

GW - 381

INSPECTION

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, July 07, 2009 2:31 PM
To: 'Mickey Broussard'
Cc: Johnson, Larry, EMNRD; 'Clayton Courville'; 'Eric Taylor'
Subject: GW-381, Knight Fishing Service, OCD Response
Attachments: GW-381, Insp.pdf

Mr. Broussard,

OCD has received and reviewed the submitted letter from EDI Environmental dated June 24, 2009.

In response:

Question 1: Owner/operator shall keep OCD informed on the proposed method to achieve compliance on the 133% secondary containment.

Question 2: Owner/operator shall implement stated testing procedures to test all sumps. Submit all test results to the Santa Fe OCD office. If the test fails then the owner/operator shall investigate the failure. See condition 18 of the permit conditions for release information. Owner/operator shall inform the OCD on the final status of the current below grade system and submit any new designs to the OCD prior to installation.

Question 3: Owner/operator shall submit drain line test results to the OCD upon completion.

Question 4: OCD has viewed the accompanying photos on the stated drum storage area clean up. The photos noted that several barrels/containers were still located directly on the ground. Owner/operator shall adhere to Condition 7 and 9. During the last inspection there were several soil staining on the east side of the Paint Room and Washrack buildings. Were those addressed as well?

OCD request that the owner/operator submit updates on the above stated items by December 2009.

I have attached the photos from the last inspection of this facility for overall reference.

Thank you for your attention.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>



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2009 JUN 29 PM 1 06

148-C Easy Street, Lafayette, Louisiana 70506

Post Office Box 60726, Lafayette, Louisiana 70596-0726

Phone: (337) 264-9810 Fax: (337) 264-9816

June 24, 2009

Mr. Leonard Lowe
State of New Mexico
Energy Minerals and Natural Resources
OCD – Environmental Bureau
1220 South St. Francis Dr.
Sante Fe, NM 87505

Re: Knight Fishing Services – **GW-381**
Hobbs, NM
Discharge Permit – Approval Conditions

Dear Mr. Lowe:

EDI Environmental Services, Inc. (EDI) on behalf of Knight Fishing Services (KFS) is pleased to provide the following responses to the *Discharge Plan Approval Conditions*, which were noted in your June 18th correspondence and due on or before June 30th, 2009.

NM OCD Questions (June 18th, 2009 letter date)

- 1. What is the status of the insufficient secondary containment for the identified tanks within the application?**

Insufficient secondary containment was discovered for the 1,000 gallon diesel tank (current cont. pan will hold 1165 gal.) and the 500 gallon UNICHEM 9120 (current cont. pan will hold 573 gallons). In order qualify with the 100% + 1/3 criteria KFS will either reduce the tank volumes supplied by the vendor or build larger containment pans. The previous is proposed to be completed by the end of the calendar year 2009, upon the departments' acceptance.

- 2. and 3. Below grade tank/sump and piping.....**

KFS has elected to perform a 24 hour leak test on the sump system including lines to verify soundness or confirm leakage. This test will be the prelude to a possible below grade tank system closure. The system is proposed to be replaced by an above ground system (photo attached - 1)* As per Mr. Larry Johnson, if the sump and lines pass the leak test they may then be filled with concrete. As noted the above ground system option is currently being negotiated with vendors. In the interim, KFS proposes to have the sump system cleaned out on a semi-annual basis until the most effective option is chosen. Manifests for the clean-outs will be supplied for review upon completion.

4. Condition 16, OCD inspections: Submit all testing and photos....

Attachment 1 and 2 provides a photo-log of previously noted drum storage area and the remediated soil surfaces address in May of 2009. Analytical data for confirmation samples is also attached. Figure 1, attached provides a sample location map. Excavated soils (approx. 15 cu. yds.) were profiled and disposed with CRI of Hobbs, NM.

EDI on behalf of Knight Fishing Services, Inc. greatly appreciates the cooperation shown on the departments' behalf. If you have any questions or require clarification, please contact EDI's office at (337) 264-9810.

Sincerely,
EDI Environmental Services, Inc.



