQL) are not listed in this table

^(b) Value is for PAHs: total naphthalene plus monomethylnaphthalenes.



I: 2988 SAMPLE LOC 10-03-97 JEB

BROWN AND CALDWELL
 HOUSTON, TEXAS
 SUBMITTED: _____ DATE: _____
 PROJECT MANAGER
 APPROVED: _____ DATE: _____
 BROWN AND CALDWELL

0 5 10
 SCALE: 1" = 10'
 DRAWN BY: JEB DATE 10/03
 CHK'D BY: _____ DATE _____
 APPROVED: _____ DATE _____

LEGEND
 BGS - BELOW GROUND SURFACE
 ● - SIDEWALL SAMPLE LOCATION
 X - FLOOR COMPOSITE LOCATION
 X - DISCRETE FLOOR SAMPLE

TITLE	CONFIRMATION SAMPLE LOCATIONS	DATE	10/03/97
CLIENT	BJ SERVICES COMPANY, U.S.A.	PROJECT NUMBER	2988.09
SITE	ADTECIA NEW MEXICO	FIGURE NUMBER	3

**BROWN AND
CALDWELL**

September 16, 1997

Unless otherwise indicated or obvious from the nature of the transmittal, the information contained in this facsimile message is confidential information intended for the use of the individual or entity named below. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us at the telephone number listed. Thank you.

FAX TRANSMITTAL COVER SHEET**PLEASE DELIVER THE FOLLOWING PAGES TO:**

Name: Mark Ashley **Company:** NM - Oil Conservation Division
City: Santa Fe, New Mexico **FAX No:** (505) 827-8177

THIS TRANSMITTAL IS BEING SENT FROM:

Name: Tim Jenkins **Return originals:** Yes No
User ID: **Stamp:** Yes No
Job No: 2988-09 **Staple:** Yes No

SPECIAL INSTRUCTIONS/REMARKS:

Attached are the groundwater analytical data for the sampling done on September 2, 1997. I will call you this afternoon to discuss these results.

NUMBER OF PAGES BEING TRANSMITTED INCLUDING COVER SHEET: 2

Environmental Engineering And Consulting
SUITE 2500, 1415 LOUISIANA, HOUSTON, TEXAS 77002
PHONE: (713) 759-0999 FAX: (713) 308-3886

Table 1
Groundwater Sampling - September 2, 1997
Analytical Results

BJ Services Company, U.S.A.
Artesia, New Mexico

MONITOR WELL	MW-1	MW-2	MW-3	MW-4	Field Blank	NMWQCC Groundwater Standards
VOLATILES by Method 8020 (mg/L)						
Benzene	<0.0050	<0.0010	<0.0010	<0.0010	<0.0010	0.01
Toluene	0.470	<0.0010	<0.0010	<0.0010	<0.0010	0.75
Ethylbenzene	0.059	<0.0010	<0.0010	<0.0010	<0.0010	0.75
Total Xylenes	0.190	<0.0010	<0.0010	<0.0010	<0.0010	0.62
SEMIVOLATILES by Method 8270 (mg/L) ^(a)						
Dibenzofuran	0.012	<0.005	<0.005	<0.005	<0.005	NL
2-Methylnaphthalene	0.024	<0.005	<0.005	<0.005	<0.005	NL
4-Methyphenol	0.059	<0.005	<0.005	<0.005	<0.005	NL
Napthalene	0.032	<0.005	<0.005	<0.005	<0.005	0.03 ^(b)

^(a) Chemicals with concentrations below Practical Quantitation Limit (PQL) are not listed in this table

^(b) Value is for PAHs: total naphthalene plus monomethylnaphthalenes.

4-2-98 1:30 PM
MW-3 WILL BE SAMPLED ANNUALLY
PER TIM JENKINS.

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 10:30AM	Date 8-27-97
---	-----------------	-----------------

<u>Originating Party</u> MARK ASKLEY	<u>Other Parties</u> TIM JENKINS
---	-------------------------------------

Subject BT-ARRESTA ACID ROCK CLOSURE.

Discussion TIM WAS CONCERNED THE CLOSURE ACTIVITIES MIGHT DAMAGE MW-1 ~~FROM~~ FROM THE FORMER UST.

Conclusions or Agreements I GAVE TIM THE OPTIONS OF FIRST SAMPLING MW-1, THEN EITHER PLUG THE WELL OR RISK DESTROYING IT IN THE CLOSURE. IF SAMPLE RESULTS COME BACK ABOVE STANDARDS, THE WELL WILL HAVE TO BE REINSTALLED

Distribution _____
Signed Mark Askley

**BROWN AND
CALDWELL**

Unless otherwise indicated or obvious from the nature of the transmittal, the information contained in this facsimile message is confidential information intended for the use of the individual or entity named below. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us at the telephone number listed. Thank you.

August 22, 1997

FAX TRANSMITTAL COVER SHEET**PLEASE DELIVER THE FOLLOWING PAGES TO:**

Name: Mark Ashley Company: NMOCD

City: Santa Fe, NM FAX No: (505) 827-8177

THIS TRANSMITTAL IS BEING SENT FROM:

Name: Tim Jenkins

User ID:

Job No: 2988-09

Return originals: Yes No Stamp: Yes No Staple: Yes No **SPECIAL INSTRUCTIONS/REMARKS:**

This fax serves as the 72-hour notice of sampling activities at BJ Services Company, U.S.A. Artesia District Facility. The sampling is scheduled to occur, at the earliest, on Thursday August 28, 1997. The acid dock removal activities will commence on August 25, 1997. The confirmation samples will indicate compliance with the NMOCD target levels outlined in the Closure Plan dated 06/30/97.

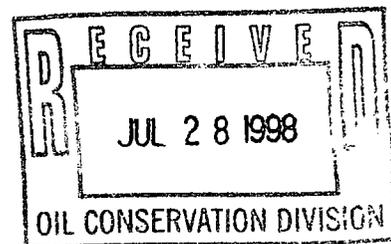
If you have any questions regarding these activities, please contact me at 713-646-1138.

NUMBER OF PAGES BEING TRANSMITTED INCLUDING COVER SHEET: 1

Environmental Engineering And Consulting
SUITE 2500, 1415 LOUISIANA, HOUSTON, TEXAS 77002
PHONE: (713) 759-0999 FAX: (713) 308-3886

22 P

B R O W N A N D
C A L D W E L L
July 24, 1998



Mr. Mark Ashley
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RECEIVED
JUL 30 1998

New Mexico Bureau
of Geology and Geophysics
Oil Conservation Division
2988-13

**Subject: Groundwater Sampling Schedule
 Fuel Island Soil and Groundwater Assessment
 BJ Services Artesia Facility
 Eddy County, New Mexico**

Reference: Ltr. from M. Ashley (NMOCD) to R. Johnson (BJ Services) dtd. 5/14/98; subj.:
 Fuel Island Soil and Groundwater Assessment, BJ Services Artesia Facility

Dear Mr. Ashley:

As discussed in our telephone conversation on July 22, 1998, the groundwater sampling events for the subject facility, as approved by the Oil Conservation Division of the New Mexico Energy, Minerals and Natural Resources Department (NMOCD) in the referenced correspondence, have been rescheduled from January 1999 and January 2000 to December 1998 and December 1999 in order to conform the Fuel Island groundwater sampling activities with other groundwater sampling events to be conducted by Brown and Caldwell on behalf of BJ Services Company, U.S.A. at the subject facility.

Brown and Caldwell and BJ Services Company, U.S.A. will continue to work with the NMOCD to complete the subject groundwater assessment.

If you have any questions regarding the information presented herein, please contact me or Tim Jenkins at (713) 759-0999.

Sincerely,

BROWN AND CALDWELL

A handwritten signature in cursive script that reads "Richard Rexroad".

Richard Rexroad, P.G.
Principal-In-Charge

cc: NMOCD – Artesia District Office
 Rick Johnson (BJ Services Company, U. S. A.)
 Tim Jenkins (Brown and Caldwell)



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

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

July 1, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-936

Ms. Jo Ann Cobb
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

**RE: Truck Wash Area Closure
Artesia Facility
Eddy County, New Mexico**

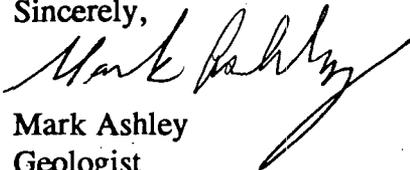
Dear Ms. Cobb:

The New Mexico Oil Conservation Division (OCD) has completed a review of BJ Services' (BJ) March 27, 1997 letter entitled "Boring Results and Closure Request for Truck Wash Area." It contains BJ's final closure activities associated with the truck wash area within the Artesia facility. Based upon the information provided, OCD does not require any further investigation at this time.

Please be advised that BJ is not relieved of liability if contamination exists which is beyond the scope of the closure plans or if the closure activities failed to adequately determine the extent of contamination related to BJ's activities. In addition, BJ is not relieved of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7155.

Sincerely,



Mark Ashley
Geologist

xc: OCD Artesia Office

P 288 258 936

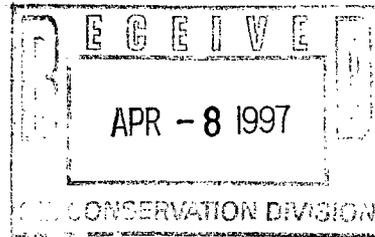
PS Form 3800, April 1995

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TOTAL Postage & Fees	\$
Postmark or Date	

B R O W N ' A N D
C A L D W E L L

March 27, 1997



Mr. Mark Ashley
State of New Mexico
Energy, Minerals, and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

2988-09

Subject: BJ Services Artesia District Facility
Boring Results and Closure Request for Truck Wash Area

Dear Mr. Ashley:

Brown and Caldwell, on behalf of BJ Services Company, U.S.A. (BJ Services), is submitting this letter to notify the New Mexico Oil Conservation Division (NMOCD) of the completion of soil sampling activities at BJ Services' Artesia, New Mexico facility, and to request closure of the Truck Wash Area.

At the request of the NMOCD, Brown and Caldwell drilled a soil boring on March 19, 1997 at the Truck Wash Area near the location of the former TW-N1 confirmation sample location, as shown in the attached figure. As previously discussed in letters from Brown and Caldwell to the NMOCD dated 3/10/97 and 3/18/97, a boring was advanced using a drill rig equipped with hollow stem augers and a split spoon sampler. This activity was performed to determine the vertical extent of total petroleum hydrocarbon (TPH) impact in excess of the applicable NMOCD standard. A minimum 48-hour notice was provided to the NMOCD on March 17, 1997.

The boring, drilled to a depth of 16 feet below ground surface (bgs), was sampled at 5-foot intervals, i.e. 5 feet bgs, 10 feet bgs, and 15 feet bgs. A continuous visual description was recorded in the field data book. Soil samples were collected in a two-inch diameter split spoon sampler, approximately two feet long. Each of the samples was retained for possible laboratory analysis, pending the results of field TPH analysis. The field analysis for TPH was performed using a Freon-113[®] extraction with infrared determination, similar to EPA method 418.1 modified for soils. The uppermost sample showing apparent compliance with the applicable NMOCD standard was the 15 feet bgs sample, labeled TW-N1-15, which indicated a TPH reading of 87 parts per million (ppm) using the field TPH test kit. This TPH concentration is less than 100 ppm TPH action level defined by the NMOCD.

Environmental Engineering And Consulting • Analytical Services

March 27, 1997
Mr. Mark Ashley
State of New Mexico
Page 2

The 15 feet bgs soil sample, selected for laboratory confirmation, was tested for TPH-Diesel Range Organics (TPH-DRO) using EPA Method 8015 Modified. Gasoline Range Organics were not analyzed because the BTEX results from the March 6, 1997 sampling event indicated that the TPH present at the former truck wash area was not in the gasoline range. The sample, TW-N1-15, had a TPH-DRO concentration of less than 1.0 milligram per kilogram (mg/kg). The laboratory report is attached.

Upon completion of the soil boring, 3 feet of hydrated bentonite was placed in the bottom of the borehole to seal it, with the remainder of the hole filled with concrete. An epoxy/concrete patch will be installed in the truck wash slab by BJ Services to repair damage to the slab as a result of sampling activities, effectively sealing the slab. Soil cuttings generated by the boring activities were stockpiled on-site along with an existing soil stockpile of material previously excavated from the same area.

On March 25, 1997, Roger Anderson of the NMOCD granted verbal approval for BJ Services to continue construction activities at the Truck Wash Area. This approval was based on the results identified in this letter. As the Truck Wash facility has been constructed without the complete removal of elevated TPH soil, BJ Services accepts responsibility for potential contamination of groundwater directly related to former truck wash separator area. However, this scenario is highly unlikely because the vertical extent of TPH impact in excess of the applicable NMOCD Standard has been defined as less than 15 feet bgs (TPH <1.0 mg/kg), which is above the groundwater table. Although BJ Services accepts this responsibility, it is believed that the current slab construction should provide an impermeable barrier to vertical percolation of contaminants, further minimizing the threat to groundwater.

If you have any questions concerning this closure request, please do not hesitate to contact me at (713) 759-0999.

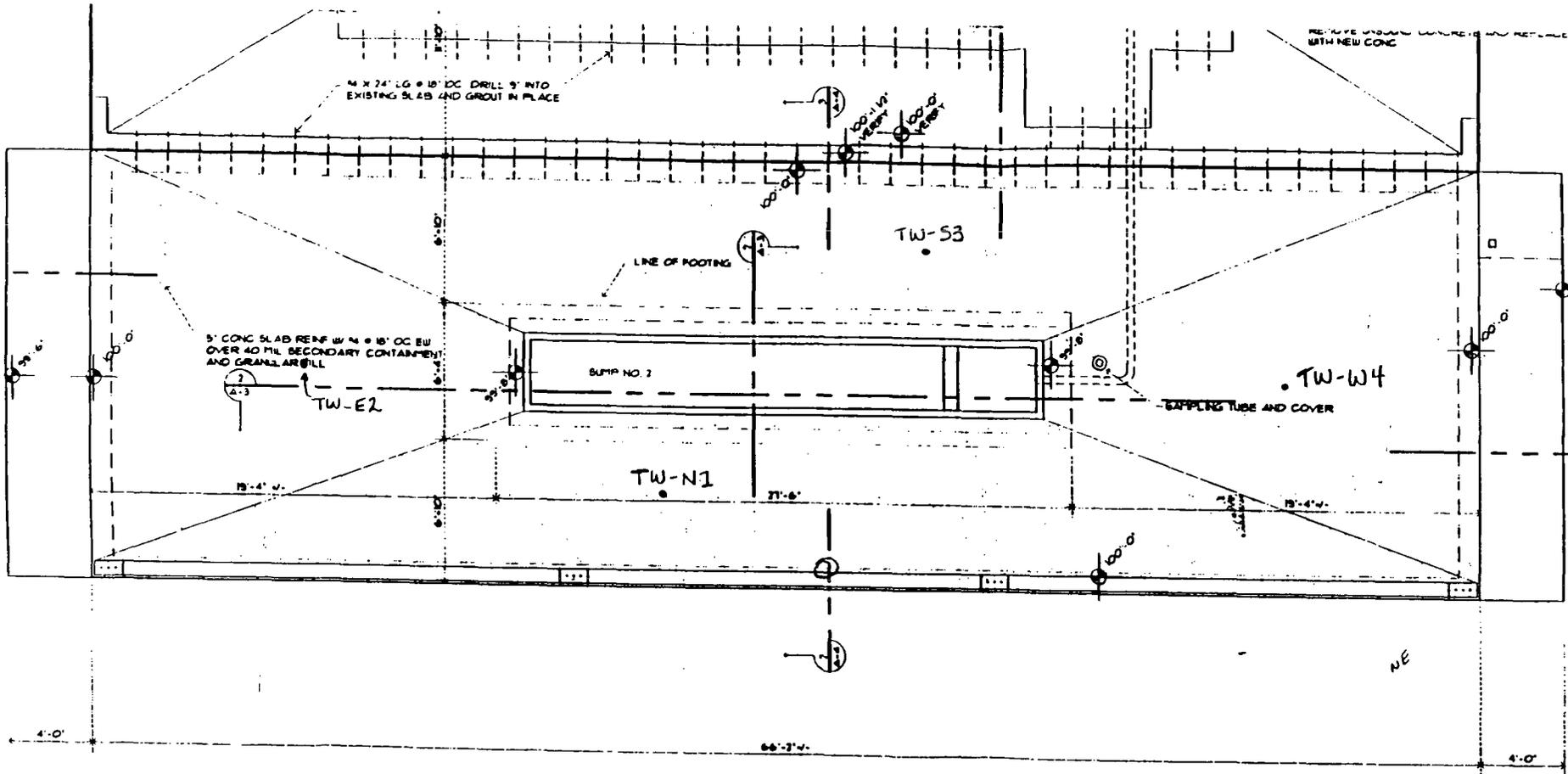
Very truly yours,



Timothy L. Jenkins
Project Manager



Robert N. Jennings, P.E.
Vice-President



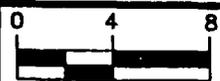
1 FOUNDATION PLAN
A-2



BROWN AND CALDWELL
HOUSTON, TEXAS

SUBMITTED: _____ DATE: _____
PROJECT MANAGER

APPROVED: _____ DATE: _____
BROWN AND CALDWELL



APPROX. SCALE

DRAWN BY: JEB DATE: 3/97

CHK'D BY: _____ DATE: _____

APPROVED: _____ DATE: _____

TITLE: SOIL SAMPLE LOCATIONS
OLD TRUCK WASH BAY

CLIENT: BJ SERVICES COMPANY, U.S.A.

