NM1 - 26

INSPECTIONS & DATA

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 27, 2003

Mr. Gerald L. Jensen
Jenex Operating Company
621 17th Street, Suite 830
Denver, CO 80293

BEVERLY

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0026
Jenex Operation Company
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Mr. Jensen:

The New Mexico Oil Conservation Division (OCD) inspected the Jenex Operating Company (Jenex) commercial surface waste management facility at the above location on August 12, 2003. A review of Jenex's financial assurance finds that Jenex's $120,000 surety bond No.04127088 is current and active. General facility upkeep and preventive maintenance has continued to improve at the Jenex facility since the previous inspections. Please review the following list of items that were noted at this inspection:

1. The OCD inspection found that the two damaged tanks (13 and 15) have been dismantled and removed to the outside of the facilitiy's fenced area (see photo 5), and that the area beneath the tanks had been excavated (see photo 1) and contaminated material had been removed to the landfarm (see photos 3 and 4).

2. The landfarm is fenced and has a locked gate (see photo 2). The landfarm berms are in good condition. Contaminated soils within the landfarm have been spread and disc. Jenex must maintain tilling records to show that soils have been disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

3. The paraffin tank is leaking. This tank should be repaired, emptied or removed.

4. The tank areas are bermed and the trash/junk, pipe, hose, and empty drums containers have been removed.

5. At the time of the inspection Jenex Personnel, Gary Guttridge, walked around the facility monitoring for H2S. A Drager Micro Pack was used and was set to register a beep at 1

ppm, 10 ppm, and 20 ppm. The Drager calibration dates were good for November 14, 2002 through November 14, 2003. H2S was not detected.

Jenex shall provide OCD with a detailed description of how the corrections will be made and a timetable of when each of the corrections will be completed. Jenex must respond to the permit deficiencies by December 1, 2003.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling
Environmental Geologist
xc with Attachments: Hobbs OCD Office

Photo 1: Insulated tank removed from SE corner of facility. Contaminated soils excavated and removed to landfarm.

Photo 2: Locking gate to landfarm.

Photo 3: Contaminated soils in Cell 2 are tank bottoms from tanks 15 and 13.

Photo 4: Cell 1 is full. Soil has been spread to approximately 8-inch thickness. Cell contains soils removed from excavations around tanks.

Photo 5: Tanks 13 and 15 have been removed to the outside of the facility fence.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

April 30, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Gerald L. Jensen
Jenex Operating Company
621 17th Street, Suite 830
Denver, CO 80293

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0026
Jenex Operation Company
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Mr. Jensen:

The New Mexico Oil Conservation Division (OCD) inspected the Jenex Operating Company (Jenex) commercial surface waste management facility at the above location on November 20, 2002. General facility upkeep and preventive maintenance has continued to improve at the Jenex facility since the previous inspections.

A review of Jenex's financial assurance finds that Jenex's $100,000 surety bond No.04127088 is current and active. Please note that according to the permit a total of **$155,580 financial assurance is due on May 13, 2003**. Jenex may obtain a copy of the OCD surface waste management facility financial assurance forms from the OCD web site http://www.emnrd.state.nm.us/ocd/. The OCD inspection and file review of Jenex indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Jenex during the inspection and file review. Attachment 2 contains photographs taken during the inspection. Jenex shall provide OCD with a detailed description of how the corrections will be made and a timetable of when each of the corrections will be completed. Jenex must respond to the permit deficiencies by June 4, 2003.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling
Environmental Geologist

xc with Attachments: Hobbs OCD Office

ATTACHMENT TO OCD 711 PERMIT APPROVAL
PERMIT WM-1-026
JENEX OPERATING COMPANY
S/2 N/2 NW/4 of Section 14, Township 20 South, Range 38 East, NMPM,
Lea County, New Mexico
(April 30, 2003)

This inspection report is based on a site visit performed on November 20, 2002 and a review of permit NM-01-0026 conditions issued in the April 13, 2001.

Overall Facility Operation:

1 The facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty (50) feet and contain the following information: a) name of the facility; b) permit number; c) location by section, township and range; and d) emergency phone number.

Facility has a sign with all of the required information and the treating plant portion of the facility is fenced (Photo 1). The landfarm portion of the facility is not fenced (Photo 21, 22 and 23).

Jenex must fence this part of the facility.

2. Disposal may occur only when an attendant is on duty. The facility must be secured when no attendant is present.

The treating plant portion of the facility has a fence with locking gate. However the land farm is not secure (Photo 20).

Jenex must secure the landfarm portion of the facility(photo 21, 22 and 23).

3. The facility must be maintained such that there will be no storm water runoff beyond the boundaries of the facility.

The treating plant and landfarm portions of the facility are adequately bermed (Photo 21, and 23).

4. Any major design changes to the surface waste management facility must be submitted to the OCD Santa Fe office for approval and a copy must be sent to the Hobbs District office.

Currently the OCD does not have any requests pending for facility design changes or permit modifications.

5. Facility inspection and maintenance must be conducted on at least a daily basis and immediately following each consequential rainstorm or windstorm. The OCD Santa Fe

and Hobbs offices must be notified within 24 hours if any defect is noted. Repairs must be made as soon as possible. If the defect will jeopardize the integrity of the tank(s), additional material may not be placed into the affected tank(s) until repairs have been completed.

The facility's daily inspection logs were not reviewed at this time. The paraffin tank was leaking a steady drip the ground behind the tank was saturated with produced water (see photo 8).

Jenex must repair or empty the leaking tank and excavate and remediate the low area behind the tank to remove the chloride-contaminated soils.

6. All saddle tanks or drums located at the facility and containing materials other than fresh water must be placed on an impermeable pad with curb containment. The pad and curb containment must be able to hold one and one-third the volume of the largest tank or all interconnected tanks. The tanks and containers must be labeled as to contents and hazards.

All saddle tanks and drums located at the facility and containing materials other than fresh water were placed on an impermeable pad with curb containment (See Photo 16).

7. All existing above-ground tanks located at the facility and containing materials other than fresh water must be bermed to contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

All existing above-ground tanks located at the facility were bermed. The berm were in good condition except for a small portion of the berm that was not completed behind the boiler building (Photo 3).

8. All new or replacement above-ground tanks located at the facility and containing materials other than fresh water must be placed on an impermeable pad and be bermed so that the area will contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

The OCD did not observe any new tanks or replacement tanks.

9. Below-grade sumps and below-grade tanks must be inspected on a daily basis and fluid must be removed to prevent overflow.

All sumps and/or valve catchments are sitting at grade and all had been emptied (Photo 7, 9 and 18).

10. Below-grade sumps and below-grade tanks must be cleaned and visually inspected

annually. Results must be recorded and maintained at the facility for OCD review. If sump/tank integrity has failed the OCD must be notified within 48 hours of discovery and the sump/tank must be replaced.

There are currently no below grade sumps, valve catchments or tanks at the Jenex facility.

11. All new or replacement below-grade sumps and below-grade tanks at the facility must have secondary impermeable containment with a leak detection system. The leak detection system must be inspected for fluids weekly. Results must be recorded and maintained at the facility for OCD review. If fluids are present they must be removed and properly disposed of or recycled and the primary containment checked for leaks and repaired or replaced. Records of inspections and repairs must be made available to the OCD upon request.

The OCD did not observe any new below-grade sumps or below-grade tanks.

12. Below-grade pipelines associated with the treating plant must be pressure tested annually. Results must be recorded and maintained at the facility for OCD review. If pipeline integrity has failed the OCD must be notified within 48 hours of discovery and the line must be repaired or replaced. Contaminated soil must be removed and disposed of at an OCD-approved facility, or landfarmed on site. Soil remediation must follow OCD surface impoundment closure guidelines. The permittee must submit a report to the OCD Santa Fe and appropriate District offices that describes the investigation and remedial actions taken.

All known pipeline at the Jenex facility is above grade.

13. Liquid waste generated at the treating plant must be disposed of at an OCD-approved disposal facility. Solid waste generated from cleanup of leaks and spills must be landfarmed on site or be disposed of at an OCD-approved disposal facility.

The OCD understood that most if not all BS&W waste is disposed of at Sundance Services Inc., an OCD permitted surface waste management facility. The OCD also understood that contaminated soils generated from the cleanup of leaks and spills have in the past gone to other OCD permitted surface waste management facilities, however, currently Jenex is managing their leaks and spills in the onsite landfarm.

Some trash items still remain in the Southeast corner of the facility and just outside of the landfarm area (photos 11, 14, 15 and 21).

Jenex must remove this material to the Lea County landfill or to another acceptable landfill facility such as Sundance Services, Lea Land, Inc. or Controlled Recovery Inc. It was the OCD's understanding that the Lea County Landfill did not want to take some/all of this material. Some of this material may need to have screening performed for NORM (used pipe) or the material within the containers may need to

be analyzed to show that the material to be non-hazardous. Please Review OCD Rule 712 as to what Lea County Landfill may be able to take. Please call me if you need further information or assistance.

14. To protect migratory birds, all tanks exceeding 16 feet in diameter and exposed pits and ponds shall be screened, netted or covered.

Jenex does not have any open top tanks or exposed pits or ponds.

15. Within 24 hours of receiving notification from the OCD that an objectionable odor has been detected or reported, the facility must implement the following response procedure:

    a. log date and approximate time of notice that an odor exists;

    b. log investigative steps taken, including date and time, and conclusions reached; and

    c. log actions taken to alleviate the odor, which may include adjusting chemical treatment, air sparging, solidification, landfarming, or other similar responses.

A copy of the log, signed and dated by the facility manager, must be maintained for OCD review.

After reviewing the records on file from July 1997 to present, the NMOCD has not received any notification from any interested parties regarding objectionable odors associated with Jenex Operating Company.

H_2S Prevention & Contingency Plan

1. Jenex must develop a prevention and contingency plan for ambient H_2S levels to protect public health. The H_2S prevention and contingency plan must be submitted to the OCD Santa Fe and Hobbs offices for approval by June 13, 2001. The plan must address how Jenex will monitor for H_2S to ensure the following: (please review permit for complete language.)

The NMOCD did not review the H_2S daily logs during this inspection. The OCD did not see any signs warning for H_2S. The OCD noted only one windsock (Photo 14).

Please submit the daily logs from October 2002 through April of 2003 recording the information as laid out in the Jenex Prevention and Contingency Plan dated September 10, 2002.

Landfarm Construction

1. Construction must commence on the landfarm area within one (1) year of the permit approval date. If construction of the landfarm does not commence within one (1) year of

the permit approval date, the provisions of this permit authorizing landfarm construction and operation will be of no effect.

Jenex has constructed a landfarm directly east of the treating plant.

2. Contaminated soils may not be placed within one hundred (100) feet of the boundary of the facility.

Contaminated soils are well within 100 feet of the facility property.

3. Contaminated soils may not be placed within twenty (20) feet of any pipeline crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility must have surface markers identifying the location of the pipelines.

After reviewing the application submitted October 3, 1997 the OCD does not know if there are any pipelines located within 20 feet of the current landfarm.

Jenex must identify all pipelines within 20 feet of the landfarm facility. If there are any please supply a map that shows where the pipelines are in relation to the landfarm.

4. The portion of the landfarm containing contaminated soils must be bermed to prevent runoff and runon. A perimeter berm no less than two (2) feet above grade with a base of at least three (3) feet must be constructed and maintained such that it is capable of containing precipitation from a one-hundred year flood for the specific region. Individual cells must be contained with a berm no less than two (2) feet above grade with a base of at least three (3) feet.

The landfarm berms were in good condition.

Landfarm Operation

1. Only soils generated exclusively from cleanup of leaks and spills at the Jenex Operating Company surface waste management facility may be landfarmed at the Jenex Operating Company facility landfarm.

Without a fence securing the landfarm facility it is possible for dumping by a third party to occur. Jenex must secure the landfarm with a fence and locking gate(Photos 21, 22 and 23.

2. Contaminated soil must be spread on the surface in lifts of six inches or less.

The contaminated soil appears to be thicker than 6 inches (Photo 23). Piles of contaminated soil have not been spread (Photo 22).

3. Soils must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

Tilling records were not reviewed at this time. Please submit the tilling records from when the first loads were put into the facility up through April, 2003.

4. Moisture may be added as necessary to enhance bioremediation and to control blowing dust. There may be no ponding, pooling or run-off of water allowed. Any ponding of precipitation must be removed within twenty-four (24) hours of discovery.

At the time of the inspection there was no standing water in the landfarm.

5. Successive lifts of contaminated soils may not be spread until a laboratory measurement of total petroleum hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations must be maintained at the facility. Authorization from the OCD must be obtained prior to application of successive lifts and/or removal of the remediated soils.

The OCD has reviewed the records on file. There are no requests pending or analytical results on file.

6. Enhanced bio-remediation through the application of microbes (bugs) and/or fertilizers requires prior approval from the OCD. Requests for application of microbes or fertilizers must include the location of the area designated for the program, the composition of additives, and the method, amount and frequency of application.

The OCD has not received any request at this time.

7. Any design changes to the landfarm facility must be submitted to the OCD Santa Fe office for approval and a copy must be sent to the Hobbs District office.

The OCD has not received any design change requests for the landfarm.

8. Landfarm inspection and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm. The OCD Santa Fe and Hobbs offices must be notified within 24 hours if any defect is noted. Repairs must be made as soon as possible.

Tilling and maintenance records were not reviewed at this time.

Treatment Zone Monitoring

1. Prior to waste acceptance, one (1) background soil sample must be taken from the center portion of the landfarm two (2) feet below the native ground surface. The sample must be

analyzed for total petroleum hydrocarbons (TPH), volatile aromatic organics (BTEX), major cations/anions and Water Quality Control Commission (WQCC) metals.

The OCD has not received the background analytical results for the landfarm area. After reviewing the Jenex file the OCD does have TPH, BTEX results for three samples collected on December 1, 2001 and labeled as Landfarm cells. All show levels that are below the detection limits of the laboratory equipment.

Jenex must sample the undisturbed landfarm area and have the sample analyzed for the list outlined in the permit conditions.

2. A treatment zone not to exceed three (3) feet beneath the landfarm native ground surface must be monitored. A minimum of one random soil sample must be taken from each individual cell quarterly, with no cell being larger than five (5) acres. The sample must be taken at two (2) to three (3) feet below the native ground surface.

   The first quarterly treatment zone monitoring sample is usually taken six months after the first lifts are placed in the landfarm cell and then quarterly thereafter. When were the first lifts placed in the landfarm? Please submit the first quarterly treatment zone monitoring results if they have been obtained.

3. The soil samples must be analyzed using EPA-approved methods for total petroleum hydrocarbons (TPH) and volatile aromatic organics (BTEX) quarterly and for major cations/anions and Water Quality Control Commission (WQCC) metals annually.

   The analytical results have not been reviewed to date.

4. After soil samples are obtained, the boreholes must be filled with an impermeable material such as cement or bentonite.

   Please describe how the sample holes were filled.

Waste Acceptance Criteria

1. The facility is authorized to accept only:(Please review the permit for the exact language)

   The OCD understood that Jenex accepts only exempt waste in the form of recovered oil and oil that has been processed/recovered through other treating plants.

2. At no time may any OCD-permitted surface waste management facility accept wastes that are hazardous by either listing or characteristic testing.

3. The transporter of any wastes to the facility must supply a certification that wastes delivered are those wastes received from the generator and that no additional materials have been added.

All material transported to the Jenex facility are certified through the C-117 process.

4. No waste will be accepted at the treating plant unless it is accompanied by an approved Form C-117-A.

   An OCD file review finds that C-117 have been issued showing Jenex as the destination.

5. No produced water may be received at the facility unless the transporter has a valid Form C-133, Authorization to Move Produced Water, on file with the Division.

   The OCD understood that Jenex does not receive produced water into the facility.

Reporting

1. The Treating Plant Operator's Monthly Report (Form C-118 sheet 1 and 1-A), which details the oil recovered and sold during the preceding month, must be submitted to the OCD Hobbs according to form directions.

   An OCD file review finds that C-118 have been submitted consistently for the past nine years.

2. The Tank Cleaning, Sediment Oil Removal, Transportation of Miscellaneous Hydrocarbons and Disposal Permit (Form C-117) must be submitted to the OCD Hobbs office according to form directions.

3. Records of treating plant and landfarm inspections and maintenance and of pipeline testing and maintenance must be kept and maintained for OCD review.

   At the time of this inspection the OCD did not review these records.

   Jenex must submit any records of landfarm inspections and maintenance and of annual underground pipeline testing and maintenance.

4. Jenex must notify the OCD Santa Fe and Hobbs offices within 24 hours of any fire, break, leak, spill, blow out or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

   The OCD has not received any notification in the last 12 months. Jenex did not appear to have had any releases or other incidences that would require notification.

5. Comprehensive records of all material disposed of at the facility must be maintained. The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity;

5) certification of waste status as exempt; 6) NORM status declaration if applicable; and 7) transporter.

This information is recorded on the C-118 and C-117.

6. Analytical results from the background sampling and treatment zone monitoring must be submitted to the OCD Santa Fe office within thirty (30) days of receipt from the laboratory.

The OCD has not received this data.

Jenex must supply the background analysis.

7. The OCD must be notified prior to the installation of any pipelines or wells or other construction within the boundaries of the facility.

At the time of the inspection the OCD has not received any notification and has not observed any activity of this nature within the facility.

Financial Assurance

1. Financial assurance in the amount of **$207,440** in the form of a surety or cash bond or a letter of credit, which is approved by the Division, is required from Jenex Operating Company for the commercial surface waste management facility.

   By May 13, 2001 Jenex Operating Company must submit 25% of the financial assurance in the amount of **$ 51,860.**

   By May 13, 2002 Jenex Operating Company must submit 50% of the financial assurance in the amount of **$103,720.**

   By May 13, 2003 Jenex Operating Company must submit 75% of the financial assurance in the amount of **$155,580.**

   By May 13, 2004 Jenex Operating Company must submit 100% of the financial assurance in the amount of **$207,440.**

Jenex must submit the next increment of the financial assurance by May 13, 2003.

Photo 1. Entrance and sign for Jenex

Photo 2. Boiler blowdown tank.

Photo 3. Break in the berm behind the boiler house.

Date in camera was incorrect.

Photo 4. Area between tanks is free of recent spills.

Photo 5. Berm along south edge of treating plant tanks.

Photo 6. Area between tanks backfilled with clean soil.

Date in camera was incorrect.

Photo 7. Barrel catchment in place and empty.

Photo 10. Berm around the outside of the facility fence and around the tanks in the southwest corner.

Photo 8. Parifin Tank is leaking a steady drip. The ground is very saturated with produced water.

Photo 11. Trash pile along south fence primarily hoses.

Photo 9. Tanks in the southwest corner are bermed and labeled.

Photo 12. Contaminated soil pile has been removed from the southeast corner.

Date in camera was incorrect.

Photo 13. Trash in the southeast corner including barrels, buckets, boards and hose.

Photo 16. Fuel tank labeled and contained within a lined berm. Rainwater from recent rain event.

Photo 14. Tanks bermed. Looking Northwest

Photo 17. Tanks bermed.

Photo 15. Trash in the southeast corner of the facility.

Photo 18 Barrel catchment was in place and empty.

Photo 19. Berm around tanks.

Photo 20. Entrance gate and north yard.


Photo 21. Landfarm entrance. Pile of trash containing plastic and drums outside of landfarm.

Date in camera was incorrect.

Photo 22. Contaminated soil piles within the landfarm have not been spread. Soil appear to be compacted and not turned.


Photo 23. Contaminated soils in the landfarm are pushed up on the side of the berm.

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 7, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 7001-1940-0004-3929-8188

Mr. Gerald L. Jensen
Jenex Operating Company
621 17th Street, Suite 830
Denver, CO 80293

RE: Follow-up to April 10, 2002 Inspection Report
Jenex Operation Company, NMOCD Permit NM-01-0026
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Mr. Jensen:

The New Mexico Oil Conservation Division (OCD) has received the Jenex Operating Company (Jenex) letters dated May 1, 2002, May 29, 2002 and September 20, 2002 in response to the inspection report dated April 10, 2002. The OCD has reviewed these letters and has the following comments as they relate back to the April 10, 2002 report:

1. Permit NM-01-0026, Treating Plant Operation, Item 1: The facility must be fenced and have a sign at the entrance. The sign must be legible from at least 50 feet and contain the following information: a) name of the facility; b) permit number; c) location by section, township and range; and d) emergency phone number.

