

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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DEC 16 1997

Environmental Bureau

Form C-137
Originated 8/8/95
Revised 6/25/97

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to appropriate
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY
(Refer to the OCD Guidelines for assistance in completing the application)

Commercial

Centralized

1. Type: Evaporation Injection Other _____
 Solids/Landfarm Treating Plant

2. Operator: Gandy Marley, Inc.

Address: P. O. Box 1658, Roswell, NM 88202

Contact Person: Larry Gandy Phone: 505-398-4960

3. Location: Sections 4, 5, 8 and 9 / 4 Section _____ Township 11S Range 31 E
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? Yes No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.

NA 8. Attach a contingency plan for reporting and clean-up for spills or releases.

NA 9. Attach a routine inspection and maintenance plan to ensure permit compliance.

10. Attach a closure plan.

NA 11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.

NA 12. Attach proof that the notice requirements of OCD Rule 711 have been met.

NA 13. Attach a contingency plan in the event of a release of H₂S.

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

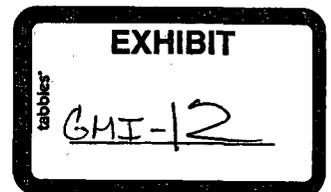
I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Larry Gandy

Title: Vice-President

Signature: Larry Gandy

Date: 12-9-97





COMMERCIAL LAND FARMS

*A New Mexico Enterprise
Serving New Mexico's Needs*

November 7, 1997

Mr, Roger Anderson
New Mexico Oil Conservation Division
2040 S. Pacheco Street
Santa Fe, New Mexico 88254

RE: Closure Bond and Repermitting of Commercial Landfarm
Gandy Marley, Inc.
Contaminated Soils Landfarm (NM-711-1-0020)
Sections 4, 5, 8 and 9, T-11-S, R-31-E
Chaves County, New Mexico

Dear Mr. Anderson:

Gandy Marley, Inc. requests approval of closure bond and remediation standards for the existing contaminated soils remediation site.

The enclosed permit application provides a description of the site and details facility operations in accordance with OCD Rule 711.

Sincerely,

Larry Gandy
Vice-President

cc: OCD District Office, Hobbs



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1. Type of Operation

The facility operates as a soil remediation, recycling, liquid and sludge solidification, and land farm facility.

2. Operator

Gandy Marley, Inc.
PO Box 1658
Roswell, New Mexico 88267
505-625-9206 or 505-398-4960

3. Location of Facility

Refer to figure #1 for large scale topo map.

4. Modification

This permit application relates to the new Rule 711 and a minor modification in remediation standards.

5. Land and ownership

Land owner of the facility site is:

Gandy Marley, Inc.
P.O. Box 1658
Roswell, NM 88202

The only land owners within one mile are the Marley Ranches.

6. Facility description

The purpose of the facility is to remediate oilfield contaminated soils and solidify and remediate oilfield liquids and sludges that are unacceptable for injection wells. This facility is depicted in Figure #1.



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7. Facility Construction/Operation and Waste Classification

The facility is situated on the Western edge of a geological bench known locally as the Caprock. The Caprock is characterized by rocky terrain and runs in a North-South direction.

There are no water courses, lake beds, sink holes or other depressions located adjacent to the site. Thus no storm water run off plan is required to accompany this permit application.

As outlined in Figure 3, access to the facility is restricted by perimeter fencing. Gates to the facility will remain locked.

No contaminated soils will be placed within 100 feet of the fenced facility boundary. The buffer zone is illustrated in Figure 3.

The perimeter of the facility is bermed to alleviate storm water run off and run on. The perimeter berm has been constructed to a height of 3 feet. This will be adequate to contain precipitation in the event of a 100 year storm.

A treatment zone not to exceed two feet beneath the facility will be monitored. Twelve months following the placement of contaminated soils, a minimum of one random soil sample will be taken from the cell in which the soils were placed. Subsequent soil samples will be taken annually thereafter. Samples will be analyzed to identify any variation in levels of constituents found in the background sample taken prior to operation. Soil samples will be analyzed using EPA methods for TPH & BTEX annually, and general chemistry and heavy metal before successive lifts are placed. This sampling and analysis schedule will apply to each respective cell.