SITE LOCATION: ARTESIA, N.M.

DATE: 03/10/97

PROJECT NUMBER: 2988-09

FIGURE NUMBER: 1

T:\2988\EMERSAMP 03-10-97 JEB



LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Rick Rexroad
BROWN & CALDWELL
1415 Louisiana
Suite 2500
Houston, TX 77002

03/21/1997

EPIC Job Number: 97.01026

Enclosed is the Analytical and Quality Control report for the following samples submitted to the Dallas Division of EPIC Laboratories, Inc. for analysis. Reproduction of this analytical report is permitted only in its entirety.

<u>Sample Number</u>	<u>Sample Description</u>	<u>Date Taken</u>	<u>Date Received</u>
330075	TW-NI-5	03/19/1997	03/20/1997
330076	TW-NI-10	03/19/1997	03/20/1997
330077	TW-NI-15	03/19/1997	03/20/1997

EPIC Laboratories, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

Holding Times: All holding times were within method criteria.

Method Blanks: All method blanks were within quality control criteria.

Instrument calibration: All calibrations were within method quality control criteria.

Analysis Comments: No Unusual Comments

Cathy Coney for
Jim Rowley
Project Manager

ANALYTICAL REPORT

Rick Rexroad
 BROWN & CALDWELL
 1415 Louisiana
 Suite 2500
 Houston, TX 77002

03/21/1997

EPIC Job Number: 97.01026

Page No.: 2

Project Description: BJ Services-TW Boring-Artesia

Analyte	Result	Flag	Units	Reporting Limit	Date Analyzed	Analyst Initials	Prep Batch No.	Run Batch No.	Method Reference
SAMPLE NO. 330075	SAMPLE DESCRIPTION TW-NI-5							DATE-TIME TAKEN 03/19/1997 08:30	
HOLD / ARCHIVE	30 Days				03/20/1997	rar		103	
SAMPLE NO. 330076	SAMPLE DESCRIPTION TW-NI-10							DATE-TIME TAKEN 03/19/1997 08:45	
HOLD / ARCHIVE	30 Days				03/20/1997	rar		103	
SAMPLE NO. 330077	SAMPLE DESCRIPTION TW-NI-15							DATE-TIME TAKEN 03/19/1997 08:45	
Prep, DRO (Nonaqueous)	c				03/20/1997	out	56		S-8015M
DRO-Nonaqueous									
TPH as Diesel	<1.0		ug/g	1.0	03/21/1997	out	56	43	S-8015M

QUALITY CONTROL REPORT
BLANKS

JOB NUMBER: 97.01026

<u>Analyte</u>	<u>Prep Batch No.</u>	<u>Run Batch No.</u>	<u>Blank Value</u>	<u>Flag</u>	<u>Units</u>	<u>Reporting Limit</u>	<u>Date Analyzed</u>
DRO-Nonaqueous TPH as Diesel	56	43	<1.0		ug/g	1.0	03/21/1997

Advisory Control Limits for Blanks

Metals/Wet Chemistry/Conventionals/GC - All compounds should be less than the Reporting Limit.

GC/MS Semi-Volatiles - All compounds should be less than the Reporting Limit except for phthalates which should be less than 5 times the Reporting Limit.

GC/MS Volatiles - Toluene, Methylene chloride, Acetone and Chloroform should be less than 5 times the Reporting Limit. All other volatile compounds should be less than the Reporting Limit.

QUALITY CONTROL REPORT
 Laboratory Control Sample
 (LCS)

JOB NUMBER: 97.01026

Analyte	Prep Batch No.	Run Batch No.	LCS True Conc	Units	LCS Conc Found	LCS % Rec.	LCS Dup Found	LCS Conc. Dup	LCS % Rec	RPD	Flag	Date Analyzed
DRO-Nonaqueous TPH as Diesel	56	43	500	ug/g	415	83						03/21/1997

Advisory Control Limits for LCS

Inorganic Parameters - The LCS recovery should be 80-120%.

B R O W N A N D
C A L D W E L L

March 19, 1997



Mr. Mark Ashley
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

2988-09

Subject: Proposed Soil Boring Activities to Determine Vertical Extent of TPH Impact
 Removal of Old Truck Wash Drain System
 BJ Services Company, U.S.A. Artesia Facility
 Eddy County, New Mexico

Dear Mr. Ashley:

Brown and Caldwell, on behalf of BJ Services Company, U.S.A. (BJ Services), is submitting this letter to notify the New Mexico Oil Conservation Division (NMOCD) of soil sampling activities at BJ Services' Artesia, New Mexico facility.

As requested by the NMOCD, a soil boring will be drilled at the approximate location of the former TW-N1 confirmation sample location, as shown in the attached figure. The boring will be drilled using a drill rig equipped with augers and a split spoon sampler. This activity will be performed to determine the vertical extent of total petroleum hydrocarbon (TPH) impact in excess of the applicable NMOCD standard. A minimum 48-hour notice will be provided to you prior to commencing the boring activities.

The boring will be sampled at 5-foot intervals to a maximum depth of 20 feet, and a continuous visual description recorded on field data sheets. Soil samples will be collected in a two-inch diameter split spoon sampler, approximately two feet long. Each of the four samples will be retained for possible laboratory analysis. Using field TPH analysis, the uppermost sample showing apparent compliance (i.e., less than 100 ppm TPH) will be selected for laboratory confirmation.

The soil sample subjected to laboratory analysis will be tested for TPH-Diesel Range Organics (TPH-DRO) using EPA Method 8015 Modified. Gasoline Range Organics will not be analyzed since the BTEX results from the March 6, 1997 sampling event indicated that TPH is not in the gasoline range. Upon completion of the soil boring, the boreholes will be plugged with a bentonite grout. A concrete patch will be installed in the truck wash slab to repair any

March 19, 1998
Mr. Mark Ashley
New Mexico Oil Conservation Division
Page 2

damage from sampling activities. Soil cuttings generated by the boring activities will be disposed of along with an existing soil stockpile located on-site.

Upon receipt of the analytical results, a letter report will be submitted to your office detailing the field activities, the results of the investigation, and recommendations.

If you have any questions, please call me at (713) 759-0999.

Sincerely,

BROWN AND CALDWELL



Timothy L. Jenkins
Project Manager

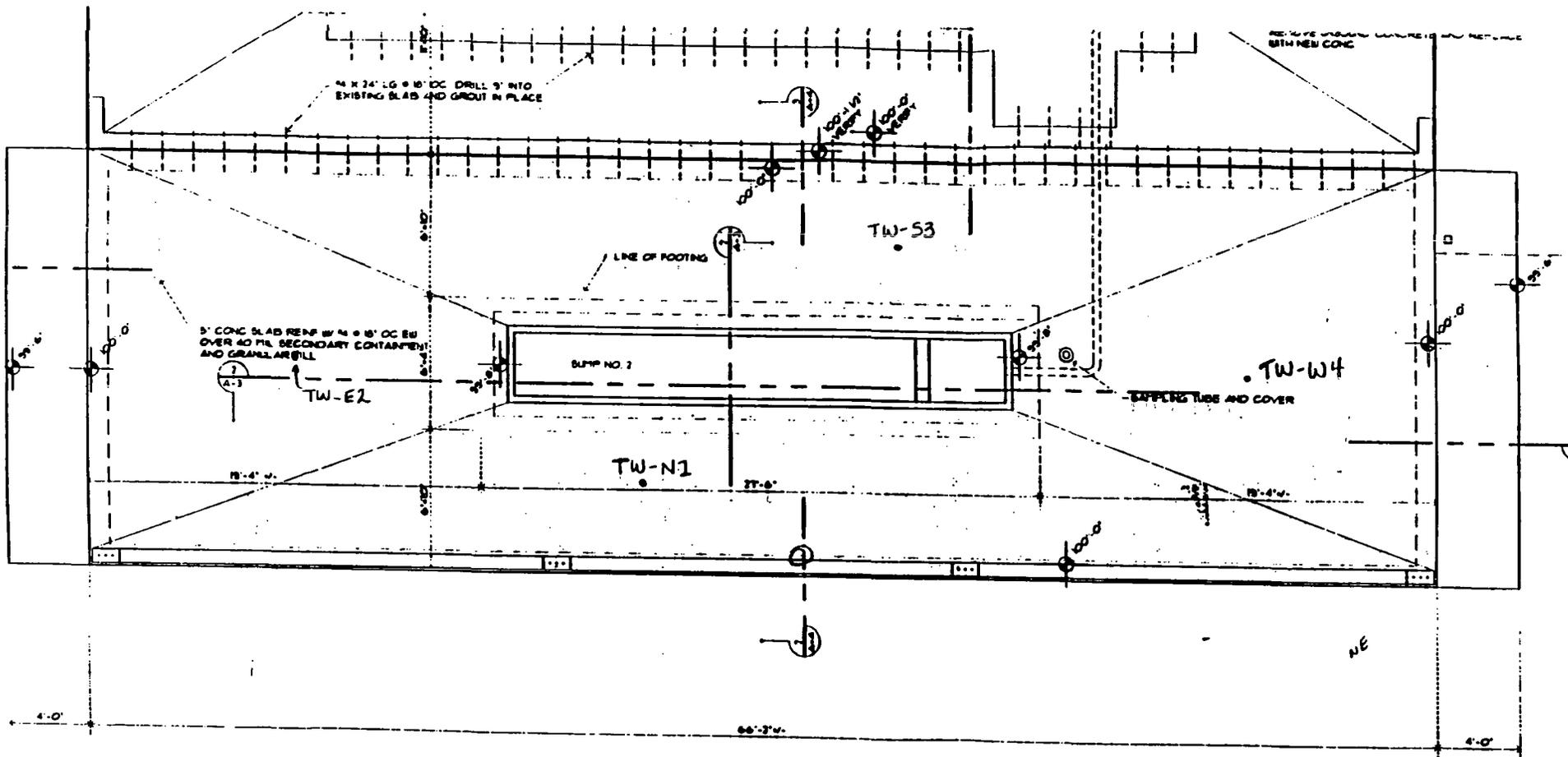


Robert N. Jennings, P.E.
Vice President

TLJ\RNJ:elg

Attachment

cc: Jo Ann Cobb-BJ Services Company, U.S.A., Houston, TX
Mike Wiggins-BJ Services Company, U.S.A., Artesia, NM
Richard Rexroad-Brown and Caldwell, Houston, TX



1 FOUNDATION PLAN
A-2



BROWN AND CALDWELL
HOUSTON, TEXAS

SUBMITTED: _____ DATE: _____
PROJECT MANAGER

APPROVED: _____ DATE: _____
BROWN AND CALDWELL

0 4 8

APROX. SCALE

DRAWN BY: JEB DATE: 3/97

CHK'D BY: _____ DATE: _____

APPROVED: _____ DATE: _____

TITLE: SOIL SAMPLE LOCATIONS: OLD TRUCK WASH BAY

CLIENT: BJ SERVICES COMPANY, U.S.A.

SITE LOCATION: ARTESIA, N.M.

DATE: 03/10/97

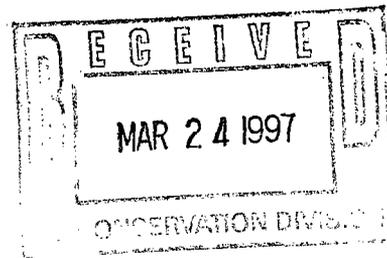
PROJECT NUMBER: 2988-09

FIGURE NUMBER: 1

T:\2988\EMERSAMP 03-10-97 JEB

B R O W N A N D
C A L D W E L L

March 10, 1997



Mr. Mark Ashley
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

2988-09

Subject: Discharge Plan GW-190
 Removal of Old Truck Wash Drain System
 BJ Services Company, U.S.A. Artesia Facility
 Eddy County, New Mexico

Dear Mr. Ashley:

Pursuant to the Reference^a directive of the New Mexico Oil Conservation Division (NMOCD), Brown and Caldwell, on behalf of BJ Services Company, U.S.A. (BJ Services), performed soil sampling on March 6, 1997 at the old truck wash bay at the BJ Services Artesia, New Mexico facility.

Due to the shallow nature of the excavation created during removal of the old truck wash bay, there were no free-standing sidewalls associated with this excavation. Therefore, grab samples were collected from four locations surrounding the former oil-water separator at the old truck wash bay. Sampling was performed in this manner based on the understanding that such sampling would test soil in the area where impact was most likely to have occurred.

A decontaminated hand auger soil collection device was used to collect soil samples from the 0.5- to 1-foot depth interval within native caliche at locations to the north, east, south, and west of the former oil-water separator, as shown in the attached figure. The samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) by Method 8020 and total petroleum hydrocarbons (TPH) by Method 418.1. The sample collected from the location to the south of the former oil-water separator was also analyzed for the eight (total) RCRA metals using the SW846 3050/6010/7000 Series.

Based on a previously determined site ranking score of 20, the soil cleanup goals listed below in Table 1 have been established for the site.

^a Letter from Mark Ashley (NMOCD) to Jo Ann Cobb (BJ Services) dated November 18, 1996, subject: Discharge Plan GW-190, Artesia Facility
W:\BJSERV\2988\026L.DOC

Table 1
Soil Cleanup Goals

Constituent	Action Level
Benzene	10 parts per million (ppm)
BTEX, Total	50 ppm
TPH	100 ppm
RCRA Metals	
Arsenic	< 5.0 milligrams per liter (mg/L) ⁽¹⁾
Barium	< 100.0 mg/L ⁽¹⁾
Cadmium	< 1.0 mg/L ⁽¹⁾
Chromium	< 5.0 mg/L ⁽¹⁾
Lead	< 5.0 mg/L ⁽¹⁾
Mercury	< 0.2 mg/L ⁽¹⁾
Selenium	< 1.0 mg/L ⁽¹⁾
Silver	< 5.0 mg/L ⁽¹⁾

⁽¹⁾ - Toxicity Characteristic Leachate Procedure (TCLP)

As shown in the laboratory analytical reports contained in Attachment 1, there were no detections of BTEX constituents at a detection limit of 10 micrograms per kilogram ($\mu\text{g}/\text{kg}$). There were no detections of total RCRA metals at concentrations in excess of 20 times the applicable TCLP action levels. The TPH action level of 100 ppm was exceeded in three of the four samples, however. TPH was detected in samples collected to the north, east, and south of the former oil-water separator at respective concentrations of 714 micrograms per gram ($\mu\text{g}/\text{g}$), 124 $\mu\text{g}/\text{g}$, and 223 $\mu\text{g}/\text{g}$.

During construction of the new truck wash bay at the subject facility, a pre-fabricated fiberglass sump will be placed at the location of the former oil-water separator at the old truck wash bay, as shown in the attached figure. The fiberglass sump will be set into and surrounded by continuous-pour concrete, which will cap the entire area within which the samples displaying elevated TPH levels were collected. This construction will thus serve to mitigate the potential for migration of hydrocarbons within the subsurface, and will also eliminate the potential for exposure to on-site workers.

