

GW – 404

**PERMIT,
Application**

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, November 09, 2010 1:42 PM
To: 'Gibson, Allison E'
Subject: GW-404, Tuboscope Service Company Crouch Mesa N.M. San Juan County

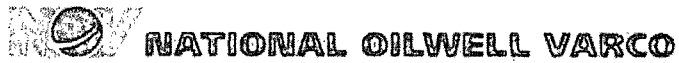
Allison Gibson,

OCD approves your closure of your 32 bbl below grade tank at your Crouch Mesa facility.

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/oed/>



RECEIVED OCD
2010 NOV -8 P. 1: 19

November 4, 2010

Mr. Leonard Lowe
Environmental Engineer
Oil Conservation Division – New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: GW-404
Tuboscope Service Company
Crouch Mesa, Aztec, New Mexico, San Juan County

Dear Mr. Lowe,

Please see the attached letter from LT Environmental describing the actions taken in inspecting and filling the sump at National Oilwell Varco's Tuboscope facility in Aztec, New Mexico. This documentation is in response to your email dated August 27th, 2010.

Please contact me should you have any questions with the attached information.

Sincerely,

A handwritten signature in cursive script that reads 'Allison Gibson'.

Allison Gibson
Corporate Environmental Coordinator



COMPLIANCE / ENGINEERING / REMEDIATION

LT Environmental, Inc.

*2243 Main Avenue, Suite 3
Durango, Colorado 81301
T 970.385.1096
F 970.385.1873*

November 4, 2010

Leonard Lowe
Environmental Engineer
Oil Conservation Division
New Mexico Energy, Minerals, and Natural Resources Department
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

**RE: GW-404, Final Closure Report - Sump Closure
NOV Tuboscope Crouch Mesa Four Corners Facility
30 Road 3351
Aztec, New Mexico 87410**

Dear Mr. Lowe:

LT Environmental, Inc. (LTE) was contracted by National Oilwell Varco LP (NOV) to complete a sump closure at the NOV Tuboscope Four Corners Facility for two sumps located on site. The two below-grade 10-foot by 6-foot by 3-foot rectangular concrete open top sumps were located within a curbed 110-foot by 105-foot concrete pad. The concrete pad was installed to contain residual cleaning agents used in pipe maintenance operations. The concrete pad was sloped toward the two sumps in order to collect any precipitation that could potentially come into contact with these residual cleaning agents.

As a result of the site inspection on June 17, 2009 by the New Mexico Energy, Minerals, and Natural Resources Department - Oil Conservation Division (OCD), NOV was notified that a discharge permit under the New Mexico Environment Department - Water Quality Control Commission was required in order to use the sumps for water collection. NOV discontinued pipe maintenance operations on the pad following this notification. In lieu of permitting the discharge to the sumps, NOV chose to close the sumps in place in accordance with the OCD recommendations presented in email correspondence between NOV and OCD dated August 27, 2010.

On September 25, 2010, LTE inspected two below grade sumps at the Tuboscope Four Corners Facility for integrity. On September 28, 2010, LTE was present for in-place closure of the sumps. A summary of the inspection and closure activities is included in this letter report.

Sump Inspection

Approximately 3,360 gallons of precipitation was removed from the two sumps and concrete pad area by Roberts Trucking on September 24, 2010. Although there was no sheen present, the water was hauled to Basin Disposal, Inc. for disposal. The sumps were clean and dry for the inspection on September 25, 2010.



Structural integrity of each sump was evaluated by inspecting the sump floors and walls for any sign of cracking significant enough to produce leakage. No cracks or areas of concern were identified and LTE concluded that there was no evidence that the integrity of these sumps had been compromised. Inspections photos are included in the Attachment.

Sump Closure

On September 28, 2010, LTE observed in-place closure of the sumps by Sky Ute Sand and Gravel. No precipitation accumulated between the sump inspection and closure activities. Each sump was filled with approximately 4.4 cubic yards of gravel and covered with approximately 2.2 cubic yards of concrete. The concrete was poured on top of the gravel and finished to ensure a good seal to the existing concrete pad. Photos taken during sump closure and after completion are included in the Attachment.

LTE and NOV appreciate your efforts in assisting to complete this sump closure. Should you have any questions or require additional information, please contact Kay Vollmayer of LTE at 303-433-9788 or Allison Gibson of NOV at 780-490-3776.

Sincerely,
LT ENVIRONMENTAL, INC.