   The May 1, 2002 response has addressed this item.

2. Permit NM-01-0026, Treating Plant Operation, Item 6: All saddle tanks or drums located at the facility and containing materials other than fresh water must be placed on an impermeable pad with curb containment. The pad and curb containment must be able to hold one and one-third the volume of the largest tank or all interconnected tanks. The tanks and containers must be labeled as to contents and hazards.

   The May 1, 2002 response has addressed this item.

3. Permit NM-01-0026, Treating Plant Operation, Item 7: All existing above-ground tanks located at the facility and containing materials other than fresh water must be bermed to

contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

The May 1, 2002 response addressed this item. However, an inspection has not been performed to date to verify that the berms have been reconstructed to contain adequate volume.

4. Permit NM-01-0026, Treating Plant Operation, Item 8: All new or replacement above-ground tanks located at the facility and containing materials other than fresh water must be placed on an impermeable pad and be bermed so that the area will contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

The May 1, 2002 and September 20, 2002 response addressed this item. However, an inspection has not been performed to date to verify tank replacement and installation of an impermeable pad beneath the new tank.

5. Permit NM-01-0026, Treating Plant Operation, Item 13: Liquid waste generated at the treating plant must be disposed of at an OCD-approved disposal facility. Solid waste generated from cleanup of leaks and spills must be landfarmed on site or be disposed of at an OCD-approved disposal facility.

The May 1, 2002 and September 20, 2002 response addressed this item. However, an inspection has not been performed to date to verify that the solid waste has been picked up or recycled.

6. Permit NM-01-0026, H2S Prevention and Contingency Plan, Item 1: Jenex must develop a prevention and contingency plan for ambient H_2S levels to protect public health. The H_2S prevention and contingency plan must be submitted to the OCD Santa Fe and Hobbs offices for approval by June 13, 2001. The plan must address how Jenex will monitor for H_2S to ensure the following: (please review permit for complete language)

The May 1, 2002 and September 20, 2002 response has addressed this item

7. Permit NM-01-0026, Landfarm Construction, Item 1: Construction must commence on the landfarm area within one (1) year of the permit approval date. If construction of the landfarm does not commence within one (1) year of the permit approval date, the provisions of this permit authorizing landfarm construction and operation will be of no effect.

The May 1, 2002 and September 20, 2002 response has partly addressed this item. The OCD has received background analysis for total petroleum hydrocarbons (TPH) as GRO and DRO, benzene toluene, ethyl benzene and total xylenes (BTEX) for the landfarm. Background soil samples must also be analyzed for major cations/anions and the metal constituents listed in Water Quality Control Commission Regulations (WQCC) NMAC 20.6.2.3103 (please review Page 5,

Treatment Zone Monitoring, Items 1, 2 and 3 of the Jenex permit conditions). Jenex must sample and submit the remaining background analyses to the OCD Santa Fe office by December 31, 2002.

8. Permit NM-01-0026, Waste Acceptance Criteria, Item 4: No waste will be accepted at the treating plant unless it is accompanied by an approved Form C-117-A.

This item has been addressed

9. Permit NM-01-0026, Reporting, Item 1: The Treating Plant Operator's Monthly Report (Form C-118 sheet 1 and 1-A), which details the oil recovered and sold during the preceding month, must be submitted to the OCD Hobbs according to form directions.

The May 1, 2002 and September 20, 2002 response has addressed this item. The OCD Santa Fe office has received the missing Form C-118 sheets 1 and 2 in question.

10. Permit NM-01-0026, Financial Assurance, Item 1: Financial assurance in the amount of **$207,440** in the form of a surety or cash bond or a letter of credit, which is approved by the Division, is required from Jenex Operating Company for the commercial surface waste management facility.

By May 13, 2001 Jenex Operating Company must submit 25% of the financial assurance in the amount of **$ 51,860.**

By May 13, 2002 Jenex Operating Company must submit 50% of the financial assurance in the amount of **$103,720.**

By May 13, 2003 Jenex Operating Company must submit 75% of the financial assurance in the amount of **$155,580.**

By May 13, 2004 Jenex Operating Company must submit 100% of the financial assurance in the amount of **$207,440.**

The May 1, 2002 and September 20, 2002 response addressed this item. A review of the Jenex financial assurance finds that a $100,000 surety bond No. 04127088 is current and active. Please note that according to the permit a total of $155,580 financial assurance is due on May 13, 2003. To date the OCD has not received an alternate estimate from Jenex. If Jenex wishes to provide an alternate estimate based on all subsequent cleanup and preventive measures that have been implemented since the June 7, 2001 inspection, the OCD will review any proposals submitted.

11. Regarding OCD Rule 116: It was noted in Jenex's letter dated April 20, 2001 that assistance was requested regarding information on soil sampling and witnessing. At the OCD inspection on July 7, 2002 the OCD spoke to Mr. Jensen and staff about sampling

and notifying the Hobbs district office for witnessing. However my records do not have any additional correspondence regarding the cleanup of the spills that were documented in 2000 and 2001 by the OCD.

The May 1, 2002, May 29, 2002 and September 20, 2002 response addressed this item. The analytical results identify diesel range organics (DRO) in the samples taken around the plant to confirm cleanup of contaminated soils from spills and leaks. Based on depth to ground water (>100feet), distance to surface water and nearest water well Jenex has met the cleanup levels for this site.

Jenex may submit photographs as a response to the remaining items in this letter. The OCD is planning an inspection of the Jenex plant during the week of November 18, 2002. Thank you for your response I look forward to hearing from you.

If you have any questions please contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling
Environmental Geologist

Attachments
xc: Hobbs OCD Office

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

April 10, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 7001-1940-0004-4054

Mr. Gerald L. Jensen
Jenex Operating Company
621 17th Street, Suite 830
Denver, CO 80293

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0026
Jenex Operation Company
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Mr. Jensen:

The New Mexico Oil Conservation Division (OCD) inspected the Jenex Operating Company (Jenex) commercial surface waste management facility at the above location on June 7, 2001. A review of Jenex's financial assurance finds that Jenex's $50,000 surety bond No.124047699 is current and active. Please note that according to the permit a total of **$103,720 financial assurance is due on May 13, 2002.**

General facility upkeep and preventive maintenance had greatly improved at the Jenex facility since the previous inspections. Jenex has implemented new tank monitoring procedures prior to Jenex trucks unloading to mitigate tank overflows at the facility. Aged and faulty tanks and pipe have been taken out of service. However, the OCD identified some permit deficiencies during the inspection and subsequent file review that require attention:

1. Permit NM-01-0026, Treating Plant Operation, Item 1: The facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty (50) feet and contain the following information: a) name of the facility; b) permit number; c) location by section, township and range; and d) emergency phone number.

   A new sign has been constructed and the section of fence that was previously missing has been replaced.

2. Permit NM-01-0026, Treating Plant Operation, Item 6: All saddle tanks or drums located at the facility and containing materials other than fresh water must be placed on an

impermeable pad with curb containment. The pad and curb containment must be able to hold one and one-third the volume of the largest tank or all interconnected tanks. The tanks and containers must be labeled as to contents and hazards.

Drums and saddle tanks were located within impermeable secondary containment. All drums and saddle tanks were labeled.

3. Permit NM-01-0026, Treating Plant Operation, Item 7: All existing above-ground tanks located at the facility and containing materials other than fresh water must be bermed to contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

The berms around most of the tanks had been reconstructed however some additional work was needed to ensure adequate containment volume. Tanks were clearly labeled as to contents and hazards.

4. Permit NM-01-0026, Treating Plant Operation, Item 8: All new or replacement above-ground tanks located at the facility and containing materials other than fresh water must be placed on an impermeable pad and be bermed so that the area will contain one and one-third the volume of the largest tank or all interconnected tanks, whichever is greater. All above-ground tanks must be labeled as to contents and hazards.

At the time of the inspection some tanks were said to be not in use or being phased out. Such as the tank in the far southeast corner that had corroded and was empty. Jenex should note the permit item above.

5. Permit NM-01-0026, Treating Plant Operation, Item 13: Liquid waste generated at the treating plant must be disposed of at an OCD-approved disposal facility. Solid waste generated from cleanup of leaks and spills must be landfarmed on site or be disposed of at an OCD-approved disposal facility.

At the time of the inspection there was a trash pile of junked pipe, batteries, buckets, containers and tires in the southeast corner of the facility. At the time of the inspection the landfarm was not yet constructed. Jenex must notify the OCD as to how contaminated soils have been handled at the facility. Jenex must notify the OCD as to how liquid and solid waste streams generated at the facility are disposed of.

6. Permit NM-01-0026, H2S Prevention and Contingency Plan, Item 1: Jenex must develop a prevention and contingency plan for ambient H_2S levels to protect public health. **The H_2S prevention and contingency plan must be submitted to the OCD Santa Fe and Hobbs offices for approval by June 13, 2001**. The plan must address how Jenex will monitor for H_2S to ensure the following: (please review permit for complete language)

Jenex must provide an H2S contingency plan to the OCD Santa Fe and a copy to the Hobbs district office by May 10, 2002.

7. Permit NM-01-0026, Landfarm Construction, Item 1: Construction must commence on the landfarm area within one (1) year of the permit approval date. If construction of the landfarm does not commence within one (1) year of the permit approval date, the provisions of this permit authorizing landfarm construction and operation will be of no effect.

At the time of the inspection Jenex had not yet started construction on the landfarm. Jenex must notify the OCD as to the status of the landfarm at the facility.

8. Permit NM-01-0026, Waste Acceptance Criteria, Item 4: No waste will be accepted at the treating plant unless it is accompanied by an approved Form C-117-A.

A review of the years 2000 to 2002 show that the Forms C-117A have been received for that time period.

9. Permit NM-01-0026, Reporting, Item 1: The Treating Plant Operator's Monthly Report (Form C-118 sheet 1 and 1-A), which details the oil recovered and sold during the preceding month, must be submitted to the OCD Hobbs according to form directions.

A review of the years 2000 to 2002 shows that the Form C-118 sheets 1 and 2 (formally called 1-A) have been received for all months within that time period except for October and December of 2001 and January through March of 2002. Jenex must submit the missing Form C-118 sheets 1 and 2 to OCD.

10. Permit NM-01-0026, Financial Assurance, Item 1: Financial assurance in the amount of **$207,440** in the form of a surety or cash bond or a letter of credit, which is approved by the Division, is required from Jenex Operating Company for the commercial surface waste management facility.

By May 13, 2001 Jenex Operating Company must submit 25% of the financial assurance in the amount of **$ 51,860.**

By May 13, 2002 Jenex Operating Company must submit 50% of the financial assurance in the amount of **$103,720.**

By May 13, 2003 Jenex Operating Company must submit 75% of the financial assurance in the amount of **$155,580.**

By May 13, 2004 Jenex Operating Company must submit 100% of the financial assurance in the amount of **$207,440.**

At the time of the inspection there was some concern expressed by Mr. Jensen regarding the financial assurance. Jenex should review the OCD Environmental Bureau closure cost estimate dated April 4, 1001. If Jenex wishes to provide an alternate estimate based on all subsequent cleanup and preventive measures that

have been implemented since the July 7, 2002 inspection, the OCD will review any proposals submitted.

11. Regarding OCD Rule 116: It was noted in Jenex's letter dated April 20, 2001 that assistance was requested regarding information on soil sampling and witnessing. At the OCD inspection on July 7, 2002 the OCD spoke to Mr. Jensen and staff about sampling and notifying the Hobbs district office for witnessing. However my records do not have any additional correspondence regarding the cleanup of the spills that were documented in 2000 and 2001 by the OCD.

    Jenex must notify the OCD as to the status of the cleanup and provide the final report including all sample analysis that was committed to in the Jenex letter dated August 16, 2000.

Jenex must provide the OCD with a detailed description of how these permit deficiencies will be addressed and a timetable of when each of the corrections will be completed. Jenex must respond to the permit deficiencies and the remainder of the May 9, 2000 Notice of Violation **by May 10, 2002.**

If you have any questions please contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling
Environmental Geologist

Attachments
xc: Hobbs OCD Office

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

April 9, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 7099-3220-0000-5051-2153

Mr. Gerald L. Jensen
Jenex Operating Company
621 17th Street, Suite 830
Denver, CO 80293

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0026
Jenex Operation Company
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Mr. Jensen:

The New Mexico Oil Conservation Division (OCD) inspected the Jenex Operating Company (Jenex) commercial surface waste management facility at the above location on July 7, 2000 and September 25, 2000.

The OCD inspection of Jenex indicates several permit deficiencies and violations of Rule 116, failure to report a release. Attachment 1 lists the permit deficiencies and rule violation found at Jenex during the inspections. Attachment 2 and 3 contain photographs taken during the inspections. Attachment 4 and 5 are copies of the OCD District field trip report for July 7, 2000 and September 25, 2000.

The OCD has reviewed the Jenex letter dated August 16, 2000 regarding the Notice of Violation issued on May 9, 2000. It is the OCD's understanding that in that letter Jenex has committed to:

1. Removal of chemical drums,
2. Repair of leaking pipes,
3. Removal of over 1000 yards of contaminated soil to a remedial facility,
4. Rebuilding berms with clean soil,
5. New management at the facility with authority to complete the cleanup.
6. Installation of new sumps, and
7. Submitting a final report with in 30 days of the final cleanup operations.

As of the date of this letter the OCD has not received final report on the cleanup activities at Jenex.

Jenex shall provide the OCD with a final report giving detailed descriptions of the cleanup activities and corrections that have been made since August 16, 2000. In addition, Jenex shall provide the OCD with a detailed description of how the items in Attachment 1 will be addressed and a time table of when each of the corrections will be completed. Jenex must respond to the permit deficiencies and the remainder of the May 9, 2000 Notice of Violation by April 23, 2001.

Failure to submit the requested information and respond to the permit deficiencies by April 23, 2001 will result in the issuance of a compliance order which may include civil penalties pursuant to 70-2-31 NMSA 1978 as amended.

Please note our address change. If you have any questions please contact Martyne Kieling at (505) 476-3488.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

Attachments
xc: Hobbs OCD Office

ATTACHMENT 1
INSPECTION REPORT
PERMIT NM-01-0026
JENEX OPERATION COMPANY
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM,
Lea County, New Mexico
(April 9, 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.

   Fence has been removed along the southwest corner of the facility (see attachment 3 photos 9, 10 and 20). The fence must be repaired and the facility operations secured.

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

   Facility berm at the fence line is not adequate to contain runnoff (see attachment 2 photos 1, 2, 3, 4 and 5 and attachment 3 photos 10 and 20). A spill that occurred on or around July 7, 2000 was not contained by tank berms or by the facility berm. The berms around the facility must be repaired. In addition, berms must be constructed around the tanks to contain spills and leaks.

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

   There was no trash present, however, there was a very large pile of contaminated soil that was stockpiled for off-site disposal/remediation (see attachment 3 photo 13). Contaminated soils must be removed as soon as possible to an OCD approved facility.

   The Laboratory had several containers that were not labeled as to contents and hazards (see attachment 2 photo 22). The boiler room contained an unlabeled drum with a pump that did not have secondary containment, the drum was full and close to overflowing (see attachment 2 photo 24). Containers must be labeled as to contents and hazards (see photo 25 and 26), and Material Data Safety Sheets for all products used on site must be accessible.

4. 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.

Above ground tanks are not bermed and the facility has had a history of spills, leaks and tank overflows (see attachment 2 photos 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 23 and attachment 3 photos 3, 4, 5, 6, 8, 9, 10, 13, 14, 17, 18, and 20).

On or around July 7, 2000 there was a spill from a tank in which fluid ran from the northeast tank area into the facility open are along the north fence and then outside the facility (see attachment 2 photos 1, 2, 3, 4, 5 and 6). There was no berm around the tanks to contain the spill and there was a break in the berm at the facility entrance where the spill exited the facility. A containment berm must be constructed according to standards around the tank area to confine spills to a manageable area.

There is evidence of many leaks and spills that have been covered up with clean soil rather than cleaned up (see attachment 2 photo 8, 9, 10, 11, 12, 13, 14, 15 and 16). Some of these covered leaks and spills have been excavated as of the September 25, 2000 inspection and there were no new or recient large spills or leaks evident during that inspection.

There is evidence that one or more of the sale oil tanks 14, 15, 16 and 17 in the southwest corner of the facility overflowed or leaked on or around July 7, 2000 (see attachment 2 photos 14, 15, 16, 17, 18 and 19). The berm surrounding these tanks was not adequate and the material escaped into the facility yard (see attachment 2 photo 15). The containment berm must be reconstructed to confine spills. As of the September 25 inspection the spilled material had been excavated, however, the berm was not repaired and the containment volume had not been increased (see attachment 3 Photos 8, 9, 10).

Oil must be contained and not allowed into the facility yard or to run down the drive portion of the facility. All above ground tanks at Jenex 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. This will require some modification of the current facility. Jenex may extend their concrete retaining walls, enlarge the earthen berms or propose another alternative to contain spills.

All spills should be cleaned up and or remediated in a timely manner. Covering spills and leaks with fresh soil/caliche is not an acceptable manner of remediation. All replacement tanks must be placed on an impermeable pad or ring within a berm so that leaks can be identified quickly, contained to a small area and quickly and easily picked up.

Jenex must submit: 1) a detailed daily facility inspection plan that contains items that will be checked and inspection notes, 2) an equipment replacement program for

any aging equipment that is prone to reoccurring leaks and 3) a detailed spill/leak response, notification and cleanup plan.

5. 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. All pre-existing below grade sumps or catchments must demonstrate integrity on an annual basis. Integrity tests must include visual inspections of cleaned out sumps or catchments.

The current practice of connecting and disconnecting and moving hoses to move tank fluids and then allowing hoses to drain onto the ground surface must stop (see attachment 2 Photo 20, 21.) This practice was not observed at the September 25, 2000 inspection. Tanks must have a dedicated pipe or hose for fluid transfer and a sump at each end to catch drips.

Some pipes do not have a sump to catch (see attachment 2 photo20 and 21 and attachment 3 photo 8 photo 9, photo 18). Other sumps have not been kept empty to reduce the chance of overflow (see attachment 2 photos 21 and 24 and attachment 3 photo 4, 5, 7, 8, 12 and 16). The daily facility inspections must include sumps and catchments and a schedule for them to be emptied. Sumps and catchments should be cleaned and inspected for integrity on an annual basis. Soil contaminated by overflow or leaking sumps and catchments must be cleaned up in a timely manner.

Jenex has a history of spills leaks and overflows. Secondary containment must be installed at all fluid transfer points. Jenex must submit: 1) a detailed daily facility inspection plan that contains items that will be checkrd and inspection notes, 2) an equipment maintanance and replacement program for any aging equipment that is prone to reoccurring leaks and 3) a detailed spill/leak response, notification and cleanup plan.

6. Equipment Maintenance: Equipment, tanks, pipe valves and connections must be inspected on a regular basis and repairs made as needed.

Leaking pipes, valves and tanks and tank overflows were observed (see attachment 2 photo 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23 and 24 attachment 3 photos 3, 4, 5, 6, 11, 12 and 18). All leaking pipes, valves and tanks must be repaired. Tank systems prone to overflow must be modified to prevent over-topping. Damaged tanks must be repaired or replaced. Contaminated soils must be cleaned up.

Jenex has a history of spills leaks and overflows. Jenex must submit: 1) a detailed daily facility inspection plan that contains items that will be checked and inspection notes, 2) an equipment maintanance and replacement program for any aging

equipment that is prone to reoccurring leaks and 3) a detailed spill/leak response, notification and cleanup plan.

7. 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.

   The July 7, 2000 inspection showed drums stored properly (see attachment 2 photos 25 and 26). By the September 25, 2000 inspection the drums no longer had secondary containment (see attachment 3 photos 1 and 2). All drums containing materials other than fresh water must be stored on an impermeable pad with curbing.

   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.

   Labels were were not present (see attachment 2 photos 25 and 26). One of two drums was properly labled and was ledgible (see attachment 3 photos 1 and 2). New labels should be requested from the manufacture and old ones replaced.

8. 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.

   Saddle tanks were all properly contained or had been removed (see attachment 2 photo 7 and attachment 3 photos 15).

9. 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.

   Most tanks are numbered and have plackards (see attachment 3 photos 6, 9 and 14)

10. 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.

    NA There are no open top tanks, pits or ponds.