On the basis of the analytical data and in consideration of the construction activities to be performed as specified herein, Brown and Caldwell, on behalf of BJ Services, requests that the NMOCD approve the closure activities performed relative to the old truck wash bay at the BJ Services Artesia, New Mexico facility.

March 10, 1997
Mr. Mark Ashley
New Mexico Oil Conservation Division
Page 3

If you have any questions regarding the information presented herein, please feel free to contact me or Richard Rexroad at (713) 759-0999.

Very Truly Yours,

BROWN AND CALDWELL

Richard Rexroad for

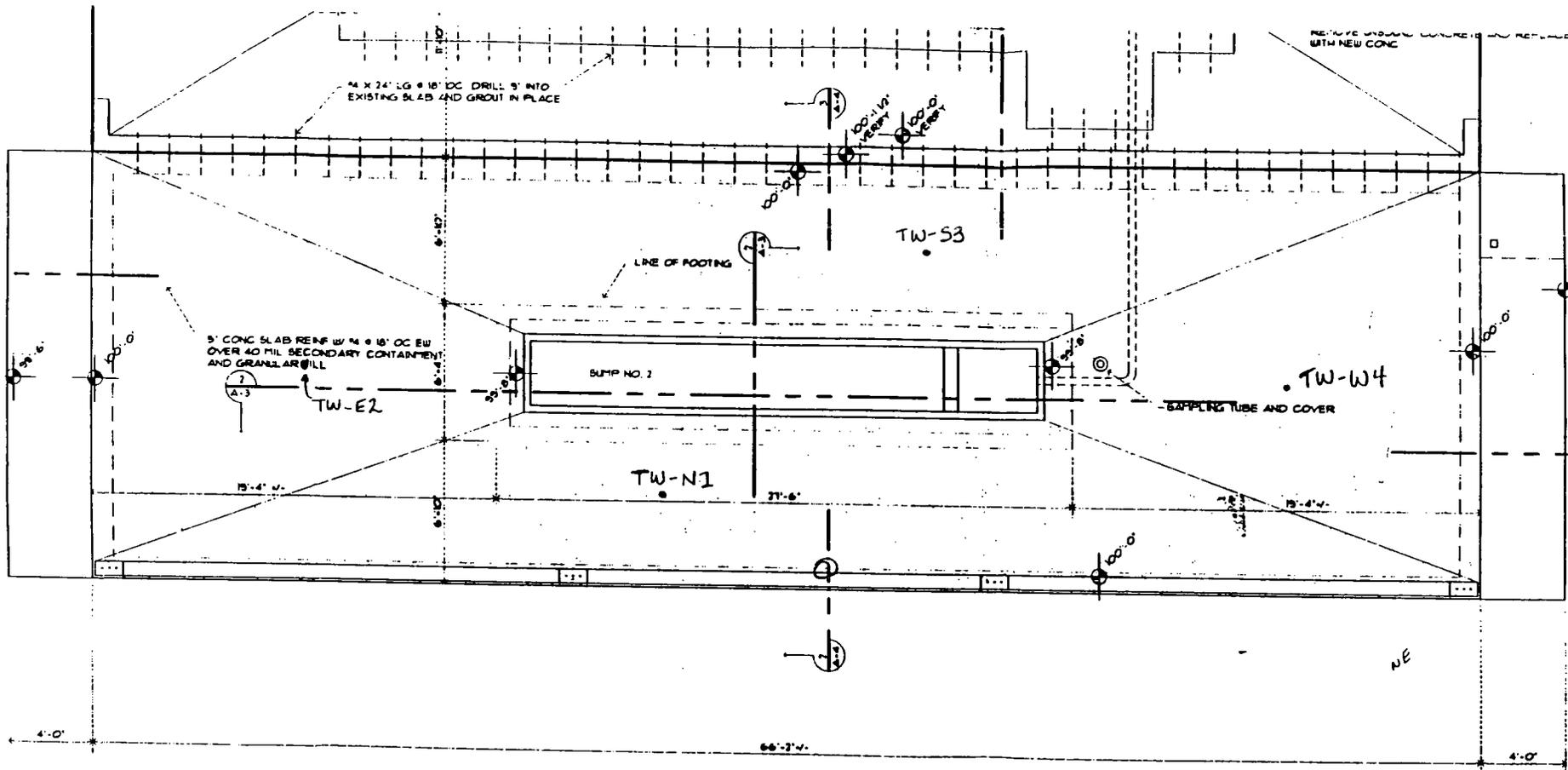
Robert N. Jennings, P.E.
Project Manager

Attachment

RNJ/RLR/efg/uak

cc: Jo Ann Cobb - BJ Services Company, U.S.A.

ATTACHMENT 1
LABORATORY ANALYTICAL REPORT



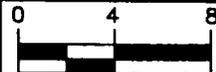
1 FOUNDATION PLAN
A-2



BROWN AND CALDWELL
HOUSTON, TEXAS

SUBMITTED: _____ DATE: _____
PROJECT MANAGER

APPROVED: _____ DATE: _____
BROWN AND CALDWELL



APPROX. SCALE

DRAWN BY JEB DATE 3/97

CHK'D BY: _____ DATE: _____

APPROVED: _____ DATE: _____

TITLE
SOIL SAMPLE LOCATIONS
OLD TRUCK WASH BAY

CLIENT
BJ SERVICES COMPANY, U.S.A.

SITE LOCATION
ARTESIA, N.M.

DATE
03/10/97

PROJECT NUMBER
2988-09

FIGURE NUMBER
1

T:\2988\EMERSAMP 03-10-97 JEB



LABORATORIES, INC.

ANALYTICAL AND QUALITY CONTROL REPORT

Rick Rexroad
BROWN & CALDWELL
1415 Louisiana
Suite 2500
Houston, TX 77002

03/10/1997

EPIC Job Number: 97.00815

Enclosed is the Analytical and Quality Control report for the following samples submitted to the Dallas Division of EPIC Laboratories, Inc. for analysis. Reproduction of this analytical report is permitted only in its entirety.

<u>Sample Number</u>	<u>Sample Description</u>	<u>Date Taken</u>	<u>Date Received</u>
329479	TW-N1	07/06/1997	03/07/1997
329480	TW-N2	07/06/1997	03/07/1997
329481	TW-N3	07/06/1997	03/07/1997
329482	TW-N4	07/06/1997	03/07/1997

EPIC Laboratories, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

Holding Times: All holding times were within method criteria.

Method Blanks: All method blanks were within quality control criteria.

Instrument calibration: All calibrations were within method quality control criteria.

Analysis Comments: No Unusual Comments

Jim Rowley
Project Manager

ANALYTICAL REPORT

Rick Rexroad
 BROWN & CALDWELL
 1415 Louisiana
 Suite 2500
 Houston, TX 77002

03/10/1997

EPIC Job Number: 97.00815

Page No.: 3

Project Description: BJ Services, Artesia NM

Analyte	Result	Flag	Units	Reporting Limit	Date Analyzed	Analyst Initials	Prep Batch No.	Run Batch No.	Method Reference
SAMPLE NO.			SAMPLE DESCRIPTION			DATE-TIME TAKEN			
329481			TW-N3			07/06/1997 09:25			
Benzene	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
Ethylbenzene	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
Toluene	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
Xylenes, Total	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
SURR: a,a,a-TFT	93		% Rec	50-130	03/07/1997	zst		929	
SAMPLE NO.			SAMPLE DESCRIPTION			DATE-TIME TAKEN			
329482			TW-N4			07/06/1997 09:35			
TPH-418.1 (Nonaqueous)	55		ug/g	10	03/07/1997	bss		1280	E-418.1
EPA 8020-NONAQ									
Benzene	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
Ethylbenzene	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
Toluene	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
Xylenes, Total	<10		ug/kg	10	03/07/1997	zst		929	S-8020A
SURR: a,a,a-TFT	101		% Rec	50-130	03/07/1997	zst		929	

QUALITY CONTROL REPORT
Continuing Calibration Verification
(CCV)

JOB NUMBER: 97.00815

Analyte	Prep	Run	Method	CCV		CCV	Date	
	Batch	Batch		True	Conc	%		
	No.	No.		Value	Units	Found	Rec	
TPH-418.1 (Nonaqueous)		1280	E-418.1	104	ug/g	106.5	102	03/07/1997
Arsenic, ICP		1375	S-6010A	100	ug/g	99	99	03/07/1997
Barium, ICP		1256	S-6010A	100	ug/g	97	97	03/07/1997
Cadmium, ICP		1547	S-6010A	100	ug/g	100	100	03/07/1997
Chromium, ICP		1547	S-6010A	100	ug/g	102	102	03/07/1997
Lead, ICP		1485	S-6010A	100	ug/g	100	100	03/07/1997
Lead, ICP		1485	S-6010A	1.00	ug/g	1.00	100	03/07/1997
Lead, ICP		1485	S-6010A	1.00	ug	1.00	100	03/07/1997
Mercury, CVAA		1017	S-7470A	0.50	ug/g	0.51	102	03/10/1997
Selenium, ICP		1382	S-6010A	100	ug/g	104	104	03/07/1997
Silver, ICP		1381	S-6010A	100	ug/g	100	100	03/07/1997
EPA 8020-NONAQ			S-8020A					
Benzene		929	S-8020A	20	ug/kg	18	90	03/07/1997
Ethylbenzene		929	S-8020A	20	ug/kg	26	130	03/07/1997
Toluene		929	S-8020A	20	ug/kg	17	85	03/07/1997
Xylenes, Total		929	S-8020A	60	ug/kg	78	130	03/07/1997

Method References and Codes

The Quality Control report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

E-100 through 493: "Methods for Chemical Analysis of Water & Wastes", U.S. EPA, 600/4-79-020, rev. 1983.

E-601 through 625: "Guidelines Establishing Test Procedures for the Analysis of Pollutants", U.S. EPA, 40CFR, Part 136, rev. 1990.

S-1000 through 9999: "Test Methods for Evaluating Solid Waste", U.S. EPA SW-846, 3rd Edition, 1986.

A: "Standard Methods for the Examination of Water and Wastewater", 16th Edition, APHA, 1985.

SM: "Standard Methods for the Examination of Water and Wastewater", 18th Edition, APHA, 1992.

D: ASTM Method

M: Method has been modified

*: Other Reference

**QUALITY CONTROL REPORT
BLANKS**

JOB NUMBER: 97.00815

Analyte	Prep Batch No.	Run Batch No.	Blank Value	Flag	Units	Reporting Limit	Date Analyzed
TPH-418.1 (Nonaqueous)		1280	<10		ug/g	10	03/07/1997
Arsenic, ICP	1159	1375	<3.0		ug/g	3.0	03/07/1997
Barium, ICP	1159	1256	<1.0		ug/g	1.0	03/07/1997
Cadmium, ICP	1159	1547	<1.0		ug/g	1.0	03/07/1997
Chromium, ICP	1159	1547	<1.0		ug/g	1.0	03/07/1997
Lead, ICP	1159	1485	<3.0		ug/g	3.0	03/07/1997
Lead, ICP	1159	1485	<3.0		ug/g	3.0	03/07/1997
Lead, ICP	1159	1485	<3.0		ug	3.0	03/07/1997
Mercury, CVAA		1017	<0.0002		ug/g	0.02	03/10/1997
Selenium, ICP	1159	1382	<4.0		ug/g	4.0	03/07/1997
Silver, ICP	1159	1381	<1.0		ug/g	1.0	03/07/1997

Advisory Control Limits for Blanks

Metals/Wet Chemistry/Conventionals/GC - All compounds should be less than the Reporting Limit.

GC/MS Semi-Volatiles - All compounds should be less than the Reporting Limit except for phthalates which should be less than 5 times the Reporting Limit.

GC/MS Volatiles - Toluene, Methylene chloride, Acetone and Chloroform should be less than 5 times the Reporting Limit. All other volatile compounds should be less than the Reporting Limit.

QUALITY CONTROL REPORT
Laboratory Control Sample
(LCS)

JOB NUMBER: 97.00815

Analyte	Prep	Run	LCS		LCS	LCS	LCS	LCS	LCS	Date	
	Batch	Batch	True	Units	Conc	%	Dup Conc.	Dup	%		
	No.	No.	Conc		Found	Rec.	Found	% Rec	RPD	Flaq	Analyzed
TPH-418.1 (Nonaqueous)		1280	2660	ug/g	2557	96					03/07/1997
Arsenic, ICP	1159	1375	100	ug/g	105	105					03/07/1997
Barium, ICP	1159	1256	100	ug/g	100	100					03/07/1997
Cadmium, ICP	1159	1547	100	ug/g	105	105					03/07/1997
Chromium, ICP	1159	1547	100	ug/g	107	107					03/07/1997
Lead, ICP	1159	1485	100	ug/g	104	104					03/07/1997
Lead, ICP	1159	1485	100	ug/g	104	104					03/07/1997
Lead, ICP	1159	1485	100	ug	104	104					03/07/1997
Mercury, CVAA		1017	0.50	ug/g	0.52	104					03/10/1997
Selenium, ICP	1159	1382	100	ug/g	108	108					03/07/1997
Silver, ICP	1159	1381	100	ug/g	90	90					03/07/1997
EPA 8020-NONAQ											
Benzene		929	100	ug/kg	117	117					03/07/1997
Ethylbenzene		929	100	ug/kg	139	139					03/07/1997
Toluene		929	100	ug/kg	119	119					03/07/1997
Xylenes, Total		929	200	ug/kg	271	136					03/07/1997

Advisory Control Limits for LCS

Inorganic Parameters - The LCS recovery should be 80-120%.

QUALITY CONTROL REPORT
Matrix Spike / Matrix Spike Duplicate
(MS / MSD)

JOB NUMBER: 97.00815

Analyte	Prep	Run	MS/MSD	Conc.	Units	Sample	Conc.	MS	Conc.	MSD	RPD	Flag	Date Analyzed
	Batch	Batch	Sample	Spike			MS	%	MSD	%			
	No.	No.	Number	Added		Result	Result	Rec.	Result	Rec.			
TPH-418.1 (Nonaqueous)		1280	329482	500	ug/g	55	532	95	497	88	7.6		03/07/1997
Arsenic, ICP	1159	1375	329481	100	ug/g	19	114	95	114	95	0		03/07/1997
Barium, ICP	1159	1256	329481	100	ug/g	78	174	96	175	97	1		03/07/1997
Cadmium, ICP	1159	1547	329481	100	ug/g	<1.0	93	93	93	93	0		03/07/1997
Chromium, ICP	1159	1547	329481	100	ug/g	14	111	97	111	97	0		03/07/1997
Lead, ICP	1159	1485	329481	100	ug/g	7.8	104	96	106	98	2.1		03/07/1997
Mercury, CVAA		1017	329081	0.50	ug/g	<0.02	0.47	94	0.50	100	6.1		03/10/1997
Selenium, ICP	1159	1382	329481	100	ug/g	<4.0	86	86	91	91	5.6		03/07/1997
Silver, ICP	1159	1381	329481	100	ug/g	<1.0	88	88	88	88	0		03/07/1997
EPA 8020-NONAQ			329482										
Benzene		929	329482	100	ug/kg	<10	114	114	109	109	4.5		03/07/1997
Ethylbenzene		929	329482	100	ug/kg	<10	138	138	130	130	6		03/07/1997
Toluene		929	329482	100	ug/kg	<10	109	109	104	104	4.7		03/07/1997
Xylenes, Total		929	329482	200	ug/kg	<10	269	135	251	126	6.9		03/07/1997

Advisory Control Limits for MS/MSDs

Inorganic Parameters - The spike recovery should be 75-125% if the spike amount value is greater than or equal to one fourth of the sample result value. The RPD for the MS/MSD should be less than 20.

NOTE: Matrix Spike Samples may not be samples from this job.



