

NM1 - 13

**INSPECTIONS &
DATA**



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

March 3, 2005

Mr. Charles Bettis
Environmental Plus, Inc.
P.O. Box 1558
Eunice, NM 88231

Dear Mr. Bettis:

RE: Environmental Plus, Inc. Landfarm (Permit number NM1-013)

The New Mexico Oil Conservation Division (NMOCD) inspected the surface waste management facility referenced above on February 8, 2005. I found the facility to be in very good shape with the exception of a minimal amount of loose plastic that was exposed and subject to movement by the wind. Please take steps to mitigate this problem.

Otherwise, the landfarm was in very good condition. The soils are being disked and turned on a regular basis and the berming was well maintained.

I would like to take this opportunity to thank Mr. Pat McCasland for his help in this inspection.

If you have any questions contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script that reads "Ed Martin".

Edwin E. Martin
Environmental Bureau

cc: NMOCD, Hobbs

22-141 50 SHEETS
22-142 100 SHEETS
22-144 200 SHEETS



NM-1-013

22-141 50 SHEETS
22-142 100 SHEETS
22-144 200 SHEETS



EPI LANDFARM

NM-1-013



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

September 2, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Ms. Sherry K. Miller
Environmental Plus, Inc.
P.O. Box 1558
Eunice, NM 88231

**RE: Inspection Report, Environmental Plus, Inc., Permit NM-01-0013
SW/4 NW/4 and the NW/4 NW/4 of Section 14, and the SE/4 NE/4 and the NE/4
NE/4 of Section 15, Township 22 South, Range 37 East, NMPM,
Lea County, New Mexico**

Dear Ms. Miller:

The New Mexico Oil Conservation Division (OCD) inspected Environmental Plus, Inc (EPI) on August 12, 2003. The OCD found the facility to be well maintained and have good security (Photos 1, 2, 3 and 4). However, there were some permit deficiencies. The cell next to the remains of the house (Photo 5) appeared to be approximately 2 to 2.5 feet thick. EPI must thin spread the lift in this cell to the permit required thickness of 8 inches or less. In addition EPI should check the thickness of the active lifts in the rest of the cells to ensure that they are the no more than 8 inches. Tilling and inspection records were not reviewed at this time. A review of the financial assurance portion of Permit NM-01-0013 finds that a surety bond in the amount of \$75,000 is on file. This is the full financial assurance amount required by the permit.

EPI shall provide OCD with a description of how the correction(s) will be made and a time-table of when the correction(s) will be completed. EPI must respond to the permit deficiency by October 2, 2003.

Please give me a call at (505) 476-3488 if you have any questions.

Sincerely

Martyne J. Kieling

xc with attachment:
Hobbs OCD Office
Eddie Seay, Agent



Photo 1: Entrance Sign. Looking west



Photo 4: Cell 8 tilling. Berms in good condition. Looking north.



Photo 2: Tilled cell (one of the EOTT cells). Looking west-southwest.



Photo 5: Cell #? next to dosed house. Lift thickness looks to be approximately 2 to 2.5 feet. This is greater than the 8 inches allowed in the permit. The gray spot in the bottom center of the photo is a boot print for scale on the sloped front of the lift. Looking west.



Photo 3: Berms are in good condition. (cell 4)



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 24, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-573-305

Mr. Charles Bettis
Environmental Plus, Inc.
P.O. Box 1558
Eunice, NM 88231

**RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0013
Environmental Plus Inc.
SW/4 NW/4 and the NW/4 NW/4 of Section 14, and the SE/4 NE/4 and the NE/4 NE/4 of
Section 15, Township 22 South, Range 37 East, NMPM
Lea County, New Mexico**

Dear Mr. Bettis:

The New Mexico Oil Conservation Division (OCD) inspected the Environmental Plus, Inc. (EPI) commercial surface waste management facility at the above location on April 13, 2000.

Overall the OCD found EPI to have a well maintained, landfarm with good security. The OCD inspection and file review of EPI indicate no permit deficiencies. Attachment 1 lists the permit requirements reviewed during the inspection and file review. No response is necessary to this inspection report.

Please be advised that the financial assurance in the amount of \$25,000 currently held by the OCD will need to be increased to \$37,500 by January 10, 2001. EPI's surety bond (No. BO4276) for \$25,000 will need to be either amended with a rider or replaced using the current OCD form. If you do not have a copy of the OCD surface waste management facility financial assurance forms you may obtain them from the OCD web site <http://www.emnrd.state.nm.us/ocd/>.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kieling
Environmental Geologist

Attachments
xc: Hobbs OCD Office

ATTACHMENT 1
INSPECTION REPORT
PERMIT NM-01-0013
ENVIRONMENTAL PLUS INC.

SW/4 NW/4 and the NW/4 NW/4 of Section 14, and the SE/4 NE/4 and the NE/4 NE/4 of Section 15,
Township 22 South, Range 37 East, NMPM
Lea County, New Mexico
(April 24, 2000)

1. Fencing and Signs: The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by section, township and range, and c) emergency phone number.

Facility is secured with fence and locking gate and has a sign at the entrance.

2. Berming: An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.

Cell berms are in good shape and well maintained.

3. Setbacks: All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within twenty (20) feet of any pipelines crossing the landfarm or within twenty (20) feet of any well or well pad located within the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

The facility set backs are maintained.

4. Soil Spreading, Disking and Lift Thickness: All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six-inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

At the time of inspection, soils in each cell had been spread and disked accordingly.

5. Free Liquids: No free liquids or soils with free liquids will be accepted at the facility.

No free liquids were observed within the landfarm

6. Trash and Potentially Hazardous Materials: All trash and potentially hazardous materials should be properly disposed of.

There was no plastic or trash in the landfarm.

7. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable pad within the berm so that leaks can be identified.

N/A There are no above ground tanks located at this facility.

8. Sumps and Valve Catchments: All sumps and catchments must be kept empty so that leaks can be identified and to prevent overflow onto the ground.

N/A There are no sumps or catchments located at this facility.

9. Concrete Mixing Impoundment: Adequate freeboard must be maintained to prevent any overtopping or slop over of material. Material received at the impoundment must be mixed and stabilized immediately.

N/A There are no impoundments located at this facility.

10. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

N/A There are no drums located at this facility.

All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

11. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

N/A There are no saddle tanks located at this facility.

12. Tank Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

N/A

13. Migratory Bird Protection: All tanks exceeding 16 feet in diameter and exposed pits, ponds or lagoons must be screened, netted, covered or otherwise rendered not hazardous to migratory birds.

N/A

14. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 to the appropriate OCD District Office.

At the time of inspection, there were no spills evident at this facility

15. Regular Facility Inspections: Cells must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants. Facility inspections and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm.

To date no records have been kept regarding the inspection and maintenance work performed. Records should indicate that diskings, facility inspections and any repair or maintenance work is being performed as required (see Permit NM-01-0013 Attachment to Permit Approval: Landfarm Operation #16 and Reporting #3)

16. H₂S Screening: H₂S screening must be recorded and maintained.

N/A

17. Waste Acceptance and Disposal Documentation: The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification; 6) NORM status declaration; 7) transporter; 8) exact cell location; and 9) any addition of microbes moisture, fertilizers, *etc.*

Information on file at the Eunice office was reviewed. Documentation included trip tickets and waste acceptance and disposal records. Waste documentation is being kept and maintained as required.



EPI LAND FARM

4-3-97



EPI LAND FARM

4-3-97



EPI LANDFARM

4-3-97