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

The OCD Hobbs office received an E-mail notification on July 7, 2000 that a spill/release had occurred at Jenex. The OCD responded and found what looked to be a major release (>25 bbls) caused when a truck operator ran a tank over. Rule 116 B.1. requires both immediate verbal notice and timely written notice pursuant to Rule 116 Paragrahs C(1) and C(2). The OCD Environmental Bureau has not received a Form C-141 or the written notice regarding this spill. (See enclosed Rule 116 and Form C-141). Jenex must provide a written notice pursuant to Rule 116 regarding this spill.

The spill that happed on or around July 7, 2000 around sale oil tanks 14, 15, 16 and 17 in the southwest corner of the facility was not reported pursuant to Rule 116. Jenex must provide a written notice pursuant to Rule 116 regarding this spill.

12. Regular Facility Inspections: Facility inspections and maintenance must be conducted on at least a daily basis and immediately following each consequential rainstorm or windstorm.

The current permit issued on October 8, 1993 has not required these inspections.

13. H_2S Screening: H_2S screening must be recorded and maintained.

The current permit issued on October 8, 1993 has not required H_2S screening and record keeping.

14. Waste Acceptance and Disposal Documentation: Documentation required by forms C-117 and C-118. These records must be maintained for each load may 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 treatment chemicals.

Records including C-117 and C-118 were not reviewed on this inspection. However they have been filed according to instructions with the OCD.

15. Landfarming of contaminated soils on site: Landfarming of contaminated soils onsite is not contained within the current permit issued on October 8, 1993. However a request for a landfarm was made in the Form C-137 dated October 3,1997. This request is being processed along with the repermitting of the Jenex facility.

On September 25, 2000 the OCD inspector noted that Jenex had constructed a landfarm outside the fenced boundary of the facility (see attachment 3 photos 19, 20 and 21). The landfarm was not bermed, cells were not identified with markers or signs and the soils were placed near a perimeter fenceline to the south. The depth of the

contaminated soils being landfarmed is not known and the OCD has not received any background soil analytical samples prior to the start of the landfarming. Jenex must design the landfarm in accordance with OCD surface waste management facility guiedlines (guidelines are enclosed).

Attachment 2

Jenex Operating Company
Inspection by Donna Williams
July 7, 2000

Photo 1 looking west
Spill that ran outside of facility.

Photo 2 looking east
Spill that ran outside of facility.

Photo 3 looking east
Spill inside along north fence.

Photo 4 looking south
Spill along the East side of the facility.

Photo 5 looking west
Fluid ponded in the north east corner of tank area.

Photo 6 looking south
Fluid ponded in the north east corner of tank area.

Photo 7 looking east
Liquid ponded in the saddle tank area.

Photo 8 Leaks and spills between tanks

Photo 9 Leaks and spills between tanks

Photo 10 Liquid ponded around tanks
numerous leaks and spills evident from stained soil .

Photo 11 Liquid ponded between tanks.

Photo 12 Stained soil around tanks from leaks.

Photo 13 Leaks and spills.

Photo 14 Spills outside of containment

Photo 15 Southwest corner
Oil spill overflowed berm.

Photo 16 Southwest corner
Oil spill.

Photo17 Southwest corner
Oil spill within berm.

Photo 18 Southwest corner
Oil spill within berm.

Jenex Operating Company
Inspection by Donna Williams
July 7, 2000

Photo 19 Standing fluid between tanks

Photo 20 Spills and leaks. Hose draining oil on to the ground.

Photo 21 Spills and leaks. Hose draining on to the ground. Valve catchment a few inches from the top.

Photo 22 Laboratory

Photo 23 Hose draining oil onto the ground

Photo 24 Barrel in boiler room is very full and does not have secondary containment.

Jenex Operating Company
Inspection by Donna Williams
July 7, 2000

Photo 25 Drum secondary containment contains several inches of fluid.

Photo 26 Drum secondary containment contains several inches of fluid.

Attachment 3

Jenex Operating Company
Inspection by Donna Williams
September 25, 2000

Photo 1 Chemical containers with valve catchments.

Photo 2 Chemical containers with valve catchments.

Photo 3 Leaking pipe.

Photo 4 Stained soil from leaks or overflow of full durm.

Photo 5 Drum full shows signs of overflow.

Photo 6 Stained soil from leaks or overflow. Some clean caliche fill brought in.

Photo 7 Valve catchment 1/3 full

Photo 10 Fence removed and berm removed.

Photo 8 Valve catchment ½ full. Stained soil from spills and overflows

Photo 11 Valve catchment shows numerous overflows.

Photo 9 Valve with out catchment. Berm is low.

Photo 12 Valve catchment ½ full.

Photo13 Pile of contaminated soil.

Photo 14 Pile of contaminated soil around tank.

Photo 15 Fuel containment.

Photo 16 Fresh caliche pile.

Photo 17 Area between tanks excavated and filled with clean fill.

Photo 18 Stained soil from spills and leaks. Catchment not under the valve.

Photo 19 Contaminated soil spread south of fence line. Landfarm area not bermed or secured within fence.

Photo 20 Contaminated soil spread south of fence line. Landfarm area not bermed or secured within fence.

Photo 21 Contaminated soil spread south of fence line. Landfarm area not bermed or secured within fence.

Attachment 4

Page 1 of 4

NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS

Name Donna Williams Date 07-07-00 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G-04721

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature Donna Williams Jemex Operating Co

Gary Wink and Donna Williams performed a Site Investigation after notification via...email of a recent Spill / release. Arrived ON Site ≈ 10:30 a.m. ON duty was Tammy - EDDIE - & JR.; - Tammy tried EDDIE & Notifying their supervisor; with no success we performed the inspection. One of their Truckers had ran a Tank over. The week of June 26th, 2000 Estimated guess by Tammy 15-20bbls and recovered most. According to visual puddles of standing oil it was a major spill; >25 bbls; (my estimated guess.) There was standing oil on outside of the fenced area that surrounds the facility. On the North Side. Standing oil inside of facility - several places. (see attached map & reference Page) Gary Wink took photos while

Mileage	Per Diem	Hours
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

TYPE INSPECTION PERFORMED

H = Housekeeping
P = Plugging
C = Plugging Cleanup
T = Well Test
R = Repair/Workover
F = Waterflow
M = Mishap or Spill
W = Water Contamination
O = Other

INSPECTION CLASSIFICATION

U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)
R = Inspections relating to Reclamation Fund Activity
O = Other - Inspections not related to injection or The Reclamation Fund
E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

NATURE OF SPECIFIC WELL OR FACILITY INSPECTED

D = Drilling
P = Production
I = Injection
C = Combined prod. inj. operations
S = SWD
U = Underground Storage
G = General Operation
F = Facility or location
M = Meeting
O = Other

NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS

Name Donna Williams Date 07-07-00 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G-04721

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature Donna Williams

I (Donna Williams) visited w/ Tommy. Standing oil (thick oil) inside of the small ditch area Next to Tanks 18 & 19. Standing oil in the Road in Front of Tanks 18 & 19. The employees have covered most of oil on location with Fine caliche & dirt. Appears NO efforts have been made to remediate this release. Inside of Boiler Room there is a 55 gallon drum Full of Liquid; at the point of overflow or may have even overflown in the recent past? I'm not sure if it contains hazardous materials? all waste - water - soil - ect... hauled to Parabo. Per Tommy. There was an apparent odor of Butane? in the area of the Boiler Room. At this point I realized there was NO windsock.

Mileage	Per Diem	Hours
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

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NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS

Name Donna Williams Date 07-07-00 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G-04721

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Signature Donna Williams

For wind indication. Also the employees had NO H_2S monitors ON. (That I Noticed) Also there had been removed 2 tanks From behind the eight - Ten large Tanks. The workers were in the process of excavating the NorthEast area to determine vertical Extent. There is No plan in place, to the best of my knowledge, of their actions or objectives with this remediation efforts. Standing rain water was inside of the excavation. I suggested they remove water as soon as possible. They have stockpiled contaminated soil, For removal of soil offsite in the South East Corner of the facility. (Did not stock-pile soils on Plastic, to prevent future Leaching into the ground from Contaminated soils).

Mileage	Per Diem	Hours
UIC	UIC	UIC
RFA	RFA	RFA
Other	Other	Other

TYPE INSPECTION PERFORMED

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Signature Donna Williams

Soils inbetween Large TANKS were saturated w/ Oil - contamination. there was standing water & ? chemical ? inside of the 2nd containment to a chemical drum on a stand in front of the Large tanks. just next to the Boiler Room. The standing water had a rusty-brown color to it. A dark-Rusty Color. All portable Sumps at the facility were full w/oil & rain water. The overall facility was in poor condition. The release was NOT reported to NMOCD office. As of DATE, there is NO C-141 written Notification Filed either, for this release or FOR the release in JANUARY. (TO The best of my knowledge)

Mileage		Per Diem		Hours	
UIC		UIC		UIC	
RFA		RFA		RFA	
Other		Other		Other	

TYPE INSPECTION PERFORMED

H = Housekeeping
P = Plugging
C = Plugging Cleanup
T = Well Test
R = Repair/Workover
F = Waterflow
M = Mishap or Spill
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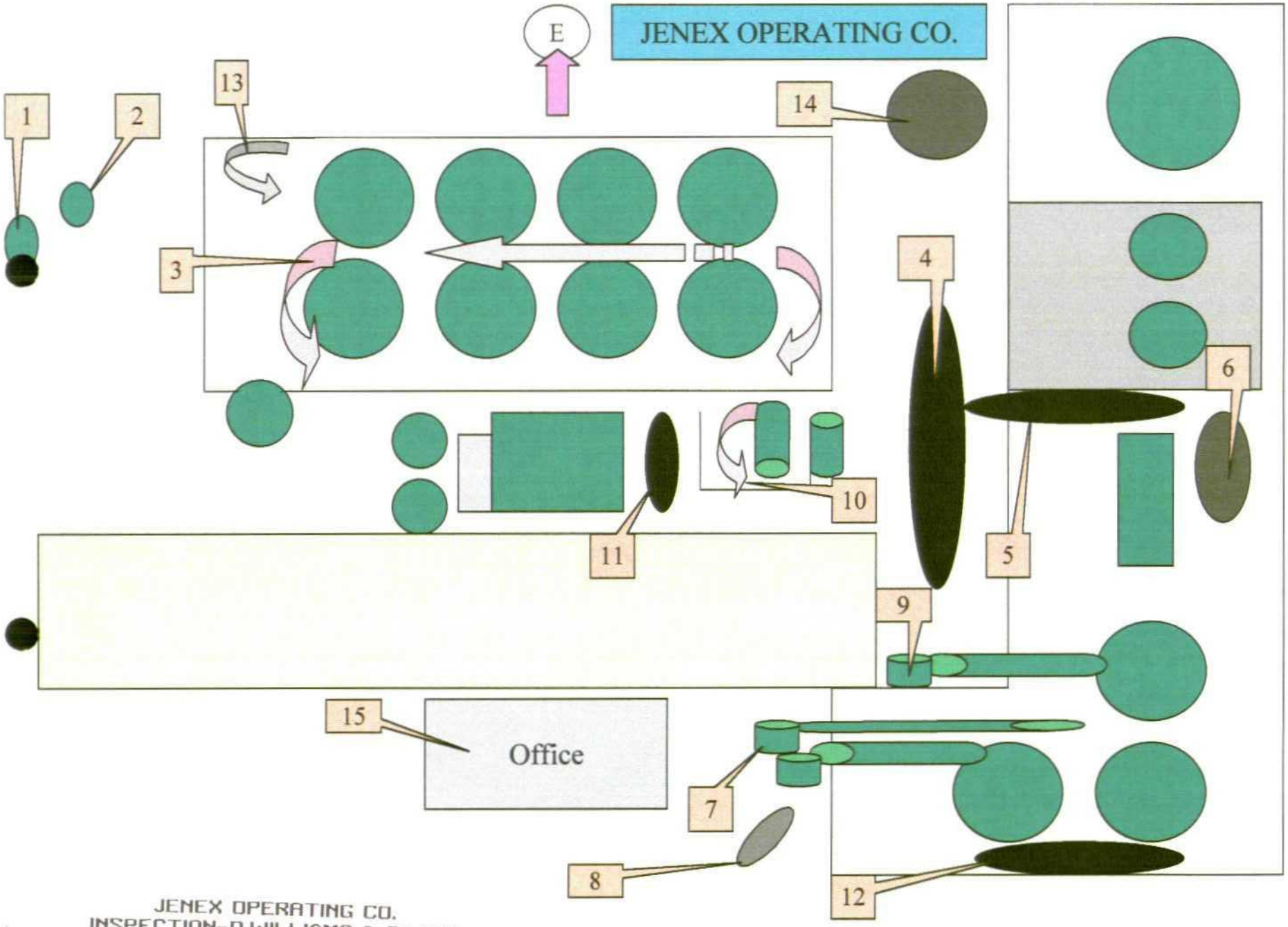


JENEX OPERATING CO.
INSPECTION-D.WILLIAMS & G.WINK
07-07-00

JENEX OPERATING CO.

(1) STANDING OIL ON THE OUTSIDE OF THE FENCE - NORTH SIDE.
(2) STANDING OIL ON THE INSIDE OF THE FACILITY.
(3) OIL SATURATED SOIL IN AND AROUND THE AREA OF THE TANKS.
(4) OIL SOAKED CALICHE - WITH SOME STANDING OIL IN AND ROUND THE AREA OF THE ROAD.
(5) DITCH WITH STANDING THICK CRUDE OIL- ABOUT 6-8 INCHES ESTIMATED GUESS.
(6) WATER & OIL STANDING AND SATURATED IN THE SOIL.
(7) PORTABLE SUMP - FULL WITH RAIN WATER AND OIL
(8) PORTABLE SUMP - FULL WITH RAIN WATER AND OIL
(9) PORTABLE SUMP - FULL WITH RAIN WATER AND OIL
(10) SECOND CONTAINMENT AREA HAS A MIXTURE OF RAIN WATER AND WHAT APPEARS TO BE SOME TYPE OF CHEMICAL- DUE TO THE COLOR OF THE THE WATER INSIDE OF THE SECOND CONTAINMENT IT HAD A RUSTY-REDDISH BROWN COLOR TO IT - AT A VOLUME OF ROUGHLY 2-5 GALLONS.
(11) HIGHLY SATURATED SOIL IN THIS AREA
(12) HIGHLY SATURATED SOIL IN THIS AREA
(13) AREA OF EXCAVATION - DEPTH OF EXCAVATION UNKNOWN DUE TO THE WATER STANDING IN IT. THEY WERE ADVISED TO REMOVE THE WATER FROM EXCAVATION. BEST GUESS WOULD BE 4-6 FEET.
(14) SOILS EXCAVATED FROM LOCATION (13) STOCKPILED IN THIS AREA
(15) INSIDE OF OFFICE SINK AREA WAS FILTHY...OILY, DIRTY, ECT....

7-7-00
D.W

Senex Inspection

Gary Wink - Donna Williams
- From Hobbs office

Employees on Duty

Tommy
JR
Eddie

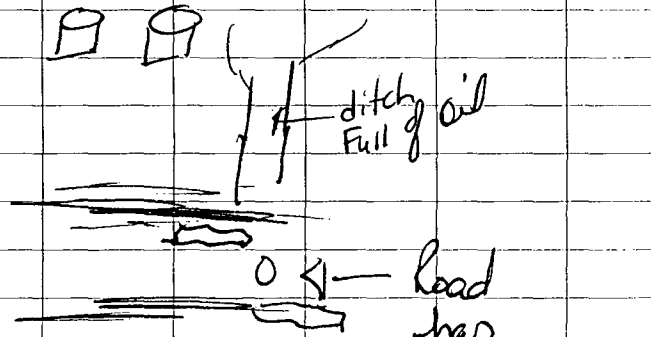
Trucker had ran a Tank over
* Last week
release -> 15-20bbls
- recovered -> some -
estimated most

Container inside of
Boiler Room
-> Bleed off from
Boiler
? Hazardous ?

(-> 300-400 yards
of cont! dirt
in remediation
efforts)

Tank #15

Tanks #18 & 19



* NO Windsock
* odor from Butane?
in area of Boiler Room

NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

Attachment 5

Name Donna Williams Date 9-25-00 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G-04721

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature Donna Williams

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS
0	O	F		

Follow-up Inspection & Gary Wink & myself went to Jenex at ≈ Approximately 9:30a.m. Gary Guttridge, the New manager, met with us to perform inspection. There has been some clean-up performed & Note: There have been "NO" samples collected to indicate adequate remediation. There were NO windsocks present. The only standing Liquids were under the piping in Front of Large Tanks. The second containment for chemical drums were removed. Guttridge indicated he would replace second Containment to prev. overflow onto ground. Contaminated soils piled in the SouthEAST Corner of facility. (Large Pile). It appears they took their fence down on the South & West Side to spread soils for Landfarming Purposes. (* Not an Approved Action) there are NO berms, N

Mileage		Per Diem		Hours	
UIC		UIC		UIC	
RFA		RFA		RFA	
Other		Other		Other	

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NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

Name Donna Williams Date 9-25-00 Miles _____ District I

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Signature Donna Williams

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS
O	O	F		

Cells, NO collecting of soils & placing them in any organized fashion. Just pushed & spread from facility to outside bermed area. There needs to be a lot more work performed still. But in general it looks better than before.

Concerns:

- They have excavation areas that are open. They have NOT been filled back in.
- They are NOT delineating - just digging - hauling - mixing

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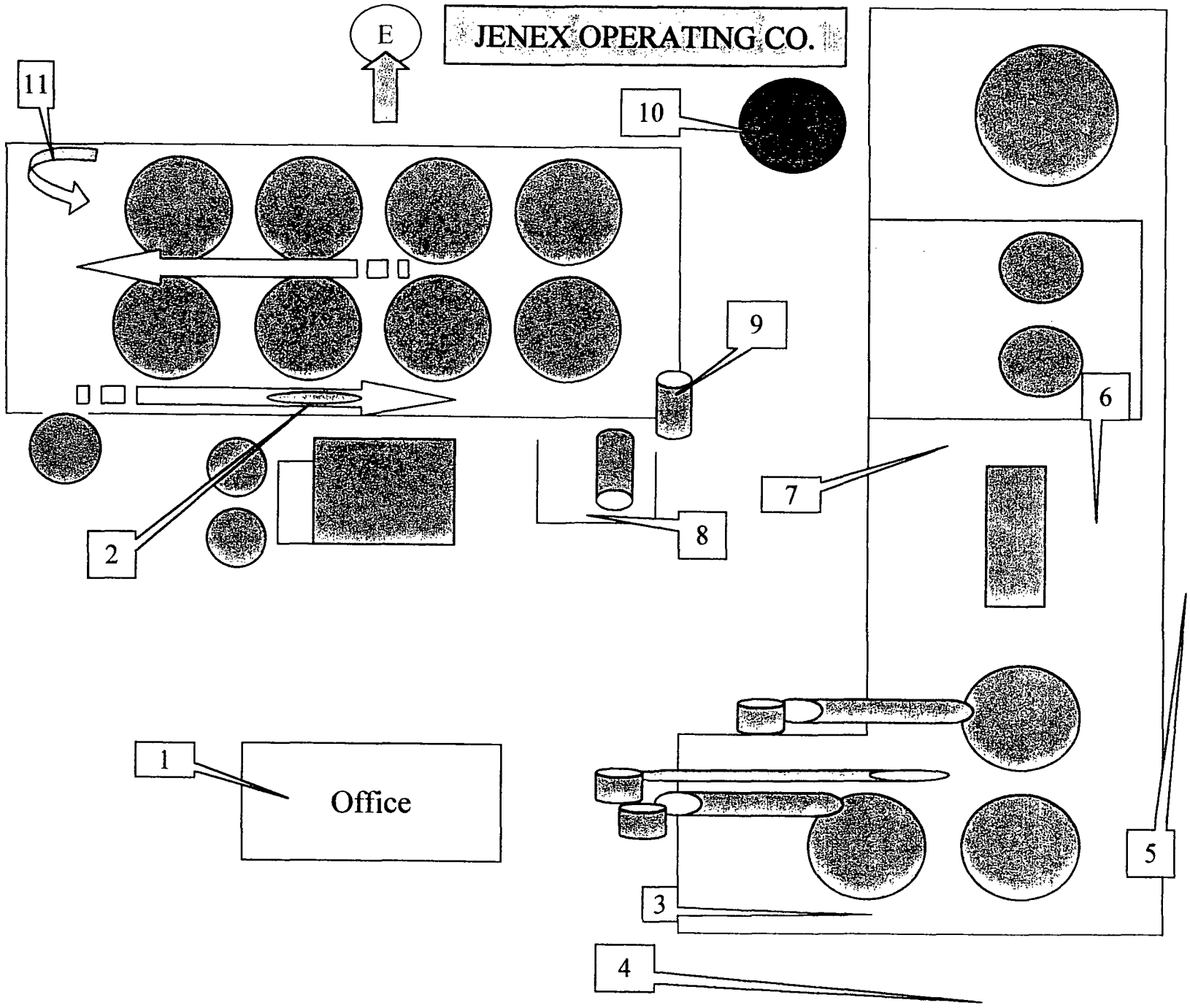
E
JENEX OPERATING CO.
11
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Office
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JENEX OPERATING CO.
09-25-00