Clayton Courville, RSO
President

att: 1- Photo-Log
2-Analytical

cc: Mr. Eric Taylor, Knight Fishing – Hobbs, NM
Mr. Keith Alexander, Knight Fishing – Regional Manager
Mr. Mickey Broussard, Knight Oil Tools – Sr. Vice President Operations

Question: 2 & 3

*(Photo attached - 1) *





Sample Date: 05/27/09
By: C. Courville

- Denotes soil sample locations

Knight Fishing Services, Inc.
1718 S. Dal Paso, Hobbs, NM

Confirmation Sample Location Map

Drawn By:	cjc	Figure:	1
Checked By:		Project No:	08546
Approved By:		File:	08546a



Attachment 1 – Photo-Log



Photo 1 - View of excavation continued in former AST area



Photo 2 - Soils were profiled and disposed with CRI in Hobbs, NM



Photo 3 - South fence hydrocarbon stain re-addressed, 05/27/09



Photo 4 - View of excavation backfilled, former AST area

Attachment 2 - Analytical



ARDINAL LABORATORIES

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

ANALYTICAL RESULTS FOR
EDI ENVIRONMENTAL SERVICES
ATTN: CLAY COURVILLE
148-C EASY ST.
LAYFAYETTE, LA 70506
FAX TO: (337) 264-9816

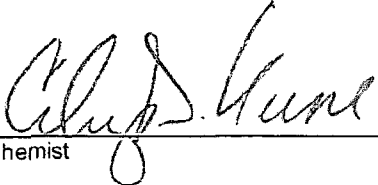
Receiving Date: 05/27/09
Reporting Date: 05/28/09
Project Number: NOT GIVEN
Project Name: KNIGHT FISHING SERVICES
Project Location: 1718 S. DAL PASO, HOBBS, NM


Sampling Date: 05/27/09
Sample Type: SOIL
Sample Condition: COOL & INTACT @ 5.5°C
Sample Received By: ML
Analyzed By: AB

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)	DRO EXT. (>C ₂₈ -C ₃₅) (mg/kg)
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ANALYSIS DATE:	05/27/09	05/27/09	05/27/09
H17492-1 AST-S-1	<10.0	<10.0	<10.0
H17492-2 S-2 RS	<10.0	<10.0	<10.0
Quality Control	482	484	-
True Value QC	500	500	-
% Recovery	96.4	96.8	-
Relative Percent Difference	12.6	14.6	-

METHODS: TPH GRO & DRO - EPA SW-846 8015 M. Reported on wet weight.


Chemist


Date

H17492 TPHE EDI

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ANALYTICAL RESULTS FOR
EDI ENVIRONMENTAL
ATTN: CLAY COURVILLE
148-C EAST ST.
LAFAYETTE, LA 70506

Receiving Date: 05/27/09
Reporting Date: 06/08/09
Project Owner: NOT GIVEN
Project Name: KNIGHT FISHING SERVICES
Project Location: 1718 SOUTH DAL PASO, HOBBS, NM

Sampling Date: 05/27/09
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT @ 5.5°C
Sample Received By: ML
Analyzed By: JM

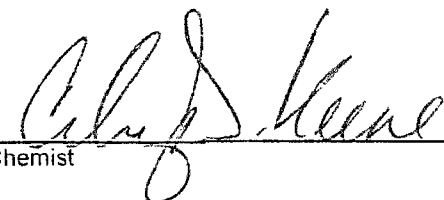
TCLP RCRA METALS

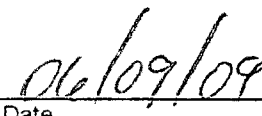
LAB NO.	SAMPLE ID	As (mg/L)	Ag (mg/L)	Ba (mg/L)	Cd (mg/L)	Cr (mg/L)	Pb (mg/L)	Hg (mg/L)	Se (mg/L)
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ANALYSIS DATE:	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/02/09	06/04/09	06/02/09
H17492-3 WW SUMP	0.11	<0.01	0.06	<0.01	<0.01	<0.05	0.0015	<0.20	
Quality Control	5.07	0.53	2.62	2.54	2.60	5.24	0.0021	10.3	
True Value QC	5.00	0.50	2.50	2.50	2.50	5.00	0.0020	10.0	
% Recovery	101	106	105	102	104	105	105	103	
Relative Standard Deviation	14.4	18.2	16.2	14.4	16.7	15.5	<0.1	14.4	

METHODS: EPA 600/4-91/010 (1311)	200.7	200.7	200.7	200.7	200.7	200.7	245.1	200.7
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Analyses subcontracted to Green Analytical Laboratories, a subsidiary of Cardinal Laboratories.