1548 VALWOOD PARKWAY, SUITE 118
 CARROLLTON, TEXAS 75008
 DALLAS (972) 408-8100
 AUSTIN (512) 928-8905

CHAIN OF CUSTODY RECORD

COMPANY BROWN AND CALDWELL
 ADDRESS 1415 LOUISEANA, SUITE 2500, HOUSTON 77002
 PHONE 713 759 0989 FAX (713) 308-3880
 PROJECT NAME/LOCATION BT SERVICES / ARTESIA, NM
 PROJECT NUMBER 2988-09
 PROJECT MANAGER RECK REXROAD

REPORT TO: RECK REXROAD
 INVOICE TO: RECK REXROAD
 P.O. NO. _____
 EPIC QUOTE NO. _____

SAMPLED BY
TIMOTHY L. JENKINS
 (PRINT NAME)

 (PRINT NAME)

[Signature]
 SIGNATURE

 SIGNATURE

ANALYSES

To assist us in selecting the proper method

Is this work being conducted for regulatory compliance monitoring? Yes ___ No ___

Is this work being conducted for regulatory enforcement action? Yes ___ No ___

Which regulations apply: RCRA ___ NPDES Wastewater ___
 UST ___ Drinking Water ___
 Other ___ None ___

DATE	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAS	COMP	HCl	NO3	PbO2	H2SO4	OTHER	# and Type of Containers				ANALYSES					
											RTX	TPH (416.1 med)	RCRA (9 metals)	TCF metals	Semivolatiles + V	RCI				
3/6/97	0905	TW-N1	S	✓							X	X	X							
3/6/97	0915	TW-E2	S	✓							X	X	X							
3/6/97	0925	TW-S3	S	✓							X	X	X							
3/6/97	0935	TW-W4	S	✓							X	X								
3/6/97	0945	TW-STK-E	S		✓									X	X	X				
3/6/97	0955	TW-GTK-W	S		✓															

COMMENTS

Rush ↑

↓

Reg HOLD

Fast results
 Reck Rexroad

* 1 jar white
 mist powder -

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO
 FIELD FILTERED? YES / NO

COC SEALS PRESENT AND INTACT? YES / NO
 VOLATILES FREE OF HEADSPACE? YES / NO

TEMPERATURE UPON RECEIPT: 4°C
 Bottles supplied by EPIC? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA _____
 I REQUEST EPIC TO DISPOSE OF ALL SAMPLE REMAINDERS _____ DATE _____

RELINQUISHED BY: <u>[Signature]</u>	DATE <u>3/7/97</u>	TIME <u>0930</u>	RECEIVED BY: <u>Alan J. Fear</u>	DATE <u>3/7/97</u>	TIME <u>0915</u>	RECEIVED FOR EPIC BY: <u>[Signature]</u>
METHOD OF SHPMENT			REMARKS:			

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 8:25 AM	Date 3-11-97
---	-----------------------------------	-----------------	-----------------

<u>Originating Party</u> RICK REXROAD	<u>Other Parties</u> MARK ASALEY
--	-------------------------------------

Subject
BT ARTESIA - OLD TRUCK WASH DRAIN SYSTEM
BT HOBBS - OLD FIELD WASTE TANKS

Discussion
ARTESIA - A SLAB WAS POURED BEFORE VERTICLE EXTENT ~~WAS~~
HAD BEEN DETERMINED.

HOBBS - BT WANTS TO USE EXISTING MONITOR WELLS (MW-10, MW-11),
AND NOT INSTALL ANY NEW ONES

Conclusions or Agreements
ARTESIA - VERTICLE EXTENT WILL BE DETERMINED
ONCE CONCRETE SETS.
HOBBS - IF MW-10 CAN BE RE-ENTERED, THE
CURRENTS WELLS (MW-10, MW-11) WILL BE SUFFICIENT.

Distribution

Signed Mark Asaley



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

December 6, 1996

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

Mr. Ken Marsh-President
Controlled Recovery, Inc.
P.O. Box 369
Hobbs, NM 88241

Re: C-138 submittal for BJ Services-Artesia Facility
dated 12/05/96.

Dear Ken,

Please find enclosed the C-138 referenced above. This request has been denied for the following reasons.

1. The C-138 indicates the waste stream is liquid in nature reflecting 120 BBLs of material to be disposed of at CRI. The analytical was ran on a solid portion of the waste called "wash bay soil."

After discussing this issue with Mr. David Burkett of BJ he confirmed the waste stream will consist of both liquid and solid material. So therefore the analyticals do not properly represent the waste stream.

2. The other issue is that Methylene Chloride was noted to be in a TCLP soil sample. Methylene Chloride is a RCRA "F" & "U" listed hazardous waste.

So therefore please have the generator demonstrate how Methylene Chloride is generated as part of the waste stream and explain why it would not be considered a RCRA listed hazardous waste.

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

Sincerely yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe
Mark Ashley-Geologist NMOCD Environmental Bureau
Tim Gumm-NMOCD District II Supervisor
David H. Burkett-BJ Services, USA
8701 New Trails Drive,
The Woodlands, Tx 77381

attachments- C-138 return



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT



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

November 18, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-873

Ms. Jo Ann Cobb
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

RE: Discharge Plan GW-190
Artesia Facility
Eddy County, New Mexico

Dear Ms. Cobb:

The New Mexico Oil Conservation Division (OCD) has completed a review of BJ Services' (BJ) September 13, 1996 discharge plan summary (GW-190) for the BJ facility in Artesia, New Mexico. This document contains BJ's work plan to remove the old truck wash bay facility, and the old acid loading facility. It also contains BJ's work plan to construct a new truck wash bay facility, a new acid loading facility, and upgrading the cement blending facility.

The above referenced work plans are approved with the following conditions:

1. BJ will sample the soils beneath the existing facilities for hazardous constituents. After removal of the existing facilities, soil samples will be collected from each of the sidewalls, and a composites from the floor of each excavation. If contamination exists, verticle extent will be determined, and the contaminated soils will be removed and disposed of at an OCD approved site.
2. The OCD will be notified 72 hours prior to all activities.
3. BJ will submit a report on each investigation to the OCD within 30 days of removal. The report will contain:

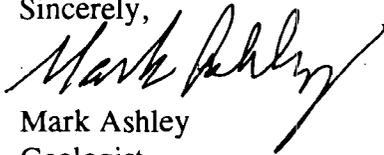
Ms. Jo Ann Cobb
November 18, 1996
Page 2

- A. A description of all activities which occurred during removal.
- B. A summary of all laboratory analytical results of soil samples.

Please be advised that OCD approval does not relieve BJ of liability if contamination exists which is beyond the scope of the work plan or if the activities fail to adequately determine the extent of contamination related to BJ's activities. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7155.

Sincerely,



Mark Ashley
Geologist

xc: OCD Artesia Office

P 288 258 873

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 827-7131

November 18, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-872

Ms. Jo Ann Cobb
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

**RE: Truck Wash Drain System, Field Waste and Steel Brine Tanks,
and Northeast Septic System Closures
Artesia Facility
Eddy County, New Mexico**

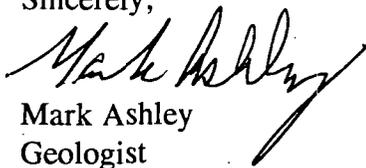
Dear Ms. Cobb:

The New Mexico Oil Conservation Division (OCD) has completed a review of BJ Services' (BJ) August 9, 1996 "Final Site Assessment Report Truck Wash Drain System", BJ's April 2, 1996 "Final Site Assessment Report Field Waste Collection System And Brine Storage Tanks", and BJ's July 9, 1996 "Final Site Assessment Report Northeast Septic System." These documents contain BJ's final closure activities associated with the above mentioned areas within the Artesia facility. The above mentioned areas were closed according to closure standards in affect at the time of BJ's closure activities. Based upon the information provided, OCD does not require any further investigation at this time.

Please be advised that BJ is not relieved of liability if contamination exists which is beyond the scope of the closure plans or if the closure activities failed to adequately determine the extent of contamination related to BJ's activities. In addition, BJ is not relieved of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7155.

Sincerely,


Mark Ashley
Geologist

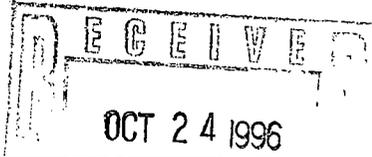
xc: OCD Artesia Office

P 288 258 872

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



October 18, 1996

Mark Ashley
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505-6429

RE: Disposal of Solid Waste

Dear Mr. Ashley:

BJ Services Company U.S.A. would like approval to dispose of non-hazardous solid waste from our five New Mexico facilities, to Controlled Recovery Services Inc.. The facility location is 35 miles West of Hobbs on 62180 at mile marker 67. The mailing address is P.O. Box 369, Hobbs N.M. 88241. The BJ Services facilities are listed below.

BJ Services, Farmington
3250 Southside River Road
Farmington, NM 87401
EPA ID#NMD000804419

BJ Services, Farmington
3220 East Bloomfield Hwy.
Farmington, NM 87401
EPA ID#NMD986676435

BJ Services, Artesia
2401 Sivley
Artesia, NM 88210
EPA ID# NMD000711515

BJ Services, Hobbs
2708 West County Rd.
Hobbs, NM 88240
EPA ID# NMD052377637





BJ Services, Hobbs
2901 Lovington Hwy.
Hobbs NM 88240
NMD360010375

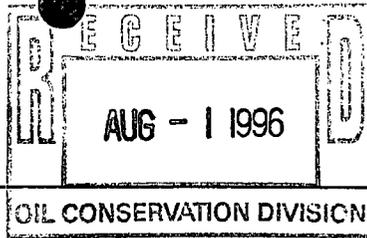
I can be contacted at (713) 362-4421.

Sincerely,

A handwritten signature in cursive script, appearing to read 'David H. Burkett'.

David H. Burkett
Environmental Specialist

cc: JoAnn Cobb



July 29, 1996

Mr. Mark Ashley
State of New Mexico
Energy, Minerals, and Natural Resources Department
2040 South Pacheco
Santa Fe, New Mexico 87505

Subject: BJ Services Artesia District Facility
Closure of Fuel Island Area

Dear Mr. Ashley:

During a conversation with an operator at the above referenced facility, it was brought to my attention that they have recently removed all fueling operations and residual soil and gravel from the facility's fuel island area, as referenced in the Discharge Plan currently approved by the State. A 12,000 gallon AST storing diesel fuel, and related piping are no longer on site. The tank and the piping were removed in late May, 1996. Gravel and soil underlying the tank, and within the containment area, were removed spread around the yard as road base. The reported 10 inch deep excavation was backfilled with a cement slurry.

The fuel island has been closed without confirmation sampling from within the excavated area. BJ Services realizes that some contamination may remain in this area, but does not believe that conditions pose a threat to groundwater.

As BJ Services has made every effort to comply with the Facility Discharge Plan for the Artesia District Facility, we intend to consult with the Oil Conservation District regarding future activities as they may relate to this plan. Thank you for your understanding of the activities concerning the closure of the fuel island area. If you have any questions concerning this closure request, please do not hesitate to contact me at (713) 363-7528.

Very truly yours,

Jo Ann Cobb
Manager Environmental Services

c: Mike Wiggins, BJ, Artesia
Bob Jennings, B&C, Houston

B R O W N A N D
C A L D W E L L

January 10, 1996

Mr. Mark Ashley
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Subject: Closure Plan Summary
Truck Wash Drain Line and Tank
BJ Services Facility in Artesia, New Mexico

Dear Mr. Ashley:

During field activities at the BJ Services Company U.S.A. (BJ Services) Artesia, NM facility, site personnel identified the location of a drainage system connected to the truck wash facility. This Truck Wash Drain System consists of a drain line leading from the truck wash oil/water separator to a single tank. Figure 1 shows the approximate location of the Truck Wash Drain System.

BJ Services intends to close the system by removing both the drain line and the tank. Excavated soils will be tested for ultimate disposal in an OCD approved facility. The excavated tank and piping will also be disposed of in an OCD approved facility. Field personnel will verify closure by collecting samples from the soils beneath the center point of the drain line and beneath the tank footprint. These samples will be split for field screening and for submission to a laboratory. Field screening for TPH will be conducted using a field test kit. Laboratory samples will be analyzed for TPH and total BTEX, total benzene, and total metals (8 RCRA metals). The TPH, BTEX and benzene results will be compared to previously determined OCD action levels for these parameters, as specified by site scoring criteria. Table 1 lists the OCD action levels for TPH, BTEX and benzene when site scoring is greater than 19. Total metal results will be multiplied by 5% for an estimated comparison to RCRA TCLP standard action levels.

Once the drain line and tank are removed, the discharge point from the oil/water separator will be plugged. BJ Services will then discharge truck wash water from the oil/water separator to an above-ground frac tank. The frac tank liquid will be periodically disposed of at an OCD approved disposal facility.

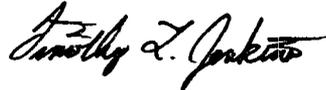
VERTICAL
EXTEND

New Mexico Energy
Minerals and Natural Resources Department
January 10, 1996
Page 2

Closure activities will commence upon your approval of the closure approach discussed above. If you have any questions concerning the contents of this letter, please call either Tim Jenkins or Bob Jennings at 713-759-0999.

Very Truly Yours,

BROWN AND CALDWELL



Timothy L. Jenkins
Associate Engineer

Enclosures:

Table 1 OCD Action Levels
Figure 1 Site Plan and Drain System Location

TLJ/RNJ/bjw

TABLES

TABLE 1

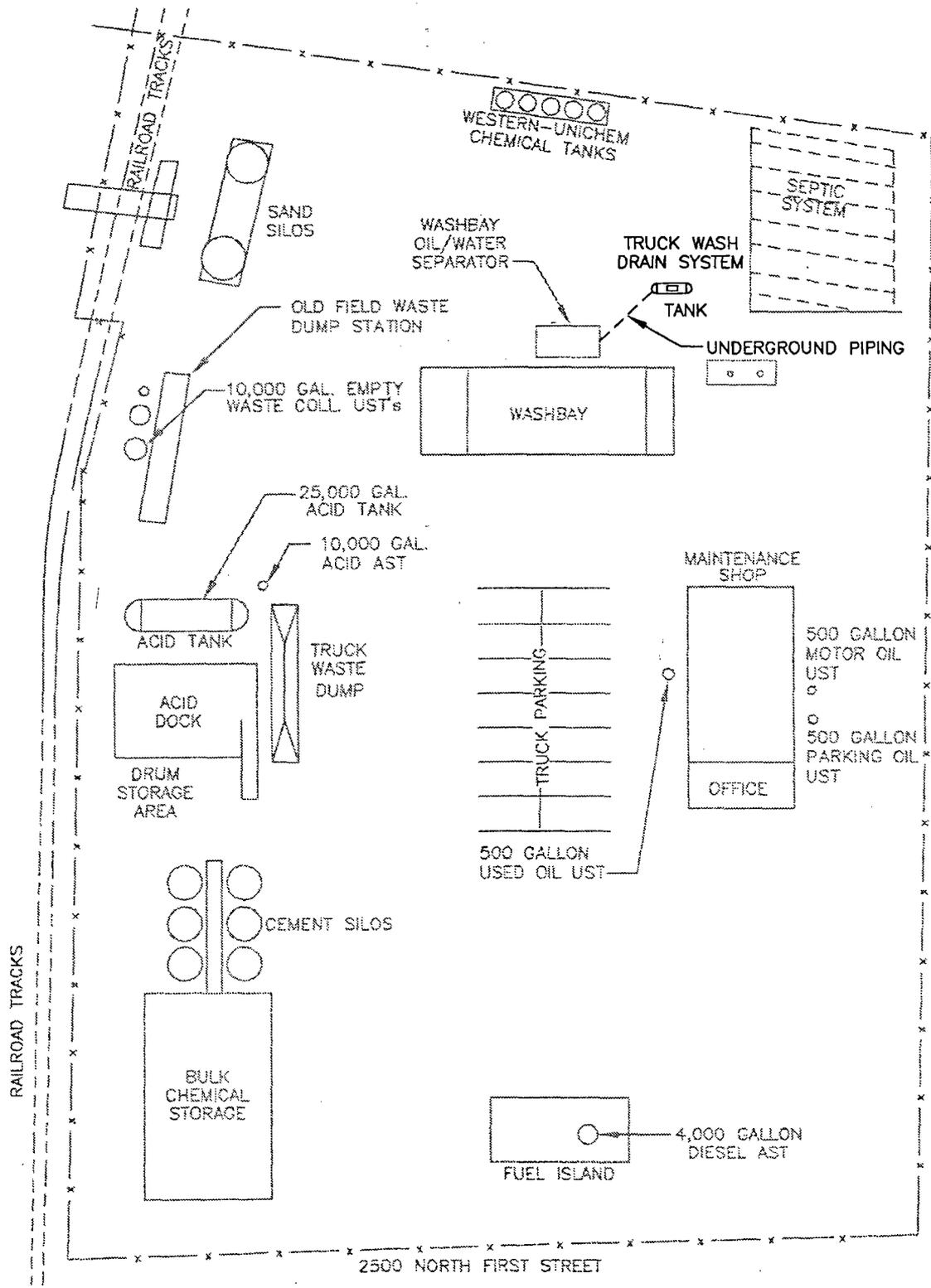
OCD Action Levels

	TPH (mg/kg)	Total BTEX (mg/kg)	Benzene (mg/kg)
OCD Action Level	100	50	10

Note: OCD Action Levels assume a site scoring of > 19. The Artesia Facility was previously scored at 20.