A handwritten signature in black ink, appearing to read "Kay Vollmayer". The signature is fluid and cursive, with a long, sweeping horizontal line extending from the end of the name.

Kay Vollmayer, P.E.
Project Engineer

cc: Brandon Powell, Oil Conservation Division, Aztec, New Mexico
Allison Gibson, NOV
John Thurstonson, Tuboscope Four Corners Facility

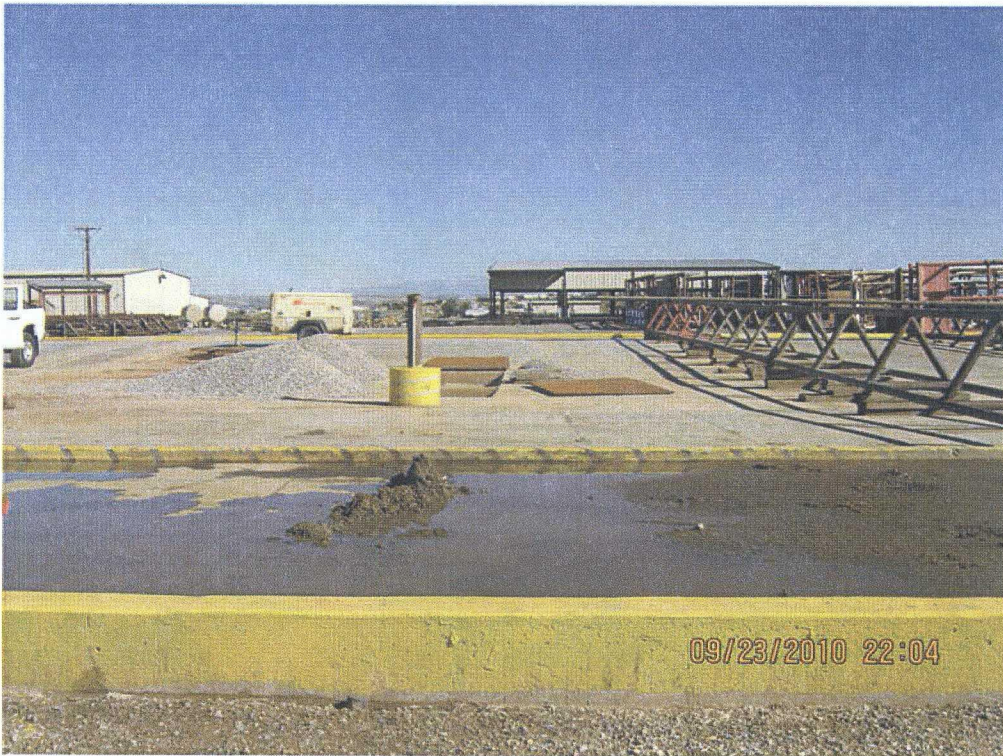
Attachments

ATTACHMENT
INSPECTION AND CLOSURE PHOTOS





110-foot x 105-foot concrete pad



Location of sumps on concrete pad (view east)



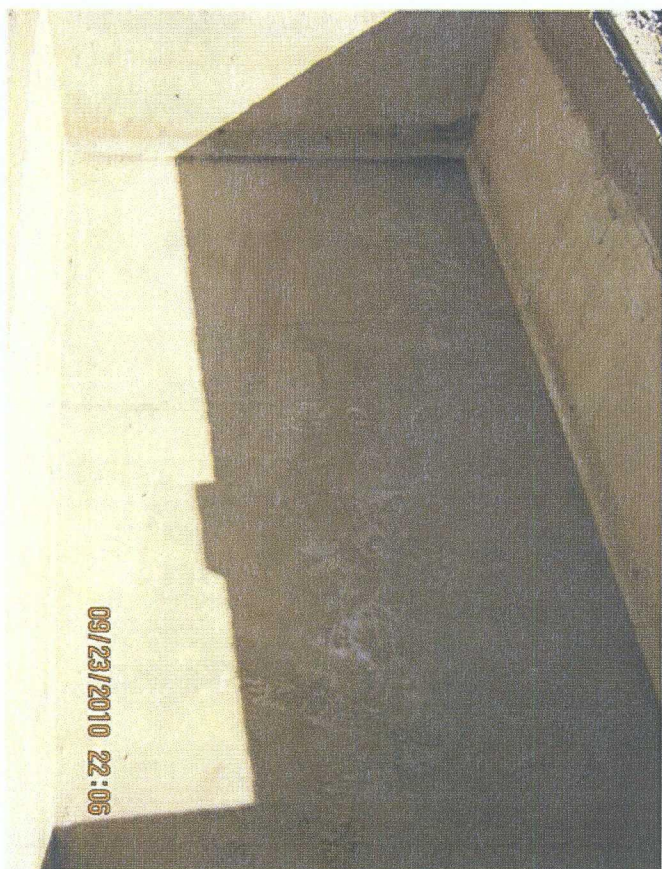
View east of sumps



View west of sumps



Interior view of east sump. Floor and south wall.