(1) Office; they have attempted to clean the area - but still dirty
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Attachment 5

Page 1 of 4

NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS
00	O	F		

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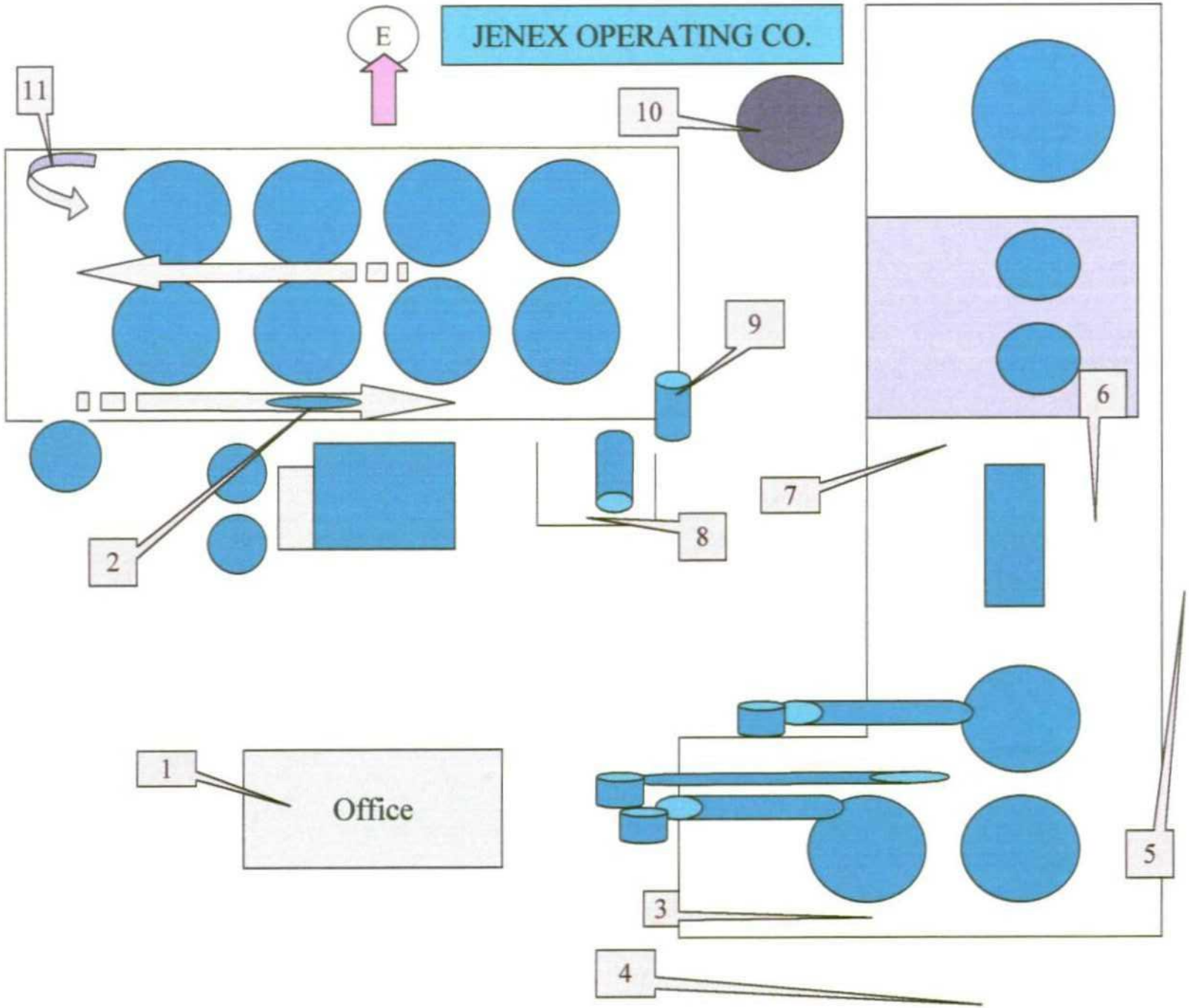
JENEX OPERATING CO.
E
11
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JENEX OPERATING CO.
09-25-00

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Kieling, Martyne

From: Williams, Donna
Sent: Tuesday, October 03, 2000 1:53 PM
To: Kieling, Martyne
Subject: Jenex

Martyne,

I did find what I was looking for so I went ahead and made up a field report and using the powerpoint map I have of Jenex I have created a map for you. attached is the copy....I have one in the mail to you with a copy of my field notes.

Jenex Operating 09-25-00.ppt

If you need anything or have questions give me a call Thanks Donna

Kieling, Martyne

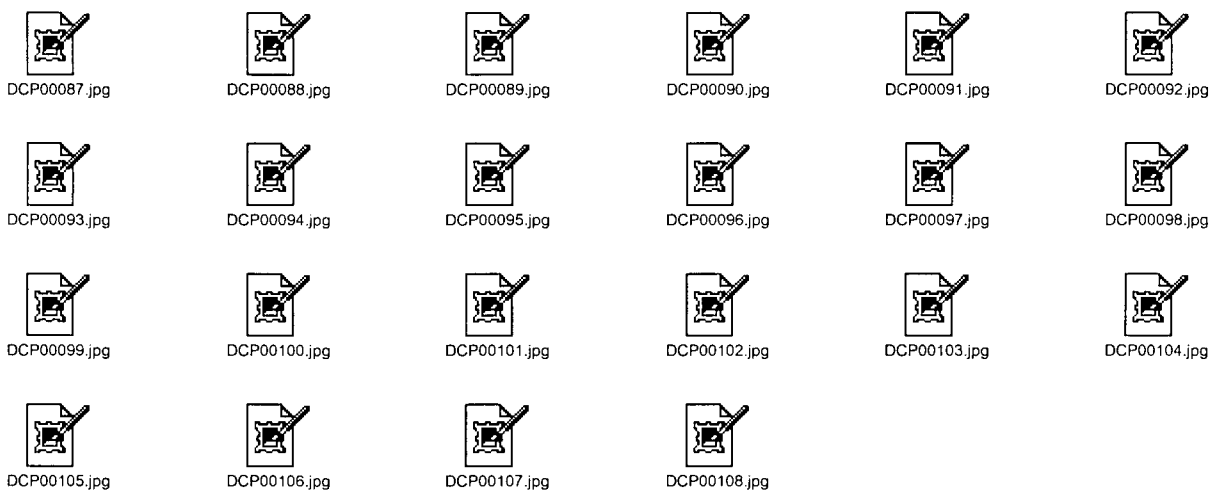
From: Williams, Donna
Sent: Tuesday, October 03, 2000 7:25 AM
To: Kieling, Martyne
Subject: Jenex

Martyne,

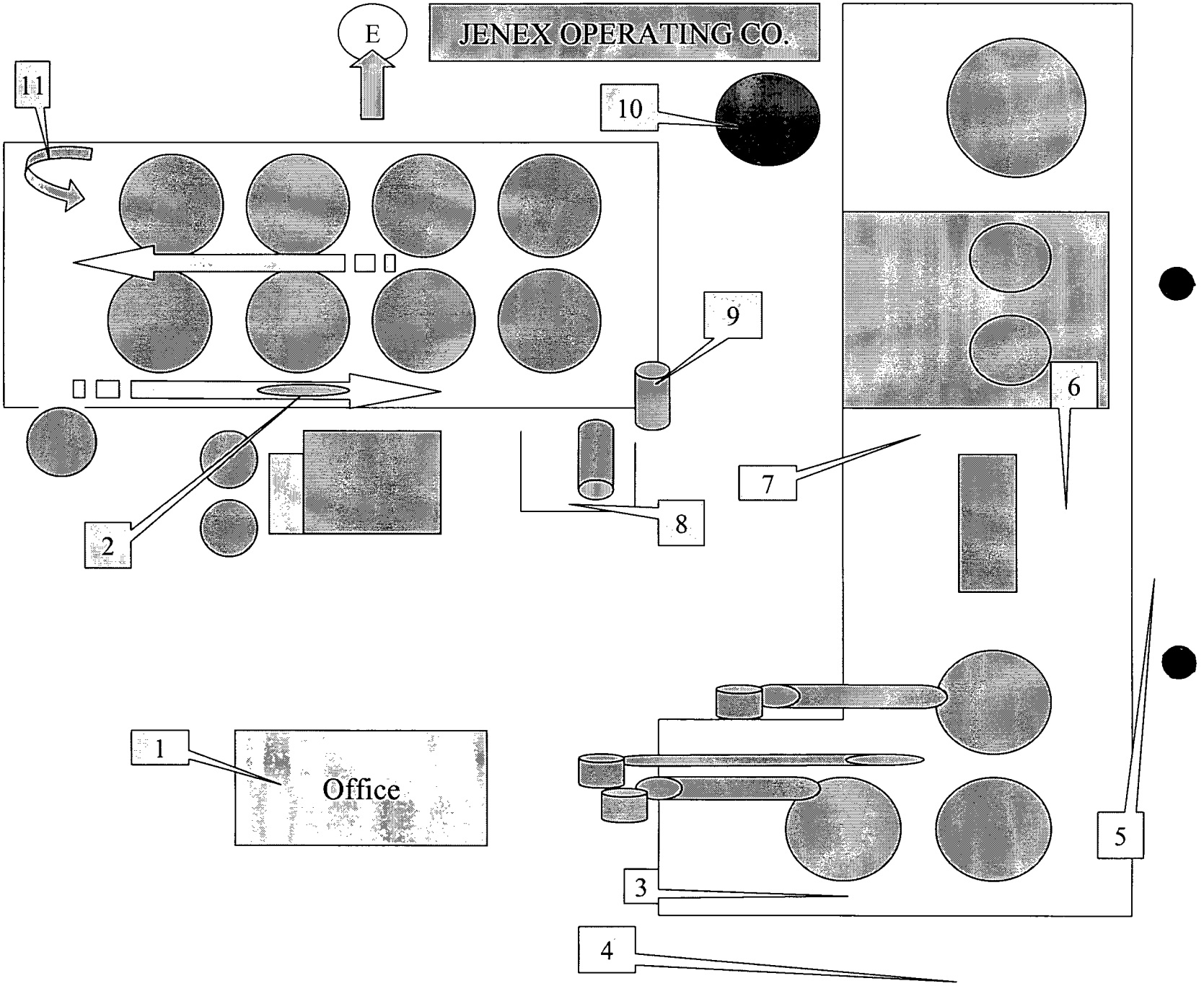
Gary and I went out to Jenex on 09-25-00, and performed a site inspection. the site looks good compared to the last few times we went there. there are however some things going on I'm not comfortable with. they are landfarming the contaminated soils on the west and south sides of the facility. they broke down the fences and pushed soils out in the pasture area. I was told that Jenex owns that land, so I'm not too worried about that just about the way they are going about it. they're not in cells there are no berms, they just pushed the soils (with a backhoe I suppose) and that is it. there are no sampling events occurring. nothing? there are excavations in and around the tanks, I wonder how safe that is? they also had no wind socks up. they had removed the second containment out from under the barrels of chemicals that were in front of the 14 tanks. (Gary, the new manager, said he would put it back). they have a lot more contaminated soils that are stockpiled at the southeast corner of the facility. they're berm is pretty much gone on the west and south ends of the facility. there is no plan as far as I am aware of as to what they are trying to accomplish. including the levels they now have and at what depths they are trying to reach and no rhyme or reason? I will let you take care of it.

here are the pictures; I was looking for the computer printout sheets that shows the tanks at Jenex couldn't find them??? I was going to do up a real nice picture again. sorry

here they are:



....all taken on 9-25-00 by Gary Wink.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JENEX OPERATING CO.
11
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Office
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JENEX OPERATING CO.
09-25-00

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NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

Name Donna Williams Date 01-20-00 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G-04721

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature Donna Williams

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS
D	O	F		

(A Follow up inspection)

≈10:00 A.m. on 01-20-00 performed An inspection Personnel on Inspection: Donna Williams; Buddy Hill; Steve Lynch - Plant Operator joined the inspection. Steve stated they had A Leak on Night of 01-17-00. Started clean-up on 01-18-00. Estimated a 40 bbl Release. Said they was going to get a crew out there today to start the clean-up of Location.

Site Looked very messy - Appeared as though they brought in dirt / gravel to soak up standing oil, and haven't attempted any other remediation / corrective action procedures. Appears has had Leaks previously and no remediation performed. Oil thick Sludge standing on ground - inside dike As well As outside of Dike Area.

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RFA		RFA		RFA	
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NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS
O	O	f		

Name Donna Williams Date 01-20-00 Miles _____ District I

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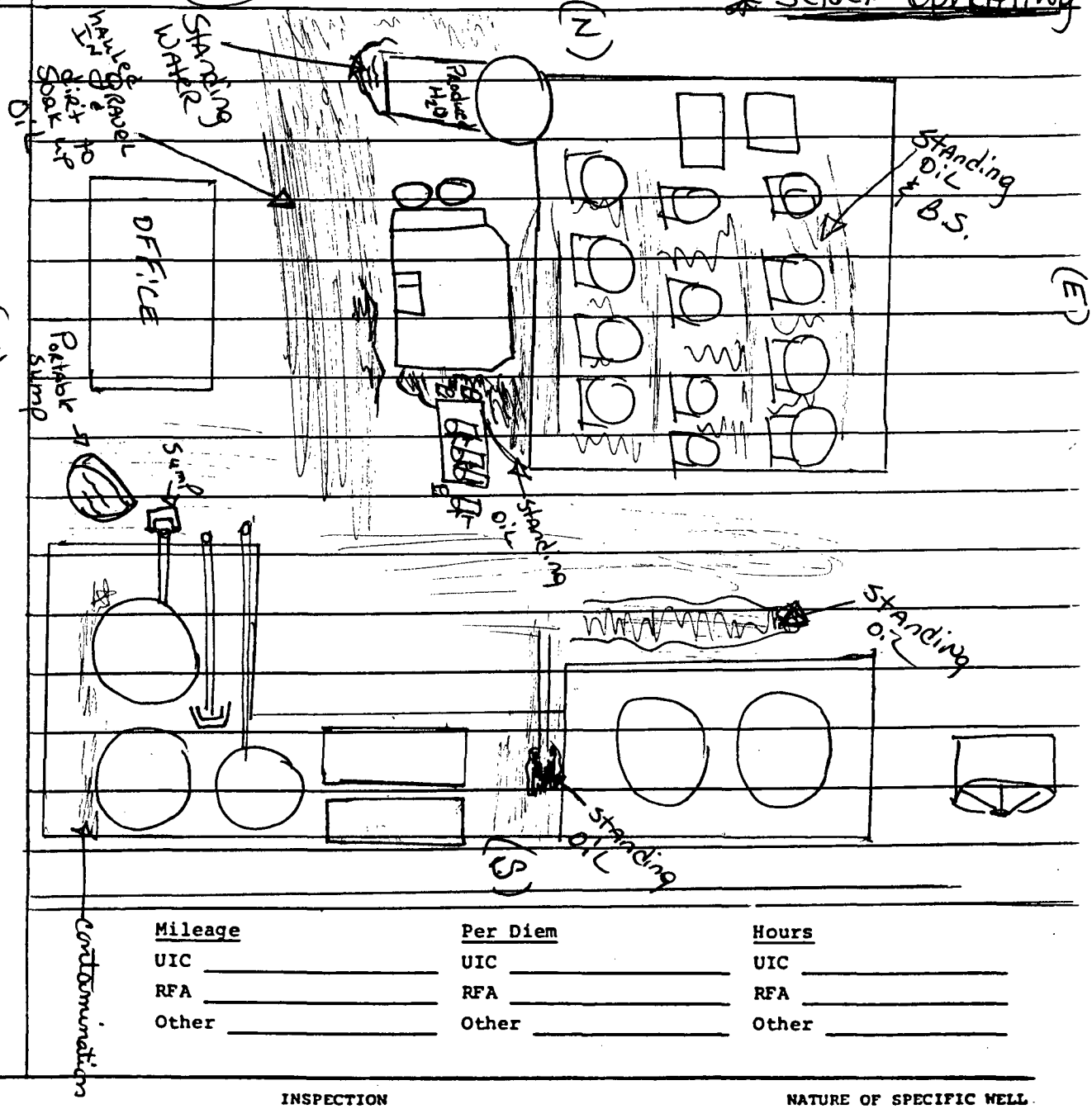

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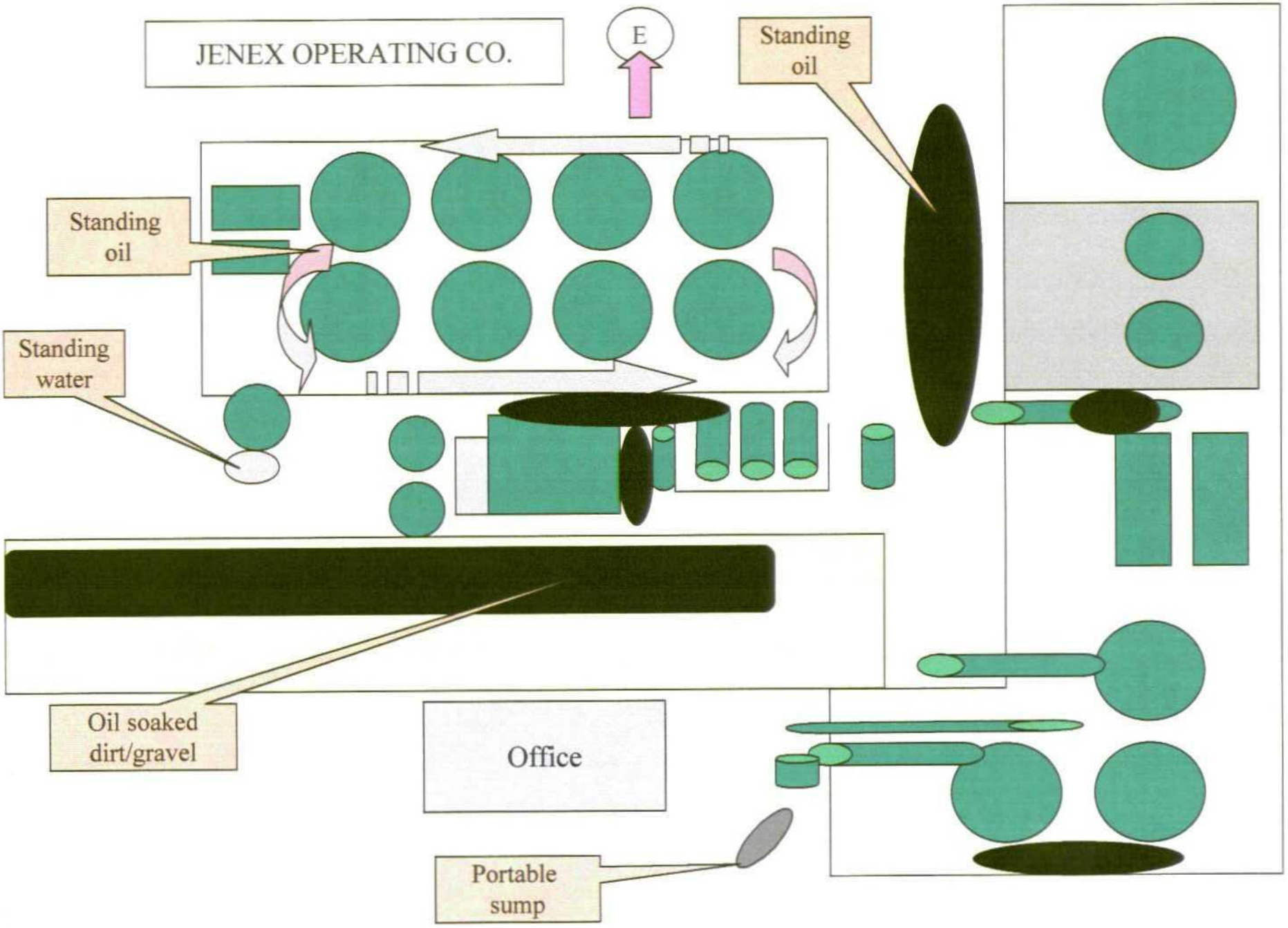

JENEX OPERATING CO.
E
Standing oil
Standing oil
Standing water
Oil soaked dirt/gravel
Office
Portable sump

Kieling, Martyne

From: Williams, Donna
Sent: Thursday, February 03, 2000 9:42 AM
To: Kieling, Martyne
Subject: JENEX OPERATING CO.