Analysis will be conducted in accordance with EPA approved methods. All analytical results will be submitted to the Santa Fe, New Mexico office of the OCD within 30 days after they are received from the laboratory.

Subsequent to collecting required soil samples, bore holes will be filled with an impermeable material such as cement or bentonite to prevent contamination below the native ground surface.

Further treatment zone monitoring will be conducted in the event of unusually



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high precipitation and upon the recommendation of the OCD. Precipitation will be removed within 72 hours following the discovery of ponding, pooling or run off.

As necessary, moisture will be added to appropriate cells to diminish blowing dust and to enhance biological remediation of contaminated soils. Caution will be observed in order to ensure that added moisture does not result in ponding, pooling or run off.

All material accepted at the facility will be spread and disced within 72 hours of receipt. Soils will be spread on the surface in six inch lifts, and soils will be disced a minimum of once every two weeks in order to enhance remediation of contaminants. Additional lifts of soil will be spread only after laboratory analysis is conducted to verify that: (1) TPH level in the previous lift is less than 2500 ppm. (2) that the sum of BTEX is less than 50 ppm, and (3) the benzene level is less than 10 ppm.

All laboratory analysis results as well as sampling location description will be maintained at the facility. No new lifts will be added without prior authorization from the OCD.

Site security will be the responsibility of facility personnel. Employees will verify that each transporter holds appropriate permits. Loads will be accepted only during daylight hours unless other prior arrangements have been made. When the facility is closed, the site will be locked to prevent unauthorized dumping.

The facility will only accept materials which are classified as non-hazardous by RCRA subtitle C exemption or by characteristic testing. Prior to placement of any contaminated materials into the facility, it will be verified that the wastes are accompanied by a "certificate of waste status" from the generator. Wastes from operations not currently exempt under RCRA subtitle C or mixed exempt and non exempt wastes will be sampled and analyzed to determine whether any hazardous constituents are present. Results of all analysis will be submitted to the OCD. No such wastes will be placed in the facility without prior approval from the OCD.

All wastes accepted by this facility will be documented at the time they are placed at the disposal facility. Each load will be inspected to ensure that only acceptable wastes are placed at the facility. At the time of the load inspection, the following information will be recorded on an inspection form and maintained at the facility



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for a period of two years.

- A. Origin of material
- B. Verification of analysis (if applicable)
- C. Name and signature of transporter
- D. Cell in which material is placed
- E. Date material is received
- F. Quantity of material
- G. Name and signature of authorized disposal facility employee
- H. Certification of waste status

8. Contingency plan--N/A

9. Inspection, maintenance and reporting--N/A

10. Closure Plan

Upon closure, and following notification to OCD that operations have ceased, existing materials which have previously been placed at the facility will continue to be managed until such time that remediation meet standards established by the OCD. Within six months following verification that all materials have met OCD remediation standards, the site will be covered and mounded to ensure that storm water does not collect above or leak into the closed cells. The site will be restored with natural vegetation. Existing fences will be maintained following closure and access will be restricted. Any additional closure requirements or conditions of the OCD will be met. See Attachment A.

11. Site characteristics--N/A

12. Proof of notice--N/A

13. H2S contingency plan--N/A

14. Additional information

All regulatory requirements and OCD rules applicable to this facility will be complied with fully.