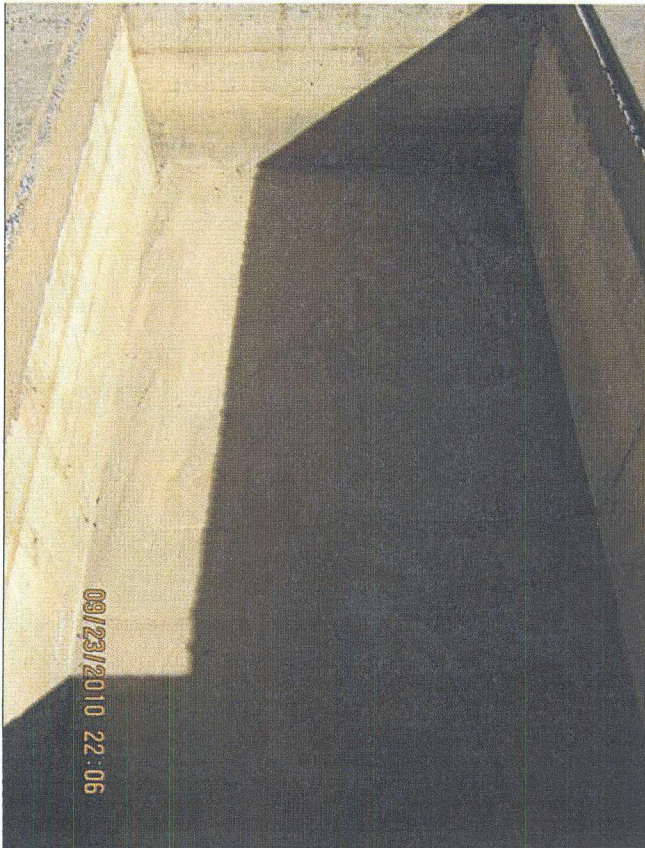
East sump floor and east and south walls



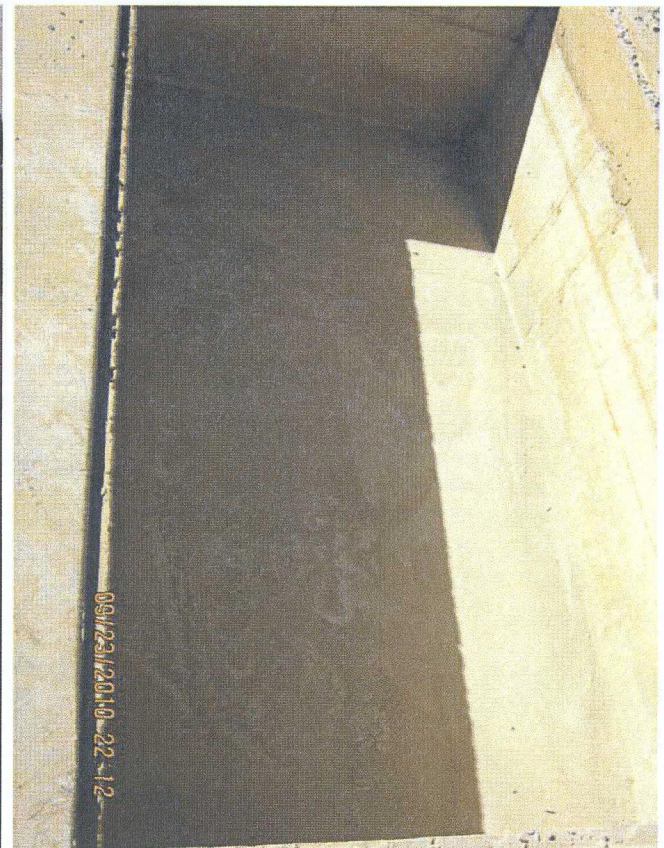
East sump floor and west and south walls



Interior view of west sump. Floor and south wall.