Martyne,
Here are the photos taken the other day at Jenex. I finally figured it out! Yeah. ☺ anyway let's make lunch plans on Tuesday of next.

I'll be up there on Monday around 4-5 maybe 3 I won't leave here til about 10-11 somewhere in that time range.

Here are those photos – I will bring the pictures and the report with me to give to you.


Scan1.jpg


Scan10.jpg


Scan11.jpg


Scan12.jpg


Scan13.jpg


Scan14.jpg


Scan15.jpg


Scan16.jpg


Scan17.jpg


Scan18.jpg


Scan19.jpg


Scan2.jpg


Scan21.jpg


Scan22.jpg


Scan23.jpg


Scan24.jpg


Scan25.jpg


Scan26.jpg


Scan27.jpg


Scan28.jpg


Scan29.jpg


Scan3.jpg


Scan4.jpg


Scan5.jpg


Scan6.jpg


Scan7.jpg


Scan8.jpg


Scan9.jpg

this was the only way I could send these to you – next time I won't take so many pictures. ☺
Donna

Inspection Report
Jenex Operating Company
Lea County, NM

Inspection Date: November 4-5, 1998

EPA ID Number: none

Facility Name: Jenex Operating Company

Physical Location: 7.5 miles south of Hobbs on Highway 18

Mailing Address: P.O. Box 308, Hobbs, NM 88241

Type of Ownership: private

Inspection Participants:

Lead EPA Inspector: Melissa Smith (214) 665-7357 **Initials:** MLS

Other Participants:

Roger Anderson	New Mexico Oil Conservation Division	(505) 827-7152
Doug McKenna	U.S. Fish and Wildlife Service	(505) 589-2823
Greg Stover	U.S. Fish and Wildlife Service	(505) 883-7828
Wesley Ganter	Science Applications International Corporation (SAIC)	(303) 382-6717
Tim Reeves	SAIC	(303) 382-6730

Facility Owner: Jenex Operating Company
1675 Broadway, Suite 1030
Denver, CO 80202

Facility Representatives: Keith Grogan, Facility Manager (505) 397-3360
Daniel Ruth, Operation Manager (505) 397-3360

Facility Description: Commercial facility for oil field waste disposal.

Generator Status: non-generator

Inspection Type: Compliance evaluation inspection with sampling

Reason for Evaluation: General inspection with sampling

Summary of Inspection: see narrative

Checklists Completed: none

Peer Reviewed by: Diana Wootan **Date:** 7/6/99

Compliance Evaluation Inspection Narrative
Jenex Operating Company
Lea County, NM

On November 4, 1998, members of the inspection team arrived at the Jenex Operating Company facility ("facility", or "Jenex") at 5:25 pm. Jenex is located on Highway 18 between Hobbs and Eunice, New Mexico. The lead inspector explained that compliance evaluation inspections were being conducted at oil field waste disposal and treatment facilities in the area. Facility representatives briefly explained the processes conducted at the facility. Since it was late in the evening and already dark outside, the inspection team returned the following day to conduct the inspection. The purpose of the inspection was to determine if any pits or structures at the facility pose a threat to human health or the environment (including wildlife), and to determine if the facility handles any waste which may be subject to the Resource Conservation Recovery Act ("RCRA") regulations regarding hazardous waste. The inspection team arrived at the facility at approximately 8:00 am. The team was met by Mr. Keith Grogan, Facility Manager, and Mr. Daniel Ruth, Operation Manager.

The facility buys, treats, and resells oil. Product oil and oil field wastes are treated and stored in tanks (see Attachment A, facility diagrams of tanks). The facility does not operate any pits. "Sweet" oil, or oil with less than .49% sulfur is placed into 3, 1000-barrel capacity tanks ("sweet tanks"). The oil is tested for leads, chlorides, and sulphur. Sweet oil is not treated, but is stored and sold as product. "Sour" oil, or oil with more than 1% sulfur is placed in LACT units, or cook tanks, for treatment. The facility operates 4, 1000-barrel cooking/treating tanks (see Attachment B, photo #'s 1 & 6). Recovered oil from the treating tanks is stored in 2, 500-barrel tanks and sold as product (see Attachment B, photo #2). The facility also operates a rectangular tank for storage of paraffin wax which is heated and blended with the oil (see Attachment B, photo #3), and 4 reserve tanks for storage of oil prior to treatment (see Attachment B, photo #4). Waste solids and produced water from the treating tanks are stored in 500-barrel and 1000-barrel tanks (see Attachment B, photo #5). Waste solids and produced water are then sent to Sundance Services for disposal. Jenex does not accept any waste from service companies. Jenex is also a transportation company; therefore, they pick-up and transport their own wastes.

When receiving waste from a new lease, the material is sampled for leads, chlorides, and sulphur before being accepted. All wastes being received are sampled again every 30 days. The gravity of every load is checked to insure that the oil hasn't changed significantly from the initial sampling. The Texas/New Mexico Pipeline buys oil from Jenex, and they also sample the oil for leads, chlorides, and sulphur.

At the time of the inspection, the facility's tanks were equipped with secondary containment consisting of an earthen berm. Standing water was observed within the secondary containment due to rainy conditions in the area at the time of the inspection. Also observed at the facility were two smaller containers: a 250-gallon container of surfactant, and a 210-gallon container of citric acid (see Attachment B, photo #7). According to facility representatives, these materials are used for cleaning equipment at the facility. Copies of the Material Safety Data Sheets ("MSDS") for these materials were obtained by the lead inspector (see Attachment C, MSDS).

Representative samples were collected from one of the treating tanks and from one of the waste tanks. The following samples were collected:

- Treating Tank #3: A representative liquid sample was collected of the water which had separated in the tank. The sample was collected at the outflow of the pipe leading from the tank (sample # Janex-3). Two duplicate samples were collected for quality control purposes (Janex-1, Janex-QC-1).

- Waste Tank #9: A representative liquid sample was collected of the water which had separated in the tank. The sample was collected at the outflow of the pipe leading from the tank (Janex-2). Not enough water was present in the tanks to collect the requested volumes for all desired analytical parameters (listed in the next paragraph). The sample collected for metal analysis was mostly solid material rather than liquid. Volumes were not collected for pesticides and for one of the semi-volatile analyses; however, the lab was able to run all of the desired parameters with the volumes that were collected.

Appropriate quality assurance and quality control (QA/QC) samples were collected for the site. The samples were sent via Federal Express to Core Lab-Gulf States Analytical in Houston, Texas, for analysis (see Attachment D, chain of custody for samples). The samples were analyzed for volatile organic compounds, semi-volatile organic compounds, organochlorine pesticides, organophosphorus pesticides, chlorophenoxy herbicides, polychlorinated biphenols (PCBs), and HSL metals (Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Nickel, Potassium, Selenium, Silver, Sodium, Thallium, Vanadium, and Zinc). A summary of the analytical results is included as Attachment E.

No areas of concern were identified during the inspection. No wildlife mortality was observed at the site at the time of the inspection.

Attachments

A Facility diagrams of tanks

B Photograph log

C Material Safety Data Sheets

D Chain of Custody for samples

E Analytical Data Summary

ATTACHMENT A

JENEX OPERATING COMPANY: HOBBS, N.M.

Date: _____

DAILY PURCHASES

Ticket #	Company	Gross BBL	Net BBL	BS&W	Gravity	Tank Off-load
TOTAL:						

Jenex

DAILY TOTALS

BBLS Oil Hauled/Day: _____

Total Oil Sold/Month: _____ Beginning Meter #: _____

Total of BS&W Hauled/Day: _____

Total Oil Skimmed/Day: _____

SALES TANKS

Tank 19
(500)
Gauge:
BS&W:
Hauled:

Tank 18
(500)
Gauge:
BS&W:
Hauled:

Tank 16
(1000)
Gauge:
BS&W:
Hauled:

Working Tanks

Tank 1
(1000)
Gauge: Heated:
Status:
Transfers:

Tank 2
(1000)
Gauge: Heated:
Status:
Transfers:

Tank 3
(1000)
Gauge: Heated:
Status:
Transfers:

Tank 4
(1000)
Gauge: Heated:
Status:
Transfers:

Tank 12

Feedstock
(1000)

Gauge: ft. in.

Waste →

Tank 13

Waste BS&W
(1000)

Gauge: ft. in.

Est. Water:

Solids:

DATE: _____

Tank 17

Frac
Feedstock

Jenep

Tank 10 Frac

Feedstock

Tank 14

Feedstock
(1000)

Gauge: ft. in.

Est. BS&W:

Top:

Bottom:

Tank 15

Feedstock
(1000)

Gauge: ft. in.

Est. BS&W:

Top:

Bottom:

Tank 5

Feedstock
(500)

Gauge: ft. in.

Est. BS&W Top:

Bottom:

Tank 6

Feedstock
(500)

Gauge: ft. in.

Est. BS&W Top:

Bottom:

Tank 7

Feedstock
(500)

Gauge: ft. in.

Est. BS&W Top:

Bottom:

Tank 8

Feedstock
(500)

Gauge: ft. in.

Est. BS&W Top:

Bottom:

Tank 9

Feedstock
(500)

Gauge: ft. in.

Est. BS&W Top:

Bottom:

ATTACHMENT B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo Number: 1 Photographer: T. Reeves, SAIC
Location: Jenex
Subject: Treatment tanks
City/County: Lea County State: NM
Date: 11/05/98 Time: am Weather: cloudy, cool

Photo Number: 2 Photographer: T. Reeves, SAIC
Location: Jenex
Subject: Product tanks
City/County: Lea County State: NM
Date: 11/05/98 Time: am Weather: cloudy, cool

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

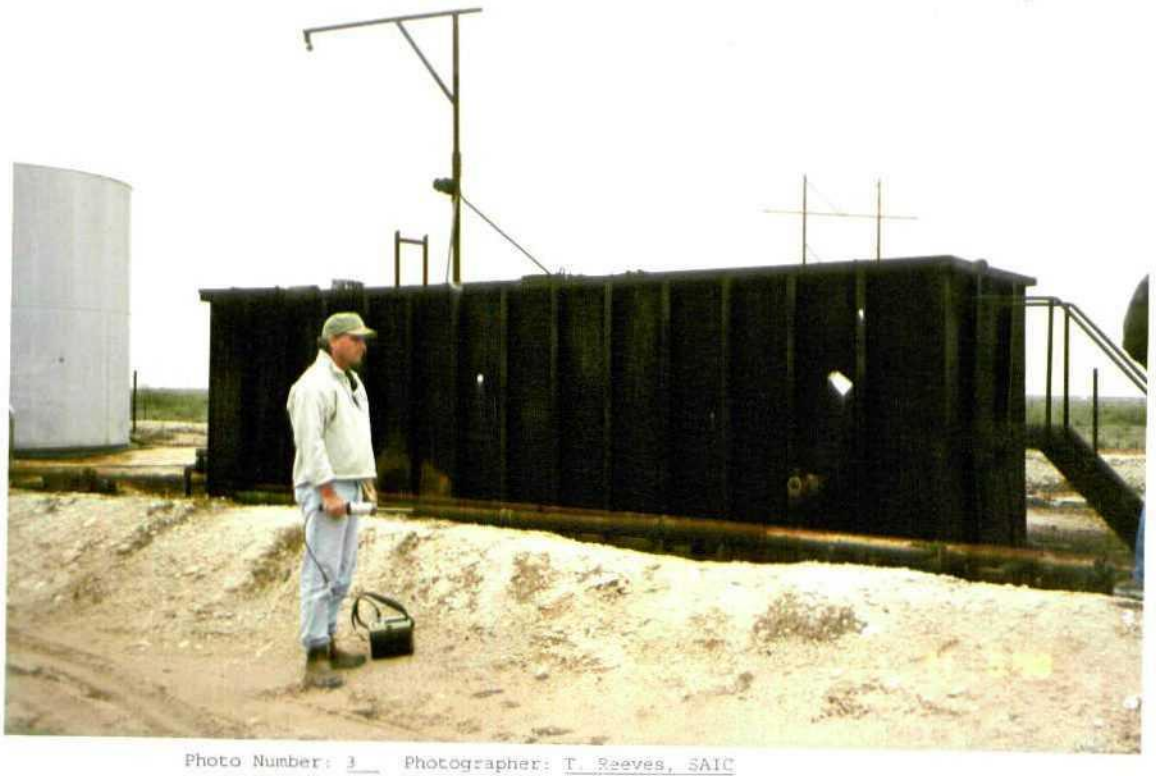


Photo Number: 3 Photographer: T. Reeves, SAIC
Location: Jenex
Subject: Paraffin tank
City/County: Lea County State: NM
Date: 11/05/98 Time: am Weather: cloudy, cool

Photo Number: 4 Photographer: T. Reeves, SAIC
Location: Jenex
Subject: Reserve tanks to accept waste prior to treating in treatment tanks
City/County: Lea County State: NM
Date: 11/05/98 Time: am Weather: cloudy, cool

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo Number: 5 Photographer: T. Reeves, SAIC
Location: Jenex
Subject: Waste storage tanks
City/County: Lea County State: NM
Date: 11/05/98 Time: am Weather: cloudy, cool

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo Number: 7 Photographer: T. Reeves, SAIC
Location: Jenex
Subject: Containers of cleaning solutions (surfactant and citric acid)
City/County: Lea County State: NM
Date: 11/05/98 Time: am Weather: cloudy, cool

ATTACHMENT C

ALLIED COLLOIDS INC
2301 WILROY ROAD, P.O. BOX 620
SUFFOLK, VA 23439-0820
(804) 538-3700

24-HOUR EMERGENCY CONTACT
CHEMTREC: 800/424-9300

Material Safety Data Sheet

SECTION I - IDENTIFICATION

PRODUCT: **PERCOL® 789**

ISSUE/REV DATE: 16-Jul-92

CHEMICAL FAMILY: Copolymer of a quaternary acrylate salt and acrylamide.

DESCRIPTION: White, free flowing powder with little or no odor.

HMIS RATING (NPCA)

H 1 (ACUTE)
F 1 (FLAMMABILITY)
R 0 (REACTIVITY)
P * (PERSONAL PROTECTION)

* PERSONAL PROTECTION RATING TO BE SUPPLIED BY USER. DEPENDENT ON USE.

DEGREE OF HAZARD
4 = SEVERE
3 = SERIOUS
2 = MODERATE
1 = SLIGHT
0 = MINIMAL

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	CAS No.	LIMIT(S) IN AIR PPM	LIMIT(S) IN AIR mg/m³	REMARKS
COPOLYMER ACRYLAMIDE: DMAEA Q.(MeCl)	69418-26-4	ND	ND	
ADIPIC ACID	124-04-9	ND	ND	

T = TWA-8, C = CEILING, S = STEL-15min
NTP and/or IARC in remarks indicates possible or probable human carcinogen

SECTION III - PHYSICAL PROPERTIES

BOILING POINT: NA

SPECIFIC GRAVITY: 0.8-1.0

VAPOR DENSITY (air=1): NA

pH: NA

VOLATILES (% by volume): NA

VAPOR PRESSURE (mmHg): NA

EVAPORATION RATE (ether=1): NA

SOLUBILITY IN WATER: Soluble - solubility limited by viscosity.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

EXTINGUISHING MEDIA
Carbon dioxide, dry chemical or foam.

FLASH POINT: NA
LEL: NA
UEL: NA

SPECIAL FIRE FIGHTING PROCEDURES
No special procedures. However, wetted product presents a slip hazard. Pedestrian and vehicular traffic must proceed with caution where wet product may exist.

UNUSUAL FIRE AND EXPLOSION HAZARDS
Dust in sufficient concentration can result in an explosive mixture in air. Handle to minimize dusting, and eliminate open flame and other sources of ignition.

SECTION V - REACTIVITY DATA

STABILITY: STABLE

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR.

INCOMPATIBILITY: Strong oxidants such as liquid chlorine, enriched gaseous or liquid oxygen, and sodium or calcium hypochlorite.

HAZARDOUS DECOMPOSITION PRODUCTS: Thermal decomposition or combustion may produce oxides of carbon and nitrogen, various hydrocarbons, ammonia and/or hydrogen chloride vapor. Vapor may be irritating or harmful.

PERCOL IS A TRADEMARK OF ALLIED COLLOIDS INC

SECTION VI - HEALTH HAZARD DATA

NATURE OF PRINCIPAL HAZARD(S): Eye irritant

TARGET ORGAN(S): Eyes, lungs

SIGNS, SYMPTOMS, AND EFFECTS OF EXPOSURE:
Contact with the eye may produce irritation and/or redness.
Inhaled dust may cause some respiratory irritation.

CARCINOGENICITY:
Not listed as a carcinogen by IARC, NTP, OSHA or ACGIH

EXPOSURE LIMITS (as particulates not otherwise regulated):
The OSHA 8-hour TWA for total dust is 15 mg/cu-meter (5 mg/cu-meter for the respirable fraction). The ACGIH TLV-TWA is 10 mg/cu-meter.

SAFETY PRECAUTIONS:
Do not get in eyes, on skin, on clothing.
Wash thoroughly after handling.
Avoid prolonged or repeated inhalation of dust.
Avoid prolonged or repeated skin contact.
Caution - slip hazard - see Sections IV and/or VII.

FIRST AID:

EYE CONTACT:	Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.
INGESTION:	Do not give an emetic unless directed by a physician. Never give anything by mouth to an unconscious person.
SKIN CONTACT:	Remove contaminated clothing and launder before reuse. Wash effected area with soap and water.
INHALATION:	Remove to fresh air.

SECTION VII - ENVIRONMENTAL DATA

SPILL OR LEAK PROCEDURES
Product becomes slippery and difficult to handle when wet; spills are best handled while still dry. Sweep up and collect dry product. Absorb wet product with vermiculite or other inert material. Then water wash area to waste treatment to eliminate slip hazard.

WASTE DISPOSAL METHOD
Disposal must be arranged in accordance with local, state and federal regulations. This material, when unadulterated, is not a RCRA regulated hazardous waste. However, local disposal regulations will often apply. Care must be taken to prevent environmental contamination from the disposal of material, residues and containers.

SECTION VIII -PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION:	Use NIOSH approved dust respirator as required to control exposure. Follow ANSI Z88.2.		
PROTECTIVE GLOVES:	Not normally required.	EYE PROTECTION:	Goggles (ANSI Z87.1 std; safety glasses alone do not protect from dust).
VENTILATION:	Provide mechanical ventilation to prevent dust concentrations, and to reduce potential exposure.		
OTHER EQUIPMENT:	Provide eyewash station(s). Select additional protective equipment (eg apron, face shield, etc.), depending on conditions of use.		

19920716

Allied Colloids Inc

Material Safety Data Sheet

SECTION IX - REGULATORY INFORMATION

SHIPPING INFORMATION

PROPER SHIPPING NAME: NOT A DOT/IMO HAZARDOUS MATERIAL

ID NUMBER: NA RQ: NA DOT EMERGENCY GUIDE (ERG) #: 31

HAZARD CLASS or DIVISION: NA PACKING GROUP: -

TSCA COMPONENTS APPEAR ON THE TSCA INVENTORY

SARA PRODUCT HAZARD CATEGORIES (Sec 311): ACUTE HEALTH HAZARD

The following components are defined as toxic chemicals subject to reporting requirements of SARA Section 313 and of 40 CFR 372:

No components are 313 Toxic Chemicals

STATE LABELLING INFORMATION

NJ RTK LABEL - COMPONENTS INCLUDE:

	CAS or ID #:
WATER	7732-18-5
COPOLYMER ACRYLAMIDE: DMAEA Q.(MeCl)	69418-26-4
ADIPIC ACID	124-04-9

CA PROP 65: CALL FOR ADDITIONAL INFORMATION

SECTION X - ADDITIONAL INFORMATION

NA=Not Applicable; ND=Not Determined or No Data

Good personal hygiene practices can reduce potential exposure. Wash with soap and water following any contact with this product, as well as before breaks and meals. Shower and change clothing at end of work shift. If clothing becomes contaminated, remove and launder or dry-clean before reuse.