FIGURES

Site Plan



T:\2988\ARTESIA 1/9/96 DHD

BROWN AND CALDWELL HOUSTON, TEXAS SUBMITTED: _____ DATE: _____ PROJECT MANAGER APPROVED: _____ DATE: _____ BROWN AND CALDWELL	 NOT TO SCALE DRAWN BY: <u>DHD</u> DATE <u>10/25</u> CHK'D BY: _____ DATE _____ APPROVED: _____ DATE _____	TITLE	SITE PLAN	DATE	1/9/96
		CLIENT	BJ SERVICES COMPANY, U.S.A.	PROJECT NUMBER	2988-07
		SITE LOCATION	ARTESIA, NEW MEXICO	FIGURE NUMBER	1

B R O W N A N D
C A L D W E L L

February 26, 1996

Mr. Mark Ashley
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

2988.27

Subject: Land Spreading of Excavated Soils
Truck Wash Drain System
BJ Services Facility in Artesia, New Mexico

Dear Mr. Ashley:

Beginning February 2, 1996, Brown and Caldwell removed the tank and drain line to fulfill the Truck Wash Drain System closure at the BJ Services Company U.S.A. (BJ Services) Artesia, NM facility, in accordance with Brown and Caldwell's letter of January 10, 1996. During removal activities, two previously unknown leaching lines were found to be connected to the tank. Upon approval from the NMOCD, these lines and the surrounding soil were subsequently removed as well. Approximately 300 cubic yards of soil were excavated and stockpiled on-site. Based on the laboratory results summarized in this letter, Brown and Caldwell proposes to dispose of these excavated soils in a one-time application of an on-site land spreading operation. A complete closure report will be submitted to the OCD at a future date describing the closure activities for the Truck Wash Drain System.

The stockpile consists of soil generated during the removal of the tank, drain line, and leaching lines that were part of the drain system. Soil excavated from around the leaching lines constitutes the majority of the material to be spread. The stockpiled material is located south of the leaching lines and east of Truck Wash Bay. See Figure 1 for the approximate locations of the stockpile and Truck Wash Drain System. Tank concrete and drain line piping were disposed of separately, and therefore have not been incorporated into the stockpile.

Laboratory results of the stockpile composite sample indicated that the material was non-hazardous based on a full TCLP and R.C.I. analysis, that TPH levels were non-detect, and that

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"This report was prepared in accordance with the standards of the environmental consulting industry at the time it was prepared. It should not be relied upon by parties other than those for whom it was prepared, and then only to the extent of the scope of work which was authorized. This report does not guarantee that no additional environmental contamination beyond that described in this report exists at this site."

Environmental Engineering And Consulting • Analytical Services

1415 LOUISIANA, SUITE 2500, HOUSTON, TX 77002
(713) 759-0999 FAX (713) 759-0952

February 26, 1996
Mr. Mark Ashley
NMOCD
Page 2

BTEX levels were also below OCD action levels. Table 1 presents the stockpile analytical results along with a comparison to OCD action levels for this facility.

BJ Services intends to move the stockpiled soil from its present location to a land spreading area as shown in Figure 2. Once the land spread area is established, actual dimensions will be measured, and a sampling grid placed at 30 feet intervals both north and east as shown in Figure 3. Based on the anticipated dimensions, 12 samples locations will be created by the grid. A composite sample will be collected using approximately equal volumes of soil from each sample location. The composite sample will then be placed in laboratory supplied jars and submitted to a laboratory for TPH, total BTEX, and total benzene analysis. If the results are below the action levels for these parameters (refer to Table 1), then no further action will be required, and the land spread closure report will be prepared.

If levels of TPH, total BTEX, or total benzene exceed the OCD action levels, then bioenhancement activities such as periodic aeration, moisture control, and fertilization will commence. When the results are below the action levels in Table 1, no further action will be required, and the closure report will be prepared.

Land spreading activities will commence upon your approval of the approach discussed above. If you have any questions concerning the contents of this letter, please call either Tim Jenkins or Bob Jennings at 713-759-0999.

Very Truly Yours,

BROWN AND CALDWELL



Timothy L. Jenkins
Associate Engineer



Robert N. Jennings, P.E.
Vice President

Enclosures: Table 1 OCD Action Levels
Figure 1 Site Plan and Stockpile Location
Figure 2 Proposed Landspread Location
Figure 3 Proposed Grid Sampling

W:\BJSERV\2988\005R.DOC

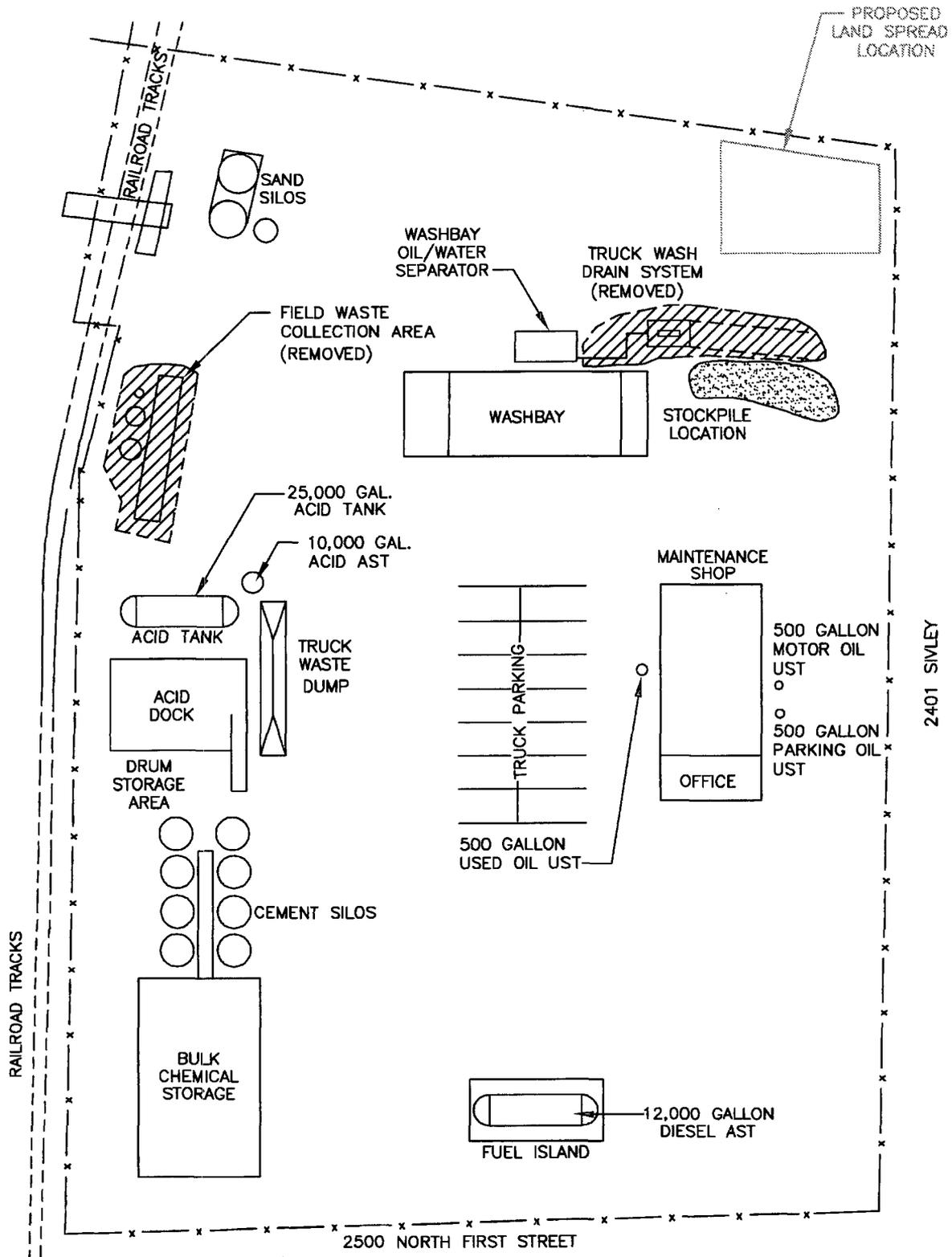
TABLE 1

**Analytical Results and
Regulatory Action Levels**

	TPH (mg/kg)	Total BTEX (mg/kg)	Benzene (mg/kg)	TCLP Barium^(b) (mg/L)
TWDS - Piles	<5	0.016	< 0.01	0.43
OCD Action Level^(a)	100	50	10	
RCRA Action Level				100

Notes:

- (a) OCD Action Levels assume a site scoring of > 19. The Artesia Facility was previously scored at 20.
- (b) RCRA Regulatory limits for all other TCLP parameters are not summarized since the analytical results showed that these parameters were not detected in the composite sample collected from the stockpile.



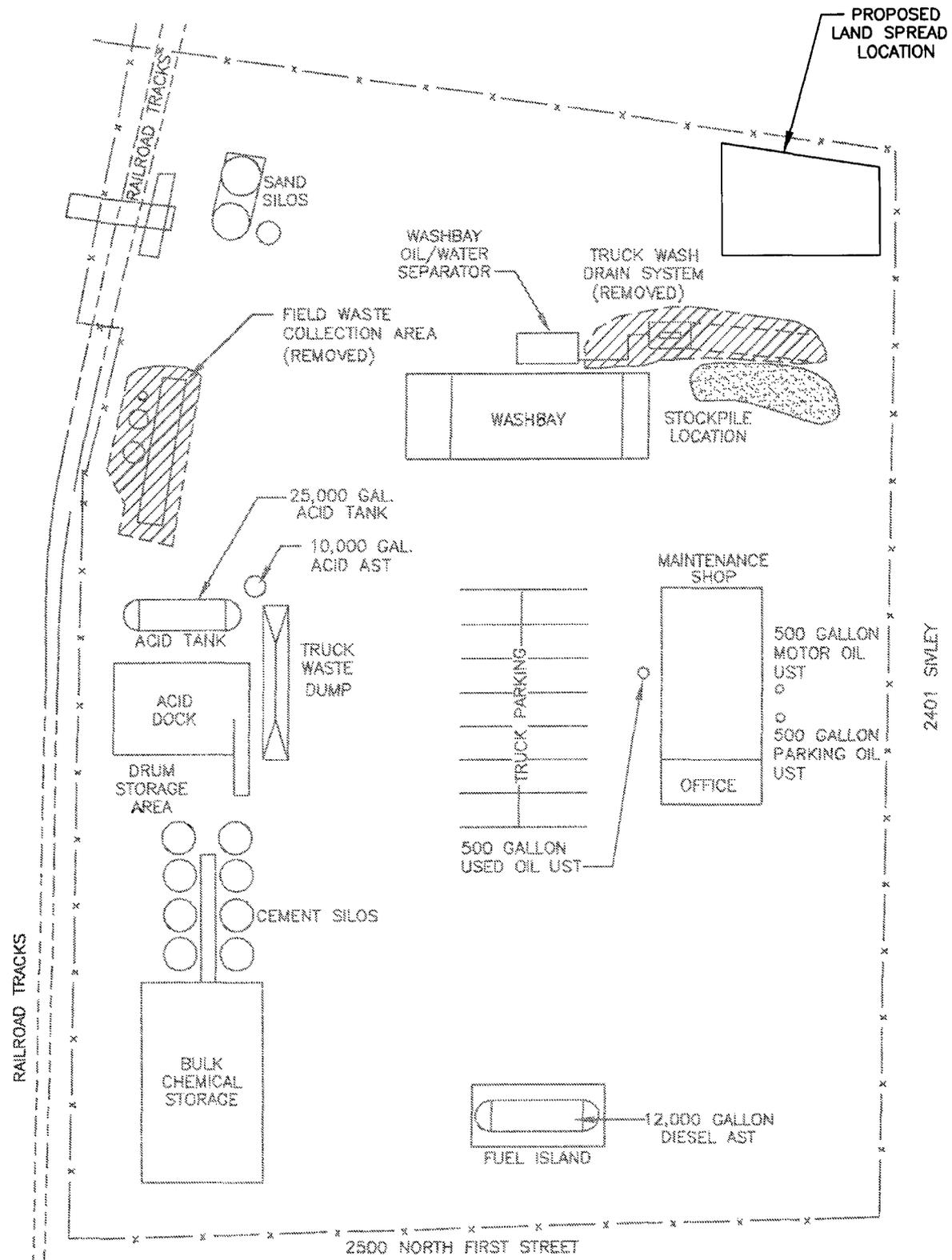
T:\2988\SITEPLAN 2/26/96 DHD

BROWN AND CALDWELL
HOUSTON, TEXAS
SUBMITTED: _____ DATE: _____
PROJECT MANAGER
APPROVED: _____ DATE: _____
BROWN AND CALDWELL

0 0 0
NOT TO SCALE
DRAWN BY: *DHD* DATE: *10/25*
CHK'D BY: _____ DATE: _____
APPROVED: _____ DATE: _____

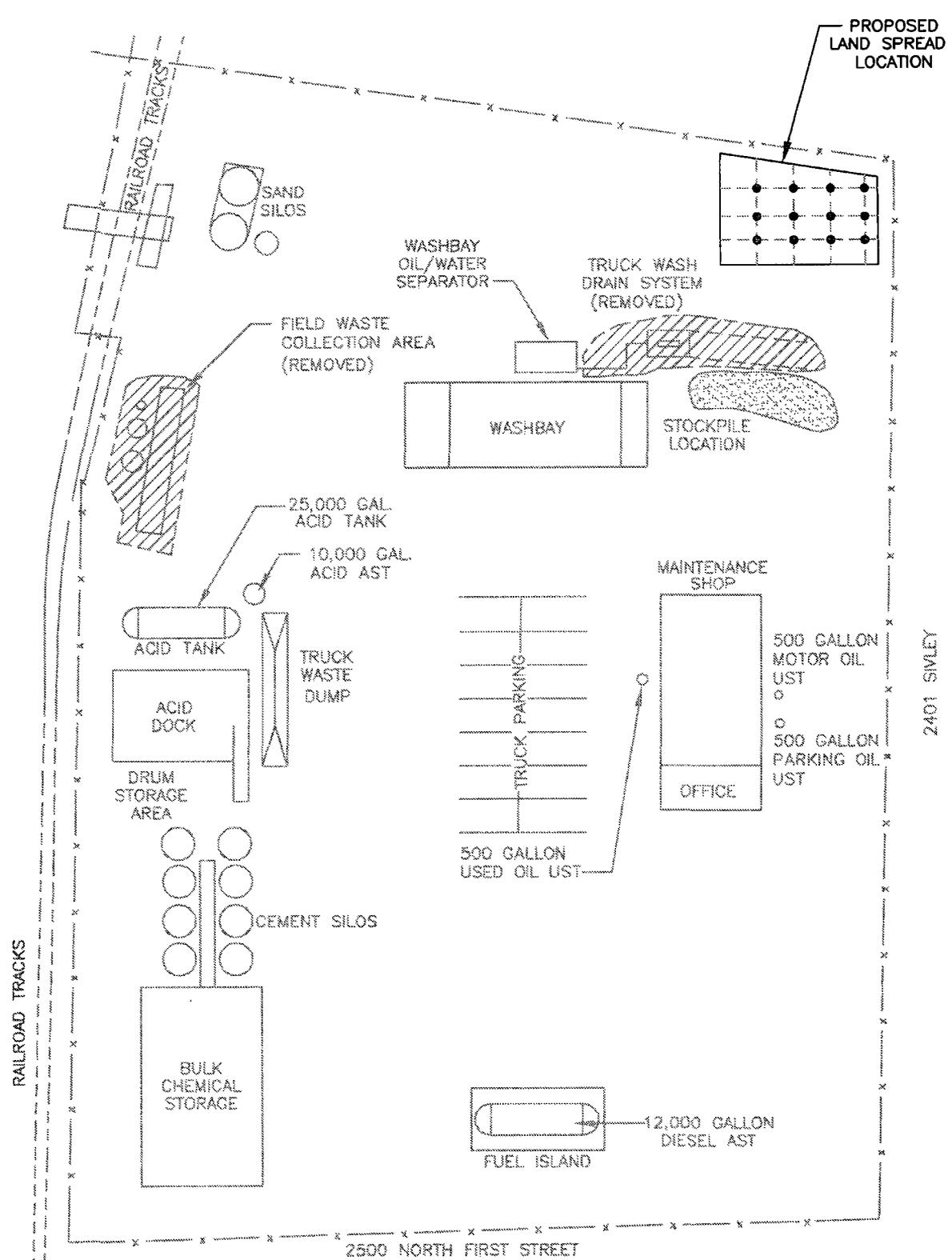
TITLE: SITE PLAN
CLIENT: BJ SERVICES COMPANY, U.S.A.
SITE LOCATION: ARTESIA, NEW MEXICO