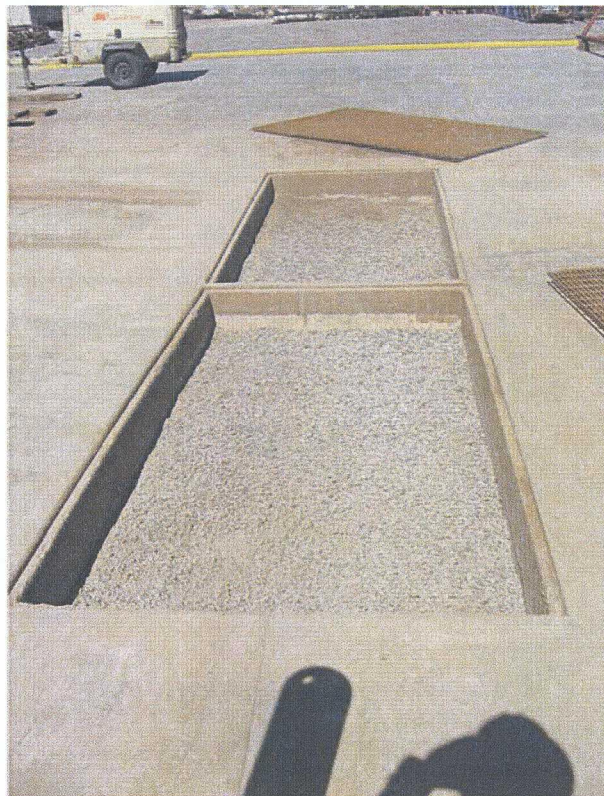
West sump floor and north, south, and east walls



West sump floor and west and south walls



Sumps partially filled with gravel



Sump partially filled with gravel



Sump partially filled with gravel



Both sumps being filled with concrete during closure activities



Filling the sumps with concrete



Filling the west sump with concrete



Finished concrete over sumps



View of the sumps after closure activities were completed



October 8, 2009

RECEIVED

2009 OCT 13 PM 12 49

Mr. Leonard Lowe
Environmental Engineer
Oil Conservation Division – New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: AMENDED - Discharge Plan Submittal Request (Designated GW-~~400~~)
Tuboscope Service Company
Crouch Mesa, Aztec, New Mexico, San Juan County

*404 changed to 404 on
8.26.10 for RECORD ONLY.*

Dear Mr. Lowe,

On August 20, 2009 a letter was sent with an initial proposed solution in response to your letter dated August 17, 2009. This letter is intended to supersede the August 20, 2009 response with a revised solution.

The initial proposed solution included reducing the size of the below grade tank to less than 500 gallons and installing an above ground liquid storage tank to allow any liquids that enter the sump to be pumped into this tank. Tuboscope management has chosen to close the sump by filling in the void space with compactable materials and capping with cement. While this is a departure from NOV's previously proposed solution, we believe this new solution will better allow this facility to stay within the compliance requirements of the State of New Mexico.

Please respond to confirm this is a suitable solution and a discharge permit will not be required if these steps are taken.

If you have any questions or require further information please call me at 780-490-3776 or email at Allison.Gibson@NOV.com.

Sincerely,

Allison Gibson
for Allison Gibson
Allison Gibson

Corporate Environmental Coordinator

Cc: John Thurstonson, Area Operations Manager, Tuboscope
Jeff Mann, Environmental Manager, NOV
Bob Townsend, HSE Manager, NOV
Saul Medina, EH & S Specialist, NOV



RECEIVED

2009 SEP 8 PM 3 25

August 28, 2009

Mr. Leonard Lowe, Environmental Engineer
Oil Conservation Division – New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan Submittal Request (Designated GW-400)
Tuboscope Service Company
Crouch Mesa, Aztec, New Mexico, San Juan County

Dear Mr. Lowe,

Pursuant to our conversation, National Oilwell Varco's Tuboscope facility located at #30 Road 3351, Aztec, New Mexico has developed an alternative solution in response to the letter dated August 17, 2009.

It is proposed to reduce the size of the below grade tank to less than 500 gallons to satisfy the definition of a sump. Additionally, an above ground liquid storage tank will be placed within the containment area to allow any liquids that enter the sump to be pumped into this tank to ensure liquids will not remain in the sump. A schematic is attached.