The information and recommendations contained herein are, to the best of Allied Colloids Inc's knowledge and belief, accurate and reliable as of the last revision date. This document is offered in good faith. The information relates to the specific material designated, and may not be valid for such material used in combination with any other materials, in any process, or if used in a manner other than for which it is intended.

Allied Colloids Inc does not warrant or guarantee accuracy, reliability or completeness. It is the user's responsibility to satisfy himself as to the suitability and completeness of such information for his own particular use. We do not accept liability for any loss or damage that may occur from the use of this information, nor do we offer warranty against patent infringement.

Allied Colloids Inc
Material Safety Data Sheet

ALLIED COLLOIDS INC

2301 WILROY ROAD, P.O. BOX 820
SUFFOLK, VA 23439-0820
(804) 538-3700

24-HOUR EMERGENCY CONTACT
CHEMTREC 800/424-9300

SECTION I - IDENTIFICATION

PRODUCT: **PERCOL® 787**

ISSUE/REV DATE: 16-Jul-92

CHEMICAL FAMILY: Copolymer of a quaternary acrylate salt and acrylamide.

DESCRIPTION: White, free flowing micro-beads with little or no odor.

HMIS RATING (NPCA)

H 1
F 1
R 0
P *

* EXTRAORDINARY PRECAUTIONS ARE REQUIRED. SEE SECTION VII.

DEGREE OF HAZARD
4 = SEVERE
3 = SERIOUS
2 = MODERATE
1 = SLIGHT
0 = MINIMAL

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	CAS No.	LIMIT(S) IN AIR PPM	LIMIT(S) IN AIR mg/m³	REMARKS
ADIPIC ACID	124-04-9	ND	ND	None
COPOLYMER ACRYLAMIDE: DMAEA Q. (MeCl)	69418-26-4	ND	ND	None

T = TWA-8, C = CEILING, S = STEL-15min
NTP and/or IARC in remarks indicates possible or probable human carcinogen

SECTION III - PHYSICAL PROPERTIES

BOILING POINT: NA

SPECIFIC GRAVITY: 0.8-1.0

VAPOR DENSITY (air=1): NA

pH: NA

VOLATILES (% by volume): NA

VAPOR PRESSURE (mmHg): NA

EVAPORATION RATE (ether=1): NA

SOLUBILITY IN WATER: Soluble - solubility limited by viscosity.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

EXTINGUISHING MEDIA
Carbon dioxide, dry chemical or foam.

FLASH POINT: NA
LEL: NA
UEL: NA

SPECIAL FIRE FIGHTING PROCEDURES
No special procedures. However, wetted product presents a slip hazard. Pedestrian and vehicular traffic must proceed with caution where wet product may exist.

UNUSUAL FIRE AND EXPLOSION HAZARDS
Dust in sufficient concentration can result in an explosive mixture in air. Handle to minimize dusting, and eliminate open flame and other sources of ignition.

SECTION V - REACTIVITY DATA

STABILITY: STABLE

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR.

INCOMPATIBILITY: Strong oxidants such as liquid chlorine, enriched gaseous or liquid oxygen, and sodium or calcium hypochlorite.

HAZARDOUS DECOMPOSITION PRODUCTS: Thermal decomposition or combustion may produce oxides of carbon and nitrogen, various hydrocarbons, ammonia and/or hydrogen chloride vapor. Vapor may be irritating or harmful.

PERCOL IS A TRADE MARK OF ALLIED COLLOIDS LTD

Material Safety Data Sheet

SECTION VI - HEALTH HAZARD DATA

NATURE OF PRINCIPAL HAZARD(S): Eye irritant

TARGET ORGAN(S): Eyes, lungs

SIGNS, SYMPTOMS, AND EFFECTS OF EXPOSURE:
Contact with the eye may produce irritation and/or redness.
Inhaled dust may cause some respiratory irritation.

CARCINOGENICITY:
Not listed as a carcinogen by IARC, NTP, OSHA or ACGIH

EXPOSURE LIMITS (as particulates not otherwise regulated):
The OSHA 8-hour TWA for total dust is 15 mg/cu-meter (5 mg/cu-meter for the respirable fraction). The ACGIH TLV-TWA is 10 mg/cu-meter.

SAFETY PRECAUTIONS:
Do not get in eyes, on skin, on clothing.
Wash thoroughly after handling.
Avoid prolonged or repeated inhalation of dust.
Avoid prolonged or repeated skin contact.
Caution - slip hazard - see Sections IV and/or VII.

FIRST AID:

EYE CONTACT:	Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.
INGESTION:	Do not give an emetic unless directed by a physician. Never give anything by mouth to an unconscious person.
SKIN CONTACT:	Remove contaminated clothing and launder before reuse. Wash effected area with soap and water.
INHALATION:	Remove to fresh air.

SECTION VII - ENVIRONMENTAL DATA

SPILL OR LEAK PROCEDURES
Product becomes slippery and difficult to handle when wet; spills are best handled while still dry. Sweep up and collect dry product. Absorb wet product with vermiculite or other inert material. Then water wash area to waste treatment to eliminate slip hazard.

WASTE DISPOSAL METHOD
Disposal must be arranged in accordance with local, state and federal regulations. This material, when unadulterated, is not a RCRA regulated hazardous waste. However, local disposal regulations will often apply. Care must be taken to prevent environmental contamination from the disposal of material, residues and containers.

SECTION VIII - PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION:	Use NIOSH approved dust respirator as required to control exposure. Follow ANSI Z88.2.		
PROTECTIVE GLOVES	Not normally required.	EYE PROTECTION:	Goggles (ANSI Z87.1 std; safety glasses alone do not protect from dust).
VENTILATION.	Provide mechanical ventilation to prevent dust concentrations, and to reduce potential exposure.		
OTHER EQUIPMENT.	Provide eyewash station(s). Select additional protective equipment (eg apron, face shield, etc.), depending on conditions of use.		

Allied Colloids Inc
Material Safety Data Sheet

SECTION IX - REGULATORY INFORMATION

SHIPPING INFORMATION

PROPER SHIPPING NAME: NOT A DOT/IMO HAZARDOUS MATERIAL

ID NUMBER: NA RQ: NA DOT EMERGENCY GUIDE (ERG) #: 31

HAZARD CLASS or DIVISION: NA PACKING GROUP: -

TSCA COMPONENTS APPEAR ON THE TSCA INVENTORY

SARA PRODUCT HAZARD CATEGORIES (Sec 311): ACUTE HEALTH HAZARD

The following components are defined as toxic chemicals subject to reporting requirements of SARA Section 313 and of 40 CFR 372:

No components are 313 Toxic Chemicals

STATE LABELLING INFORMATION

NJ RTK LABEL - COMPONENTS INCLUDE.	CAS or ID #:
WATER	7732-18-5
ADIPIC ACID	124-04-9
COPOLYMER ACRYLAMIDE: DMAEA Q. (MeCl)	69418-26-4

CA PROP 65: CALL FOR ADDITIONAL INFORMATION

SECTION X - ADDITIONAL INFORMATION

NA=Not Applicable; ND=Not Determined or No Data

Good personal hygiene practices can reduce potential exposure. Wash with soap and water following any contact with this product, as well as before breaks and meals. Shower and change clothing at end of work shift. If clothing becomes contaminated, remove and launder or dry-clean before reuse.

The information and recommendations contained herein are, to the best of Allied Colloids Inc's knowledge and belief, accurate and reliable as of the last revision date. This document is offered in good faith. The information relates to the specific material designated, and may not be valid for such material used in combination with any other materials, in any process, or if used in a manner other than for which it is intended.

Allied Colloids Inc does not warrant or guarantee accuracy, reliability or completeness. It is the user's responsibility to satisfy himself as to the suitability and completeness of such information for his own particular use. We do not accept liability for any loss or damage that may occur from the use of this information, nor do we offer warranty against patent infringement.

Allied Colloids Inc

Material Safety Data Sheet

ATTACHMENT D

Relinquished by Sampler: (Signature)	Date	Time:	Received by: (Signature)	Date	Time:
[signature]	11/6/98	0700			
Relinquished by: (Signature)	Date	Time:	Received by: (Signature)	Date	Time:

PH, INC. - (713) 780-0400

ATTACHMENT E

TABLE 6-1

SUMMARY OF DETECTED CONSTITUENTS FOR WATER SAMPLES LOCATION 6, CARLSBAD, NEW MEXICO

Duplicate of Tank 3 T. 9 Tank 3

Detected Constituent	JANEX-FB	JANEX-1	JANEX-2	JANEX-3
HSL Metals (SW-846 Methods 3051/6010B/7470A)				
Aluminum	0.058 T	< 0.0222	31.8	0.0908 T
Antimony	< 0.0038	0.0112 T	< 0.17	0.0149 T
Arsenic	< 0.0019	0.298	0.578	0.324
Barium	0.00096 T	1.4	42.5	1.48
Beryllium	< 0.00022	0.00048 T	< 0.01	0.00028 T
Cadmium	< 0.00044	< 0.00044	0.114 T	< 0.00044
Calcium	< 0.004	1,420	2,170	1,480
Chromium	< 0.00067	0.0129	0.588	0.0136
Copper	< 0.0011	0.0188 T	8.61	0.0174 T
Iron	< 0.0544	2.62	1,650	6.17
Lead	< 0.002	< 0.002	8.73	< 0.002
Magnesium	< 0.0296	567	234 T	586
Manganese	< 0.00056	2.62	12.5	2.79
Mercury	< 0.00011	<0.00011	10.8	< 0.00011
Nickel	< 0.0078	0.0094 T	1.39 T	0.0227 T
Potassium	0.1 T	349	4,100 T	386
Selenium	0.0068 T	0.0286	< 0.19	0.0198
Silver	< 0.00078	0.008 T	< 0.035	0.0092 T
Sodium	6.74	15,500	10,200	18,200
Vanadium	< 0.00067	0.0145 T	< 0.03	0.0162 T
Zinc	< 0.0013	0.0491	27.5	0.0877
Total VOCs (SW-846 Method 8260B)				
Benzene	< 0.005	6.8 D	2.7 D	5.6 D
Ethylbenzene	< 0.005	0.71	0.74	0.38
2-Hexanone	< 0.01	0.017 V	< 0.10	< 0.10
Methylene chloride	0.002 V	< 0.05	< 0.05	< 0.05
Toluene	< 0.005	7.1 D	4.3 D	4.8 D
Xylene (total)	< 0.015	2.1	1.6	0.95
Total SVOCs (SW-846 Method 8270C)				
Bis(2-ethylhexyl) phthalate	< 0.01	< 0.01	0.019 VD	< 0.01
2,4-Dimethylphenol	< 0.01	< 0.01	< 0.08	0.13
Dimethylphthalate	< 0.01	< 0.01	< 0.08	0.0073 V
Fluorene	< 0.01	0.0062 V	0.079 VD	0.0044 V
Total SVOCs (SW-846 Method 8270C) (Continued)				

TABLE 6-1 (Continued)

SUMMARY OF DETECTED CONSTITUENTS FOR WATER SAMPLES LOCATION 6, CARLSBAD, NEW MEXICO

Detected Constituent	JANEX-FB	JANEX-1	JANEX-2	JANEX-3
2-Methylnapthalene	< 0.01	0.058	0.97 D	0.049
2-Methylphenol	< 0.01	0.41 D	0.10 D	0.27
4-Methylphenol	< 0.01	0.45 D	0.45 D	0.3
Naphthalene	< 0.01	0.092	0.49 D	0.081
Phenanthrene	< 0.01	0.0068 V	0.15 D	0.005 V
Phenol	< 0.01	0.74 D	0.11 D	0.61 D
Pesticides (SW-846 Methods 8081A/8141)				
None Detected				
Polychlorinated Biphenyls (SW-846 Method 8082)				
None Detected				
Herbicides (SW-846 Method 8151)				
None Detected				

Notes:

All concentrations are reported in units of milligrams per liter (mg/L).

Constituents reported in this table include those detected in at least one sample at a concentration greater than the reporting limit.

D	This flag identifies all compounds indentified in an analysis at a secondary dilution factor
HSL	Hazardous Substance List
SW-846	U.S. EPA (1996), Test Methods for Evaluating Solid Waste: Update III, third edition, Washington, D.C.
SVOC	Semivolatile organic compound
T	The reported value is less than the contract required detection limit but greater than the instrument detection limit
V	Result is less than the contract required quantitation limit but greater than zero
VOC	Volatile organic compound

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

July 3, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-302

Mr. Gerald Jensen
Jenex Operating Company
1675 Broadway, Suite 1030
Denver, CO 80202

RE: Treating Plant Inspection
Jenex Operating Company
SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14,
Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Mr. Jensen:

The New Mexico Oil Conservation Division (OCD), inspected Jenex Operating Company (Jenex) treating plant located in the SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4 of Section 14, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico, on April 2,1997.

The OCD inspection and current file review of Jenex indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Jenex during the inspection and the new Rule 711 requirements that are not on file. Attachment 2 contains photographs taken during the inspection. Jenex shall provide the OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. A response is required by Jenex to these deficiencies by September 3, 1997.

Pursuant to Order R-10411-B the OCD General Rule 711 has been revised. The OCD is currently in the process of re-permitting all surface waste management facilities under the new Rule 711. Jenex treating plant is included under the new Rule 711. A copy of Order R-10411-B along with the new bond forms were given to Mr. Speedy Hill during the OCD inspection on April 2, 1997. An additional set of these forms and the Order is included with this report. A permit application, Form C-137 (attachment 3), shall be filed with the OCD according to the instructions in Attachment 1, Section 14.

Please be advised that the bonding requirements have changed under the new Rule 711. Jenex's current cash bond (Bond No.124047699) for $25,000 will need to be replaced. The new bonded

amount will be based upon the estimated closure costs that the State of New Mexico would incur if a third party contractor were to remediate the facility (see Rule 711.B.1.i). Jenex must have a new bond in place for the approved estimated closure amount prior to receiving a new waste management facility permit.

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
APRIL 2, 1997
JENEX OPERATING COMPANY.
(SW/4 NE/4 NW/4 and the S/2 NW/4 NW/4
of Section 14, Township 20 South, Range 38 East, NMPM)
LEA COUNTY, NEW MEXICO

1. 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.

Impermeable pad and curb containment needs to be repaired and all drums with waste or product should be stored within the containment (see pictures 1 and 5). Empty drums should be stored in the proper position, recycled or returned to the supplier.

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.

Drums were not clearly labeled as to their contents and hazards (see pictures 1 and 5).

2. Process Area: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

The tank piping, valve, transfer hose, and the oil storage tank areas show evidence of past leaks and or spills reaching the ground surface (see pictures 3, 4, and 9). Spill collection barrels below tank valves need to be kept empty and/or drained and checked for leaks (see picture 3, 4, and 9).

3: 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 type pad within the berm so that leaks can be identified.

The above ground tank berms at this facility are not adequate to contain a volume of one-third more than the total volume of all interconnected tanks(see pictures 2, 3,

4, 6, 7, 8, 9, and 10). In addition, the berms around the south group of tanks need to be repaired (see picture 4).

4. Open Top Tanks and Pits: To protect migratory birds, all tanks exceeding 16 feet in diameter, and exposed pits and ponds shall be screened, netted or covered.

   N/A This facility does not have any open top tanks, pits, or ponds.

5. 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.

   The saddle tanks located south of the boiler room and fuel saddle tanks at the eastern edge of the facility need to have impermeable pad and curb type containment (see picture 10).

6. 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.

   The above ground tanks are not labeled (see pictures 2, 3, 4, 6, 7, 8, 9, and 10).

7. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing and/or visual inspection of cleaned out tanks or sumps, or other OCD approved methods.

   Some of the below grade sumps at the tank outlet valves contained oil and did not have secondary containment (see pictures 3, 4 and 9). These sumps should be kept empty and checked regularly for leaks

8. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter. Companies may propose various methods for testing such as pressure testing or other OCD approved methods.

   Any underground process/wastewater lines will need to have a mechanical integrity testing proposal.

9. Housekeeping: All systems designed for spill collection/prevention should be inspected frequently to ensure proper operation and to prevent overtopping or system failure.

Spill cleanup is proactive but additional work should be done to remediate soils. Facility housekeeping including berms, and valve sump collection barrels need to be maintained and checked frequently (see pictures 2, 3, 4, 5, 7, 8, 9, and 10). The tanks have stains and/or heavy oil build up on the exteriors indicating that they have been overtopped or may have leaks (see pictures 4, 6, 8, and 10)

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

The solid waste dump contained many items including but not limited to contaminated soil in open drums, unlabeled partly filled drums, unlaced containers, spray cans, oil filters, and a lawnmower (see picture 5). The trash should be removed and disposed of properly. A solid waste collection/recycling system is needed to keep trash under control.

11. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116.

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

12. Security: The facility shall be secured when no attendant is present, to prevent any unauthorized dumping. Securing the facility may included locks on tank valves, a perimeter fence and locked gate or other similar security measures.

Facility has a perimeter fence and locking gate.

13. Signs: The facility shall have a sign in a conspicuous place at the facility. The sign shall be maintained in legible condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by quarter-quarter section, township and range, and c) emergency phone number.

The facility does not have a sign posted at the entrance gate.

14. Application Requirements for Permit Under the New Rule 711: An application, Form C-137, for a permit renewal shall be filed in DUPLICATE with the Santa Fe Office of the Division and ONE COPY with the Hobbs OCD district office. The application shall comply with Division guidelines and shall include:

(a) The names and addresses of the applicant and all principal officers of the business if different from the applicant;

Please submit with C-137 application.

(b) A plat and topographic map showing the location of the facility in relation to governmental surveys (1/4 1/4 section , township, and range), highways or roads giving access to the facility site, watercourses, water sources, and dwellings within one (1) mile of the site;

This is already on file with the OCD.

(c) The names and addresses of the surface owners of the real property on which the management facility is sited and surface owners of the real property of record within one mile of the site;

This is already on file with the OCD.

(d) A description of the facility with a diagram indicating location of fences and cattle guards, and detailed construction/installation diagrams of any pits, liner, dikes, piping, sprayers, and tanks on the facility;

This is already on file with the OCD.

(e) A plan for management of approved wastes;

Please submit with C-137 application.

(f) A contingency plan for reporting a cleanup of spills or releases;

Please submit with C-137 application.

(g) A routine inspection and maintenance plan to ensure permit compliance;

Please submit with C-137 application.

(h) A Hydrogen Sulfide (H_2S) Prevention and Contingency Plan to protect public health;

Please submit with C-137 application.

(i) A closure Plan including a cost estimate sufficient to close the facility to protect public health and the environment; said estimate to be based upon the use of equipment normally available to a third party contractor;

Please submit with C-137 application.

(j) Geological/hydrological evidence, including depth to and quality of groundwater beneath the site, demonstrating that disposal of oil field wastes will not adversely impact fresh water;

Please submit geological/hydrological evidence, including depth to and quality of groundwater beneath the facility with the C-137 application.

(l) Certification by an authorized representative of the applicant that information submitted in the application is true, accurate and complete to the best of the applicant's knowledge.

Please submit with C-137 application.