DATE: 1/9/96
PROJECT NUMBER: 2988-07
FIGURE NUMBER: 1



T:\2988\LANDSPRD 2/26/96 DHD

BROWN AND CALDWELL HOUSTON, TEXAS SUBMITTED: _____ DATE: _____ PROJECT MANAGER APPROVED: _____ DATE: _____ BROWN AND CALDWELL	 NOT TO SCALE DRAWN BY: <i>DHD</i> DATE: <i>10/25</i> CHK'D BY: _____ DATE: _____ APPROVED: _____ DATE: _____	TITLE PROPOSED LAND SPREADING LOCATION	DATE 1/9/96
		CLIENT BJ SERVICES COMPANY, U.S.A.	PROJECT NUMBER 2988-07
		SITE LOCATION ARTESIA, NEW MEXICO	FIGURE NUMBER 2



LEGEND

- SAMPLE LOCATIONS

T: 2988 SMPLOCN 2/26/96 DHD

BROWN AND CALDWELL HOUSTON, TEXAS		 NOT TO SCALE	TITLE SAMPLE LOCATIONS AT PROPOSED LAND SPREADING AREA	DATE 1/9/96
SUBMITTED: _____ DATE: _____ PROJECT MANAGER		DRAWN BY: <i>DHD</i> DATE: <i>10/25</i>	CLIENT BJ SERVICES COMPANY, U.S.A.	PROJECT NUMBER 2988-07
APPROVED: _____ DATE: _____ BROWN AND CALDWELL		CHK'D BY: _____ DATE: _____ APPROVED: _____ DATE: _____	SITE LOCATION ARTESIA, NEW MEXICO	FIGURE NUMBER 3

STATE OF
NEW MEXICO



OIL
CONSERVATION
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 1:45 PM	Date 2-16-96
---	-----------------	-----------------

<u>Originating Party</u>	<u>Other Parties</u>
--------------------------	----------------------

TIM JENKINS	MARK ASHLEY
-------------	-------------

Issue EXCAVATED SOILS REMOVAL / LAND SPREADING

Discussion ^{SPREAD} WANTS TO LAND FILL SOILS FROM EXCAVATIONS ON SITE. HE WILL SEND IN A PLAN.

Conclusions or Agreements I GIVE VERBAL FOR A ONE TIME APPLICATION

Signature Signed *Mark Ashley*



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 3:00 PM	Date 2-5-96
---	-----------------------------------	-----------------	----------------

<u>Originating Party</u> TIM JENKINS	<u>Other Parties</u> MARK KELLEY
---	-------------------------------------

Subject BT-ARTESIA - TRUCK WASH SEPTIC SYSTEM

Discussion TIM REMOVED SEPTIC SYSTEM + TESTED FOR TPH. TPH WAS ABOVE 200 PPM

Inclusions or Agreements TIM WILL SAMPLE FOR TCEP, RIC BEFORE ANY FURTHER WORK IS DONE

Signature Signed Mark Kelley



MEMORANDUM OF MEETING OR CONVERSATION

Telephone

Personal

Time 11:45 AM

Date 2-1-96

Originating Party

Other Parties

TIM JENKINS

MARK KEALEY

Subject PIT CLOSURE

Discussion

TPH LEVELS WERE REDUCED TO LEVELS BELOW 200 TPH. BROWN & CALDWELL DON'T BELIEVE CURRENT LEVELS ARE A THREAT TO ENVIRONMENT & GROUND WATER.

TPH? SOUTH WALL 176 PPM

NORTH WALL 54 PPM

NORTH FLOOR 187 PPM

Inclusions or Agreements

I GAVE VERBAL TO BACKFILL & MOUND UP. I WILL FOLLOW UP WITH A LETTER OF APPROVAL

Signature

Signed

Mark Kealey

Environmental Laboratories
 Bethany Tech Center • Suite 190
 400 W. Bethany Rd. • Allen, Texas 75013

February 8, 1996

REPORT OF: Soil Analysis

REPORT TO: Mr. Tim Jenkins
 Brown and Caldwell
 1415 Louisiana St., Suite 2500
 Houston, Texas 77002

PROJECT NAME: BJ - Artesia: TWDS
 2401 Sivley
 Artesia, NM 88210

PROJECT NUMBER: 2988-27

SAMPLE I.D.: See Below

SAMPLE DATE: February 02, 1996
SAMPLE RECEIVED: February 06, 1996
TIME RECEIVED: 9:10AM
SAMPLE COLLECTED BY: TLJ - Customer

SAMPLE NUMBER: See Below

RESULTS:

Sample Number	Sample I.D.	TPH-Gas (mg/kg)	TPH-Diesel (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl Benzene (mg/kg)	Xylene (mg/kg)	Total BTEX
56836	TWDS-TKFT	<5.0	6.8	<0.010	<0.010	<0.010	<0.030	*ND
56837	TWDS-DRLN	<5.0	6.2	<0.010	<0.010	<0.010	<0.030	*ND
56838	TWDS-LCHLN	14	45	<0.010	<0.010	<0.010	0.069	0.069
Detection Limits		5.0	5.0	0.010	0.010	0.010	0.030	

Quality Control Information

Parameter	Sample Preservation	EPA Method	C.V. %	Standard Deviation	Spike Recovery %	Date of Analysis	Analyst
TPH Matrix Spikes: TPH - Gasoline Sample Number: Surrogate: Trifluorotoluene	Cool to 4°C	8015	22.4	± 0.607	72	02/06/96	J. Karkari
			N/A	N/A	99		

Environmental Laboratories
 Bethany Tech Center • Suite 190
 400 W. Bethany Rd. • Allen, Texas 75013

February 9, 1996

REPORT OF: Soil Analysis

REPORT TO: Mr. Tim Jenkins
 Brown and Caldwell
 1415 Louisiana Street, Suite 2500
 Houston, Texas 77002

PROJECT NAME: BJ-Artesia: TWDS
 2401 Sivley
 Artesia, NM 88210

PROJECT NUMBER: 2988-27

SAMPLE I.D.: TWDS-TKFT

SAMPLE DATE: February 02, 1996
SAMPLE TIME: 12:00PM
SAMPLE RECEIVED: February 06, 1996
TIME RECEIVED: 9:10AM
SAMPLE METHOD: Grab
SAMPLE COLLECTED BY: TLJ - Customer

SAMPLE NUMBER: 56636

RESULTS:

<u>Parameter</u>	<u>Detection Limits (mg/kg)</u>	<u>Observed Concentration (mg/kg)</u>
Arsenic, Total	1.0	<1.0 (1)
Barium, Total	0.25	13
Cadmium, Total	0.20	0.54
Chromium, Total	0.25	6.7
Lead, Total	0.50	2.8
Mercury, Total	0.02	<0.02
Selenium, Total	0.75	<0.75
Silver, Total	0.35	<0.35

Quality Control Information

<u>Parameter</u>	<u>Sample Preservation</u>	<u>EPA Method</u>	<u>C.V.%</u>	<u>Standard Deviation</u>	<u>Spike Recovery%</u>	<u>Date of Analyses</u>	<u>Time of Analyses</u>	<u>Analyst</u>
Metals Digestion - ICP		3050				02/07/96	11:00AM	J. Marconi
Metals Digestion - Mercury		7471				02/08/96	11:30AM	J. Marconi
Arsenic	Cool to 4°C	6010	1.3	± 0.01	96	02/07/96	3:01PM	D. Bernhard
Barium	Cool to 4°C	6010	1.4	± 0.01	94	02/07/96	3:01PM	D. Bernhard
Cadmium	Cool to 4°C	6010	0.8	± 0.008	98	02/07/96	3:01PM	D. Bernhard
Chromium	Cool to 4°C	6010	1.0	± 0.01	101	02/07/96	3:01PM	D. Bernhard
Lead	Cool to 4°C	6010	0.8	± 0.008	97	02/07/96	3:01PM	D. Bernhard

Local: (914) 727-1122



Environmental Laboratories
Bethany Tech Center • Suite 180
400 W. Bethany Rd. • Allen, Texas 75013

February 9, 1996

REPORT OF: Soil Analysis

REPORT TO: Mr. Tim Jenkins
Brown and Caldwell
1415 Louisiana Street, Suite 2500
Houston, Texas 77002

PROJECT NAME: BJ-Artesia: TWDS
2401 Sivley
Artesia, NM 88210

PROJECT NUMBER: 2988-27

SAMPLE I.D.: TWDS-DRLN

SAMPLE DATE: February 02, 1996

SAMPLE TIME: 1:30PM

SAMPLE RECEIVED: February 06, 1996

TIME RECEIVED: 9:10AM

SAMPLE METHOD: Grab

SAMPLE COLLECTED BY: TLJ - Customer

SAMPLE NUMBER: 66837

RESULTS:

Parameter

Detection Limits (mg/kg)

Observed Concentration (mg/kg)

Arsenic, Total	1.0	2.0
Barium, Total	0.25	130
Cadmium, Total	0.20	0.55
Chromium, Total	0.25	5.6
Lead, Total	0.50	2.0
Mercury, Total		

Vanadium, Total
Chromium, Total
Lead, Total
Mercury, Total
Selenium, Total
Silver, Total

0.25
 0.20
 0.25
 0.50
 0.02
 0.75
 0.35

130
 0.55
 5.8
 3.6
 <0.02 (1)
 <0.75
 <0.35

Quality Control Information

<u>Parameter</u>	<u>Sample Preservation</u>	<u>EPA Method</u>	<u>C.V. %</u>	<u>Standard Deviation</u>	<u>Spike Recover %</u>	<u>Date of Analysis</u>	<u>Time of Analysis</u>	<u>Analyst</u>
Metals Digestion - ICP		3050						
Metals Digestion - Mercury		7471						
Arsenic	Cool to 4°C	6010	1.3	± 0.01	96	02/07/96	11:00AM	J. Marconi
Barium	Cool to 4°C	6010	1.4	± 0.01	94	02/08/96	11:30AM	J. Marconi
Cadmium	Cool to 4°C	6010	0.8	± 0.008	98	02/07/96	3:08PM	D. Bernhard
Chromium	Cool to 4°C	6010	1.0	± 0.01	98	02/07/96	3:08PM	D. Bernhard
Lead	Cool to 4°C	6010	0.8	± 0.008	101	02/07/96	3:08PM	D. Bernhard
		6010			97	02/07/96	3:08PM	D. Bernhard

Local: (214) 727-1123

Long Distance: (800) 228-ERMI

FAX: (214) 727-1176

Environmental Laboratories
 Bethany Tech Center • Suite 190
 400 W. Bethany Rd. Allen, Texas 75013

February 9, 1996

REPORT OF:

Soil Analysis

REPORT TO:

Mr. Tim Jenkins
 Brown and Caldwell
 1415 Louisiana Street, Suite 2500
 Houston, Texas 77002

PROJECT NAME:

BJ-Artesia: TWDS
 2401 Sivley
 Artesia, NM 88210
 2988-27

PROJECT NUMBER:

TWDS-LCHLN

SAMPLE I.D.:

SAMPLE DATE:

February 02, 1996

SAMPLE TIME:

2:00PM

SAMPLE RECEIVED:

February 06, 1996

TIME RECEIVED:

9:10AM

SAMPLE METHOD:

Grab

SAMPLE COLLECTED BY:

TLJ - Customer

SAMPLE NUMBER:

56838

RESULTS:

Parameter	Detection limits (mg/kg)	Observed Concentration (mg/kg)
Arsenic, Total	1.0	<1.0 (1)
Barium, Total	0.25	138
Cadmium, Total	0.20	0.01
Chromium, Total	0.25	6.7
Lead, Total	0.50	2.6
Mercury, Total	0.02	<0.02
Selenium, Total	0.75	<0.75
Silver, Total	0.35	<0.35

Quality Control Information

Parameter	Sample Preservation	EPA Method	C.V. %	Standard Deviation	Spike Recovery %	Date of Analysis	Time of Analysis	Analyst
Metals Digestion - ICP		3050				02/07/96	11:00AM	J. Marconi
Metals Digestion - Mercury		7471				02/08/96	11:30AM	J. Marconi
Arsenic	Cool to 4°C	6010	1.3	± 0.01	96	02/07/96	3:15PM	D. Bernhard
Barium	Cool to 4°C	6010	1.4	± 0.01	94	02/07/96	3:15PM	D. Bernhard
Cadmium	Cool to 4°C	6010	0.8	± 0.008	98	02/07/96	3:15PM	D. Bernhard
Chromium	Cool to 4°C	6010	1.0	± 0.01	101	02/07/96	3:15PM	D. Bernhard
Lead	Cool to 4°C	6010	0.8	± 0.008	97	02/07/96	3:15PM	D. Bernhard

Local: (214) 727-1123

Long Distance: (800) 228-ERM1

FAX: (214) 727-1175

December 21, 1995

Mr. Mark Ashley
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

2988.26

RE: Additional Delineation of North FWT Area; Artesia, NM

Dear Mr. Ashley:

Pursuant to our conversation Monday, December 18, 1995, Brown and Caldwell has developed a protocol for additional delineation of impacted soil, and sampling of the groundwater in the north end of the Field Waste Tank (FWT) area. This investigation is tentatively planned to begin on Wednesday, December 27, 1995, subject to your concurrence.

In our letter to the NMOCD dated December 7, 1995, we reported that BJ Services Company, U.S.A. removed three field waste tanks at their Artesia, New Mexico facility during the period November 14 - 16, 1995. Confirmation samples were collected from the excavation bottom beneath each of the tank footprints, and from the sidewalls at a depth of 6 feet (ft.) The sidewall samples were taken within a zone of visible staining, which appeared consistently at a depth interval of 5 ft - 7 ft. The analytical results of these samples were:

Sample I.D.	TPH Diesel mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Xylene mg/kg
North Tank, Floor	1,059	< 0.050	< 0.050	0.145	1.3
Middle Tank, Floor	276	< 0.050	< 0.050	< 0.050	0.28
South Tank, Floor	213	< 0.050	< 0.050	< 0.050	0.465
North Sidewall	5,045	< 0.500	< 0.500	< 0.500	9.2
→ South Sidewall	652	< 0.250	< 0.250	< 0.250	0.825
East Sidewall	52	< 0.050	< 0.050	< 0.050	< 0.150
West Sidewall	81	< 0.050	< 0.050	< 0.050	< 0.150

In our conversation, you requested additional delineation of impacted soils in the area north of the FWT excavation. You also requested a groundwater analysis for dissolved TPH constituents. Based on our understanding of your concerns, Brown and Caldwell proposes that the following delineation activities be performed at the site.