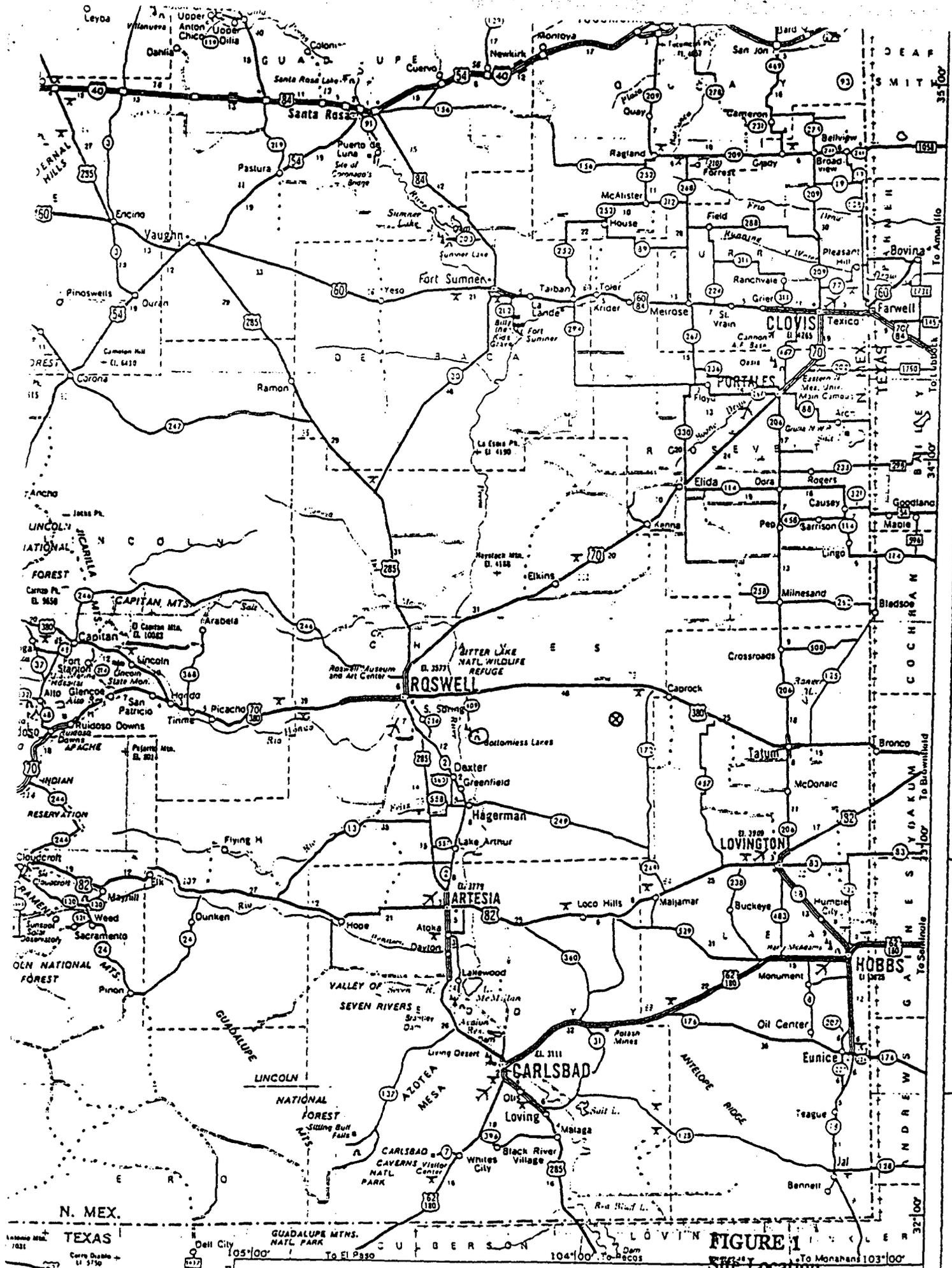


FIGURE 1
Site Location

MILEAGE LOG: Distances shown are computed over Controlled...
 opposite the number assigned to the other. For example—Carls...
 a 743 miles (interior) and a 743 miles (interior) mileage is