Chemist


Date

H17492TM EDI

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ANALYTICAL RESULTS FOR
EDI ENVIRONMENTAL
ATTN: CLAY COURVILLE
148-C EAST ST.
LAFAYETTE, LA 70506

Receiving Date: 05/27/09
Reporting Date: 06/16/09
Project Owner: NOT GIVEN
Project Name: KNIGHT FISHING SERVICES
Project Location: 1718 SOUTH DAL PASO, HOBBS, NM
Sample ID: WW SUMP
Lab Number: H17492-3

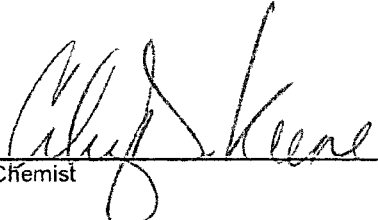
Analysis Date: 06/09/09
Sampling Date: 05/27/09
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT @ 5.5°C
Sample Received By: ML
Analyzed By: CK

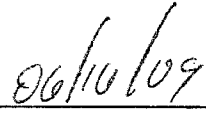
TCLP SEMIVOLATILES (mg/L)	EPA LIMIT	Sample Result H17492-3	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.038	<0.010	0.024	121	0.020
1,4-Dichlorobenzene	7.50	<0.019	<0.005	0.029	145	0.020
o-Cresol	200	<0.038	<0.010	0.023	115	0.020
m, p-Cresol	200	<0.019	<0.005	0.025	125	0.020
Hexachloroethane	3.00	<0.019	<0.005	0.026	129	0.020
Nitrobenzene	2.00	<0.019	<0.005	0.022	112	0.020
Hexachloro-1,3-butadiene	0.500	<0.038	<0.010	0.026	129	0.020
2,4,6-Trichlorophenol	2.00	<0.019	<0.005	0.020	97.7	0.020
2,4,5-Trichlorophenol	400	<0.019	<0.005	0.022	110	0.020
2,4-Dinitrotoluene	0.130	<0.031	<0.008	0.019	95.2	0.020
Hexachlorobenzene	0.130	<0.019	<0.005	0.024	121	0.020
Pentachlorophenol	100	<0.077	<0.020	0.024	119	0.020

% RECOVERY

Fluorophenol	13.8
Phenol-d5	10.1
Nitrobenzene-d5	101
2-Fluorobiphenyl	57.6
2,4,6-Tribromophenol	28.2
Terphenyl-d14	97.0

METHODS: EPA SW-846 1311, 8270, 3510


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ANALYTICAL RESULTS FOR
EDI ENVIRONMENTAL
ATTN: CLAY COURVILLE
148-C EAST ST.
LAFAYETTE, LA 70506

Receiving Date: 05/27/09
Reporting Date: 06/16/09
Project Owner: NOT GIVEN
Project Name: KNIGHT FISHING SERVICES
Project Location: 1718 SOUTH DAL PASO, HOBBS, NM
Sample ID: WW SUMP
Lab Number: H17492-3

Analysis Date: 06/09/09
Sampling Date: 05/27/09
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT @ 5.5°C
Sample Received By: ML
Analyzed By: JS

TCLP							
VOLATILES - 8260 (mg/L)		EPA LIMIT	Sample Result H17492-3	Method Blank	QC	%Recov.	True Value QC
1	Vinyl chloride	0.20	<0.001	<0.001	NR	NR	NR
2	1,1-Dichloroethene	0.7	<0.001	<0.001	0.025	123	0.020
3	Chloroform	6.0	<0.001	<0.001	NR	NR	NR
4	Carbon tetrachloride	0.5	<0.0005	<0.0005	NR	NR	NR
5	2-Butanone	200	<0.005	<0.005	NR	NR	NR
6	Benzene	0.5	<0.0005	<0.0005	0.023	114	0.020
7	1,2-Dichloroethane	0.5	<0.0005	<0.0005	NR	NR	NR
8	Trichloroethene	0.5	<0.001	<0.001	0.022	111	0.020
9	Tetrachloroethene	0.7	<0.001	<0.001	NR	NR	NR
10	Chlorobenzene	100	<0.001	<0.001	0.022	108	0.020
11	1,4 Dichlorobenzene	7.5	0.001	<0.001	NR	NR	NR

NR = Not reported.

Surrogates	%Recovery
Dibromofluoromethane*	128
Toluene-d8	106
4-Bromofluorobenzene	107

METHODS: EPA SW-846-1311/8260. Analysis subcontracted to SunStar Laboratories, Inc.

*Note: Surrogate recovery outside of established control limits. The data was accepted based on valid recovery of the remaining surrogate(s).