December 22, 1995
Mr. Mark Ashley
New Mexico Oil Conservation Division
Page 2

Impacted Soil Delineation

Additional delineation of FWT area soils will take place as shown in Figure 1, and will be accomplished using a tiered field screening approach. Field screening includes visual observations during trenching and field analysis for TPH. A summary of the tiered approach is described below:

Tier 1 - Trench north 10 ft. from north excavation sidewall to a depth of 10 ft. below grade.

- Observe visually the soil profile.
 - a. If visual staining is observed, then determine the sampling depth accordingly.
 - b. If no visual staining, then collect a sample from the bottom end of the trench.
- Split sample and field test for TPH, placing remainder into laboratory container for subsequent analysis.
 - a. If field test shows >1,000 mg/kg, then proceed to Tier 2.
 - b. If field test shows <1,000 mg/kg, then no further soil investigation will be performed.

Tier 2 - Trench north 20 ft. from north excavation sidewall to a depth of 10 ft. below grade.

- Observe visually the soil profile.
 - a. If visual staining is observed, then determine the sampling depth accordingly.
 - b. If no visual staining, then collect a sample from the bottom end of the trench.
- Split sample and field test for TPH, placing remainder into laboratory container for subsequent analysis.
 - a. If field test shows >1,000 mg/kg, then proceed to Tier 3.
 - b. If field test shows <1,000 mg/kg, then no further soil investigation will be performed.

Tier 3 - Trench north 10 ft. from north excavation sidewall to a depth of 15 ft. below grade.

- Observe visually the soil profile.
 - a. If visual staining is observed, then determine the sampling depth accordingly.

December 22, 1995
Mr. Mark Ashley
New Mexico Oil Conservation Division
Page 3

- b. If no visual staining, then collect a sample from the bottom end of the trench.
- Split sample and field test for TPH, placing remainder into laboratory container for subsequent analysis.
 - a. If field test shows >1,000 mg/kg, then proceed to Tier 4.
 - b. If field test shows <1,000 mg/kg, then no further soil investigation will be performed.

Tier 4 - Trench north 20 ft. from north excavation sidewall to a depth of 15 ft. below grade.

- Observe visually the soil profile.
 - a. If visual staining is observed, then determine the sampling depth accordingly.
 - b. If no visual staining, then collect a sample from the bottom end of the trench.
- Split sample and field test for TPH, placing remainder into laboratory container for subsequent analysis.
 - a. If field test shows >1,000 mg/kg, further delineation activity will await the laboratory analytical results and discussions with BJ Services and the OCD.
 - b. If field test shows <1,000 mg/kg, then no further soil investigation will be performed.

Groundwater Sampling

A groundwater sample will be collected from within the existing excavation, at a depth of approximately 20 ft. An exploratory hole will be advanced to groundwater. This hole will be cleaned of any debris, and groundwater will be allowed to flow into it. A small pump will then be lowered into the hole to remove at least three volumes of groundwater inflow rate permitting. The groundwater samples will be collected with a disposable bailer from the water that collects in the hole after development.

NO
GW,
@ 23,

The groundwater sample will be collected, placed in the proper laboratory containers, and sent to a laboratory. Groundwater samples will be analyzed for total petroleum hydrocarbons (TPH) by EPA Method 8015 Modified for diesel range organics (DRO).

December 22, 1995
Mr. Mark Ashley
New Mexico Oil Conservation Division
Page 4

Site Restoration

Soil removed during the trenching activities will be stockpiled on site until field screening and sampling activities are completed. The non-impacted excavated material will then be placed back into the trench. If hydrocarbon stained soil is encountered during the trenching activities, it will be stockpiled along with the material previously stockpiled during FWT excavation.

The results of this additional delineation of impacted soils will be summarized as part of the FWT closure report to be submitted to the OCD in early January.

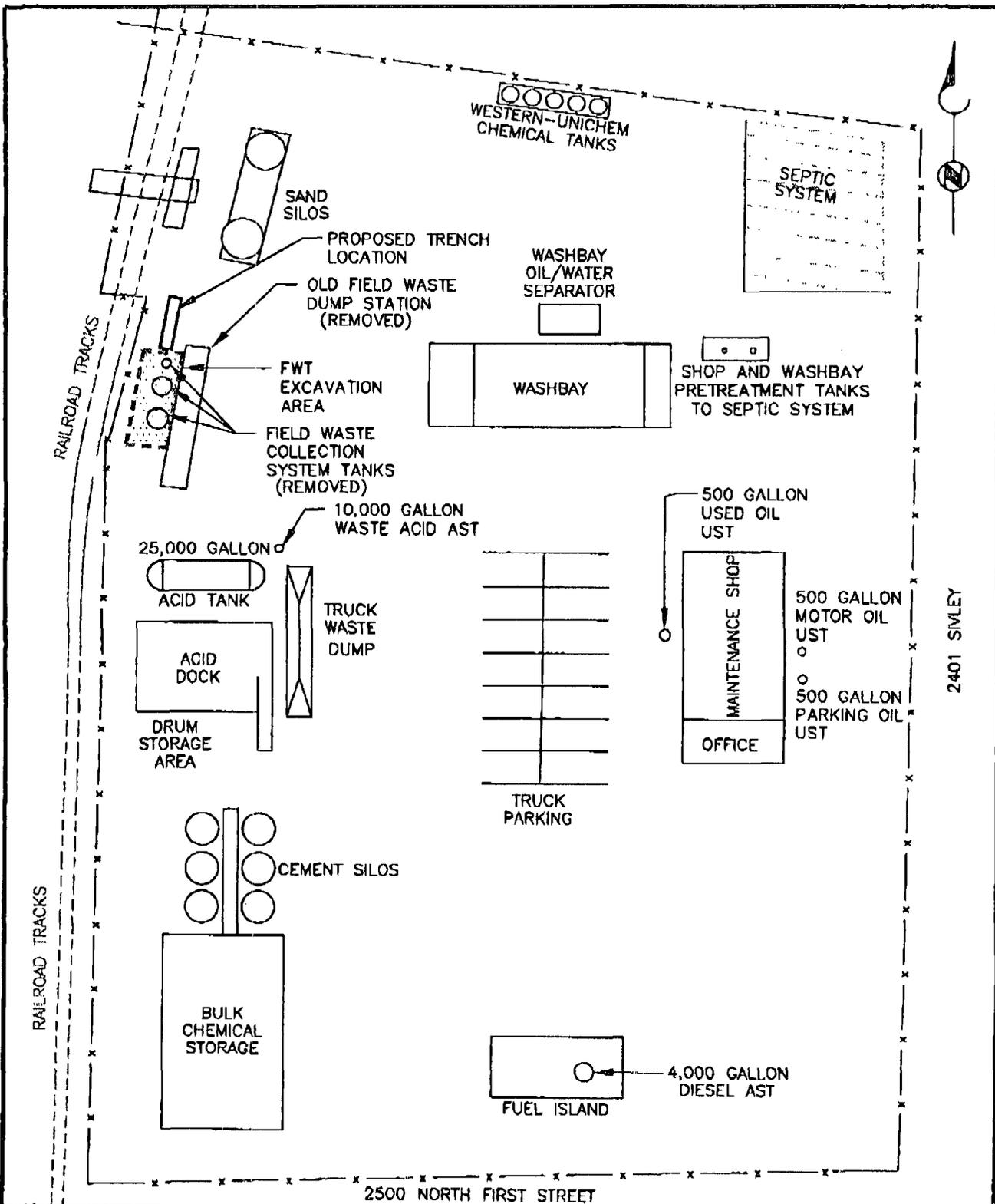
BJ Services will remove impacted excavation soils for disposal in an OCD approved facility in conjunction with this delineation exercise. We look forward to your response. If you have any questions, please feel free to contact Tim Jenkins or Bob Jennings at (713) 759-0999.

Very truly yours,

BROWN AND CALDWELL

Timothy L. Jenkins
Associate Engineer

TLJARNJ:elg



T:\2988\2988\FAC1 12/21/95 DHD

BROWN AND CALDWELL
 HOUSTON, TEXAS
 SUBMITTED: _____ DATE: _____
 PROJECT MANAGER
 APPROVED: _____ DATE: _____
 BROWN AND CALDWELL

0 0 0
 NOT TO SCALE
 DRAWN BY: DHD DATE: 12/23
 CHK'D BY: _____ DATE: _____
 APPROVED: _____ DATE: _____

TITLE: **SITE PLAN**
 CLIENT: **BJ SERVICES COMPANY, U.S.A.**
 SITE LOCATION: **ARTESIA, NEW MEXICO**

DATE: **12/21/95**
 PROJECT NUMBER: **2988-26**
 FIGURE NUMBER: **1**

12.5.95 2:30AM:
BOB JENNINGS
ENCOUNTERED GW WITH
A TRACK HOE.

BROWN AND CALDWELL

December 7, 1995

Mr. Mark Ashley
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

2988.26

Dear Mr. Ashley:

BJ Services Company, U.S.A. removed three field waste tanks at their Artesia, New Mexico facility during the period November 14 - 16, 1995. The tanks were removed in accordance with the October 26, 1995 Closure Plan, approved by the OCD on November 2, 1995. The tank locations relative to other facility features are depicted on Figure 2 of the closure plan, which is also attached to this letter.

A complete closure report will be prepared and submitted for your review. However, the purpose of this letter is to request permission to backfill the excavation with no further remedial action.

The overall excavation for tank removal was nominally 50 ft long, 21 ft wide at its widest point, and varied from 12 ft deep beneath the southernmost tank to 14 ft deep beneath the northernmost tank. Confirmation samples were taken from the excavation bottom beneath each of the tank footprints, and from the sidewalls at a depth of 6 ft. The sidewall samples were taken within a zone of visible staining, which appeared consistently at a depth interval of 5 ft - 7 ft. The excavation was conducted in the dry. However, an exploratory hole was advanced to determine the depth to free water. Water was encountered at a nominal depth of 20 ft.

SAMPLES FROM BORING?

WITH A TRACK HOE.

Confirmation samples indicate that no analytical results for organic or inorganic chemicals are present above action levels, with the exception of Total Petroleum Hydrocarbons. Analytical results for organic constituents are summarized in the following table:

Sample I.D.	TPH Diesel mg/kg	100 Benzene mg/kg	10 Toluene mg/kg	.75 Ethylbenzene mg/kg	.62 Xylene mg/kg
North Tank, Floor	1,059	< 0.050	< 0.050	0.145	1.3
Middle Tank, Floor	276	< 0.050	< 0.050	< 0.050	0.28
South Tank, Floor	213	< 0.050	< 0.050	< 0.050	0.465

BTEX
50

Environmental Engineering And Consulting • Analytical Services

1415 LOUISIANA, SUITE 2500, HOUSTON, TX 77002
(713) 759-0999 FAX (713) 759-0952

Mr. Mark Ashley
 December 7, 1995
 Page 2

Sample I.D.	TPH Diesel mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Xylene mg/kg
North Sidewall	5,045	< 0.500	< 0.500	< 0.500	9.2
South Sidewall	652	< 0.250	< 0.250	< 0.250	0.825
East Sidewall	52	< 0.050	< 0.050	< 0.050	< 0.150
West Sidewall	81	< 0.050	< 0.050	< 0.050	< 0.150

Our opinion is that the excavation can be backfilled with no further remedial action.

Toxicological information on Total Petroleum Hydrocarbons indicates that the chemicals of primary concern are volatile BTEX compounds. Because benzene results are consistently non-detect, and the remaining BTEX constituents are either non-detect or well below any action level for soils, our conclusion is that the TPH present in the soil is not of concern to human health.

Additionally, because the TPH in site soils comprises less volatile compounds, it is not expected to be particularly mobile. Previous site studies (1993) have indicated that no water wells are present within a 0.5 mile radius of the site. (The study was conducted with a 0.5 mile search radius).

The combination of lack of toxicity and relatively low mobility lead us to conclude that the TPH present in the site soils is not a threat to human health or the environment. The primary source area, including the tanks and soils immediately surrounding the tanks, has been removed. Intrinsic remediation mechanisms, including biodegradation, will continue to degrade petroleum hydrocarbon compounds which remain.

BJ Services would like to backfill the excavation with imported fill as soon as possible, so they can proceed with facility improvements planned for that area. We look forward to your response. If you have any questions, please feel free to call Bob Jennings at (713) 646-1111.

Very truly yours,

BROWN AND CALDWELL



Robert N. Jennings, P.E.
 Gulf Coast Regional Manager

NEED:
 EXTENT OF CONTAMINATION
 SAMPLE GROUNDWATER
 IMPERMEABLE MOUNDING AND

RNJ:elg



OIL CONSERVATION DIVISION
RECEIVED

'96 JAN 8 AM 8 52

GW-190

Jo Ann Cobb, REM
Manager, Environmental Services
Tel. 713/363-7528
Fax 713/363-7595

December 11, 1995

NMED Water Quality Management
State of New Mexico
Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Re: Discharge Plan Requirement
Artesia Facility
Eddy County, New Mexico

Dear Sir:

Please find enclosed a check to cover the fees associated with the above referenced Discharge Plan. This is to replace a check which was lost in route to you earlier. I am sorry for the delay.

Sincerely,

Jo Ann Cobb



BJ SERVICES COMPANY

Check No. - [REDACTED]
Check Date - 10/17/95

Stub 1 of 1

INVOICE NUMBER	DATE	DESCRIPTION	GROSS	DEDUCTIONS	AMOUNT PAID
040695	04/06		1,430.00		1,430.00

DETACH STATEMENT BEFORE DEPOSITING

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/17/95,
or cash received on 1/8/96 in the amount of \$ 1430.00
from BJ Services
for Artesia Facility GW-190

Submitted by: _____ Date: _____
(Facility Name) (DP No.)

Submitted to ASD by: RC Ruder Date: 1/16/96

Received in ASD by: Angela Herrera Date: 1-17-96

Filing Fee New Facility Renewal _____
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

THE BACK OF THIS CHECK CONTAINS A FACSIMILE WATERMARK—CAN BE SEEN AT AN ANGLE



BJ SERVICES COMPANY

P.O. BOX 4442
HOUSTON, TX 77210
713-462-4239

IN FULL PAYMENT OF ITEMS SET FORTH ON THE ACCOMPANYING REMITTANCE ADVICE

CITIBANK DELAWARE, ONE PENN'S WAY NE

CHECK NO.

DATE

AMOUNT

126792

10/17/95

\$*****1,430.00

VOID IF NOT CASHED IN 60 DAYS

PAY ONE THOUSAND FOUR HUNDRED THIRTY AND 00/100 *****

TO THE ORDER OF:

STATE OF NEW MEXICO
ENERGY MINERALS & NATURAL
RESOURCES DEPT OIL CONSER DIV
P O BOX 2088
SANTA FE, NM 87504-2088

WJH
BJ SERVICES COMPANY, U.S.A.



OIL CONSERVATION DIVISION

November 2, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-892

Mr. C.L. Smith
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

**RE: Field Waste and Steel Brine Tank Closure Plan
Artesia Facility
Eddy County, New Mexico**

Dear Mr. Smith:

The New Mexico Oil Conservation Division (OCD) has completed a review of BJ Services' (BJ) October 26, 1995 "Closure Plan Field Waste Tanks and Old Steel Brine Tanks BJ Services Company, U.S.A. Artesia, New Mexico Facility." This document contains BJ's work plan to remediate and determine the extent of potential soil contamination related to the operation of the tank system.

The above referenced work plan is approved with the following conditions:

1. Crystalline salt and any salt contaminated soils will be disposed of at an OCD approved site.
2. BJ will submit a report on the investigation to the OCD by January 12, 1996. The report will contain:
 - a. A description of all activities which occurred during the investigation, conclusions and recommendations.
 - b. A summary of the laboratory analytic results of soil samples.

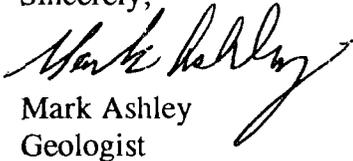
Mr. C.L. Smith
November 2, 1995
Page 2

3. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve BJ of liability if contamination exists which is beyond the scope of the work plan or if the activities fail to adequately determine the extent of contamination related to BJ's activities. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7155.