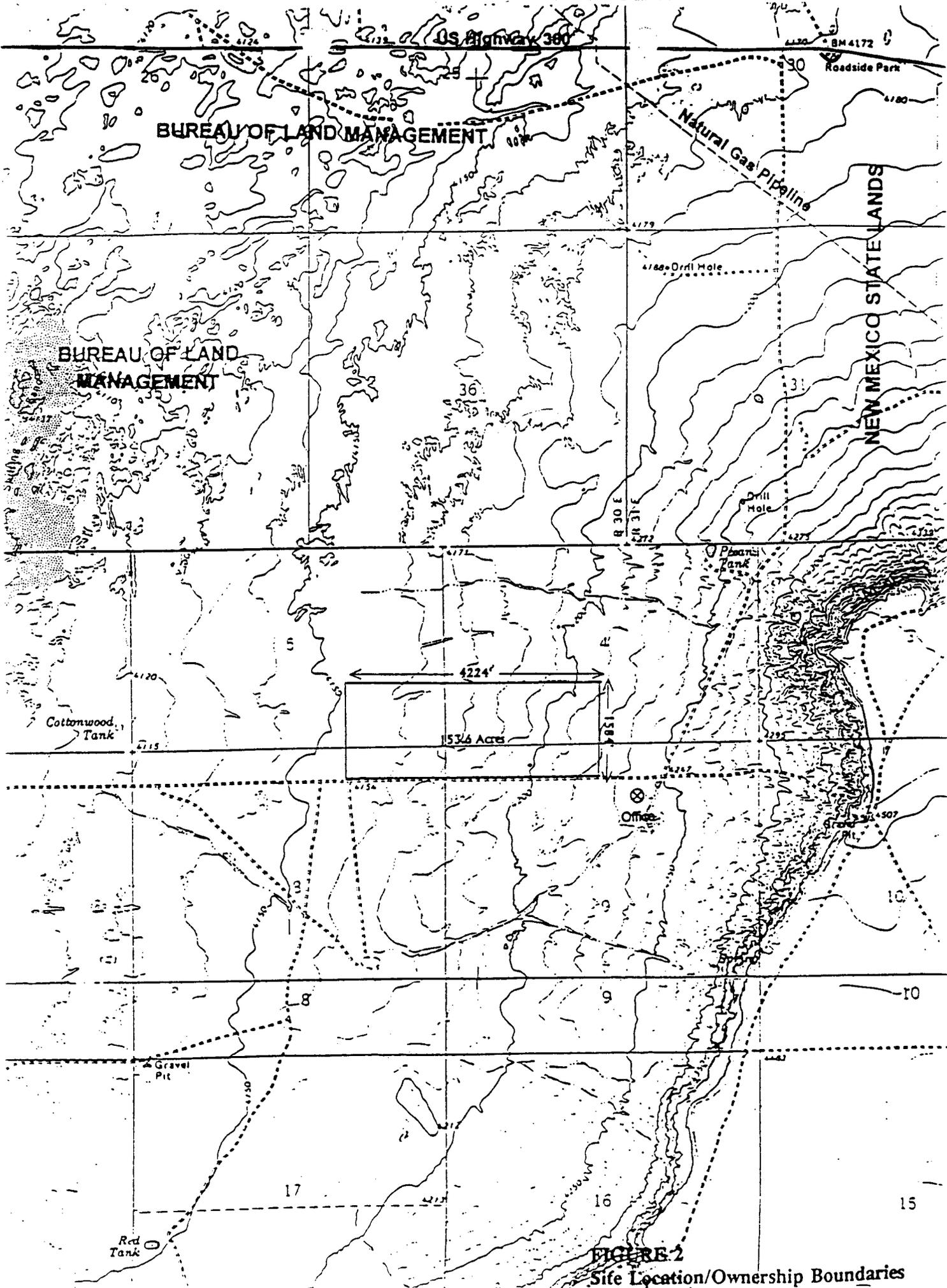