Please respond to confirm this is a suitable solution and a discharge permit and engineering approved technical documents will not be required. We will complete the necessary changes within 60 days of receiving written approval.

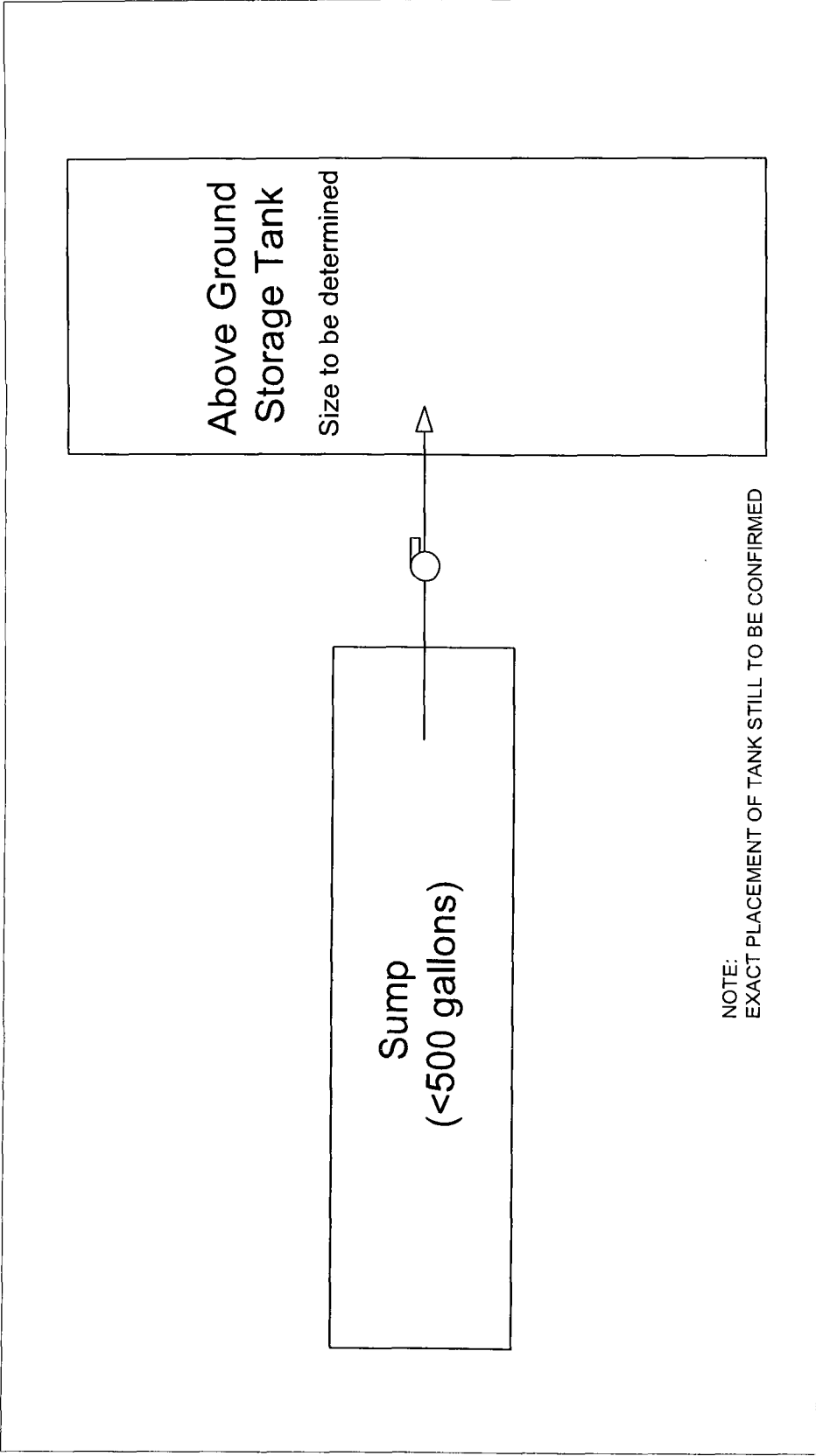
If you have any questions or require further information please call me at 780-490-3776 or email at Allison.Gibson@NOV.com.

Sincerely,

A handwritten signature in cursive script that reads "Allison Gibson".