JENEX OPERATING CO. TREATING PLANT INSPECTION (PHOTOS BY OCD)

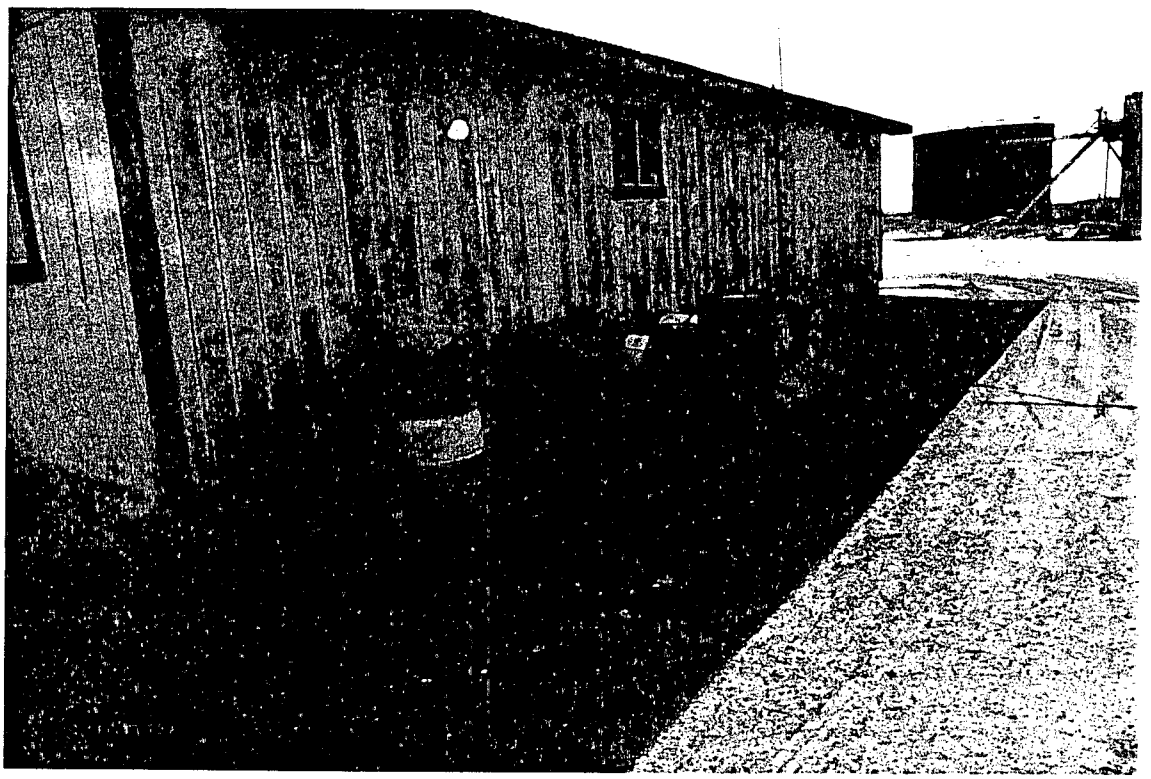


PHOTO NO. 1 DATE: 04/2/97

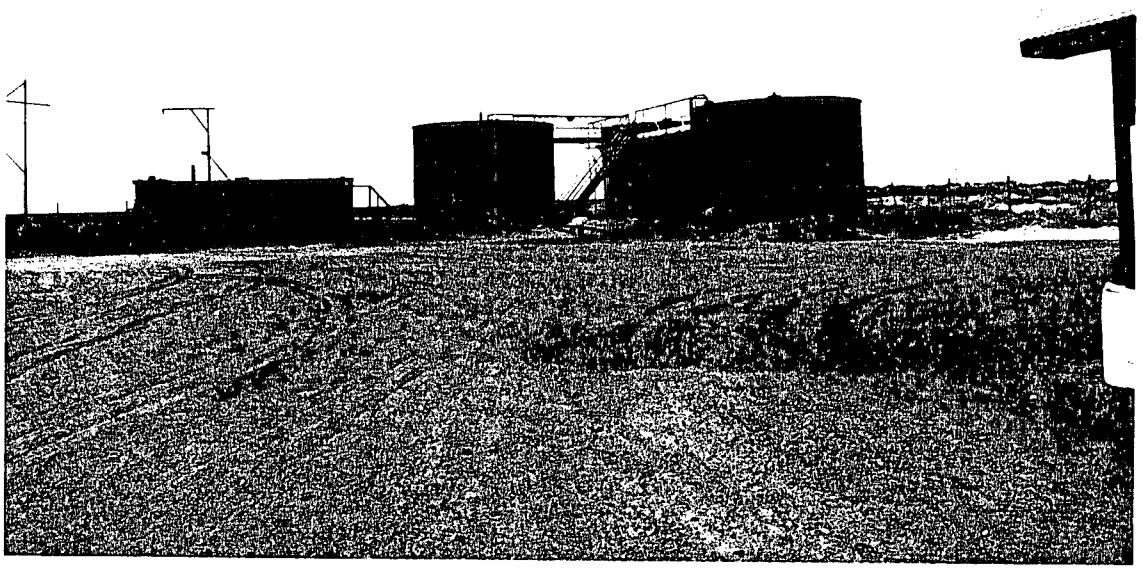
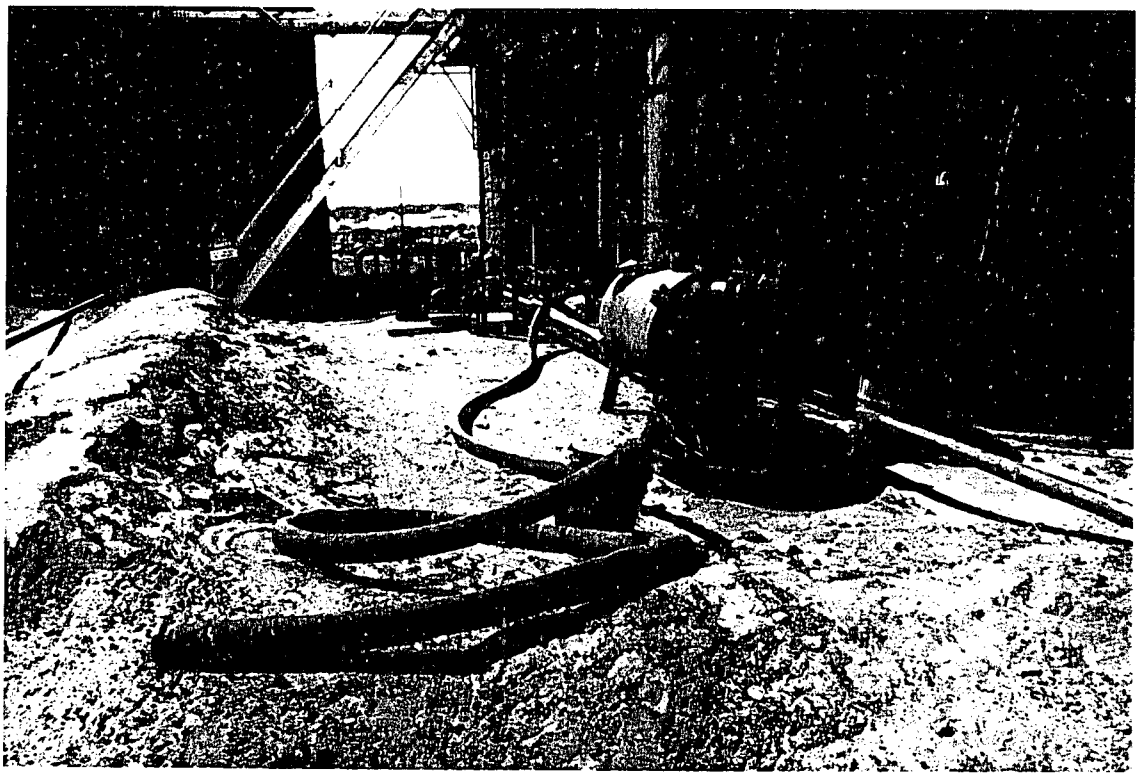


PHOTO NO. 2 DATE: 04/2/97

JENEX OPERATING CO. TREATING PLANT INSPECTION (PHOTOS BY OCD)



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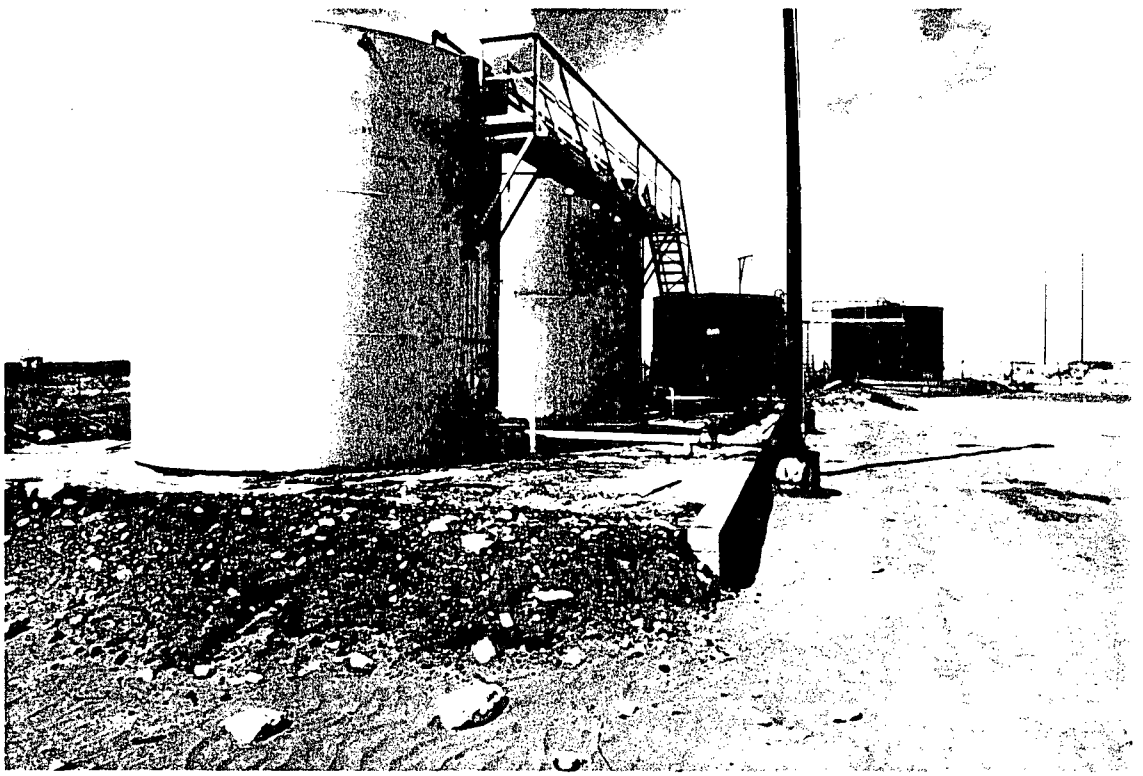


PHOTO NO. 4 DATE: 04/2/97

JENEX OPERATING CO. TREATING PLANT INSPECTION (PHOTOS BY OCD)

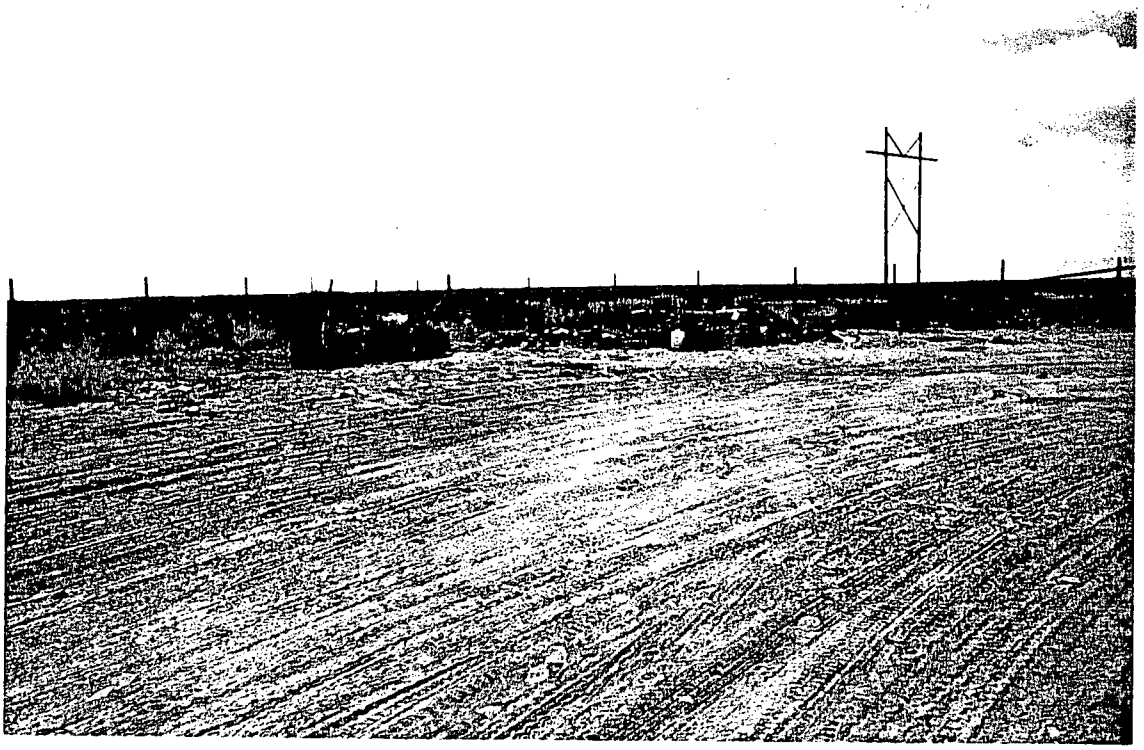


PHOTO NO. 5 DATE: 04/2/97

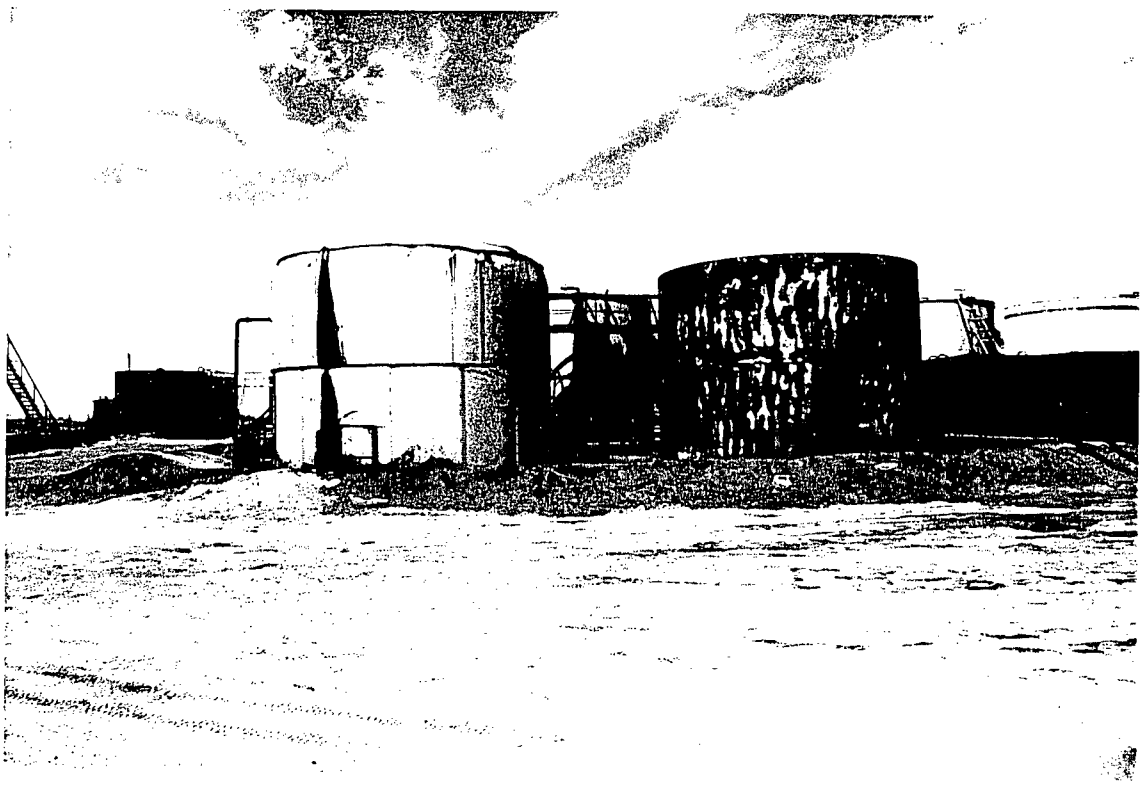


PHOTO NO. 6 DATE: 04/2/97

JENEX OPERATING CO. TREATING PLANT INSPECTION (PHOTOS BY OCD)

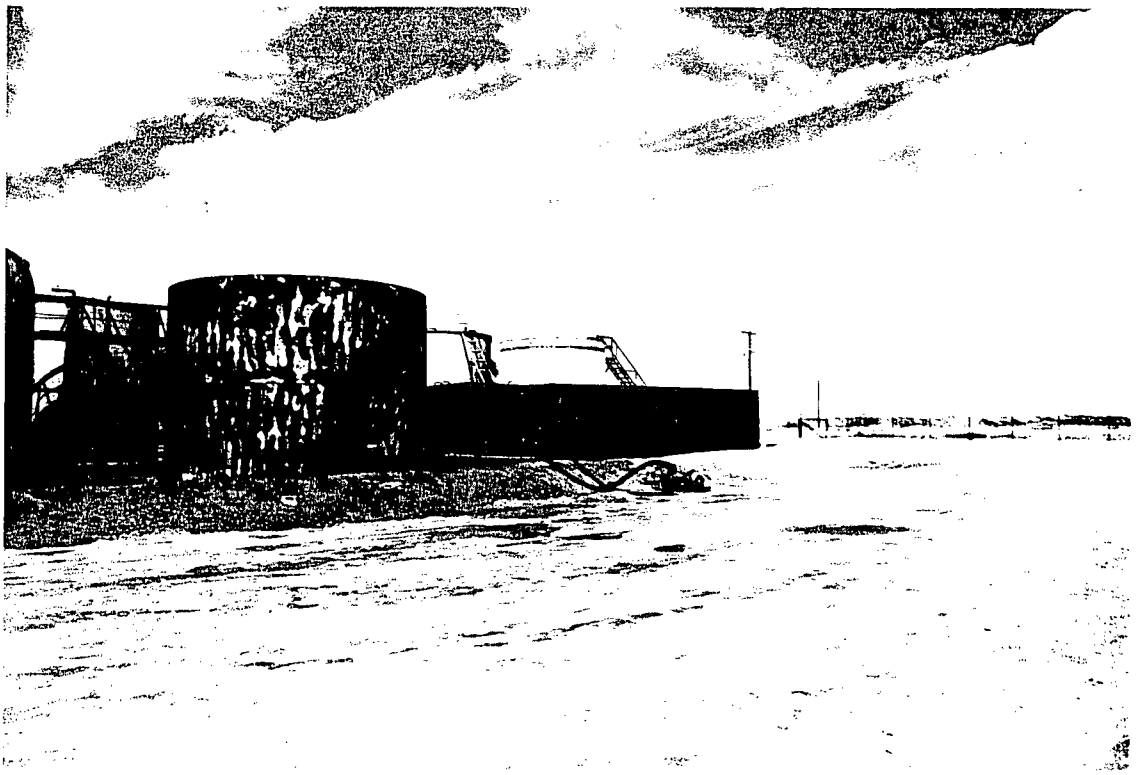


PHOTO NO. 7 DATE: 04/2/97

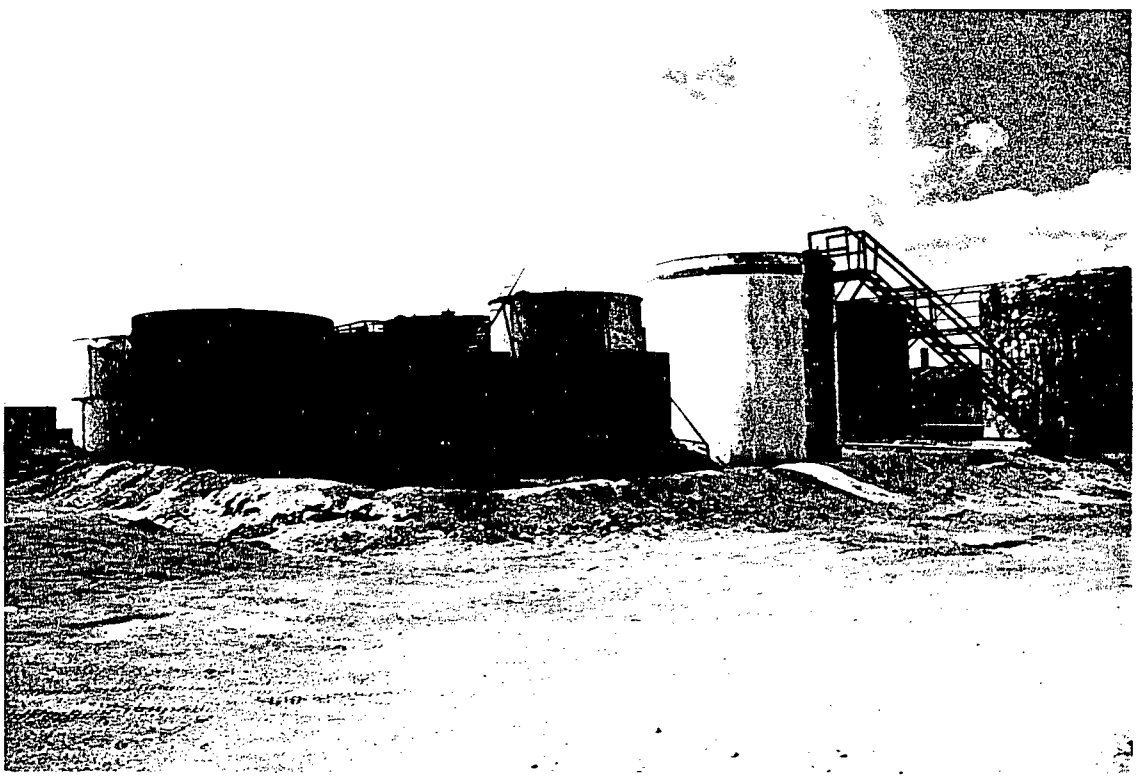


PHOTO NO. 8 DATE: 04/2/97

JENEX OPERATING CO. TREATING PLANT INSPECTION (PHOTOS BY OCD)