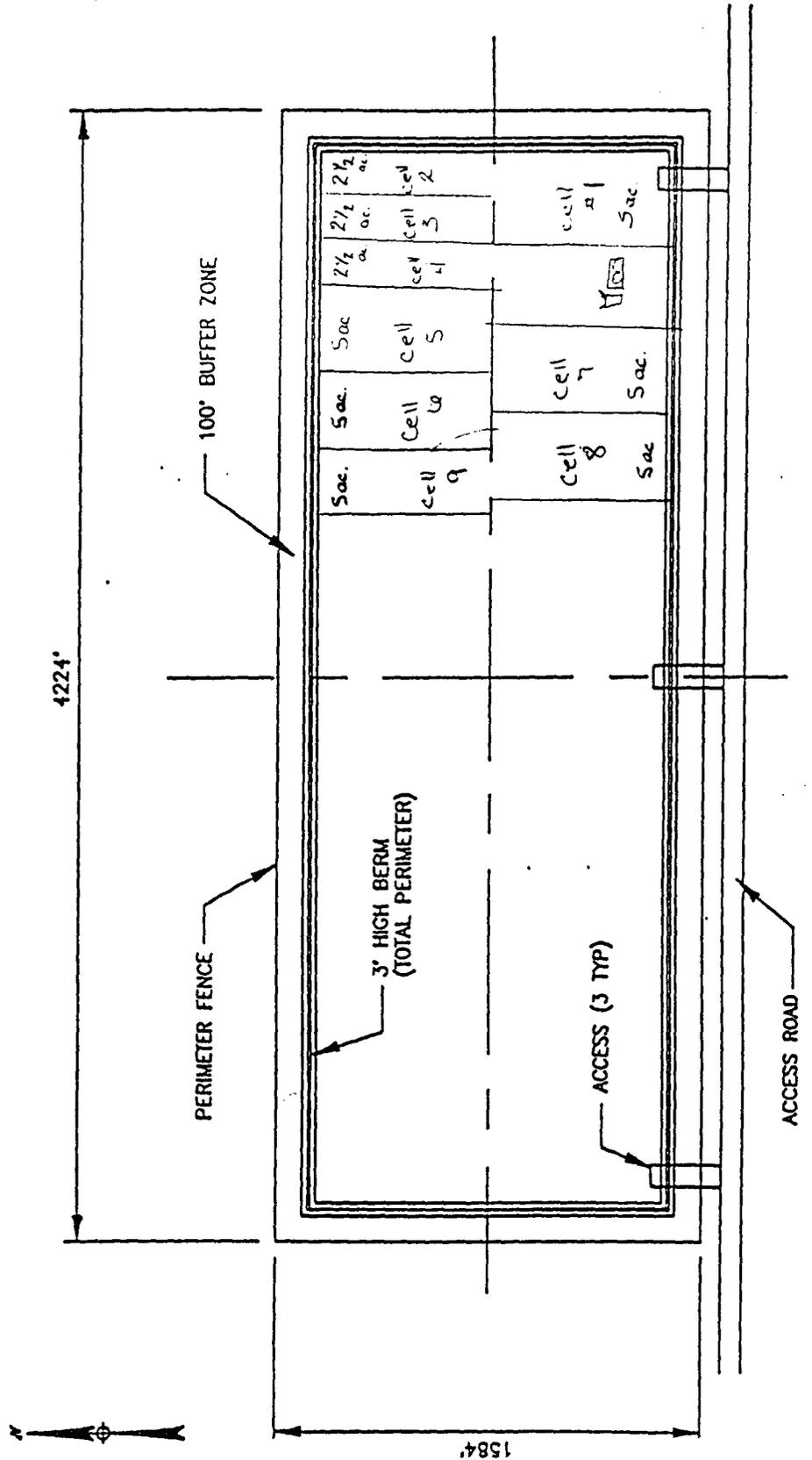