Allison Gibson
Corporate Environmental Coordinator

Cc: John Thurstonson, Area Operations Manager, Tuboscope
Jeff Mann, Environmental Manager, NOV
Bob Townsend, HSE Manager, NOV
Saul Medina, EH & S Specialist, NOV
Guillermo Flores, Environmental Engineer, NOV



NOTE:
EXACT PLACEMENT OF TANK STILL TO BE CONFIRMED

PROPRIETARY AND CONFIDENTIAL THE INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF NOV. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF NOV IS PROHIBITED.		NATIONAL OILWELL VARCO			
		Aztec, NM Sump Schematic			
		SIZE DWG. NO. A 001 - Sump	REV 1		
		SCALE: 1:192 WEIGHT: 1 SHEET 1 OF 1			
		UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES TOLERANCES: FRACTIONAL ± ANGULAR: MACH ± BEND TWO PLACE DECIMAL ± THREE PLACE DECIMAL ±	DRAWN CHECKED ENG APPR. MFG APPR. O.A. COMMENTS:	NAME AG	DATE
		INTERPRET GEOMETRIC TOLERANCING PER MATERIAL			
		FINISH			
		USED ON			
		NEXT ASSY			
		APPLICATION			

08.20.10

left voicemail w/ Allison Gibson
T= 4:25 P.M. Inquiring about stat of
facility. I think issue gone. Not sure

8.24.10

Sent E-mail to Allison Gibson
for an update of this facility status.

8.26.10

Talked to Allison Sent her another e-mail. Inquiring
about facility information & what's going
into BST. Was writing closure e-mail but
waiting. Trying to get in touch w/ Brandon
about this facility. Waiting on e-mail.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 27, 2010 10:32 AM
To: 'Gibson, Allison E'
Cc: Powell, Brandon, EMNRD
Subject: Tuboscope Service Company Crouch Mesa N.M. San Juan County

Ms. Allison Gibson,

Good morning.

Thank you for the verbal conference yesterday morning.

NOTE: OCD originally identified this location (Crouch Mesa) Tuboscope facility under a Discharge Plan permit number (GW-400) at the time of initial inspection. As of **August 26, 2010**, OCD has re-identified this site as **GW-404**. This was done for record only. OCD will annotate this new file as a retracted permitted facility. Keeping record of this occurrence shall be noted within the OCD and with Tuboscope. Crouch Mesa Tuboscope shall keep a record of this history so that any future OCD inquires maybe accounted for, UNLESS Tuboscope Crouch Mesa implements practices that will require WQCC (Water Quality Control Commission) permitting, the OCD considers the closing of the 500 gallon below grade tank acceptable. OCD requests the following:

1. Verify that, since the implementation of the 500 gallon BGT, has maintained integrity with its use. If there are any possibilities that there may be integrity issues, Tuboscope shall investigate the matter prior to closing. Submit this information to the OCD.
2. Photograph the area once the below grade tank is 'closed'. If there are any waste generated during this closure please note this on the final report submittal.

Once completed submit a final closure report to the Santa Fe OCD office. CC the Aztec OCD office as well. Mr. Brandon Powell can be reached at 505-334-6178 (X-115) or by cell phone 505-320-0200 if you need to.

OCD suggest that Tuboscope review status of its facilities to verify if it falls under the Water Quality Control Commission Discharge Plan Permit criteria. If it does Tuboscope shall request an OCD inspection for OCD verification.

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/>

From: Gibson, Allison E [<mailto:Allison.Gibson@nov.com>]
Sent: Wednesday, August 25, 2010 6:14 AM
To: Lowe, Leonard, EMNRD
Subject: RE: Tuboscope Service Company Crouch Mesa N.M. San Juan County

Hi Leonard,

Thanks for your email. I am currently out of the country but would be happy to discuss this with you. Can we plan to talk tomorrow (Thursday) around 10 am your time?

Thank you,

Allison Gibson, EIT
Corporate Environmental Coordinator
National Oilwell Varco
D: 780-490-3776
C: 780-288-4667

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Tuesday, August 24, 2010 11:57 AM
To: Gibson, Allison E
Subject: Tuboscope Service Company Crouch Mesa N.M. San Juan County

Allison Gibson,

Good afternoon,

I am trying to get an update on this facility pertaining to its anticipated discharge plan. It has been awhile since I have worked this facility and am just needing an update on it.

Please get in touch with me on this facility in accordance to our last correspondence. Letter dated October 9, 2009 from you to the OCD.

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/oed/>

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