PHOTO NO. 9 DATE: 04/2/97

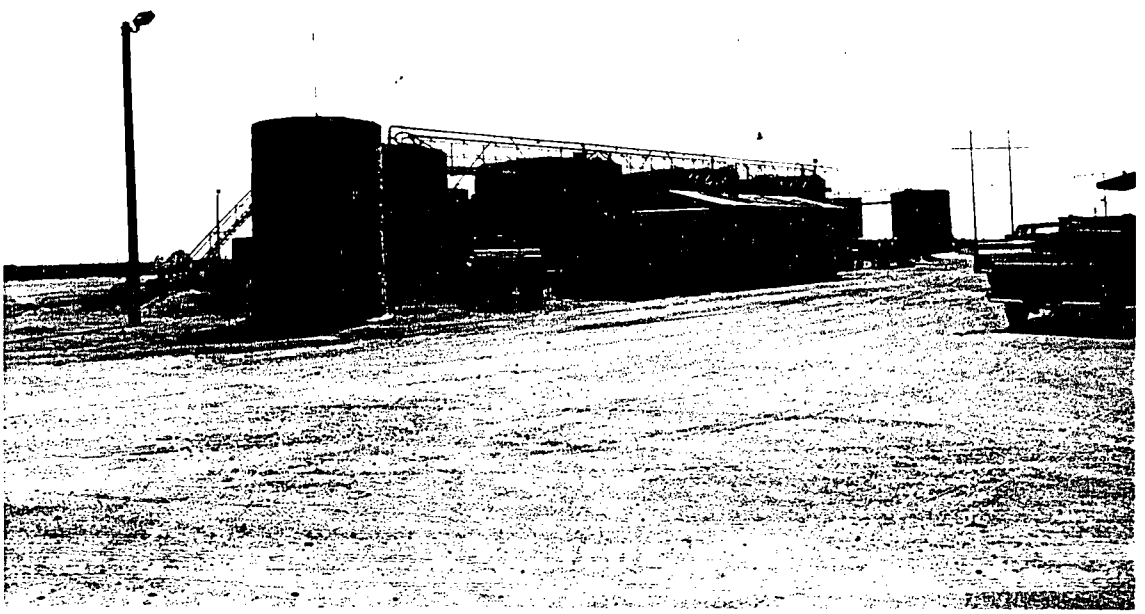
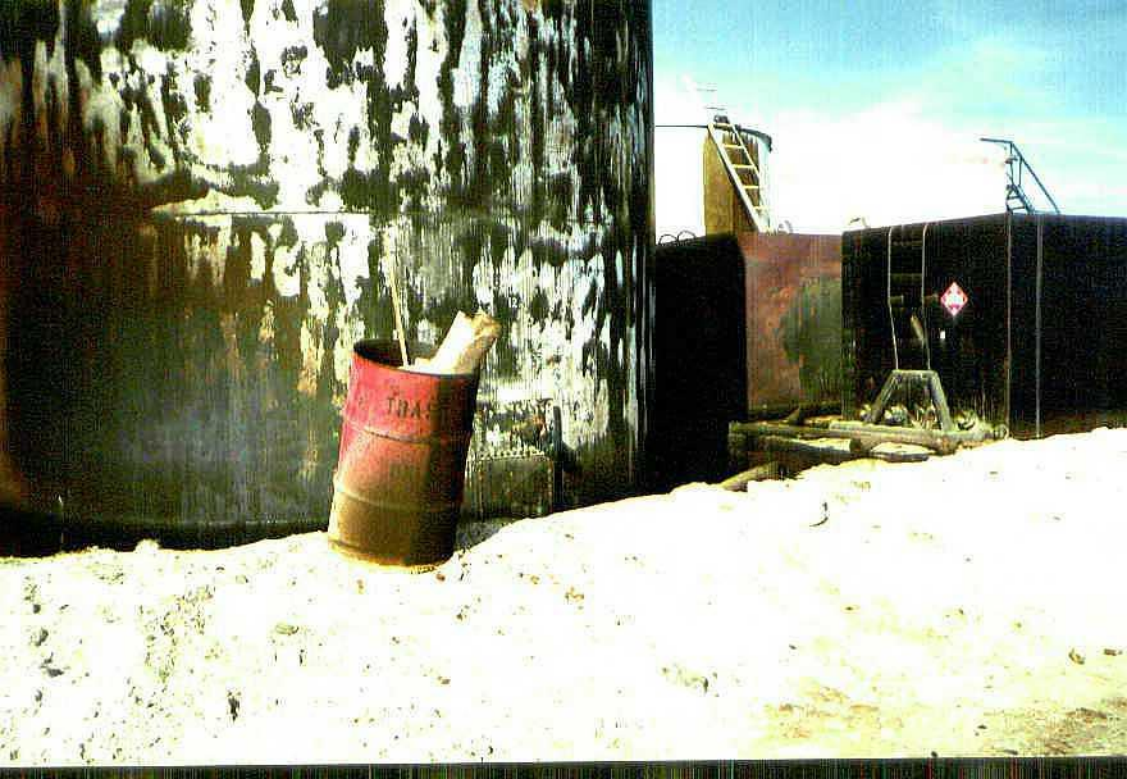


PHOTO NO. 10 DATE: 04/2/97


TRASH

BACK OF TANKS
FACING>WEST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

IN BETWEEN TANKS
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

FRONT OF TANKS
FACING>EAST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"B"

FRONT OF TANKS
FACING>EAST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"B"

SOUTHWEST CORNER OF FACILITY
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

BACK OF TANKS
FACING>NORTH - NORTHEAST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

IN BETWEEN TANKS
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

FRONT OF TANKS
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

FACING>NORTH
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

IN BETWEEN TANKS
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

FRONT OF TANKS
FACING>NORTH
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

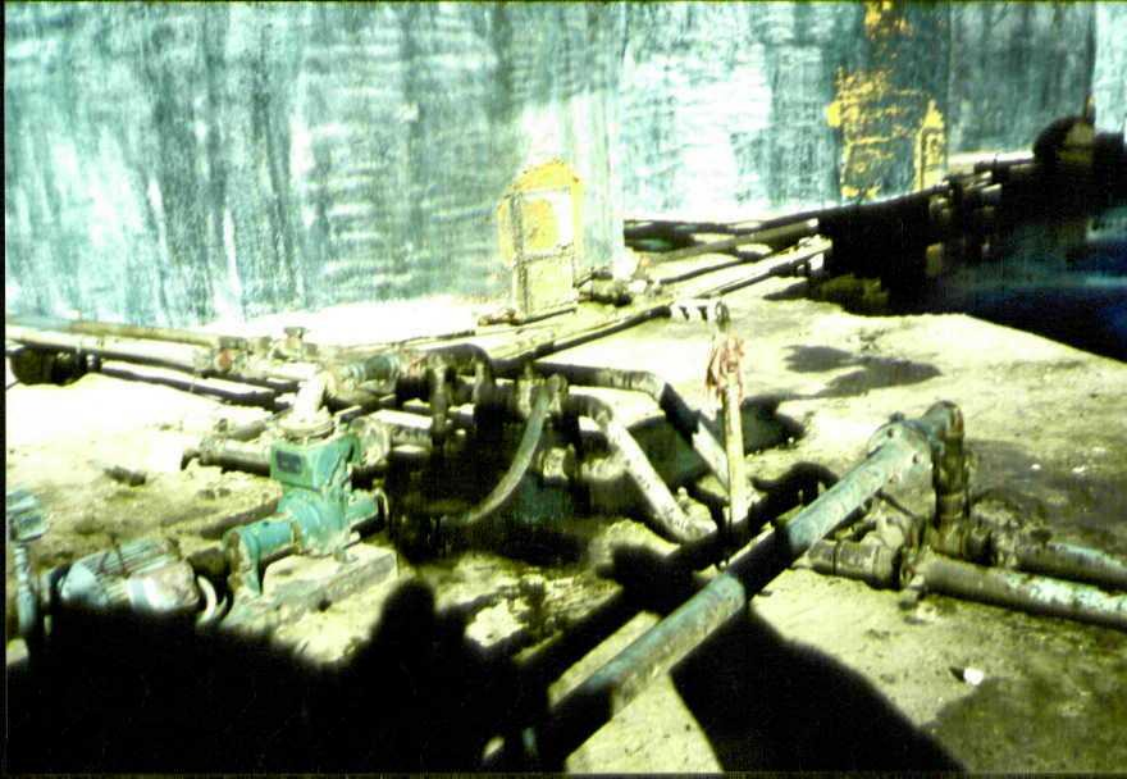
ON SOUTH SIDE OF FACILITY
FACING>SOUTHEAST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

ON SOUTH SIDE OF FACILITY
FACING>WEST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

FRONT OF TANKS
FACING>EAST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"


DANGER

ON SOUTH SIDE OF FACILITY
FACING>SOUTH
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"



IN BETWEEN TANKS
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"A"

FRONT OF TANKS
FACING>NORTHEAST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"B"

SOUTHWEST CORNER
OF FACILITY
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"B"

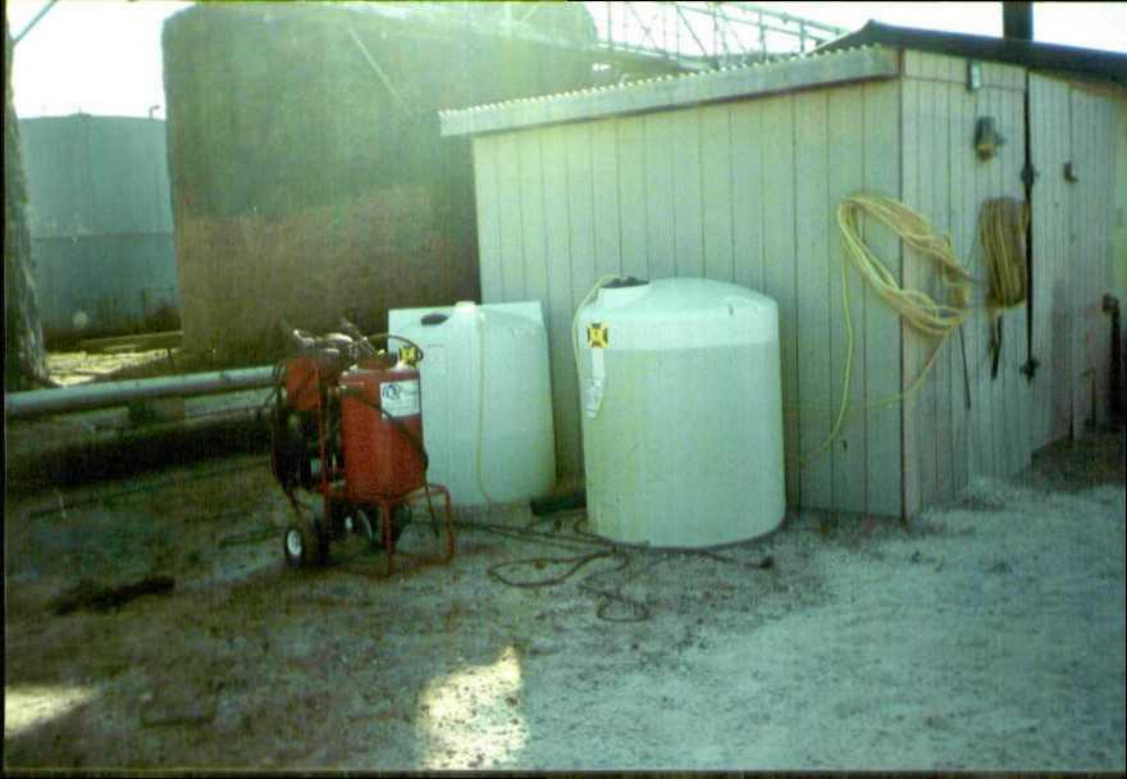
FRONT OF TANKS
FACING>NORTH
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"B"

ENTRANCE OF FACILITY WHERE OIL
HAS RAN DOWN THE ROAD
NORTH OF FACILITY
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00


1993

ALONG THE EAST FENCE LINE
DIESEL TANK
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

BACK OF TANKS
FACING>WEST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"



FRONT OF TANKS
FACING>EAST
ACROSS FROM THE OFFICE
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00

STANDING WATER MIXED WITH OIL
THAT WAS JUST RELEASED FROM
TANKS (APPROXIMATELY 40 bbls)
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00

"C"

NORTH SIDE OF TANKS/FACILITY
FACING>SOUTH
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

24


31161
5146

SOUTHWEST CORNER OF FACILITY
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

SOUTHWEST CORNER OF FACILITY
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"


TRASH
ONLY

SOUTHWEST CORNER OF FACILITY
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

NORTH SIDE OF FACILITY
FACING>WEST-NORTHWEST
JENEX OPERATING CO.
by DONNA WILLIAMS
01-20-00
"C"

INFRONT OF LARGE TANKS-WATER
AND/OR CHEMICAL ??
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

OIL STANDING ON THE OUTSIDE OF
THE FENCE-NORTH SIDE
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

South Side of Facility
in Front of Tanks 18 & 19
Oil soaked up by Caliche & dirt

Jenex operation

Picture taken by Gary Wink

SOUTH SIDE OF FACILITY-IN FRONT O
TANKS #18-#19
OIL SOAKED UP BY CALICHE & DIRT
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

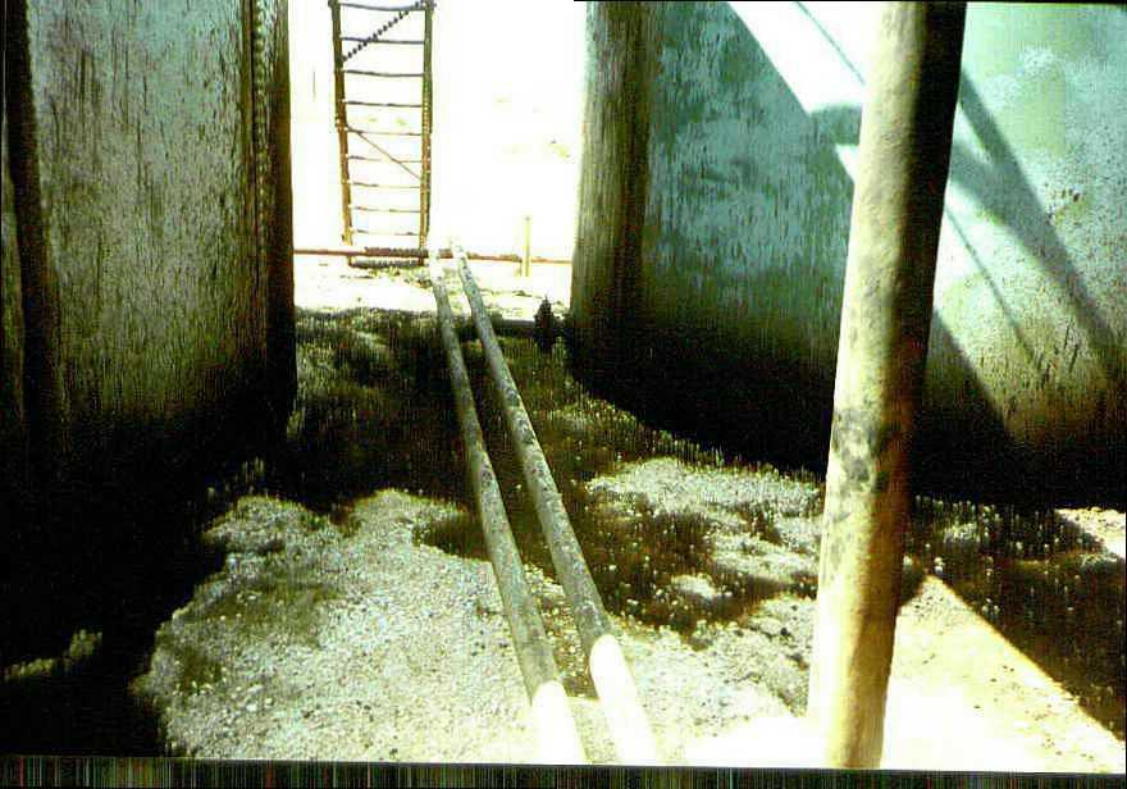
IN AND AROUND LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

IN AND AROUND LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

IN AND AROUND LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

IN AND AROUND LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

IN AND AROUND LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00



IN AND AROUND LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00


1993
SMOKING

WATER STANDING INSIDE OF SECOND
CONTAINMENT-BACK OF FACILITY
LOOKING EAST
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

EXCAVATION BESIDE THE LARGE
TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

EXCAVATION BESIDE THE LARGE TANKS
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

OIL SOAKED/STANDING-BACK OF
FACILITY-FACILITY YARD
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

OIL STANDING ON THE INSIDE OF
THE FENCE-ON FACILITY-NORTH SIDE
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

(8) STANDING ON THE OUTSIDE OF
THE FENCE -NORTH SIDE
LOOKING OPERATING CO.
Taken by Gary Wink
07-07-00

INFRONT OF LARGE TANKS-WATER
AND/OR CHEMICAL ??
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

INSIDE OF BOILER-ROOM -FULL OF
LIQUIDS (?WATER?)
JENEX OPERATING CO.
taken by Gary Wink
07-07-00


POTABLE
WATER

IN FRONT OF THE LARGE TANKS-
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

INSIDE OF THE OFFICE
SINK AREA
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

South west Corner of facility

Sump removed
hole Left open

7-7-00
Jenex Operating
by Gary Wink

SOUTH WEST CORNER OF FACILITY
SUMP REMOVED-HOLE LEFT OPEN
IN THE GROUND-SUMPS FULL
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

hole in ground
oil in hole standing (Full)

Jenex 7-7-00
Picture TAKen by Gary Wink

SOUTH WEST CORNER OF FACILITY
SUMP REMOVED-HOLE LEFT OPEN
IN THE GROUND-SUMPS FULL
JENEX OPERATING CO.
taken by Gary Wink
07-07-00


NGER
GAS MAY
PRESENT

SOUTH WEST CORNER OF FACILITY
STANDING OIL& WATER AROUND TANK
JENEX OPERATING CO.
taken by Gary Wink
07-07-00


1267

SOUTH WEST CORNER OF FACILITY
STANDING OIL& WATER AROUND TANK
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

South West Corner of facility
oil & water
in & around Tanks

Jenex 7-7-00
Picture taken by Gary Wink

SOUTH WEST CORNER OF FACILITY
STANDING OIL & WATER AROUND TANK
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

South side of facility
behind
Parrifin storage

Jenex 07-07-00
by Gary Wink

SOUTH SIDE OF FACILITY-BESIDE
TANKS #18-#19-BEHIND PARRIFIN
TANK-STANDING OIL & WATER
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

SOUTH SIDE OF FACILITY-BESIDE
TANKS #18-#19-DITCH FULL OF OIL
(ONLY-OIL) CALICHE/DIRT SOAKED
JENEX OPERATING CO.
taken by Gary Wink
07-07-00

Jenex Treating Plant

4-2-97

Jenex Treating Plant

4-2-97

Jenex Treating Plant

4-2-97

Jenex Treating Plant

4-2-97

Jenex Treating Plant

4-2-97

Senex Treating Plant

4-2-97

Jenex Treating Plant

4-2-97

Jenex Treating Plant

4-2-97

Jenex treating Plant

4-2-97

Senex treating Plant

4-2-97