FIGURE 2
Site Location/Ownership Boundaries



127 AC. W/IN PERIMETER BERM / 31.96 AC. W/IN EACH QUADRANT
 SCALE: NONE
 4-2-96

FIGURE 3
 Site Diagram

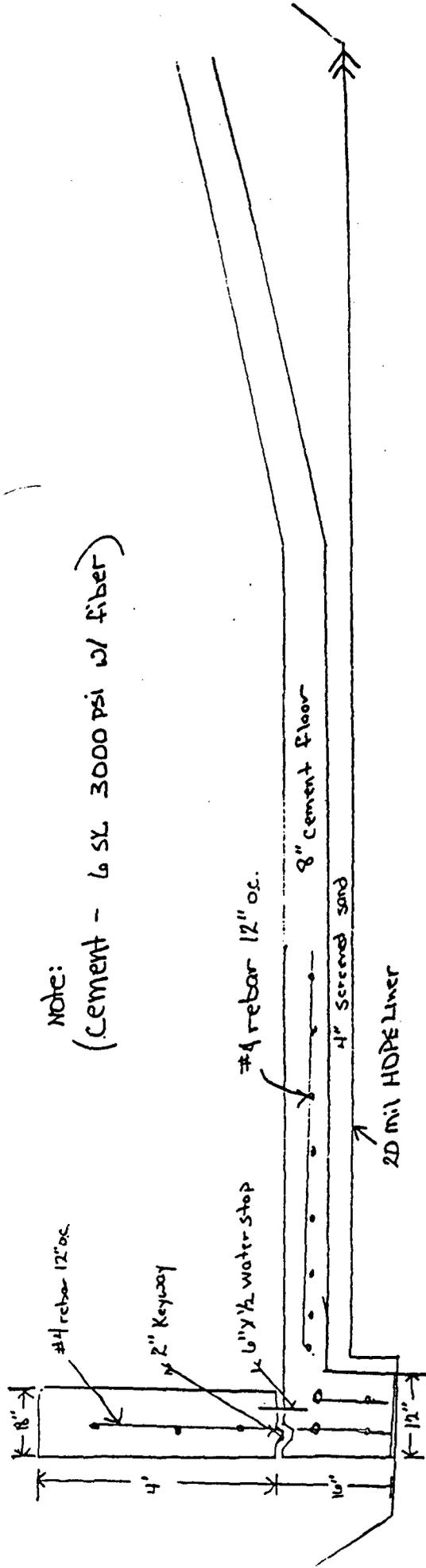
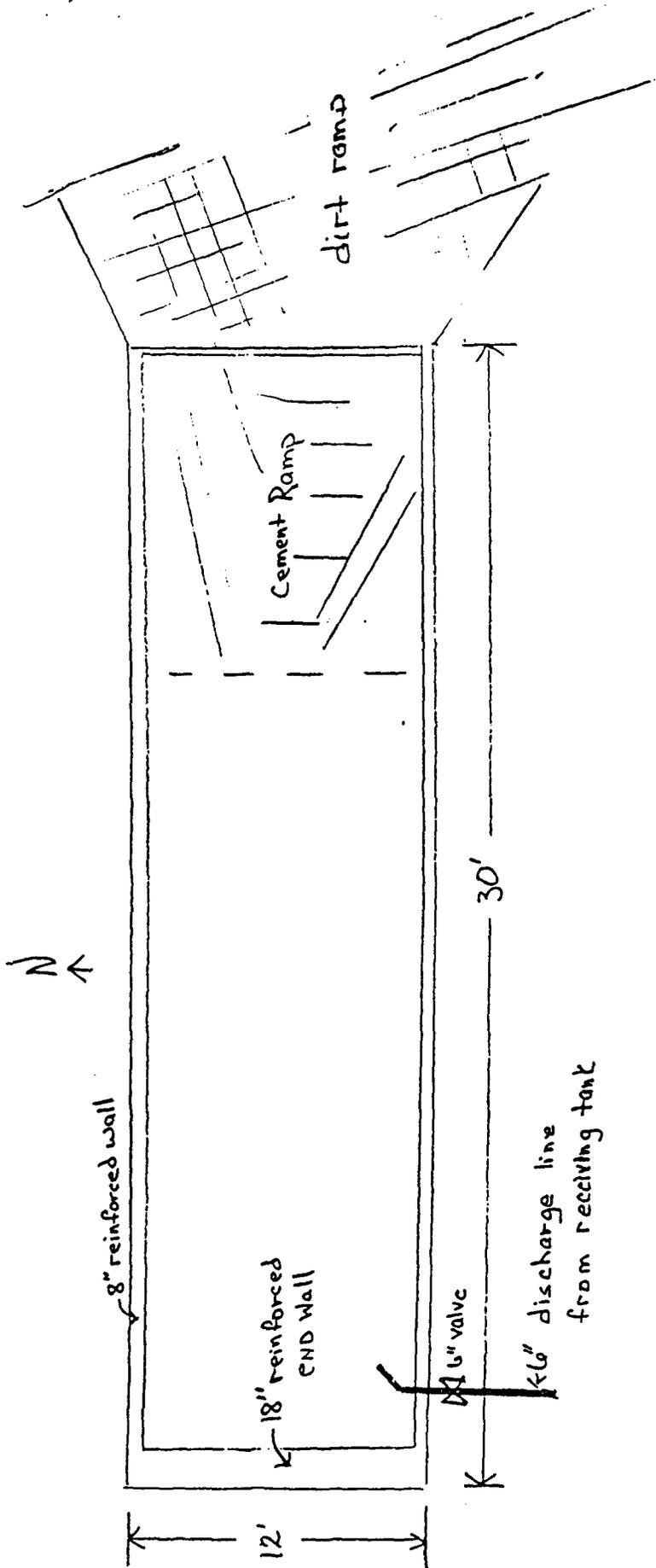
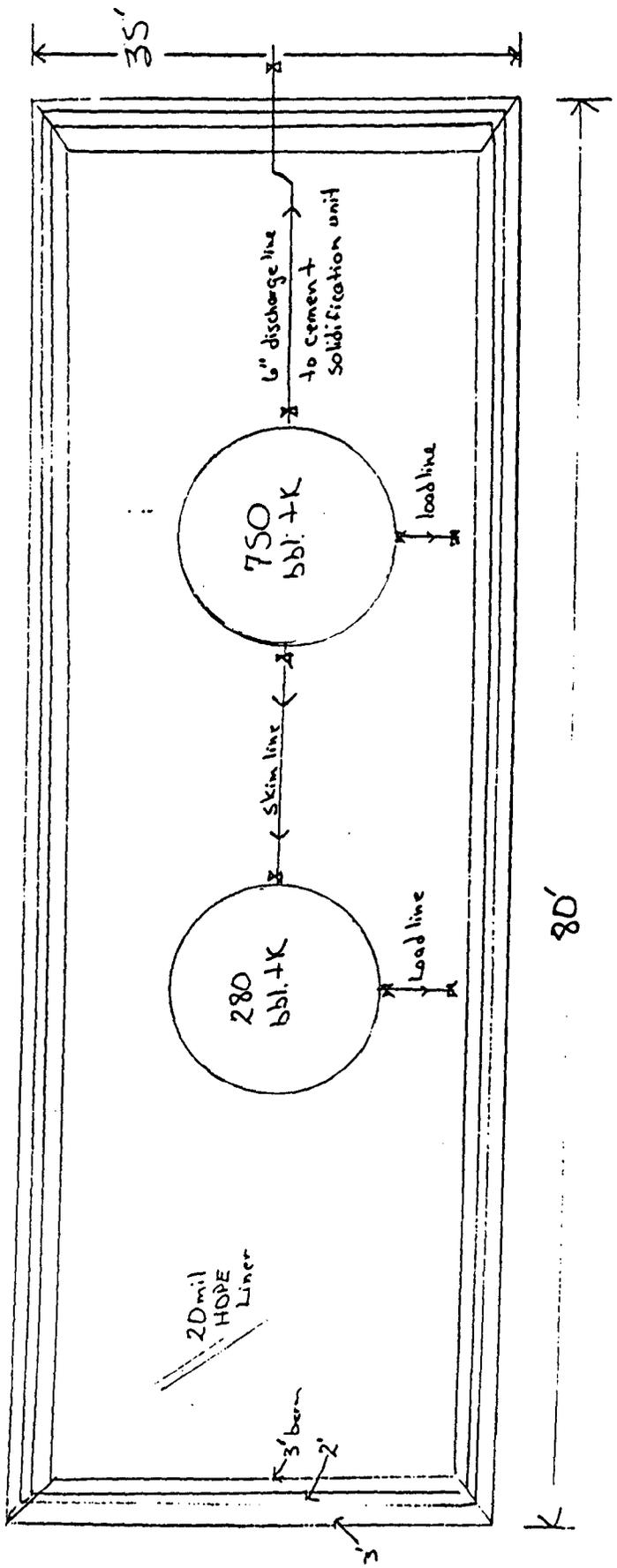
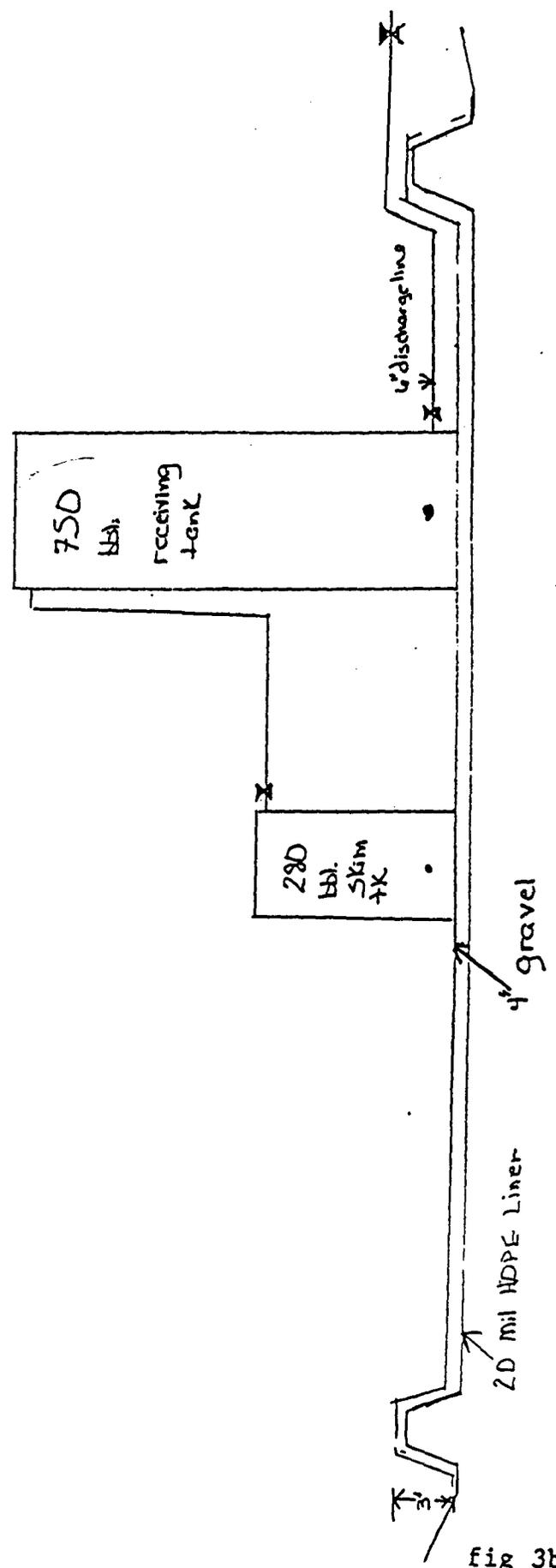


Fig. 3a



↗ ↘



scale: none

fig 3b



Whole Earth Environmental, Inc.

19606 San Gabriel, Houston, Texas 77084
713/492-7077 Fax: 713/492-7077

November 18, 1997

Gandy Construction
P.O. Box 827
Tatum, New Mexico

Attn: Larry Gandy

Dear Larry:

I want to thank you for the opportunity of quoting the closure of the Gandy Marley, Inc. landfill in accordance with the New Mexico OCD Closure Guidelines dated March, 1993.

As you know our approach to closures is to perform the bulk of the analytical work on location saving both time and money over the conventional approach of sending all samples to laboratories for analyses. This capability will result in significant savings to you as we can be far more efficient in our approach to the project.

I believe that by utilizing your own equipment, we will be able to remediate the entire site within a period of three months using aeration, dilution and bio-augmentation as the remediation techniques for a total "not to exceed" cost of \$48,650.00. This cost includes all analytical testing, our supervision, and full documentation.

We will provide you with all of the detailed protocols and procedures within two weeks of your request.

Thank you again for the opportunity of quoting this very interesting and challenging project.

Warmest regards,

Mike Griffin
President

Whole Earth Environmental, Inc.

ATTACHMENT A