Sincerely,



Mark Ashley
Geologist

xc: OCD Artesia Office

Z 765 962 892


UNITED STATES
POSTAL SERVICE

**Receipt for
Certified Mail**
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

OIL CONSERVATION DIVISION

November 1, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-891

Mr. C.L. Smith
BJ Services Company, U.S.A.
8701 New Trails Drive
The Woodlands, Texas 77381

**RE: Septic System Closure Plan
Artesia Facility
Eddy County, New Mexico**

Dear Mr. Smith:

The New Mexico Oil Conservation Division (OCD) has completed a review of BJ Services' (BJ) September 11, 1995 "Closure Plan for the Septic System BJ Services Artesia, New Mexico Facility." This document contains BJ's work plan to determine the extent of potential soil and ground water contamination related to the operation of the wastewater/septic system.

The above referenced work plan is approved with the following conditions:

1. All borings which encounter ground water will be completed as monitor wells. All monitor wells will be completed as follows:
 - a. A minimum of fifteen feet of well screen will be installed, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
 - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug will be placed above the gravel pack.
 - d. The remainder of the hole will be grouted to the surface with cement containing 5 % bentonite.

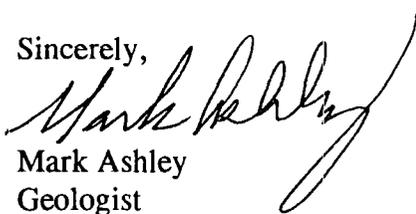
Mr. C.L. Smith
 November 1, 1995
 Page 2

2. All boreholes will be plugged upon completion with cement containing 5 % bentonite.
3. All wastes generated will be disposed of at an OCD approved facility.
4. Ground water from the monitor wells will be sampled and analyzed for concentrations of major cations and anions, heavy metals, polynuclear aromatic hydrocarbons, and aromatic and halogenated organics using EPA approved methods.
5. BJ will submit a report on the investigation to the OCD by January 12, 1996. The report will contain:
 - a. A description of all activities which occurred during the investigation, conclusions and recommendations.
 - b. A summary of the laboratory analytic results of soil and water quality sampling of the monitor wells and boreholes.
 - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
 - d. A geologic log for each borehole or monitor well and as built well completion diagrams for each monitor well.
6. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve BJ of liability if contamination exists which is beyond the scope of the work plan or if the activities fail to adequately determine the extent of contamination related to BJ's activities. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7155.

Sincerely,



Mark Ashley
 Geologist

xc: OCD Artesia Office

Z 765 962 891

Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)



Sent to	
Street and No.	
P. O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

to Artesia



**The Western Company
of North America**

Post-it® Fax Note	7671	Date	6/27	# of pages	▶
To	<i>Mark</i>	From	<i>Angela</i>		
Co./Dept	<i>Ashley</i>	Co.			
Phone #		Phone #			
Fax #	<i>505/827-8177</i>				

MICHAEL LADD

ANGELA HARDY, AEP, AEA
Environmental Coordinator
Tel. 713/629-2884 713-362-4442
FAX 713/629-2885

April 10, 1995

Mr William J LeMay Director
State of New Mexico
Energy, Minerals and Natural Resources Department
2040 South Pacheco
Santa Fe NM 87505

RE: Discharge Plan Application for
The Western Company of North America
Artesia New Mexico

Dear Mr LeMay:

Enclosed are two copies of the Discharge Plan Application for The Western Company's Artesia NM District. One copy has been sent to the OCD Artesia Office.

Also enclosed is Western's Check No. 1045885 for \$1,430 that covers the flat fee of \$1,380 for oil and gas service companies and the \$50 filing fee.

If you have questions or need additional information, please let us know.

Sincerely

Angela Hardy

Angela Hardy
THE WESTERN COMPANY OF NORTH AMERICA

pc: OCD Artesia Office
John Bendure, Artesia
ART Discharge Plan file
ERF

515 Post Oak Blvd., Suite 1200, Houston, TX 77027
P.O. Box 56006, Houston, TX 77256
(713) 629-2600—Office • 792093—Telex • (713) 629-2609—Fax

*WE NEVER
RECEIVED THIS
LETTER & CHECK.
MA 6-30-95*

Post-It® Fax Note	7671	Date	6/28	# of pages	1
To	Mark Kasperby Angela				
Co./Dept	Co.				
Phone #	Phone #				
Fax #	505-827-8177				

THE WESTERN COMPANY
OF NORTH AMERICA

Check No. - [REDACTED]
Check Date - 04/10/95

Stub 1 of 1

040695	04/06	1,430.00	1,430.00
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Artesia

DETACH STATEMENT BEFORE DEPOSITING



THE WESTERN COMPANY

OF NORTH AMERICA
615 POST OAK BLVD.
HOUSTON, TEXAS 77027-8407

IN FULL PAYMENT OF ITEMS SET FORTH ON THE ACCOMPANYING REMITTANCE ADVICE

126792

CITYBANK DELAWARE, ONE PENN'S WAY NEW CASTLE, DE 19720

CHECK NO. [REDACTED]

04/10/95 \$*****1,430.00

62-20
311

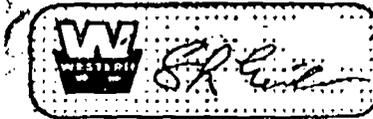
VOID IF NOT CASHED IN 90 DAYS

PAY

ONE THOUSAND FOUR HUNDRED THIRTY AND 00/100 *****

TO THE ORDER OF:

STATE OF NEW MEXICO
ENERGY MINERALS & NATURAL
RESOURCES DEPT OIL CONSER DIV
P O BOX 2088
SANTA FE, NM 87504-2088



C. John Bendure

NOT
RECEIVED.
MA
6-30-95



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

June 15, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-732

Ms. Angela Hardy
BJ Services
11211 FM 2920
Tomball, Texas 77375

**RE: Discharge Plan GW-190 Approval
Artesia Facility
Eddy County, New Mexico**

Dear Ms. Hardy:

The discharge plan GW-190 for the BJ Services (BJ), Artesia Facility located in the SE/4 SE/4, Section 32, Township 16 South, Range 26 East, NMPM, Eddy County, New Mexico, is hereby **approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application received April 12, 1995.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve you of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve BJ of responsibility for compliance with any other federal, state or local laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Ms. Angela Hardy
June 15, 1995
Page 2

Please note that Section 3-104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4., this plan is for a period of five (5) years. This approval will expire on June 13, 2000, and you should submit an application six months before this date.

The discharge plan application for the BJ Artesia Facility is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars, due upon receipt of this approval, plus a flat fee of thirteen-hundred and eighty dollars (\$1,380.00) for oil and gas service companies. The New Mexico Oil Conservation Division (OCD) has not received your fifty (50) dollar filing fee or your flat fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review. If you have any questions, please contact Mark Ashley of my staff at (505) 827-7155.

Sincerely,

by  Deputy Director
William J. LeMay
Director

WJL/mwa
Attachment

xc: Tim Gum, OCD Artesia Office
Ray Smith, OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN GW-190 APPROVAL
BJ SERVICES
ARTESIA FACILITY
DISCHARGE PLAN REQUIREMENTS
(June 15, 1995)

1. Payment of Discharge Plan Fees: The fifty (50) dollar filing fee and the thirteen-hundred and eighty dollar (\$1,380.00) flat fee shall be submitted upon receipt of this approval. The required flat fee of thirteen-hundred and eighty dollar (\$1,380.00) may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Sump Inspection: All pre-existing single-lined sumps at this facility will be cleaned and visually inspected on an annual basis. The inspection will coincide with the annual scheduled plant shutdown.

Any new or rebuilt sumps or below-grade tanks will incorporate leak detection in their designs and will be approved by the OCD prior to installation.
4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) times the capacity of the largest tank within the berm or one and one-third (1-1/3) times the total capacity of all interconnected tanks.
5. Above Grade Tanks: All above ground tanks (saddle tanks) will be on impermeable pad and curb type containment.
6. Pressure Testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
7. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and Artesia District Offices pursuant to WQCC Rule 1-203 and OCD Rule 116.
8. Closure: The OCD will be notified when operations of the facility is discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
9. Action Items: The action items and time frames agreed upon by BJ Services will be adhered to for completion.
10. Septic System: BJ Services will submit a closure plan for the existing septic system (Class V Well) by September 13, 1995 for approval by the OCD.

Z 765 962 732



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

Mark Ashley

From: Tim Gumm
Date sent: Thursday, June 15, 1995 8:02AM
To: Mark Ashley
Subject: Registered: Tim Gumm

Your message

To: Tim Gumm
Subject: review of letters
Date: Wednesday, June 14, 1995 7:37PM
was accessed on
Date: Thursday, June 15, 1995 8:02AM

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS & NATURAL
RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-190) The Western Company of North America, Philip Box, 515 Post Oak Blvd., Suite 915, Houston, Texas 77027-9407, has submitted a discharge plan application for their Artesia Facility, located in SE/4, SE/4, Section 32, Township 16 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 5,000 gallons per month of truck wash wastewater is disposed of in a septic system and 4100 gallons per month of field and acidic wastewater is disposed of at an OCD approved disposal facility. Ground water not likely to be affected. In the event of an accidental discharge is at a depth of approximately 15'. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 5:00 p.m. Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest. If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing. GIVE IN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12th day of April, 1995.
Journal: April 19, 1995.



NOTARY PUBLIC
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

My Commission Expires: 5-20-98

Mejor Millage

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 19 day of Sept, 1994, and the subsequent consecutive publications on 19, 1994.

Bill Tafoya
Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 19 day of Sept 1994.

PRICE 29.33
Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER 180932

Affidavit of Publication

No. 15056

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

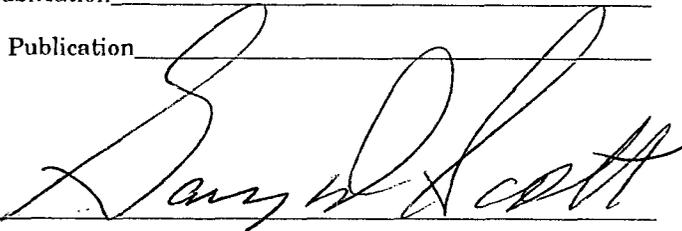
was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication April 19, 1995

Second Publication _____

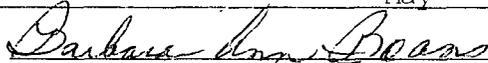
Third Publication _____

Fourth Publication _____



Subscribed and sworn to before me this 10th day

of May 1995



Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of I

ma's XI Chapter Reccurim

Motion passed on a 3-2 vote as a commission count.

back and change every

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12th day of April, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION

s-William J. LeMay
WILLIAM J. LEMAY
Director

SEAL
Published in the Artesia Daily Press, Artesia, N.M. April 19, 1995.

Legal 15056

LEGAL NOTICE

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-190) - The Western Company of North America, Phillip Box, 515 Post Oak Blvd., Suite 915, Houston, Texas 77027-9407, has submitted a discharge plan application for their Artesia Facility located in SE/4, SE/4, Section 32, Township 16 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 5,000 gallons per month of truck wash wastewater is disposed of in a septic system and 4100 gallons per month of field and acidic wastewater is disposed of at an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 15. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 5:00 p.m. Monday thru



April 14, 1995

ARTESIA DAILY PRESS
P. O. Box 179
Artesia, New Mexico 88210

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit in duplicate.
2. Statement of cost (also in duplicate.)
2. CERTIFIED invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than April 21, 1995.

Sincerely,

Sally E. Martinez
Sally E. Martinez
Administrative Secretary

Attachment

Z 765 962 314



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Artesia Daily Press	
Street and No. P.O. Drawer 179	
P.O. Code Artesia, NM 88210	
Postage	\$
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Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993



April 14, 1995

ALBUQUERQUE JOURNAL
P. O. Drawer J-T
Albuquerque, New Mexico 87103

RE: NOTICE OF PUBLICATION

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Administrative Secretary

Attachment

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

7 765 962 315



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Sent to <i>Ally Journal</i>	
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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12th day of April, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

SEAL

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12st day of April, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

SEAL



January 26, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-765-962-811

Mrs. Angela Hardy
Environmental Coordinator
The Western Company
515 Post Oak Blvd.
Suite 915
Houston, TX 77027-9407

**RE: Discharge Plan Requirement
Artesia Facility
Eddy County, New Mexico**

Dear Mrs. Hardy:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for the Artesia Facility located in Eddy County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.P of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

VILLAGRA BUILDING - 408 Gallisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
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827-5970

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Mrs. Angela Hardy
January 26, 1995
Page 2

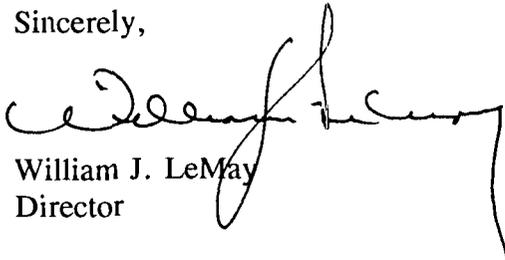
A copy of the regulations have been provided for your convenience. Also provided was an OCD guideline for the preparation of discharge plans at oil & gas service companies. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of one thousand, three hundred and eighty (\$1380) dollars for oil & gas service companies. The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

Please make all checks payable to: **NMED Water Quality Management** and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please feel free to contact Mark Ashley at 827-7155 or Roger Anderson at 827-7152.

Sincerely,



William J. LeMay
Director

WJL/mwa

XC: OCD Artesia Office

Z 765 962 811

 **Receipt for Certified Mail**
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

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Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993



THE WESTERN COMPANY OF NORTH AMERICA

515 Post Oak Blvd., Ste. 915
Houston, TX 77027
Ph: 713/629-2861 FAX 713/629-2885

REAL ESTATE & ENVIRONMENTAL COMPLIANCE

DATE: January 23, 1995

TO: COMPANY NAME: State of New Mexico

ATTENTION OF: Mark Ashley

REFERENCE: Artesia Discharge Plan

TELEFAX NO: 505/827-~~7135~~ 8177

FROM: Angela Hardy, Environmental Coordinator

3 PAGE(S), INCLUDING COVER SHEET

COMMENTS:

The following two pages list action items discussed in our meeting on January 19. Will you acknowledge by approving this list or make revisions. The list approved by your office will be included in the Artesia Discharge Plan.

If you have problems receiving transmission of this telefax, please contact Angela Hardy 713/629-2864.

THE FOLLOWING ITEMS REQUIRE ACTION TO BE TAKEN AT THE ARTESIA FACILITY, AND HAVE BEEN AGREED UPON BY MARK ASHLEY OF THE STATE OF NEW MEXICO:

1. TRUCK MAINTENANCE BUILDING

- A. Sample oil from the sump collection tank. Make hazardous or non-hazardous determination. Insure proper disposal.
- B. Annually test this sump for leaks, using a hydrostatic test.
- C. Relocate packing oil and motor oil tanks from the maintenance shop to the old fuel island.
- D. Remove any contaminated or oil soaked soils after the tanks have been relocated. The soils will be tested for BTEX, TPA AND RIC. Disposal will be appropriate for the type of contaminate determined.

2. FUEL ISLAND AREA

- A. Test old soil inside the concrete containment area using BTEX, TPA and RIC analysis. Dispose of soils accordingly.

3. DRUM STORAGE AREA

- A. Place a curb around the drum storage area and finish pouring concrete to provide for all drums to be stored on a concrete pad with containment.

4. TRUCK LOADING DOCK

- A. Pour a concrete curb around the dock such that chemicals cannot run off or be spilled on the ground.

ACID DOCK AND DRIVE RAMP

- A. Replace and rebuild the acid drive.
- B. Take appropriate action to clean any contaminated soils, if discovered. A 72-hour notice to the State will be required prior to any construction or excavation work being done.
- C. Install an acid containment wall adequate to hold 1-1/3 times the volume of acid stored.

6. **OIL FIELD WASTE COLLECTION SYSTEM**

- A. Have a closure plan prepared, based on State guidelines, to remove or close in-place three tanks.

7. **OLD BRINE STEEL TANKS**

- A. Arrange for proper disposal of the residual crystalline salt and rusty metal.

8. **TRUCK WASH BAY - OIL AND WATER SEPARATOR**

- A. Take samples of oil and make hazardous or non-hazardous determination.