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Date

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ANALYTICAL RESULTS FOR
EDI ENVIRONMENTAL
ATTN: CLAY COURVILLE
148-C EAST ST.
LAFAYETTE, LA 70506
FAX TO: (337) 264-9816

Receiving Date: 05/27/09
Reporting Date: 06/08/09
Project Owner: NOT GIVEN
Project Name: KNIGHT FISHING SERVICES
Project Location: 1718 S. DAL PASO, HOBBS, NM

Sampling Date: 05/27/09
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
@ 5.5°C
Sample Received By: ML
Analyzed By: HM/AB

LAB NO.	SAMPLE ID	REACTIVITY			
		Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		06/02/09	06/02/09	06/02/09	06/02/09
H17492-3	WW SUMP	< 0.01	<0.100	7.87	>140
Quality Control		NR	NR	7.07	78
True Value QC		NR	NR	7.00	80 +/- 2
% Recovery		NR	NR	101	97.5
Relative Percent Difference		NR	NR	0.4	2.5

METHOD: EPA SW-846 7.3, 7.2, 1010A (ASTM D 93-80), 1311, 40 CFR 261

Chemist

Date

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New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



June 18, 2009

Mr. Mickey Broussard
Knight Oil Tools
P.O. Box 52688
Lafayette, LA 70505-2688

Re: **GW-381** Discharge Permit Conditions response
Knight Oil Fishing Services, 1718 S. Dal Paso
Hobbs, New Mexico, Lea County 88240

Dear Mr. Broussard:

The OCD has reviewed EDI's Discharge Permit – Approval Condition letter on behalf of Knight Oil Fishing Services dated April 29, 2009 in response to the permit conditions issued on April 8, 2009.

1. OCD inquiry Condition 9, Above Ground Tanks:
What is the status of the insufficient secondary containments for the identified tanks within the application?
2. OCD inquiry Condition 11, Below-Grade Tanks/Sumps and Pits/Ponds:
Upon review of the submitted information on the wash water collection system the OCD concludes that this system is to be re-engineered to meet the permit Condition 11 for a below grade tank (BGT). The below grade tank will need to be implemented with a secondary containment with a leak detection system. In the mean time the system will need to be cleaned and inspected. These will need to be completed annually until the system is upgraded to meet permit conditions, prior to permit renewal. Contact the local OCD office's Environmental Engineer, Larry Johnson 575-393-6161 to be in attendance when BGT is ready for inspection. The inspection will include an integrity test. Submit the new design to the OCD Santa Fe office prior to installation.
3. OCD inquiry Condition 12, Underground Process/Wastewater lines:
Knight Oil Services shall test all underground lines as prescribed within Condition 12. Any proposed methods shall be submitted to the Santa Fe OCD office for approval prior to testing. All results shall be submitted when obtained.
4. OCD inquiry B. Condition 16, OCD inspection:
Submit to the OCD all testing results along with photos of cleaned up area.

Oil Conservation Division * 1220 South St. Francis Drive

* Santa Fe, New Mexico 87505

* Phone: (505) 476-3440 * Fax (505) 476-3462* <http://www.emnrd.state.nm.us>



June 18, 2009

Page 2

EDI Environmental Services has until June 30th to submit all required information stated within the permit conditions as agreed to by the Santa Fe OCD Environmental Bureau.

If you have any questions pertaining to this process please call me at (505) 476-3492 or e-mail me at leonard.lowe@state.nm.us.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Leonard Lowe', with a stylized flourish at the end.

Leonard Lowe
Environmental Engineer

xc: Larry Johnson, Environmental Engineer OCD District I Office
Eric Taylor, Regional Manager Knights Oil Tool Hobbs
Clay Courville, EDI Environmental Consulting Lafayette Louisiana



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2009 MAY 5 AM 11:48

148-C Easy Street, Lafayette, Louisiana 70506

Post Office Box 60726, Lafayette, Louisiana 70596-0726

Phone: (337) 264-9810 Fax: (337) 264-9816

April 29, 2009

Mr. Leonard Lowe
State of New Mexico
Energy Minerals and Natural Resources
OCD – Environmental Bureau
1220 South St. Francis Dr.
Sante Fe, NM 87505

Re: Knight Fishing Services GW-381
Hobbs, NM
Discharge Permit – Approval Conditions

Dear Mr. Lowe:

EDI Environmental Services, Inc. (EDI) on behalf of Knight Fishing Services is pleased to provide the following responses to the *Discharge Plan Approval Conditions*, which were noted due on or before May 5th, 2009.

Condition B. #11.A Response:

Brief Washing System Description:

Closed Loop Washing System / Sump Wastewater

Wash water is recycled through a series of collection sumps and tanks which separate the heavy hydrocarbons and flow-through process the re-useable wash water. The hydrocarbons remain in the initial sump encountered which is removed by Safety Kleen approximately once every two (2) months. The re-useable water is conveyed through a *Water Maze™* wastewater treatment system. This system utilizes a series of additional separation and bio treatment to produce a wash water re-useable with the pressure/steam system.

- I. Total Volume Capacity = 200 Gallons
- II. Minimal separated hydrocarbons remain for periods of 45 to 60 days
- III. Drawings of sump system (Attached); material makeup = reinforced concrete
- IV. Sump does not have secondary containment with leak detection.

Condition #12.A. Response:

EDI on behalf of Knight Fishing requests assistance in determining whether or not the piping system between the sump and the wastewater treatment system is required to be tested. The current system is not pressurized and was in-place prior to Knight's involvement.

Condition B.#16 Response:

Site conditions noted during the OCD May 14th, 2008 inspection have been addressed and documented by photos previously submitted to the department. EDI has scheduled a site visit for mid-May to continue to remediate surface stained areas in the vicinity of the former above-ground storage tank area. Excavated soils will be properly profiled and disposed under manifest. Additionally the pertinent confirmation samples will be collected to assure adequate remediation was performed. EDI respectfully requests an acceptable parameter list for the confirmation samples to be collected.

EDI will make every effort to comply with the May 24th, 2009 due date for the formal response concerning the May 2008 OCD Inspection.

If you have any questions or require amendments, please contact our office at (337) 264-9810.

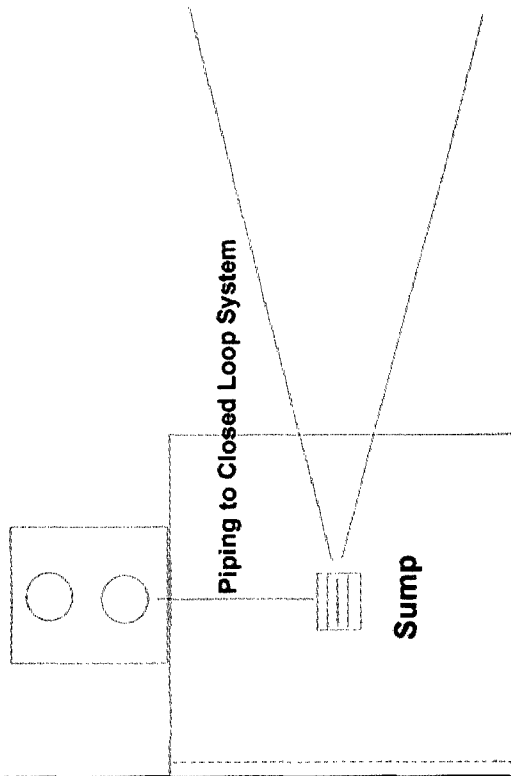
Sincerely,
EDI Environmental Services, Inc.



Clayton Courville, RSO
President

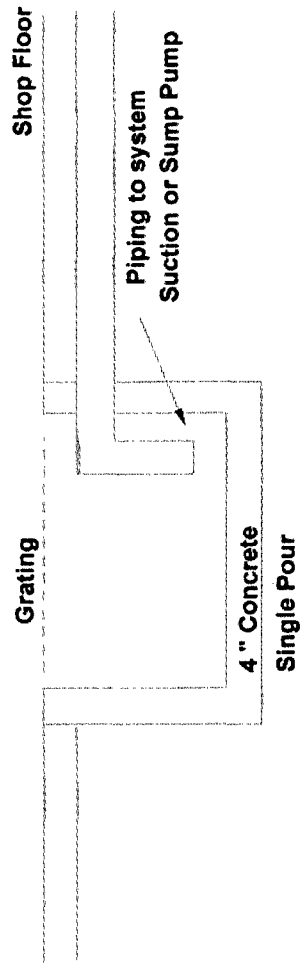
att: Sump Schematic

cc: Mr. Eric Taylor, Knight Fishing – Hobbs, NM
Mr. Keith Alexander, Knight Fishing – Regional Manager
Mr. Mickey Broussard, Knight Oil Tools – Sr. Vice President Operations



Back Maintenance / Washrack Shop

*Washing is done under cover



Sump Dimensions = 3 ft. x 3 ft. x 3 ft.

Approx. 200 Gallons

*Not to scale



Knight Fishing
Hobbs, NM

General Sump Schematic

Drawn By: cjc

Figure: 1

Checked By:

Project No:

Approved By:

File: