

GW - 203

**GENERAL
CORRESPONDENCE**

YEAR(S):
2005 - 1995

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No [REDACTED] dated 4/26/05,
or cash received on _____ in the amount of \$ 200.00

from Baker Hughes
for Appasia Service Facility GW-204
Hobbs Service Facility GW-203
(Facility Name)

Submitted by: [Signature] Date: 5/3/05
(DP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

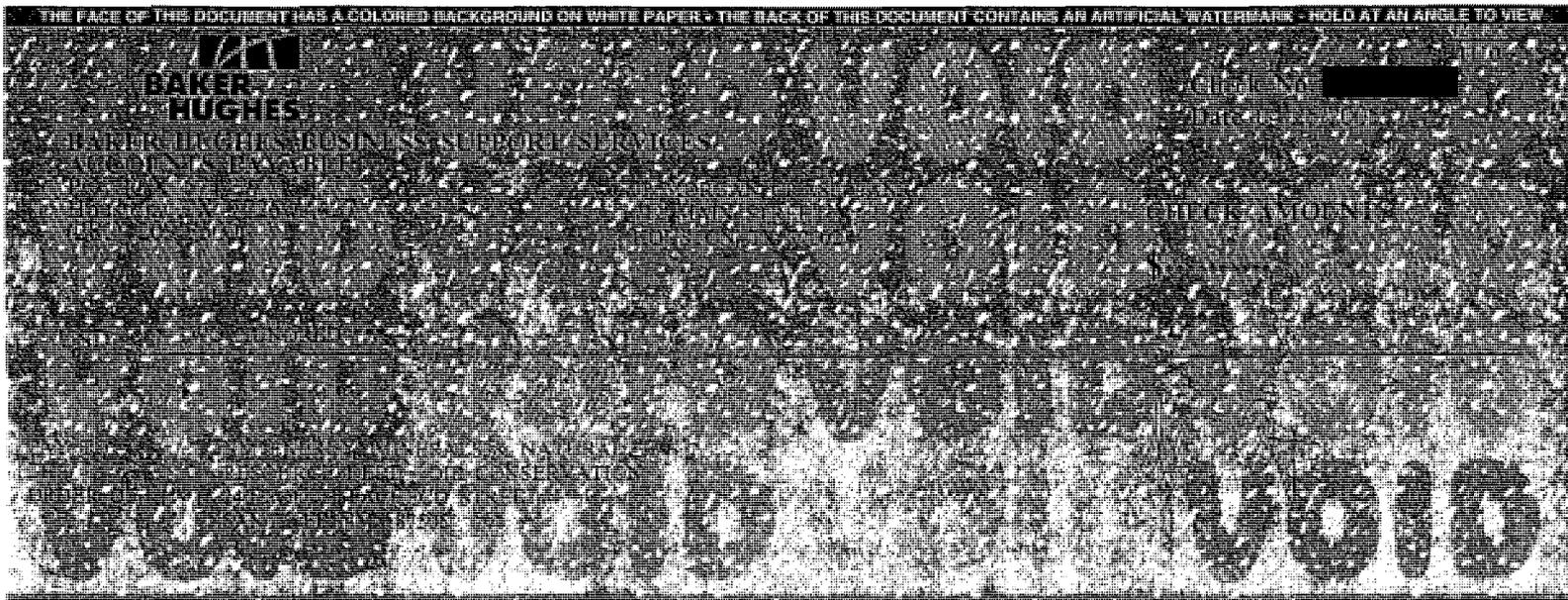
Filing Fee New Facility _____ Renewal

Modification _____ Other _____
(Specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____



**BAKER HUGHES BUSINESS SUPPORT
SERVICES
ACCOUNTS PAYABLE**

PO BOX 674427
HOUSTON, TX 77267-4427
(281)209-7500

Check Information

Check No. / Date

000850566 / 04/26/2005

Your account with us



Document	Your document	Date	Gross amount	Deductions	Net amount
Payment is made on behalf of Baker Petrolite Corp., .					
1900334449	042105	04/21/2005	200.00	0.00	200.00
Hobbs & Artesia Discharge Plan Applic.Renewal					
Sum total			200.00	0.00	200.00

AP 5489737



District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS,
REFINERIES, COMPRESSOR, GEOTHERMAL FACILITIES
AND CRUDE OIL PUMP STATIONS**

(Refer to the OCD Guidelines for assistance in completing the application)

GLW-203

New Renewal Modification

1. Type: Oil Field Chemical Service Company (SIC 1389)

2. Operator: Baker Petrolite - Hobbs, NM Warehouse

Address: 5624 Lovington Highway / Hobbs, NM 88240

Contact Person: Roy Young Phone: (432) 495-7212

3. Location: _____ /4 _____ /4 Section _____ Township _____ Range _____

Submit large scale topographic map showing exact location.

No changes, revisions, or modifications.

4. Attach the name, telephone number and address of the landowner of the facility site.

Baker Petrolite
12645 West Airport Blvd.
Sugar Land, TX 77478
281-275-7400

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
No changes, revisions, or modifications to the facility description. Current facility diagram is attached.

6. Attach a description of all materials stored or used at the facility.
No changes, revisions, or modifications.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
No changes, revisions, or modifications.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
No changes, revisions, or modifications.

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
No changes, revisions, or modifications.

10. Attach a routine inspection and maintenance plan to ensure permit compliance.
No changes, revisions, or modifications.

11. Attach a contingency plan for reporting and clean-up of spills or releases.
No changes, revisions, or modifications.

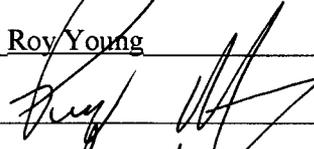
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
No changes, revisions, or modifications.

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

No changes, revisions, or modifications.

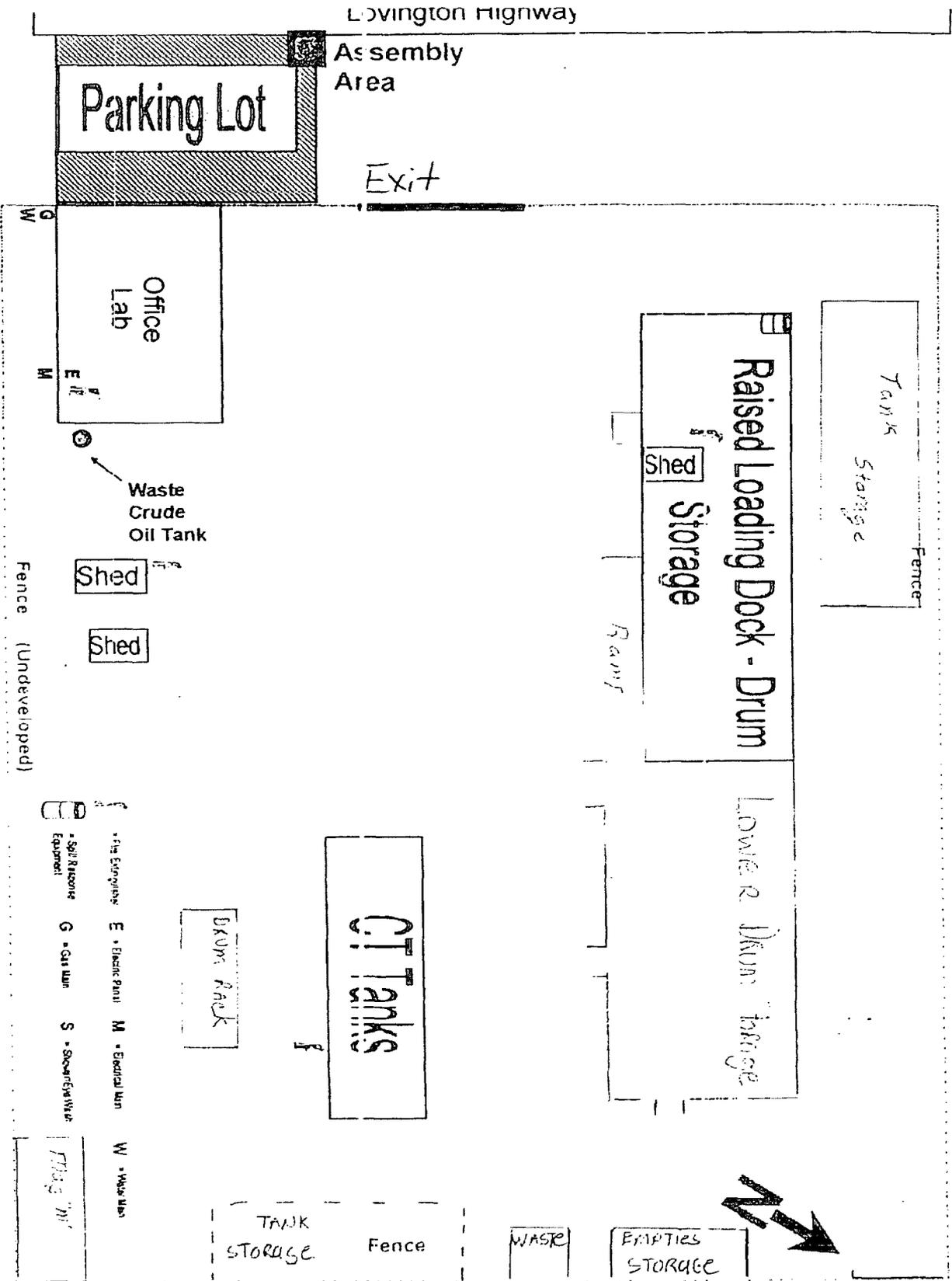
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Roy Young Title: Ops Manager

Signature:  Date: 4/21/05

E-mail Address: Roy.Young@BakerPetrolite.com

- HOBBS, N.I.VI.





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

April 4, 2005

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Mr. Ray B. Young
Baker Petrolite
10520 West I-20 East
Odessa, Texas 79765

RE: Discharge Permit Renewal Notice for Baker Petrolite Facilities

Dear Mr. Young:

Baker Petrolite has the following discharge permits that expire on the dates shown below.

GW-203 expires 8/29/2005 – Hobbs Service Facility

GW-204 expires 8/29/2005 – Artesia Service Facility

WQCC 3106.F. If the holder of an approved discharge permit submits an application for discharge permit renewal at least 120 days before the discharge permit expires, and the discharger is not in violation of the approved discharge permit on the date of its expiration, then the existing approved discharge permit for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge permit continued under this provision remains fully effective and enforceable. An application for discharge permit renewal must include and adequately address all of the information necessary for evaluation of a new discharge permit. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge permit renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee for oil field service facilities. The \$100.00 filing fee is submitted with the discharge permit renewal applications and is nonrefundable.

Please make checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge permit renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Artesia District Office and one copy to the OCD Hobbs District Office, respectfully. **Note that the completed and signed application form must be submitted with your discharge permit renewal request.** (Copies of the WQCC regulations and discharge permit application form and guidelines are available on OCD's website at www.emnrd.state.nm.us/ocd/).

Mr. Ray B. Young
Baker Petrolite Company
April 4, 2005
Page 2

If any of the above facilities no longer has any actual or potential discharges and a discharge permit is not needed, please notify this office. If the Baker Petrolite has any questions, please do not hesitate to contact me at (505) 476-3489.

Sincerely,



W. Jack Ford, C.P.G.
Oil Conservation Division

cc: OCD Artesia District Office
 OCD Hobbs District Office

**BAKER
HUGHES**

Baker Petrolite

12645 West Airport Boulevard
Sugar Land, TX 77478 USA
P.O. Box 5050
Sugar Land, TX 77478-5050 USA
Tel 281-276-5400
Toll Free 800-231-3606
Fax 281-275-7385

FAX TRANSMISSION

Date : 9/23/04

No. of Pages : 4
(including cover)

Name : Jack Favel

Company : New Mexico OCD

Fax No : 505-476-3462

FROM: HEALTH, SAFETY, ENVIRONMENTAL /QUALITY & REGULATORY AFFAIRS
RETURN FAX NO. (281) 275-7385

- | | | |
|--|---|---|
| <input type="checkbox"/> L. Breen (281) 275-7354 | <input type="checkbox"/> W. Harris (281) 276-5888 | <input checked="" type="checkbox"/> D. Munzenmaier (281) 276-5710 |
| <input type="checkbox"/> H. Caravello (281) 275-7345 | <input type="checkbox"/> G. Johnson (281) 275-72744 | <input type="checkbox"/> T. Nugent (281) 275-7260 |
| <input type="checkbox"/> P. Ciszewski (281) 276-5659 | <input type="checkbox"/> D. Kuykendall (281) 276-5868 | <input type="checkbox"/> N. Palacios (281) 275-7323 |
| <input type="checkbox"/> M. Curl (281) 275-7471 | <input type="checkbox"/> K. Lane (281) 275-7373 | <input type="checkbox"/> A. Potten (281) 275-7396 |
| <input type="checkbox"/> L. Deichert (281) 275-7389 | <input type="checkbox"/> J. Lowell (281) 275-7439 | <input type="checkbox"/> M. Rhea (281) 275-7257 |
| <input type="checkbox"/> M. Duplantis (281) 275-5878 | <input type="checkbox"/> M. Macias (281) 275-7496 | <input type="checkbox"/> K. Singh (281) 276-5668 |
| <input type="checkbox"/> B. Friedman (281) 275-7477 | <input type="checkbox"/> K. Medeiros (281) 275-7205 | <input type="checkbox"/> T. Sittler (281) 275-7262 |
| <input type="checkbox"/> J. Garcia (281) 275-7483 | <input type="checkbox"/> J. Miggins (281) 275-7462 | <input type="checkbox"/> _____ |
| <input type="checkbox"/> M. Greulich (281) 275-7425 | <input type="checkbox"/> D. Morton (281) 275-7261 | <input type="checkbox"/> _____ |

Message: Jack, Thanks for taking my call.
I did not include the reference attachments to
save pages. If you need the, please let me
know.
 DJ

David L. Munzenmaier
Environmental Engineer



Baker Petrolite

12645 West Airport Blvd.
Sugar Land, Texas 77478 USA
P.O. Box 5050 77487
Tel 281-276-5710 • Fax 281-275-7385
E-mail david.munzenmaier@bakerpetrolite.com



Amarillo:

4104 West 33rd Street
Amarillo, Texas 79109
(806) 467-0607
Fax (806) 467-0622



Llano-Permian Environmental

Midland:

1031 Andrews Highway, Suite 115
Midland, Texas 79701
(915) 522-2133
Fax (915) 522-2180

March 5, 2002

Ann Potten
Environmental Specialist
Baker Petrolite Corporation
12645 West Airport Boulevard
Sugar Land, Texas 77478

Re: Chromium in soil evaluation, BPC Facility, Hobbs, New Mexico

Dear Ms. Potten,

Llano Permian Environmental Services (Llano-Permian) is pleased to present Baker Petrolite Corporation (Baker Petrolite) this letter report concerning research that was conducted in reference to chromium concentrations detected in shallow soils at the BPC facility in Hobbs, New Mexico. The following is a description of the research and its conclusions.

BPC requested the research be done on behalf of correspondence from the New Mexico Oil Conservation Division (NMOCD) requesting additional information concerning chromium concentrations observed at the referenced site. In August of 2000, BPC conducted a soil investigation at the BPC Hobbs facility. A report was generated with the findings of the investigation and submitted to the NMOCD in October of 2000. In 2001, the NMOCD submitted correspondence to BPC concerning the observed chromium concentrations at the site. The total chromium concentrations at the site ranged from 5.9 mg/Kg to 10 mg/Kg. The research conducted by Llano-Permian Environmental (LP) focused on NMOCD and New Mexico Environmental Department (NMED) regulations and Texas Natural Resource Conservation Commission (TNRCC) regulations.

NMOCD Regulations

The NMOCD follows the RCRA guidelines of utilizing the Toxic Characteristic Leachate Procedure (TCLP) for evaluating chromium concentrations in soils. The TCLP value for chromium to be considered a hazardous waste is 5.0 mg/L. The TCLP analytical process requires that a solid sample be exposed to a pH specific liquid saturation for a specific period of time. After the saturation time has been reached the liquid is separated from the sample and analyzed for chromium in a liquid form, hence the conversion of measuring total chromium in mg/Kg to measuring TCLP chromium in mg/L. In addition, there is a 20 to 1 dilution factor in the TCLP analytical method. Therefore, you must have at least

100 mg/Kg of chromium in the soil that is 100% available in the saturation portion of the analysis to fail the TCLP concentration of 5.0 mg/L.

In addition, in NMOCD Table 4-16 found in "4.0 Risk-Based Evaluation of Petroleum Releases", the NMOCD lists lead as the only metal of concern. Chromium is not included in the NMOCD soil concentration risk table (Attachment 1).

NMED Regulations

The NMED was consulted to determine if the State of New Mexico had any published background concentrations of elements such as chromium for specific geographical areas. Ms. Debby Brinkerhoff, Manager of the Compliance and Technical Assistance Program for the NMED stated that the State of New Mexico does not have published background concentrations for specific elements, however, the State does have risk based screening levels for particular contaminants for Residential/ Industrial/ Occupational and Construction Worker Soil scenarios.

The residential/ Industrial/ Occupational and Construction Worker Soil screening level for trivalent chromium (chromium III) in soil in the State of New Mexico is 100,000 mg/Kg. The Screening levels for hexavalent chromium (Chromium VI) are more varied. The chromium VI screening level for residential is 230 mg/Kg, Industrial/ Occupational is 660 mg/Kg and Construction Worker is 1000 mg/Kg.

TNRCC Regulations

The TNRCC regulations were researched for background specific chromium concentrations that may be present near the Texas/New Mexico border since Hobbs, New Mexico is only approximately 10 miles from the Texas Border. Texas does not publish known background element concentrations, however, Texas does have its own risk based criteria similar to the State of New Mexico and it has published the Texas-Specific Background Concentrations for many elements, chromium included. Texas has published that the median background concentration of Total Chromium in the State of Texas is 30 mg/Kg (Figure: 30 TAC-350.51(m)).

The most stringent risk based standard for a Tier 1 Commercial/ Industrial Soil Protective Concentration Limit for Chrome III is 1200 mg/Kg for the groundwater/soil ingestion pathway for a 30-acre source area. The most stringent risk based standard for a Tier 1 Commercial/ Industrial Soil Protective Concentration Limit for Chrome VI is 14 mg/Kg for the groundwater/ soil ingestion pathway for a 30-acre source area.

Conclusions

The chromium concentrations observed at the Hobbs BPC facility are uniformly consistent and are also consistent with known background chromium concentrations from the local area. Based on this data LP considers the chromium concentrations at the Hobbs BPC facility to be natural in origin.

Llano -Permian Environmental

Environmental Chemists • Biologists • Geologists • Scientists • Corrective Action Project Managers

It has also been demonstrated that the chromium concentrations could not be considered hazardous for TCLP and the concentrations do not approach any published criteria that that pose a threat to persons or the environment. Therefore, Llano-Permian Environmental considers that the observed chromium concentrations at the referenced site are natural background concentrations and are not a threat to public welfare or the environment.

Should you have any questions regarding this proposal or require any additional information, please contact Terry James at (915) 522-2133.

Sincerely,

Llano Permian Environmental Services



Terry James
Senior Project Manager

TJ/dr

Ford, Jack

From: Potten, Ann M.[SMTP:Ann.Parks@bakerpetrolite.com]
Sent: Monday, November 20, 2000 10:11 AM
To: Ford, Jack
Subject: BPC Hobbs Environmental Work

Jack,

Per our conversation last week regarding the site assessment and remediation at the BPC Hobbs facility, I have discussed the possible existence of an on-site well with other BPC personnel. No other BPC personnel at the site, district office, or corporate office are aware of any wells at the Hobbs facility, specifically no wells related to the laboratory. In addition, I have reviewed our files and have not found any documentation related to the installation, maintenance, and/or closure of any wells on the Hobbs property. I have also reviewed a listing of water wells in the area, none of which were listed for the BPC Hobbs property. If you have reason to believe there is a well on the BPC property, please let me know as soon as possible.

I have also reviewed the Chromium results in SB-2. 10mg/kg was reported in the soil sample collected from SB-2, which was compared to the TCLP criterion, 5.0 mg/L. Using the 'divisible by 20' rule, the chromium detected in this soil sample, would not likely be leachable and is also less than the regulatory criteria. Metals are typically found in southern NM/west Texas soils due to natural geologic formations. In addition, chromium is not an element typically used in BPC products.

If you have any questions or comments, please feel free to email or call me.
Thank you,

Ann Potten, CHMM
Environmental Programs
Baker Petrolite Corporation
phone (281) 275-7396

Roy Young
432
975-556-0929

Troy Womack

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 12-5-00,
or cash received on _____ in the amount of \$ 1,380.00

from Baker Hughes

for Hobbs Facility and Artesia Facility

9W-203-690.0
9W-204-690.0

Submitted by: [Signature] Date: 12-18-00

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal X

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment _____



BAKER HUGHES BUSINESS SUPPORT
SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
Houston, TX 77267-4427
(281) 209-7500

CHASE BANK OF TEXAS

Check No. [REDACTED]
Date: 12/05/2000

CHECK AMOUNT
\$*****1,380.00*

PAY *** ONE THOUSAND THREE HUNDRED EIGHTY USD***
TO THE ORDER OF

WATER QUALITY MANAGEMENT FUND
C/O OIL CONSERVATION DIVISION
2040 SOUTH PACHECO
SANTA FE NM 87505

[Signature]

BAKER HUGHES BUSINESS SUPPORT
SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
HOUSTON, TX 77267-4427
(281)209-7500

Check Information

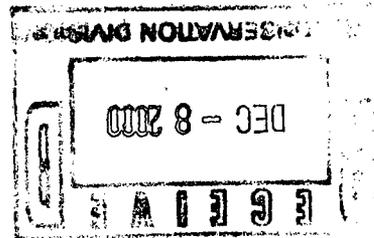
Check No. / Date

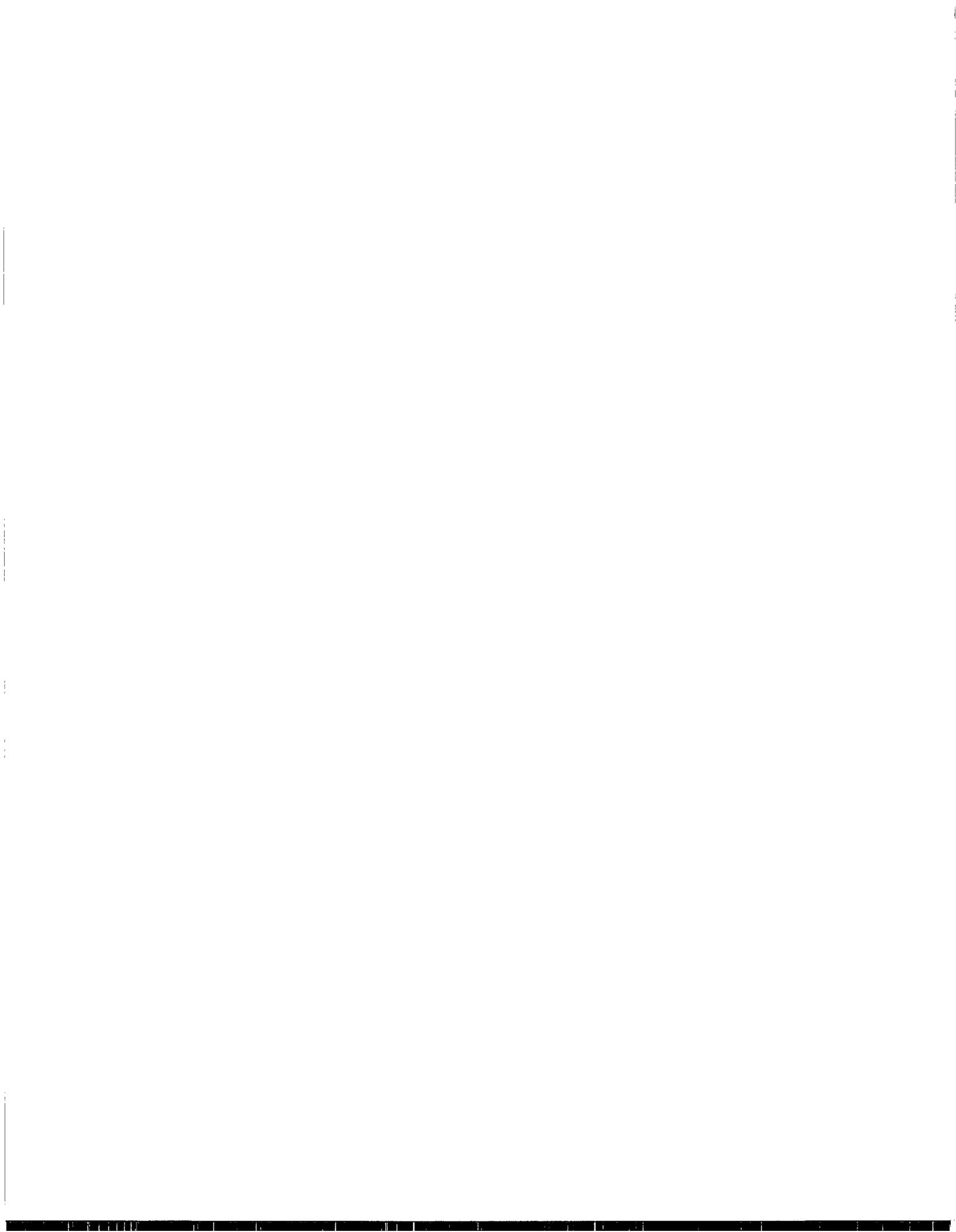
/ 12/05/2000

Your account with us

133797

Document	Your document	Date	Gross amount	Deductions	Net amount
Payment is made on behalf of Baker Petrolite Corp., .					
1900036167	120400	12/04/2000	690.00	0.00	690.00
1900036172	120400A	12/04/2000	690.00	0.00	690.00
Sum total			1,380.00	0.00	1,380.00





NMPCRC Corporation Information Inquiry

New Search

Public Regulation Commission

8/22/2000

BAKER PETROLITE CORPORATION

(DELAWARE Corporation)

SCC Number: **0216093**

Tax & Revenue Number: **01509895008**

Qualification Date: **MAY 17, 1939, in NEW MEXICO**

Corporation Type: **IS A FOREIGN PROFIT**

Corporation Status: **IS ACTIVE**

Good Standing: **In GOOD STANDING through 12/15/2001**

Purpose: **SALE OF CHEMICALS AND ELECTRICAL UNITS**

CORPORATION DATES

Taxable Year End Date: 09/30/99

Filing Date: 11/15/99

Expiration Date:

SUPPLEMENTAL POST MARK DATES

Supplemental: 08/07/92

Name Change: 11/24/97

Purpose Change:

MAILING ADDRESS

3900 ESSEX LN STE 1200 HOUSTON , TEXAS 77027

PRINCIPAL ADDRESS

NEW MEXICO

PRINCIPAL ADDRESS (Outside New Mexico)

12645 W. AIRPORT SUGARLAND TEXAS 77478

REGISTERED AGENT

C T CORPORATION SYSTEM

123 EAST MARCY SANTA FE NEW MEXICO 87501

Designation date: 11/15/99

Agent Post Mark Date:

Resignation date:

COOP LICENSE INFORMATION

Number:

Type:

Expiration Year:

OFFICERS

President *BASSETT, M. GLENN*

Vice President *FINLEY G. S.*

Secretary *SMITH, LINDA J.*

Treasurer *DOTY, DOUGLAS C.*

DIRECTORS

Date Election of Directors:

<i>BASSETT, M. GLEN</i>	3900 ESSEX LANE, SUITE 1200 HOUSTON , TX 77027
<i>BRAUN, JAMES E</i>	3900 ESSEX LN STE 1200 HOUSTON , TX 77027
<i>O'DONNELL, III, LAWRENCE</i>	3900 ESSEX LANE, SUITE 1200 HOUSTON , TX 77027

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

RECEIVED

New Renewal (GW-203) Modification

JUL 12 2000

1. Type: Oil field chemical service company, 1389 SIC
2. Operator: Baker Petrolite Hobbs, NM Warehouse Baker Petrolite Jal, NM Stockpoint
Address: No changes, revisions or modifications
Contact Person: No changes Phone: No changes
3. Location: _____/4 _____/4 Section _____ Township _____ Range _____
Submit large scale topographic map showing exact location.
See topographic map attached.
4. Attach the name, telephone number and address of the landowner of the facility site.
- | | |
|--------------------------|--------------------|
| Hobbs, NM Warehouse | Jal, NM Stockpoint |
| Baker Petrolite | No changes |
| 12645 West Airport Blvd. | |
| Sugar Land, TX 77478 | |
| 281-275-7400 | |
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
- | | |
|--|--|
| Hobbs, NM Warehouse | Jal, NM Stockpoint |
| See Appendix A. Facility Plot | No changes, revisions or modifications |
| Fire, Oil, and Hazardous Substance Emergency | |
| Response and Employee Contingency Plan | |
6. Attach a description of all materials stored or used at the facility.
- No changes, revisions or modifications
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
- No changes, revisions or modifications (no wastewater discharge)
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
- No changes, revisions or modifications
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
- No changes, revisions or modifications
10. Attach a routine inspection and maintenance plan to ensure permit compliance.

ACCOUNTS PAYABLE

File Fee
Received

No changes, revisions or modifications

11. Attach a contingency plan for reporting and clean-up of spills or releases.

See attached plans for both Hobbs and Jal facilities.

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

No changes

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

None

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

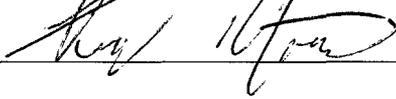
Name: _____

ROY YOUNG

Title: _____

Operations Manager

Signature: _____



Date: _____

6/23/00

Hobbs, NM - ER/SPCC



Baker Petrolite

FIRE, OIL, AND HAZARDOUS SUBSTANCE

EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

LOCATION: Hobbs, New Mexico

This Plan was developed to conform with the following applicable laws: Clean Water Act (CWA) (40 CFR § 112), Resource Conservation and Recovery Act (RCRA) (40 CFR § 265, Subpart D), Superfund Amendments and Reauthorization Act (SARA) (40 CFR § 300, Subpart C) and Occupational Safety and Health Act (OSHA § 1910.38). As such, it will replace previous SPCC and Emergency Response plans retained at the site.

ANNUAL REVIEW

Reviewed and Approved:	<u><i>Scott J. [Signature]</i></u>	Date:	<u>5/5/99</u>
Reviewed and Approved:	<u><i>AJ Thomas</i></u>	Date:	<u>5/6/99</u>
Reviewed and Approved:	<u><i>Fabian [Signature]</i></u>	Date:	<u>4/24/00</u>

BAKER PETROLITE CORPORATION
FIRE, OIL AND HAZARDOUS SUBSTANCE
EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

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1.0 CERTIFICATION*

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR § 112, attest that this SPCC plan has been prepared in accordance with good engineering practices.

(Seal)

Printed Name of Registered Professional Engineer

Date

Signature of Registered Professional Engineer

Registration Number

State Issued

*This certification is necessary when storing oil in excess of 660 gallons or 1,320 cumulative in a contiguous area at the site.

2.0 EMERGENCY RESPONSE AND CONTINGENCY PLAN

2.1 Site Description

BAKER PETROLITE CORPORATION (BPC) operates facilities for the manufacture of industrial and oil field chemicals. In addition, numerous district facilities blend chemicals to customer specifications and act as distribution points to local customers. At these facilities, petroleum products and hazardous materials may be stored in bulk quantities. This plan meets the requirements set forth in 29 CFR § 1910.38. The following BPC facility stores petroleum and/or hazardous materials in quantities which may require implementation of an emergency plan:

Baker Petrolite

Location

5624 Lovington Highway

(Street or Post Office Box)

Hobbs (LEA County)

(City) (County)

New Mexico 88240

(State) (Zip Code)

505-392-6711

(Phone Number)

The driving directions to the location from the nearest metropolitan center are as follows:

North Highway 385, 28 miles to Seminole, Texas West Highway 62

24 miles to Hobbs.

2.1.1 Material and Waste Inventory

Table 2-1 provides an inventory of oils and hazardous materials stored on site in quantities which, when released, may pose a threat to human health or the environment. A map plan depicting their storage locations is presented in Appendix A. Material Safety Data Sheets (MSDS) are stored on site at the Hobbs, New Mexico Facility.

2.1.2 Maintenance and Inspections

Normal maintenance for the material storage facilities will be performed by facility employees under the supervision of the District or Plant Manager. Routine maintenance will include, but not be limited to:

- (1) remediation of minor spills resulting from normal site operations which pose no threat to site employees;
- (2) replacement and repair of leaking fittings or valves as part of normal facility maintenance; and
- (3) discharging water from storage containment areas.

The Manager or Emergency Coordinator (EC-refer to Section 2.4.2) will determine which activities can be performed by facility operators and which need be contracted due to the potential hazards involved.

Maintenance records (Appendix B) which detail modifications or repairs made to hazardous material, oil, and waste units or devices shall be held at the facility for a minimum of 3 years.

At a minimum, oil, chemical, and waste storage facilities will be inspected routinely (in accordance to the BPC Environmental Field Manual and applicable environmental laws) for:

- (1) leaks, corrosion or integrity problems,
- (2) accumulated liquids in containment areas,
- (3) improper labeling and storage practices, and
- (4) open or deteriorated containers.

An inspection record (Appendix C) will be maintained which details inspection dates, inspection results, and any remedial actions taken as a result of these inspections.

2.1.3 Fire Prevention

The site operator shall address all major work place fire hazards (i.e., storage of flammable material, welding areas and electronic panels). Once identified, proper handling and storage procedures, potential ignition source/control procedures and type of fire protection equipment available must be specifically discussed. These are as follows:

Fire Hazard	Fire Controls and Procedures
Small Fires	An attempt will be made to put out small fires. The fire department shall be called regardless if the fire is extinguished or not.
Large Fires	No attempt should be made to extinguish fire. Evacuate all personnel and visitors. Immediately notify fire department. Close all valves on storage tanks. Stand by for fire department arrival. Contact Emergency Response Group in Sugarland. Do not permit unauthorized individuals to enter.

2.1.4 Housekeeping

The site will control the accumulation of combustable and flammable liquids in process areas as follows:

- The truck loading and unloading areas are inspected daily for cleanliness.
- Trash containers are located within the work area to collect ordinary refuse. Regular trash pickup occurs weekly at this facility. Transfer hoses are capped after each use to minimize drippage & to reduce spills.
- All minor spills will be remediated with a minimum of 24-hours of occurrence.

2.1.5 Maintenance of Fire Protection Equipment

The site shall maintain both internal and external inspection and service programs for fire protection devices. All extinguishers/deluge systems will be inspected monthly and serviced at least annually. All other emergency equipment will be inspected accordance with the applicable sections of the BPC Safety Manual.

2.1.6 Pollution Incident Reports

The site shall maintain a record of pollution incidents (Appendix D). At a minimum this record will describe:

- (1) date of the incident;
- (2) nature and extent of the incident;
- (3) internal and external notifications made, including follow-up, written reports; and
- (4) actions taken to correct the problem:

2.1.7 Employee Training

Applicable facility personnel responsible for managing hazardous waste, hazardous materials and oil, are required to attend corporate hazardous waste management (40 CFR § 265) and Hazmat training courses (29 CFR § 1910.120). In addition, each facility will provide a minimum of "first responder awareness level" training to employees during regularly scheduled safety meetings. This training, at a minimum, will include familiarizing employees with the emergency response procedures as outlined in this plan (29 CFR § 1910.120 (q)(1)). This course shall be given to the employee within six-months of his/her date of hire and annually thereafter by a trained and qualified instructor. In addition, this training is necessary whenever this plan or the employee duties change. No personnel shall handle any hazardous waste/material releases until this training is completed. At a minimum, the in-house training program will include reviewing this plan as it pertains to the following topics:

- (1) hazardous waste and material management procedures;
- (2) identification of potential hazards in the work place;
- (3) applicable pollution control laws and regulations;
- (4) Emergency Response and Contingency Plan;
 - a. initially, when plan is developed
 - b. whenever employees responsibilities change
 - c. if the plan is changed
- (5) emergency response procedures and reporting;
- (6) emergency response notification and communications;
- (7) site evacuation plan and routes; and
- (8) proper use of personnel protection equipment.

Employee Emergency Response training records will be maintained at the facility for a minimum of thirty (30) years after the employee resigns from the company. A copy of this record is presented as Appendix E.

2.2 Facility Design

2.2.1 Facility Drainage

A topographic map depicting surface water flow directions is presented as Figure 2-1. The following section discusses drainage patterns across the site, including details on out falls of facility drainage ditches and connected water bodies. Any navigable waterways or those categorized as recreational or potable within 1 mile of the site are also identified.

~~No waterways, or recreational water within one mile.~~

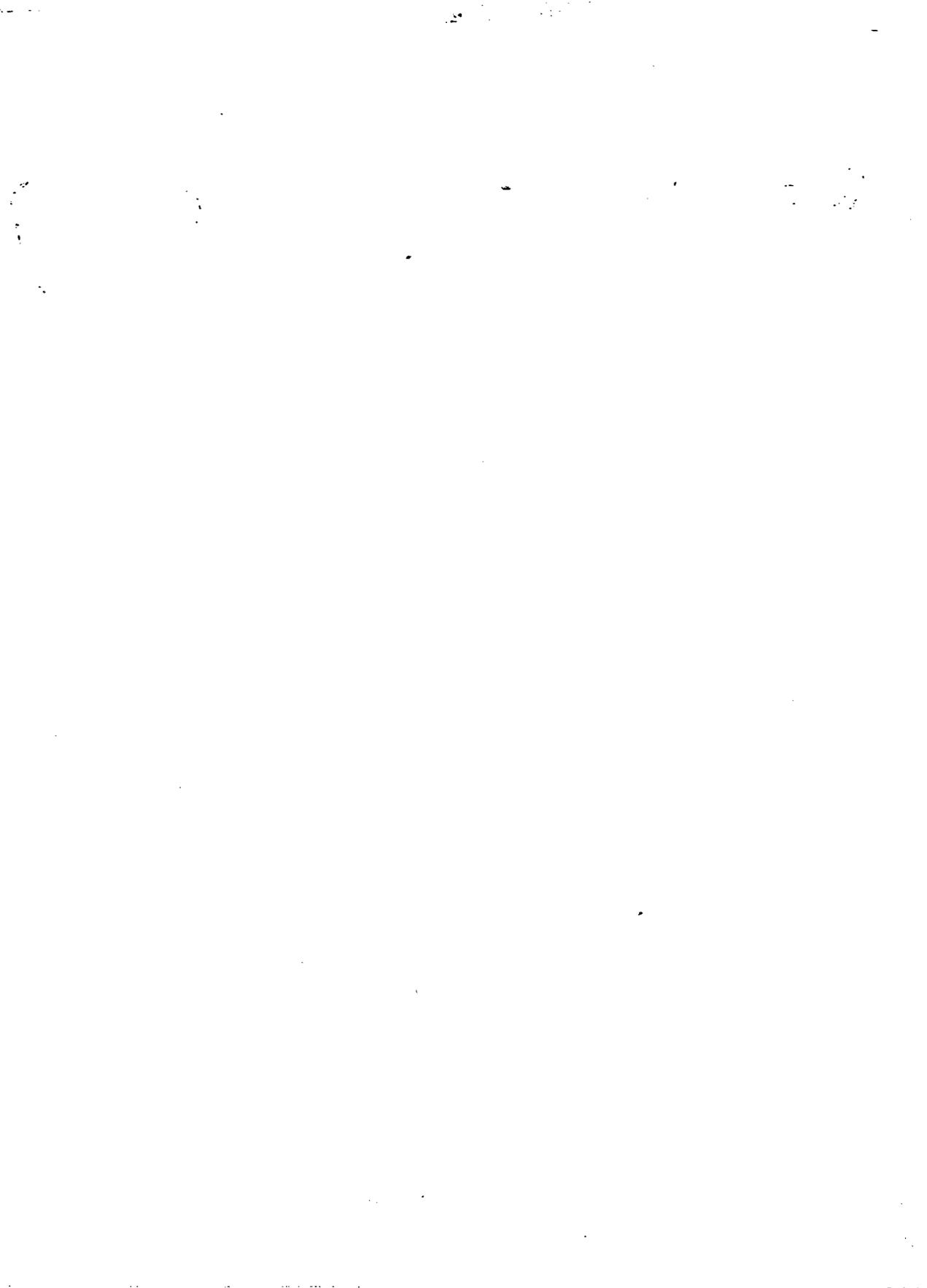
Water which accumulates in containment areas, dikes or sumps will not be drained to grade if there is evidence of an oil sheen, if contaminated, or if a spill occurred in the these areas. The draining of hazardous material storage areas will be done manually and only after the nature of the liquids has been ascertained (by visual or chemical examination). In any case, the employee is responsible for ensuring that no hazardous substances are released to any site drainage system.

2.2.2 Spill Containment

a) Secondary Containment -

BPC has provided secondary containment in those areas which exhibit the potential for releases of harmful quantities of materials. Currently, all storage tanks containing oil or hazardous substances are bermed with concrete or earthen materials. Drum storage facilities are enclosed and underlain by concrete. The drain valves from these unit containment systems remain closed.

Figure 2.1



Should the capacity of any containment area be exceeded as the result of a catastrophic storm event or spill, these areas will be temporarily enlarged by diking with soil or sand bags until such time as remedial activities are completed. A discussion of these activities are presented in Section 2.4.4.

b) Tank Design -

All hazardous substance oil storage units are fabricated with materials compatible with their contents. No substances will be stored in any tank if not compatible with these materials. All tanks will be routinely inspected for leaks as part of normal operating procedures. In addition, each tank shall be inspected as required in accordance to standard tank manufacturing guidelines for internal corrosion or pitting. Remedial action will be taken to correct any flaws in the tank structure as soon as they become apparent.

Underground storage tanks and sumps containing oils or hazardous materials will be tested periodically to determine if a release has occurred. Any newly installed UST shall be double-lined with interstitial monitoring devices. Newly installed sumps shall be equipped with secondary containment.

c) Unloading/Loading Areas -

Tank contents unloading/loading will be restricted to paved locations or those which have secondary containment capable of holding a single hose volume. If containment is unavailable during unloading/loading operations (due to the location of the operation):

- (1) nearby open drainage ditches shall be blocked off until such time as these activities are completed;
- (2) temporary berms will be constructed for the unloading/loading of large quantities of hazardous liquids; and
- (3) a site employee shall be present during transfer operation.

The area beneath tank trucks shall be inspected for spills before and after unloading/loading contents.

2.2.3 Site Security and Controls

Operational areas (i.e., blending and storage facilities) are enclosed by a fence or secured to prevent unauthorized entry onto the site. Unfenced areas are monitored daily to prevent vandalism to the site. Adequate lighting will be utilized to properly monitor the operational portions of the facility.

Warning signs are posted where necessary at storage facilities and operational areas. All facility gates are locked when unattended and tank valves are locked and tagged when these units are out-of-service.

2.3 Emergency Preparedness

This section provides a generic description of emergency response procedures to be performed to address hazardous material releases and fires at the site. Each response will vary depending upon the nature and extent of the incident. However, the general protocols outlined in this document will be followed.

2.3.1 Emergency Recognition and Spill Prevention

The first line of any emergency response involves prevention. As part of the routine inspections, site employees will attempt to identify potential problems before they develop into fires and/or environmental incidents. It is the employee's duty to examine each storage facility for bulging or leaking drums, tank or piping leaks, deterioration of containment dikes, stains, spills, etc. It is also the employee's responsibility to correct these problems wherever possible and communicate to the Emergency Coordinator (EC) the extent of these problems.

Should a spill or release be evident, the employee first detecting this condition will immediately adhere to the procedures outlined in this plan. If these spills occur in the employee's work area, he/she will immediately attempt to contain the spill to the smallest possible area. If the release is large or outside the work area, the facility Hazmat team will respond.

Should a fire occur, a trained employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher by an employee trained in its use or (2) the employee is a trained member of a BPC Fire Team.

2.3.2 Communication and Alarm Systems

Should the incident occur during normal working hours, the main office will act as the command post and, under the supervision of the EC, will direct the site response. Facility telephone extensions, listed in preferred order of reporting, are as follows:

NAME	TITLE
Gary Steen Roy Young - Midland OPS Mgr.	Plant/District Manager-EC
Steve Thomas Trey Womack - Hobbs, District Mgr	Production/Area Manager-Alternate EC
Suzanne Williams / Hobbs NM	Office Operator/Clerk
D Ann Wilkinson / Midland, TX	

Facility employees will be notified of any emergency situation and imminent hazards by the EC after the nature and extent of the problem has been determined. Notification will be completed by site alarm system, telephone, two-way radio, and/or other available means of communication.

The site evacuation and emergency communication signal is as follows (be specific):

Small facility - Verbal communication through employees.

Notify Emergency (911)

Should the release occur after normal working hours, the EC coordinator or his alternate will be contacted at his residence. The name and phone numbers for the EC and alternates are provided in Section 2.4.2.

2.4 Personnel Responsibilities/Duties

2.4.1 Responsibilities of Employees

Actions taken by location employees during an emergency response will be limited to the those which pose no threat to their personal safety. The employee will not take any action which might be hazardous due to the nature of the release (i.e., gas, acids, etc.) without the EC's approval and appropriate personnel protection equipment (PPE).

The employee's response will vary upon the extent and nature of the incident. Small fires, minor leaks and spills (which might develop into larger environmental incidents if left un-addressed) will be remediated immediately without a formal emergency response. For larger incidents requiring outside assistance or the HazMat Team, the employee's duties will be restricted to:

- (1) Limiting the magnitude of the incident (i.e., closing valves, placing adsorbent pads around spill) if possible.
- (2) Contacting the EC. Remaining near the incident if not in imminent danger and providing immediate oversight until the EC arrives.
- (3) Preventing the release from entering nearby surface waters, if possible.
- (4) Providing security for the release area to insure that site or contract employees do not unknowingly enter this area.

- (5) Sounding the alarm to nearby workers who could potentially be affected by the incident.

The responding employee should only take these actions if the release occurred in their work area.

The following critical plant activities or system shutdown will be performed by site employees prior to evacuation:

All power to building will be shut down.

Approved rescue and medical duties to be performed by site employees will include:

Notify all employees (on duty), have a head count.

Help with Emergency Rescue.

2.4.2 Emergency Coordinator and Chain-of-Command

Table 2-2 provides a list of the primary and alternate ECs for the location, including their duties, home addresses and phone numbers. They have been listed in order of preferred notification. In addition, the table provides a list of the employees who may be called upon to address small and contained releases as part of an emergency response. Specific job descriptions are further outlined in Appendix F.

TABLE 2-2
 LIST OF EMERGENCY RESPONSE PERSONNEL

	Name	Work Extension	Home Address	Home Phone
EMERGENCY Fire Dept.	Hobbs, NM	505-395-2221	301 E. White	
ALTERNATE Police Dept. Water Quality	Hobbs, NM	505-397-9265	301 N. Dalmont	
		505-827-2824		
EMPLOYEE RESPONSE TEAM				
HazMat Team	Steve Thomas	505-392-6711		915-524-4078
	Fabian Nunez	505-392-6711		915-758-6494
	Ron Matthews	505-392-6711	1301 W Large	505-392-4745
Rescue Team	Fabian Nunez	505-392-6711		915-758-6494
Fire Brigade				
Security				
Count Team				

2.4.3 Duties of Emergency Coordinator

The duties of the EC or his alternate are:

- (1) Determine the source, character, amount, and extent of the release or incident.
- (2) Assess the potential hazards to the site, environment, and neighboring community due to the incident, including possible toxic gases, hazardous runoff, etc.
- (3) Sound the site alarm and/or evacuation command to alert employees, when required.
- (4) Report release to the Régulatory Affairs (RA) Group in Houston in accordance with Section 2.5.
- (5) Contact outside remediation services or local emergency response teams to assist with incident or injuries too serious to be addressed by site personnel.
- (6) Contact Local Emergency Planning Committees (LEPC) and neighboring industries, if necessary, for assistance or to report off site releases.
- (7) Commit manpower and equipment for minor incidents which can be reasonably corrected by the site personnel.
- (8) Direct remediation efforts to contain and control the release in accordance to this plan.
- (9) Document the remedial effort, including taking photographs if possible.
- (10) Coordinate cleaning and disposal activities, including recovering usable products from the release.
- (11) Ensure that all emergency equipment used during the incident is clean and fit for use prior to placing these devices back into service. Replace spent equipment where necessary.
- (12) Generate follow-up incident report.
- (13) As instructed, and after consulting RA, answer inquiries by the local media regarding the incident. Further information regarding media relations can be found in the Environmental Field Manual.

2.4.4 Emergency and Personal Protection Equipment

Table 2-3 provides a list of both Emergency Response and Personal Protection Equipment located on site which can be used in the event of a major spill or fire. This table also identifies storage locations of this equipment as shown in the site plot plan (Appendix A).

**TABLE 2-3
 LIST OF EMERGENCY RESPONSE
 AND PERSONAL PROTECTION EQUIPMENT**

EMERGENCY RESPONSE	QUANTITY	DESCRIPTION	LOCATION	CAPABILITIES
Fire Extinguishers	2	A B C	Designed	
Hay Bales	No			
Oils Booms	No			
Chemical Absorbant (Pads/Socks/Pillows)				
Shovels/Brooms	2	Normal	Designed	
Open-Top 55-Gallon Drums	2	Ring Top	Jal, NM	
Salvage Drums				
Sump Pump	No			
HazMat Kit	1	Vallen	Designed	
Other (List)				
Heavy Equipment (List)				

2.4.5 Equipment Cleaning/Storage

Upon completing remedial response activities, the HazMat Team or hired contractor will be responsible for cleaning equipment and securing contaminated soils and/or water.

- (1) Disposable contaminated equipment, gloves, coveralls and respirator cartridges shall be placed in 55-gallon drums or 30-gallon fiberpacks until such time as their disposal can be scheduled;
- (2) Shovels, brooms, hoses, pumps, and other portable equipment shall be thoroughly rinsed using appropriate cleaning solutions in an area capable of containing all rinsates; and
- (3) Larger excavation and construction vehicles such as backhoes, trucks, or graders shall also be cleaned and decontaminated using appropriate cleansers and water. Care shall be taken to collect all rinse waters for further evaluation.

After cleaning, all equipment shall be inspected by the EC to insure that it is in proper working condition.

Contaminated materials shall be stored in the following manner:

- (1) Cleaning fluids or rinsates shall be collected and drummed at the site. These fluids shall be tested to determine if contaminated.
- (2) Drums containing hazardous waste (including contaminated personal protection equipment and rinsate) shall be appropriately labeled and placed in the Waste Storage Area.
- (3) Oil-contaminated soils will be drummed and labeled as non-hazardous materials. Large amounts of oily soils may be stored upon and covered with plastic until such time as a roll-off bin can be obtained for storage purposes.
- (4) Soils contaminated with hazardous substances will be properly tested and disposed as hazardous waste, where necessary.

All materials sent off site for disposal shall be properly manifested in accordance with applicable regulatory requirements. These procedures are further detailed in the Waste Management sections of the Environmental Field Manual.

2.5 Release Notification Procedures

2.5.1 Internal Notifications

Oil spills and hazardous substance releases must be immediately reported to the RA Group in Houston. Should RA be unavailable, releases will be reported to one of the following numbers: 713/599-7400, 800/231-3606 or 713/960-7220 (Emergency Response Pager Number). Information needed in this report includes:

- (1) Name and address (including county and township) of the facility;
- (2) Time of incident;
- (3) Nature of incident, including type of substance released, estimated quantity released, and source/cause of release. Have the Material Safety Data Sheets available;
- (4) Proposed actions to contain, clean up, and remove the substance and/or actions underway.
- (5) Extent of any injuries and identification of any environmental/public/personnel hazards;
- (6) Personnel presently on the scene, and the name and phone number of the individual coordinating the on-site response; and
- (7) Names of any agencies, BPC employees, or others (i.e., media groups) notified of the incident.

An "Incident Report" will also be completed and forwarded to these parties as soon as technically feasible by the EC.

Table 2- 4 provides a list of common materials stored at BPC sites and their related Reportable Quantities (RQ). Additional RQs are presented in Appendix G. The RA Group will determine if the release constitutes a:

- (1) Reportable Quantity under CERCLA;
- (2) Reportable Release under the Clean Water Act or RCRA; or
- (3) Reportable Threshold Quantity under SARA Title III.

This information will be helpful in making that determination.

The EC is responsible for determining the type and quantity of material released prior to reporting the incident. This information will be used by RA to determine if Agency reporting is necessary. RA will be responsible for immediately contacting the appropriate Federal and State Authorities, if necessary.

TABLE 2-4
 REPORTABLE QUANTITY

MATERIAL	EPA WASTE CODE	REPORTABLE QUANTITY
Oil	---	42 gals or sheen on water
Varsol	D001 -	100 lbs
Methyl Ethyl Ketone	F005, U159	5000 lbs
Xylene (Xylol)	F003, U239	1000 lbs
Toulene (Toluol)	F005, U220	1000 lbs
1,1,-Trichloroethane	F001, U159	1000 lbs
HAN	D001	100 lbs
HAS	D001	100 lbs
Acrolein	P003	1 lb
Acetone	U002	5000 lbs
Methanol	F003, U154	5000 lbs
Sulfuric Acid	D002	1000 lbs
Isopropanol	D001	100 lbs
Fina Aromatic Solvent	---	42 gals or sheen on water

**Additional RQs are provided in Appendix G. Individual State requirements may be more stringent. Consultation with the applicable State Agency may be necessary.*

2.5.2 External Notifications

All off site releases of hazardous materials shall be reported verbally to the Local Emergency Planning Committee by the EC. In making a determination whether an off site release has occurred, the EC will consider all resulting air emissions. Names, addresses, and phone numbers of the appropriate parties are provided below:

Name	Organization	Number
------	--------------	--------

1.2.4.1 External Reporting - All required assistance should be summoned through the 911 operator. The call to 911 is the responsibility of the individual witnessing the emergency.

The RA Group is responsible for providing follow-up written notifications to the LEPC. In addition, the RA Group shall be responsible for making written notification of releases involving Reportable Quantities (RQ) of hazardous substances or oils to the appropriate State and Federal Regulatory Agencies. For spills in excess of the hazardous substance RQ, the RA Group shall submit a written report to the EPA Administrator and/or State Agency containing the following:

- (a) Name, address and number of the facility owner;
- (b) Name, address and number of the facility;
- (c) Date, time and type of incident;
- (d) Name and quantity of substance released;
- (e) Extent of any injuries;
- (f) An assessment of the potential or realized hazards to human health or the environment; and
- (g) An estimation of the quantity and disposition of recovered materials resulting from the incident.

For oil spills in excess of State or Federal guidelines; within the required deadline, RA Group shall submit a written report to the responsible Agency detailing:

- (a) Name of facility owner;
- (b) Name and location of facility;
- (c) Date and year of initial facility operations;
- (d) Description of facility including maps, topos, and flow diagrams;
- (e) A copy of this plan;
- (f) Cause of the spill;
- (g) Corrective actions taken including any repairs; and
- (h) Preventive measures taken to minimize the potential for similar releases.

2.6 Evacuation Plan

The EC shall inform site employees if evacuation of the facility is warranted. An evacuation plan has been developed and is attached as Appendix H. Evacuation of the facility shall be performed in the following manner:

- (1) Facility employees and contractors shall walk quickly and orderly to the Front of the office. where a head count shall be taken;
- (2) Employees should remember to remain up- or cross-wind of the release area at all times, if possible.
- (3) Upon completing a head count, the EC will attempt to determine the status of missing shift workers. Should rescue operations appear necessary, the EC shall inform local emergency response teams.
- (4) All non-essential personnel will then move outside the facility and will not be given access to the site until the EC has given the "all clear".
- (5) The EC shall recommend the evacuation of local residences and industries to the appropriate officials, where necessary.

A map plan depicting the acceptable routes from the operating portions of the site is presented in Figure 2-2. This map depicts emergency rally points and will be prominently posted at each access point at the facility. The following individual, Fabian Nunez, will be responsible for performing the necessary employee and visitor head count during evacuation. Visitors must log-in at each BPC facility when entering the premises and must also be informed of evacuation procedures in case of an emergency.

Figure 2-2

2.7 Arrangements with Emergency Response Contractors

The facility has made agreements with the following firms to assist the company with any required remedial actions for releases:

Firm	Phone Number
National Response Center	800-424-8802
Water Quality Control	505-827-2824

2.8 Agreements With Local Emergency Response Teams/ Coordination With Neighboring Industries

The facility may also call on the following local emergency response teams should their assistance be required:

Police: 911 (Emergency) 505-397-9265 Hobbs Police Department

Fire Department: 911 (Emergency) 505-397-9308 Hobbs Fire Department

Hospital: Lea Regional Medical Center 505-392-6581

Emergency Medical Services: 505-397-9265

Records of response agreements made with the above teams are retained at the site and available for review.

The following industries are located within 1 mile of the facility:

Industry	Address	Number
No industries are located within a 1 mile radius.		
Les Regional med	5419 Louington Hwy North Mata	505-392-6581
New Mexico Jr College	5317 Louing Hwy	505-392-4510
Lesco	5616 Louington Hwy	505-370-5011

Under the following conditions the EC shall inform these industries of an environmental incident:

- (1) a hazardous substance release occurs into a nearby water course;
- (2) a release or fire occurs, which due to its extent, may interfere with neighboring industry operations; and
- (3) a release occurs, which due to the toxicity or hazard involved, may endanger neighboring industry employees.

2.9 Clean-Up Procedures

Techniques used to clean-up and contain spills shall conform with the Environmental Programs Manual and training received. The equipment present on site to address these type of releases are listed in Table 2-3. The primary purposes of any action taken when responding to a spill are:

- (1) Restrict the spill to the smallest possible area. Block off or close all area drains;
- (2) Avoid contaminating facility drains and ditches; and
- (3) Use sandbags, adsorbents and fill dirt to construct temporary containment structures where necessary.

2.9.1 Petroleum Spills

- (1) Restrict spill to containment area if possible by stopping or diverting flow to the tank.
- (2) Small spills and leaks should be remediated as soon as feasible. Use adsorbent pads wherever possible to reduce the amount of contaminated articles.
- (3) If the release exceeds the containment system capacity, immediately construct additional containment using sandbags or fill material. Never allow the oil to seep into soils or drains.
- (4) After all recoverable oil has been collected and drummed, place contaminated soils and articles in containers.

- (5) If a release occurs into a facility drain or nearby stream, immediately pump any floating layer into drums. For high velocity streams, place oil booms or hay bales between the release area and the plant boundary. As soon as possible, excavate contaminated soils and sediments.
- (6) For larger quantity of soils, construct temporary waste piles using plastic liners and wood settings.
- (7) Dispose of oily soils and contaminated articles in accordance with applicable State regulations.
- (8) Decontaminate all equipment before storing.
- (9) Document and report activities to RA Houston, as soon as feasible.

2.9.2 Hazardous Substance Releases

- (1) Identify the material and quantity released.
- (2) Block off drains and containment areas to limit the extent of the spill. Water should never be used to disperse a spill unless absolutely necessary.
- (3) Ensure that Personnel Protection Equipment and containers are compatible with the material released.
- (4) Collect and reclaim, if possible, as much of the spill using a hand pump or similar device. Containerize contaminated soils. Never place incompatible materials in the same drum.
- (5) Take a sample of the substance for analysis and waste profiling. Contact the Houston Office for scheduling analytical work.
- (6) Place a hazardous waste label with appropriate waste code on the drums containing contaminated materials. Move drums to the Hazardous Waste Storage Area.
- (7) Decontaminate all equipment in a contained area. Collect and containerize decontamination fluids.
- (8) Document and report activities to RA Houston.

In addition to these activities, surface water outfalls located at the site property boundary will be visually inspected for oily or contaminated discharges. Flow at locations which appear affected by the release shall be impeded:

- (1) with sand bags, adsorbent pads, or hay bales as necessary to prohibit the migration of contaminants off site or
- (2) with temporary earthen berms to impede large quantities of affected water.

2.9.3 Fires/Explosions

Should a fire occur, the employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher of which the employee has been trained or (2) the responder has completed the BPC Fire Training Course.

3.0 PLAN AVAILABILITY

One copy of this plan shall be retained at the facility and presented for review to each regulatory agency upon request. In addition, one completed copy shall be maintained by the BPC RA Group in Houston. This plan shall also be submitted to any LEPC upon request.

Finally, if it is determined that assistance may be required in the event of an emergency at the site from local police departments, hospitals, and state and local emergency response teams, a copy of the plan will be submitted to that organization by the facility after conferring with the RA in Houston. In addition, BPC invites these teams to visit the facility to familiarize themselves with the site emergency response procedures and equipment.

4.0 PLAN IMPLEMENTATION

This plan shall be implemented upon any release of hazardous waste, hazardous substance, or petroleum products in quantities exceeding those listed in Table 2-4 and Appendix G. Depending upon the type and quantity of material released, the extent of remedial response will vary.

5.0 PLAN AMENDMENTS AND REVIEW

Amendments to the plan may be initiated by either BPC or the EPA Regional Administrator (or authorized State Agency). This plan shall be reviewed and revised on an annual basis, or as needed, by the Site Manager or designated representative. Changes may be made to the plan by removing inaccuracies and writing in the revised and corrected information. Every three years, this document shall be submitted to the Houston RA Group for corrections and re-issuance. In addition the plan will be revised:

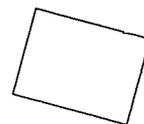
- (1) Whenever a change has occurred in facility design due to construction, operations or maintenance that materially affects the potential for an oil spill or increases the potential for fire, explosion, or release of hazardous substances, or modifies the response necessary during an emergency.
- (2) When required by the EPA after review or when applicable regulations change.
- (3) The list of emergency coordinators or emergency equipment changes.
- (4) The Plan fails during an emergency.

BPC will submit the Plan to the EPA Regional Administrator whenever one of the following occurs:

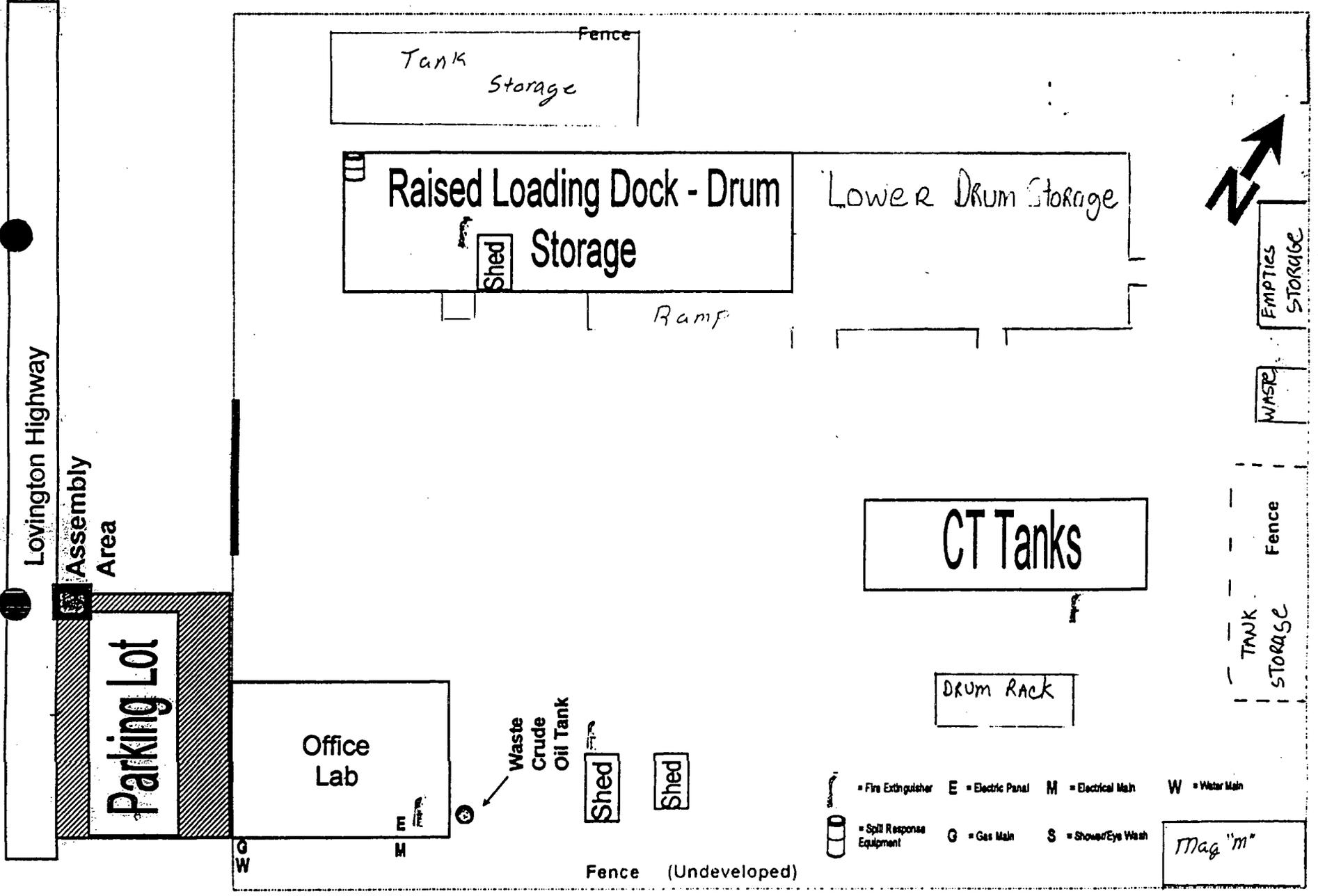
- (1) Discharges of more than 1,000 gallons of oil into navigable waters in a single spill event;
- (2) Discharge of oil in harmful quantities as defined by 40 CFR § 110 into navigable waters during two reportable spill events in a twelve-month period. A harmful quantity is defined as: (1) an oil spill which causes a film or sheen upon or discoloration of the surface of the water or adjoining shore lines or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shore lines, or (2) violates applicable water quality standards; or
- (3) When requested to do so by the US EPA.

Any information made available to the EPA will also be sent to the Water Pollution Control Division of the appropriate State Agency.

**APPENDIX A.
FACILITY PLOT**



- Hobbs, N.M.



- ☒ = Fire Extinguisher
- ☒ = Spill Response Equipment
- E = Electric Panel
- G = Gas Main
- M = Electrical Main
- S = Shower/Eye Wash
- W = Water Main

**APPENDIX B.
STORAGE FACILITY MAINTENANCE RECORDS**

APPENDIX C.
STORAGE AREA INSPECTION FORMS

**APPENDIX D.
POLLUTION INCIDENT LOG**

**APPENDIX E.
EMPLOYEE TRAINING RECORDS**

**APPENDIX F.
JOB TITLES AND DESCRIPTIONS**

**APPENDIX G.
REPORTABLE QUANTITIES**

**APPENDIX H.
EVACUATION PLAN**



Baker Petrolite

**FIRE, OIL, AND HAZARDOUS SUBSTANCE
EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN**

LOCATION: JAL, New Mexico

This Plan was developed to conform with the following applicable laws: Clean Water Act (CWA) (40 CFR § 112), Resource Conservation and Recovery Act (RCRA) (40 CFR § 265, Subpart D), Superfund Amendments and Reauthorization Act (SARA) (40 CFR § 300, Subpart C) and Occupational Safety and Health Act (OSHA § 1910.38). As such, it will replace previous SPCC and Emergency Response plans retained at the site.

ANNUAL REVIEW

Reviewed and Approved:

[Signature]

Date:

5/5/99

5/10/2000

Reviewed and Approved:

[Signature]

Date:

5/6/99

Reviewed and Approved:

Date: *

BAKER PETROLITE CORPORATION
FIRE, OIL AND HAZARDOUS SUBSTANCE
EMERGENCY RESPONSE AND EMPLOYEE CONTINGENCY PLAN

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1.0 CERTIFICATION*

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR § 112, attest that this SPCC plan has been prepared in accordance with good engineering practices.

(Seal)

Printed Name of Registered Professional Engineer

Date

Signature of Registered Professional Engineer

Registration Number

State Issued

*This certification is necessary when storing oil in excess of 660 gallons or 1,320 cumulative in a contiguous area at the site.

2.0 EMERGENCY RESPONSE AND CONTINGENCY PLAN

2.1 Site Description

BAKER PETROLITE CORPORATION (BPC) operates facilities for the manufacture of industrial and oil field chemicals. In addition, numerous district facilities blend chemicals to customer specifications and act as distribution points to local customers. At these facilities, petroleum products and hazardous materials may be stored in bulk quantities. This plan meets the requirements set forth in 29 CFR § 1910.38. The following BPC facility stores petroleum and/or hazardous materials in quantities which may require implementation of an emergency plan:

Baker Petrolite
Location

522 East Kansas
(Street or Post Office Box)

Jal, Lea (county)
(City) (County)

New Mexico, 88252
(State) (Zip Code)

Emergency # 505-392-6711 / Ron Matthews 505-370-3916
(Phone Number)

The driving directions to the location from the nearest metropolitan center are as follows:

South on Highway 18, 59 miles from Hobbs, New Mexico.

2.1.1 Material and Waste Inventory

Table 2-1 provides an inventory of oils and hazardous materials stored on site in quantities which, when released, may pose a threat to human health or the environment. A map plan depicting their storage locations is presented in Appendix A. Material Safety Data Sheets (MSDS) are stored on site at the Jal, New Mexico Facility.

2.1.2 Maintenance and Inspections

Normal maintenance for the material storage facilities will be performed by facility employees under the supervision of the District or Plant Manager. Routine maintenance will include, but not be limited to:

- (1) remediation of minor spills resulting from normal site operations which pose no threat to site employees;
- (2) replacement and repair of leaking fittings or valves as part of normal facility maintenance; and
- (3) discharging water from storage containment areas.

The Manager or Emergency Coordinator (EC-refer to Section 2.4.2) will determine which activities can be performed by facility operators and which need be contracted due to the potential hazards involved.

Maintenance records (Appendix B) which detail modifications or repairs made to hazardous material, oil, and waste units or devices shall be held at the facility for a minimum of 3 years.

At a minimum, oil, chemical, and waste storage facilities will be inspected routinely (in accordance to the BPC Environmental Field Manual and applicable environmental laws) for:

- (1) leaks, corrosion or integrity problems,
- (2) accumulated liquids in containment areas,
- (3) improper labeling and storage practices, and
- (4) open or deteriorated containers.

An inspection record (Appendix C) will be maintained which details inspection dates, inspection results, and any remedial actions taken as a result of these inspections.

2.1.3 Fire Prevention

The site operator shall address all major work place fire hazards (i.e., storage of flammable material, welding areas and electronic panels). Once identified, proper handling and storage procedures, potential ignition source/control procedures and type of fire protection equipment available must be specifically discussed. These are as follows:

Fire Hazard	Fire Controls and Procedures
Small Fires	An attempt will be made to put out small fires. The fire department shall be called regardless if the fire is extinguished or not.
Large Fires	No attempt should be made to extinguish fire. Evacuate all personnel and visitors. Immediately notify fire department. Close all valves on storage tanks. Stand by for fire department arrival. Contact Emergency Response Group in Sugarland. Do not permit unauthorized individuals to enter.

2.1.4 Housekeeping

The site will control the accumulation of combustable and flammable liquids in process areas as follows:

The truck loading and unloading areas are inspected daily for cleanliness.

Trash containers are located within the work area to collect ordinary

refuse. Regular trash pickup occurs weekly at this facility. Transfer hoses are capped after each use to minimize drippage & to reduce spills.

All minor spills will be remediated with a minimum of 24-hours of occurrence.

2.1.5 Maintenance of Fire Protection Equipment

The site shall maintain both internal and external inspection and service programs for fire protection devices. All extinguishers/deluge systems will be inspected monthly and serviced at least annually. All other emergency equipment will be inspected accordance with the applicable sections of the BPC Safety Manual.

2.1.6 Pollution Incident Reports

The site shall maintain a record of pollution incidents (Appendix D). At a minimum this record will describe:

- (1) date of the incident;
- (2) nature and extent of the incident;
- (3) internal and external notifications made, including follow-up, written reports; and
- (4) actions taken to correct the problem.

2.1.7 Employee Training

Applicable facility personnel responsible for managing hazardous waste, hazardous materials and oil, are required to attend corporate hazardous waste management (40 CFR § 265) and Hazmat training courses (29 CFR § 1910.120). In addition, each facility will provide a minimum of "first responder awareness level" training to employees during regularly scheduled safety meetings. This training, at a minimum, will include familiarizing employees with the emergency response procedures as outlined in this plan (29 CFR § 1910.120 (q)(1)). This course shall be given to the employee within six-months of his/her date of hire and annually thereafter by a trained and qualified instructor. In addition, this training is necessary whenever this plan or the employee duties change. No personnel shall handle any hazardous waste/material releases until this training is completed. At a minimum, the in-house training program will include reviewing this plan as it pertains to the following topics:

- (1) hazardous waste and material management procedures;
- (2) identification of potential hazards in the work place;
- (3) applicable pollution control laws and regulations;
- (4) Emergency Response and Contingency Plan;
 - a. initially, when plan is developed
 - b. whenever employees responsibilities change
 - c. if the plan is changed
- (5) emergency response procedures and reporting;
- (6) emergency response notification and communications;
- (7) site evacuation plan and routes; and
- (8) proper use of personnel protection equipment.

Employee Emergency Response training records will be maintained at the facility for a minimum of thirty (30) years after the employee resigns from the company. A copy of this record is presented as Appendix E.

2.2 Facility Design

2.2.1 Facility Drainage

A topographic map depicting surface water flow directions is presented as Figure 2-1. The following section discusses drainage patterns across the site, including details on out falls of facility drainage ditches and connected water bodies. Any navigable waterways or those categorized as recreational or potable within 1 mile of the site are also identified.

~~No waterways, or recreational water within one mile.~~

Water which accumulates in containment areas, dikes or sumps will not be drained to grade if there is evidence of an oil sheen, if contaminated, or if a spill occurred in the these areas. The draining of hazardous material storage areas will be done manually and only after the nature of the liquids has been ascertained (by visual or chemical examination). In any case, the employee is responsible for ensuring that no hazardous substances are released to any site drainage system.

2.2.2 Spill Containment

a) Secondary Containment -

BPC has provided secondary containment in those areas which exhibit the potential for releases of harmful quantities of materials. Currently, all storage tanks containing oil or hazardous substances are bermed with concrete or earthen materials. Drum storage facilities are enclosed and underlain by concrete. The drain valves from these unit containment systems remain closed.

Figure 2.1

Should the capacity of any containment area be exceeded as the result of a catastrophic storm event or spill, these areas will be temporarily enlarged by diking with soil or sand bags until such time as remedial activities are completed. A discussion of these activities are presented in Section 2.4.4.

b) Tank Design -

All hazardous substance oil storage units are fabricated with materials compatible with their contents. No substances will be stored in any tank if not compatible with these materials. All tanks will be routinely inspected for leaks as part of normal operating procedures. In addition, each tank shall be inspected as required in accordance to standard tank manufacturing guidelines for internal corrosion or pitting. Remedial action will be taken to correct any flaws in the tank structure as soon as they become apparent.

Underground storage tanks and sumps containing oils or hazardous materials will be tested periodically to determine if a release has occurred. Any newly installed UST shall be double-lined with interstitial monitoring devices. Newly installed sumps shall be equipped with secondary containment.

c) Unloading/Loading Areas -

Tank contents unloading/loading will be restricted to paved locations or those which have secondary containment capable of holding a single hose volume. If containment is unavailable during unloading/loading operations (due to the location of the operation):

- (1) nearby open drainage ditches shall be blocked off until such time as these activities are completed;
- (2) temporary berms will be constructed for the unloading/loading of large quantities of hazardous liquids; and
- (3) a site employee shall be present during transfer operation.

The area beneath tank trucks shall be inspected for spills before and after unloading/loading contents.

2.2.3 Site Security and Controls

Operational areas (i.e., blending and storage facilities) are enclosed by a fence or secured to prevent unauthorized entry onto the site. Unfenced areas are monitored daily to prevent vandalism to the site. Adequate lighting will be utilized to properly monitor the operational portions of the facility.

Warning signs are posted where necessary at storage facilities and operational areas. All facility gates are locked when unattended and tank valves are locked and tagged when these units are out-of-service.

2.3 Emergency Preparedness

This section provides a generic description of emergency response procedures to be performed to address hazardous material releases and fires at the site. Each response will vary depending upon the nature and extent of the incident. However, the general protocols outlined in this document will be followed.

2.3.1 Emergency Recognition and Spill Prevention

The first line of any emergency response involves prevention. As part of the routine inspections, site employees will attempt to identify potential problems before they develop into fires and/or environmental incidents. It is the employee's duty to examine each storage facility for bulging or leaking drums, tank or piping leaks, deterioration of containment dikes, stains, spills, etc. It is also the employee's responsibility to correct these problems wherever possible and communicate to the Emergency Coordinator (EC) the extent of these problems.

Should a spill or release be evident, the employee first detecting this condition will immediately adhere to the procedures outlined in this plan. If these spills occur in the employee's work area, he/she will immediately attempt to contain the spill to the smallest possible area. If the release is large or outside the work area, the facility Hazmat team will respond.

Should a fire occur, a trained employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher by an employee trained in its use or (2) the employee is a trained member of a BPC Fire Team.

2.3.2 Communication and Alarm Systems

Should the incident occur during normal working hours, the main office will act as the command post and, under the supervision of the EC, will direct the site response. Facility telephone extensions, listed in preferred order of reporting, are as follows:

NAME	TITLE
Gary Sisson - Midland OPS Mgr.	Plant/District Manager-EC
Steve Thomas - Hobbs, District Mgr	Production/Area Manager-Alternate EC
Suzanne Williams / Hobbs NM	Office Operator/Clerk
D Ann Wilkinson / Midland, TX	

Facility employees will be notified of any emergency situation and imminent hazards by the EC after the nature and extent of the problem has been determined. Notification will be completed by site alarm system, telephone, two-way radio, and/or other available means of communication.

Roy Youngd

Tray Wanack

Ron Matthews

(see Attachment)
5/8/00

The site evacuation and emergency communication signal is as follows (be specific):

Small facility - Verbal communication through employees.

Notify Emergency (911)

Should the release occur after normal working hours, the EC coordinator or his alternate will be contacted at his residence. The name and phone numbers for the EC and alternates are provided in Section 2.4.2.

2.4 Personnel Responsibilities/Duties

2.4.1 Responsibilities of Employees

Actions taken by location employees during an emergency response will be limited to the those which pose no threat to their personal safety. The employee will not take any action which might be hazardous due to the nature of the release (i.e., gas, acids, etc.) without the EC's approval and appropriate personnel protection equipment (PPE).

The employee's response will vary upon the extent and nature of the incident. Small fires, minor leaks and spills (which might develop into larger environmental incidents if left un-addressed) will be remediated immediately without a formal emergency response. For larger incidents requiring outside assistance or the HazMat Team, the employee's duties will be restricted to:

- (1) Limiting the magnitude of the incident (i.e., closing valves, placing adsorbent pads around spill) if possible.
- (2) Contacting the EC. Remaining near the incident if not in imminent danger and providing immediate oversight until the EC arrives.
- (3) Preventing the release from entering nearby surface waters, if possible.
- (4) Providing security for the release area to insure that site or contract employees do not unknowingly enter this area.

- (5) Sounding the alarm to nearby workers who could potentially be affected by the incident.

The responding employee should only take these actions if the release occurred in their work area.

The following critical plant activities or system shutdown will be performed by site employees prior to evacuation:

All power to building will be shut down.

Approved rescue and medical duties to be performed by site employees will include:

Notify all employees (on duty), have a head count.

Help with Emergency Rescue.

2.4.2 Emergency Coordinator and Chain-of-Command

Table 2-2 provides a list of the primary and alternate ECs for the location, including their duties, home addresses and phone numbers. They have been listed in order of preferred notification. In addition, the table provides a list of the employees who may be called upon to address small and contained releases as part of an emergency response. Specific job descriptions are further outlined in Appendix F.

**TABLE 2-2
 LIST OF EMERGENCY RESPONSE PERSONNEL**

	Name	Work Extension	Home Address	Home Phone
EMERGENCY Fire Dept.	Jal NM	505-395-2221	401 S. 4th Jal	
ALTERNATE Police Dept. Water Quality	Jal, Police	505-395-2501	400 S. Hwy. 18	
		505-827-2824		
EMPLOYEE RESPONSE TEAM (5/10/00)				
<i>See Attachment</i> HazMat Team	Steve Thomas	505-392-6711		915-524-4078
	Ron Matthews	505-370-3916		505-392-4745
Rescue Team	Fabian Nunez	505-392-6711		915-758-6494
Fire Brigade				
Security				
Count Team				

2.4.3 Duties of Emergency Coordinator

The duties of the EC or his alternate are:

- (1) Determine the source, character, amount, and extent of the release or incident.
- (2) Assess the potential hazards to the site, environment, and neighboring community due to the incident, including possible toxic gases, hazardous runoff, etc.
- (3) Sound the site alarm and/or evacuation command to alert employees, when required.
- (4) Report release to the Regulatory Affairs (RA) Group in Houston in accordance with Section 2.5.
- (5) Contact outside remediation services or local emergency response teams to assist with incident or injuries too serious to be addressed by site personnel.
- (6) Contact Local Emergency Planning Committees (LEPC) and neighboring industries, if necessary, for assistance or to report off site releases.
- (7) Commit manpower and equipment for minor incidents which can be reasonably corrected by the site personnel.
- (8) Direct remediation efforts to contain and control the release in accordance to this plan.
- (9) Document the remedial effort, including taking photographs if possible.
- (10) Coordinate cleaning and disposal activities, including recovering usable products from the release.
- (11) Ensure that all emergency equipment used during the incident is clean and fit for use prior to placing these devices back into service. Replace spent equipment where necessary.
- (12) Generate follow-up incident report.
- (13) As instructed, and after consulting RA, answer inquiries by the local media regarding the incident. Further information regarding media relations can be found in the Environmental Field Manual.

2.4.4 Emergency and Personal Protection Equipment

Table 2-3 provides a list of both Emergency Response and Personal Protection Equipment located on site which can be used in the event of a major spill or fire. This table also identifies storage locations of this equipment as shown in the site plot plan (Appendix A).

**TABLE 2-3
 LIST OF EMERGENCY RESPONSE
 AND PERSONAL PROTECTION EQUIPMENT**

EMERGENCY RESPONSE	QUANTITY	DESCRIPTION	LOCATION	CAPABILITIES
Fire Extinguishers	2	A B C	Designed	
Hay Bales	No			
Oils Booms	No			
Chemical Absorbant (Pads/Socks/Pillows)				
Shovels/Brooms	2	Normal	Designed	
Open-Top 55-Gallon Drums	2	Ring Top	Jal, NM	
Salvage Drums				
Sump Pump	No			
HazMat Kit	1	Vallen	Designed	
Other (List)				
Heavy Equipment (List)				

2.4.5 Equipment Cleaning/Storage

Upon completing remedial response activities, the HazMat Team or hired contractor will be responsible for cleaning equipment and securing contaminated soils and/or water.

- (1) Disposable contaminated equipment, gloves, coveralls and respirator cartridges shall be placed in 55-gallon drums or 30-gallon fiberpacks until such time as their disposal can be scheduled;
- (2) Shovels, brooms, hoses, pumps, and other portable equipment shall be thoroughly rinsed using appropriate cleaning solutions in an area capable of containing all rinsates; and
- (3) Larger excavation and construction vehicles such as backhoes, trucks, or graders shall also be cleaned and decontaminated using appropriate cleansers and water. Care shall be taken to collect all rinse waters for further evaluation.

After cleaning, all equipment shall be inspected by the EC to insure that it is in proper working condition.

Contaminated materials shall be stored in the following manner:

- (1) Cleaning fluids or rinsates shall be collected and drummed at the site. These fluids shall be tested to determine if contaminated.
- (2) Drums containing hazardous waste (including contaminated personal protection equipment and rinsate) shall be appropriately labeled and placed in the Waste Storage Area.
- (3) Oil-contaminated soils will be drummed and labeled as non-hazardous materials. Large amounts of oily soils may be stored upon and covered with plastic until such time as a roll-off bin can be obtained for storage purposes.
- (4) Soils contaminated with hazardous substances will be properly tested and disposed as hazardous waste, where necessary.

All materials sent off site for disposal shall be properly manifested in accordance with applicable regulatory requirements. These procedures are further detailed in the Waste Management sections of the Environmental Field Manual.

2.5 Release Notification Procedures

2.5.1 Internal Notifications

Oil spills and hazardous substance releases must be immediately reported to the RA Group in Houston. Should RA be unavailable, releases will be reported to one of the following numbers: 713/599-7400, 800/231-3606 or 713/960-7220 (Emergency Response Pager Number). Information needed in this report includes:

- (1) Name and address (including county and township) of the facility;
- (2) Time of incident;
- (3) Nature of incident, including type of substance released, estimated quantity released, and source/cause of release. Have the Material Safety Data Sheets available;
- (4) Proposed actions to contain, clean up, and remove the substance and/or actions underway.
- (5) Extent of any injuries and identification of any environmental/public/personnel hazards;
- (6) Personnel presently on the scene, and the name and phone number of the individual coordinating the on-site response; and
- (7) Names of any agencies, BPC employees, or others (i.e., media groups) notified of the incident.

An "Incident Report" will also be completed and forwarded to these parties as soon as technically feasible by the EC.

Table 2- 4 provides a list of common materials stored at BPC sites and their related Reportable Quantities (RQ). Additional RQs are presented in Appendix G. The RA Group will determine if the release constitutes a:

- (1) Reportable Quantity under CERCLA;
- (2) Reportable Release under the Clean Water Act or RCRA; or
- (3) Reportable Threshold Quantity under SARA Title III.

This information will be helpful in making that determination.

The EC is responsible for determining the type and quantity of material released prior to reporting the incident. This information will be used by RA to determine if Agency reporting is necessary. RA will be responsible for immediately contacting the appropriate Federal and State Authorities, if necessary.

TABLE 2-4
 REPORTABLE QUANTITY

MATERIAL	EPA WASTE CODE	REPORTABLE QUANTITY
Oil	---	42 gals or sheen on water
Varsol	D001	100 lbs
Methyl Ethyl Ketone	F005, U159	5000 lbs
Xylene (Xylol)	F003, U239	1000 lbs
Toulene (Toluol)	F005, U220	1000 lbs
1,1,-Trichloroethane	F001, U159	1000 lbs
HAN	D001	100 lbs
HAS	D001	100 lbs
Acrolein	P003	1 lb
Acetone	U002	5000 lbs
Methanol	F003, U154	5000 lbs
Sulfuric Acid	D002	1000 lbs
Isopropanol	D001	100 lbs
Fina Aromatic Solvent	---	42 gals or sheen on water

**Additional RQs are provided in Appendix G. Individual State requirements may be more stringent. Consultation with the applicable State Agency may be necessary.*

2.5.2 External Notifications

All off site releases of hazardous materials shall be reported verbally to the Local Emergency Planning Committee by the EC. In making a determination whether an off site release has occurred, the EC will consider all resulting air emissions. Names, addresses, and phone numbers of the appropriate parties are provided below:

Name	Organization	Number
------	--------------	--------

1.2.4.1 External Reporting - All required assistance should be summoned through the 911 operator. The call to 911 is the responsibility of the individual witnessing the emergency.

The RA Group is responsible for providing follow-up written notifications to the LEPC. In addition, the RA Group shall be responsible for making written notification of releases involving Reportable Quantities (RQ) of hazardous substances or oils to the appropriate State and Federal Regulatory Agencies. For spills in excess of the hazardous substance RQ, the RA Group shall submit a written report to the EPA Administrator and/or State Agency containing the following:

- (a) Name, address and number of the facility owner;
- (b) Name, address and number of the facility;
- (c) Date, time and type of incident;
- (d) Name and quantity of substance released;
- (e) Extent of any injuries;
- (f) An assessment of the potential or realized hazards to human health or the environment; and
- (g) An estimation of the quantity and disposition of recovered materials resulting from the incident.

For oil spills in excess of State or Federal guidelines; within the required deadline, RA Group shall submit a written report to the responsible Agency detailing:

- (a) Name of facility owner;
- (b) Name and location of facility;
- (c) Date and year of initial facility operations;
- (d) Description of facility including maps, topos, and flow diagrams;
- (e) A copy of this plan;
- (f) Cause of the spill;
- (g) Corrective actions taken including any repairs; and
- (h) Preventive measures taken to minimize the potential for similar releases.

2.6 Evacuation Plan

The EC shall inform site employees if evacuation of the facility is warranted. An evacuation plan has been developed and is attached as Appendix H. Evacuation of the facility shall be performed in the following manner:

- (1) Facility employees and contractors shall walk quickly and orderly to the Front of the office. where a head count shall be taken;
- (2) Employees should remember to remain up- or cross-wind of the release area at all times, if possible.
- (3) Upon completing a head count, the EC will attempt to determine the status of missing shift workers. Should rescue operations appear necessary, the EC shall inform local emergency response teams.
- (4) All non-essential personnel will then move outside the facility and will not be given access to the site until the EC has given the "all clear".
- (5) The EC shall recommend the evacuation of local residences and industries to the appropriate officials, where necessary.

A map plan depicting the acceptable routes from the operating portions of the site is presented in Figure 2-2. This map depicts emergency rally points and will be prominently posted at each access point at the facility. The following individual, Ron Matthews, will be responsible for performing the necessary employee and visitor head count during evacuation. Visitors must log-in at each BPC facility when entering the premises and must also be informed of evacuation procedures in case of an emergency.

Figure 2-2

2.7 Arrangements with Emergency Response Contractors

The facility has made agreements with the following firms to assist the company with any required remedial actions for releases:

Firm	Phone Number
National Response Center	800-424-8802
Water Quality Control	505-827-2824

2.8 Agreements With Local Emergency Response Teams/
Coordination With Neighboring Industries

The facility may also call on the following local emergency response teams should their assistance be required:

Police: 911 (Emergency) 505-395-3501 Jal Police department

Fire Department: 911 (Emergency) 505-395-2221 Jal Fire Department

Hospital: Lea Regional Hospital (Hobbs) 505-392-6581

Emergency Medical Services: 505-395-3501

Records of response agreements made with the above teams are retained at the site and available for review.

The following industries are located within 1 mile of the facility:

Industry	Address	Number
No Industries are located within a 1 mile radius.		

Under the following conditions the EC shall inform these industries of an environmental incident:

- (1) a hazardous substance release occurs into a nearby water course;
- (2) a release or fire occurs, which due to its extent, may interfere with neighboring industry operations; and
- (3) a release occurs, which due to the toxicity or hazard involved, may endanger neighboring industry employees.

2.9 Clean-Up Procedures

Techniques used to clean-up and contain spills shall conform with the Environmental Programs Manual and training received. The equipment present on site to address these type of releases are listed in Table 2-3. The primary purposes of any action taken when responding to a spill are:

- (1) Restrict the spill to the smallest possible area. Block off or close all area drains;
- (2) Avoid contaminating facility drains and ditches; and
- (3) Use sandbags, adsorbents and fill dirt to construct temporary containment structures where necessary.

2.9.1 Petroleum Spills

- (1) Restrict spill to containment area if possible by stopping or diverting flow to the tank.
- (2) Small spills and leaks should be remediated as soon as feasible. Use adsorbent pads wherever possible to reduce the amount of contaminated articles.
- (3) If the release exceeds the containment system capacity, immediately construct additional containment using sandbags or fill material. Never allow the oil to seep into soils or drains.
- (4) After all recoverable oil has been collected and drummed, place contaminated soils and articles in containers.

- (5) If a release occurs into a facility drain or nearby stream, immediately pump any floating layer into drums. For high velocity streams, place oil booms or hay bales between the release area and the plant boundary. As soon as possible, excavate contaminated soils and sediments.
- (6) For larger quantity of soils, construct temporary waste piles using plastic liners and wood settings.
- (7) Dispose of oily soils and contaminated articles in accordance with applicable State regulations.
- (8) Decontaminate all equipment before storing.
- (9) Document and report activities to RA Houston, as soon as feasible.

2.9.2 Hazardous Substance Releases

- (1) Identify the material and quantity released.
- (2) Block off drains and containment areas to limit the extent of the spill. Water should never be used to disperse a spill unless absolutely necessary.
- (3) Ensure that Personnel Protection Equipment and containers are compatible with the material released.
- (4) Collect and reclaim, if possible, as much of the spill using a hand pump or similar device. Containerize contaminated soils. Never place incompatible materials in the same drum.
- (5) Take a sample of the substance for analysis and waste profiling. Contact the Houston Office for scheduling analytical work.
- (6) Place a hazardous waste label with appropriate waste code on the drums containing contaminated materials. Move drums to the Hazardous Waste Storage Area.
- (7) Decontaminate all equipment in a contained area. Collect and containerize decontamination fluids.
- (8) Document and report activities to RA Houston.

In addition to these activities, surface water outfalls located at the site property boundary will be visually inspected for oily or contaminated discharges. Flow at locations which appear affected by the release shall be impeded:

- (1) with sand bags, adsorbent pads, or hay bales as necessary to prohibit the migration of contaminants off site or
- (2) with temporary earthen berms to impede large quantities of affected water.

2.9.3 Fires/Explosions

Should a fire occur, the employee should not attempt to extinguish the fire unless (1) it is in the incipient stage and can be extinguished with a portable extinguisher of which the employee has been trained or (2) the responder has completed the BPC Fire Training Course.

3.0 PLAN AVAILABILITY

One copy of this plan shall be retained at the facility and presented for review to each regulatory agency upon request. In addition, one completed copy shall be maintained by the BPC RA Group in Houston. This plan shall also be submitted to any LEPC upon request.

Finally, if it is determined that assistance may be required in the event of an emergency at the site from local police departments, hospitals, and state and local emergency response teams, a copy of the plan will be submitted to that organization by the facility after conferring with the RA in Houston. In addition, BPC invites these teams to visit the facility to familiarize themselves with the site emergency response procedures and equipment.

4.0 PLAN IMPLEMENTATION

This plan shall be implemented upon any release of hazardous waste, hazardous substance, or petroleum products in quantities exceeding those listed in Table 2-4 and Appendix G. Depending upon the type and quantity of material released, the extent of remedial response will vary.

5.0 PLAN AMENDMENTS AND REVIEW

Amendments to the plan may be initiated by either BPC or the EPA Regional Administrator (or authorized State Agency). This plan shall be reviewed and revised on an annual basis, or as needed, by the Site Manager or designated representative. Changes may be made to the plan by removing inaccuracies and writing in the revised and corrected information. Every three years, this document shall be submitted to the Houston RA Group for corrections and re-issuance. In addition the plan will be revised:

- (1) Whenever a change has occurred in facility design due to construction, operations or maintenance that materially affects the potential for an oil spill or increases the potential for fire, explosion, or release of hazardous substances, or modifies the response necessary during an emergency.
- (2) When required by the EPA after review or when applicable regulations change.
- (3) The list of emergency coordinators or emergency equipment changes.
- (4) The Plan fails during an emergency.

BPC will submit the Plan to the EPA Regional Administrator whenever one of the following occurs:

- (1) Discharges of more than 1,000 gallons of oil into navigable waters in a single spill event;
- (2) Discharge of oil in harmful quantities as defined by 40 CFR § 110 into navigable waters during two reportable spill events in a twelve-month period. A harmful quantity is defined as: (1) an oil spill which causes a film or sheen upon or discoloration of the surface of the water or adjoining shore lines or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shore lines, or (2) violates applicable water quality standards; or
- (3) When requested to do so by the US EPA.

Any information made available to the EPA will also be sent to the Water Pollution Control Division of the appropriate State Agency.

**APPENDIX A.
FACILITY PLOT**

APPENDIX B.
STORAGE FACILITY MAINTENANCE RECORDS

**APPENDIX C.
STORAGE AREA INSPECTION FORMS**

**APPENDIX D.
POLLUTION INCIDENT LOG**

**APPENDIX E.
EMPLOYEE TRAINING RECORDS**

**APPENDIX F.
JOB TITLES AND DESCRIPTIONS**

**APPENDIX G.
REPORTABLE QUANTITIES**

**APPENDIX H.
EVACUATION PLAN**

5/10/00

HOBBS, N.M. WAREHOUSE EMERGENCY TELEPHONE NUMBERS

Baker Petrolite Emergency Information
Rusty Brice
1-281-276-5400

Hobbs Fire Dept.
505-397-9308

Primary Coordinator
Trey Womack
1209 Northwest 15th St.
Andrews, TX 79714
Work: 505-392-6711
Home: 915-524-4078

Hobbs Police Dept.
505-397-9265

National Response Center
1-800-424-8802

Secondary Coordinator
Ron Matthews
1301 W. Paige
Hobbs, N.M. 88240
Work: 505-392-6711
Home: 505392-4745

Water Quality Control
505-827-2824

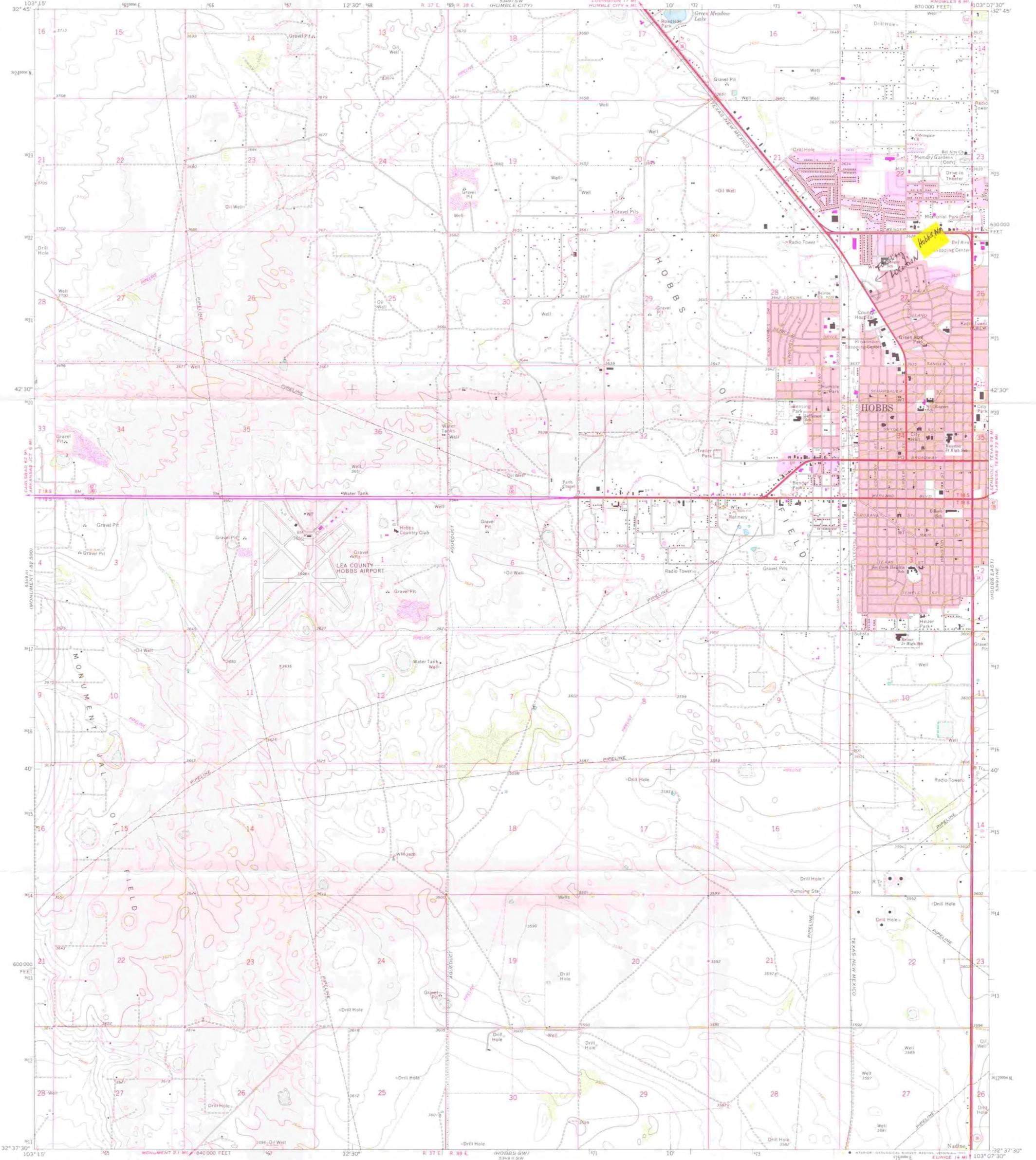
Hospital-Emergency Center
Columbia Regional Hospital
505-392-6581

Regional Distribution Manager
Roy Young
5617 Highland Blvd.
Midland, TX 79707
Work: 915-495-7212
Home: 915-697-1233

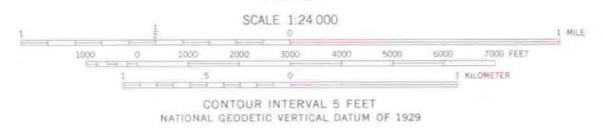
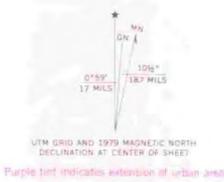
New Mexico State Police
505-392-5588

Baker Petrolite
Vice President, General Manager
Rusy Brice
12645 West Airport Blvd.
Sugar Land, TX 77478

Lea County Sheriff
505-393-2515



Mapped, edited, and published by the Geological Survey
Control by USGS and NOS/NOAA
Planimetry by photogrammetric methods from aerial photographs taken 1967. Topography by planetable surveys 1969.
Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue
Red tint indicates areas in which only landmark buildings are shown
Fine red dashed lines indicate selected fence lines
Revisions shown in purple compiled from aerial photographs taken 1977 and other source data. This information not field checked. Map edited 1979



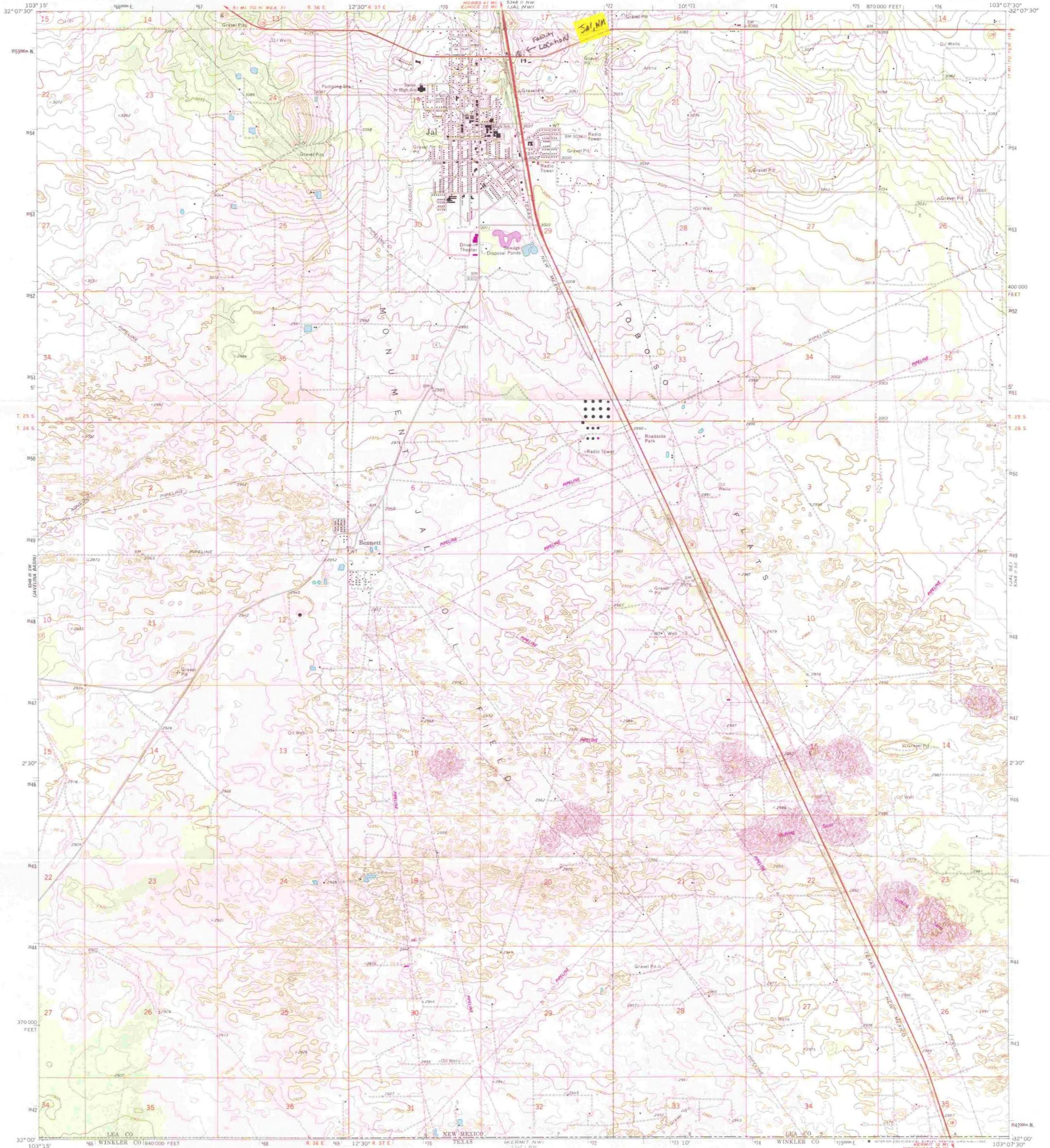
ROAD CLASSIFICATION

Primary highway, all weather, hard surface	Light-duty road, all weather, improved surface
Secondary highway, all weather, hard surface	Unimproved road, fair or dry weather
	weather

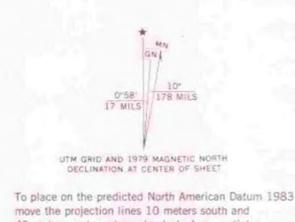
U. S. Route State Route

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

HOBBS WEST, N. MEX.
N3237.5-W10307.5/7.5
1969
PHOTOREVISED 1979
DMA 5348 II NW-SERIES V881



Maped, edited, and published by the Geological Survey
Control by USGS and NOS/NOAA
Topography by photogrammetric methods from aerial
photographs taken 1968. Field checked 1969
Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system,
east zone
1000-meter Universal Transverse Mercator grid ticks,
zone 13, shown in blue
Fine red dashed lines indicate selected fence lines
Revisions shown in purple compiled from aerial photographs
taken 1977 and other source data. This information not
field checked. Map edited 1979



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A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST



ROAD CLASSIFICATION
Primary highway, all weather. Light-duty road, all weather, hard surface. Improved surface
Unimproved road, fair or dry weather
State Route

JAL, N. MEX.—TEX.
N3200—W10307.5/7.5
1969
PHOTOREVISED 1979
DMA 5348 II SW—SERIES V881

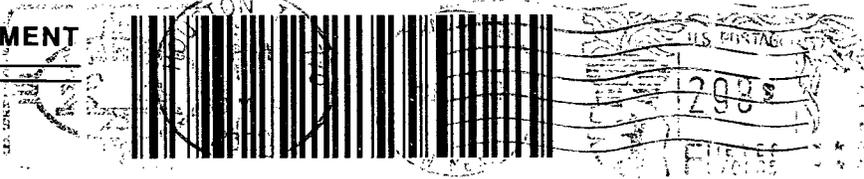
State of New Mexico

ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

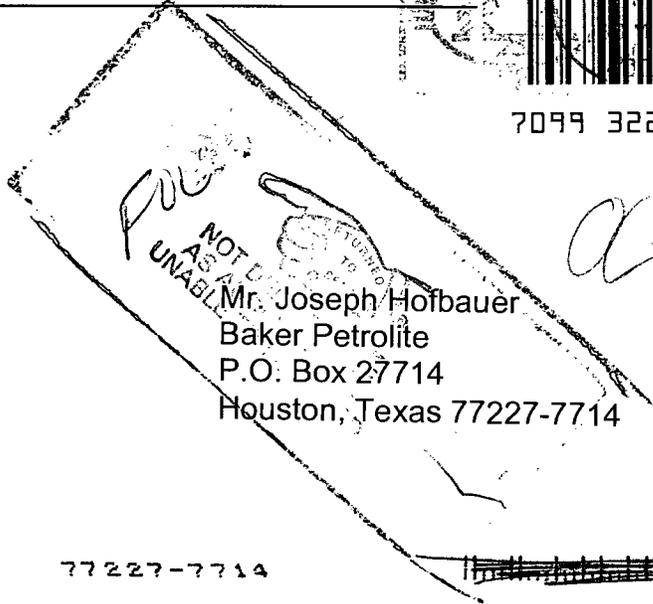
2040 South Pacheco
P.O. Box 6429
Santa Fe, New Mexico 87505-5472

1ST NOTICE
2ND NOTICE
RETURN

CERTIFIED MAIL



7099 3220 0000 5050 9313



77227-7714





NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

March 13, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9313

Mr. Joseph Hofbauer
Baker Petrolite
P.O. Box 27714
Houston, Texas 77227-7714

RE: Discharge Plan Renewal Notice for Baker Petrolite Facilities

Dear Mr. Hofbauer:

Baker Petrolite have the following discharge plans which expire during the current calendar year.

GW-203 expires 8/29/2000 – Hobbs Facility
GW-204 expires 8/29/2000 – Artesia Facility

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for oil field service company facilities. The \$50.00 filing fees are to be submitted with the discharge plan renewal applications and are nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit, for each, the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs (GW-203) or Artesia (GW-204) District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the discharge plan application form are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is available on OCD's website at www.emnrd.state.nm.us/ocd/).

Mr. Joseph Hofbauer
March 13, 2000
Page 2

If either of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Baker Petrolite has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with a large initial "R" and "A".

Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office
 OCD Artesia District Office

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS**
(Refer to the OCD Guidelines for assistance in completing the application)

New Renewal Modification

1. Type: _____

2. Operator: _____

Address: _____

Contact Person: _____ Phone: _____

3. Location: _____/4 _____/4 Section _____ Township _____ Range _____

Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATION

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

Name: _____ Title: _____

Signature: _____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
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Contact Person: _____ Phone: _____

3. Location: _____ /4 _____ /4 Section _____ Township _____ Range _____
Submit large scale topographic map showing exact location.

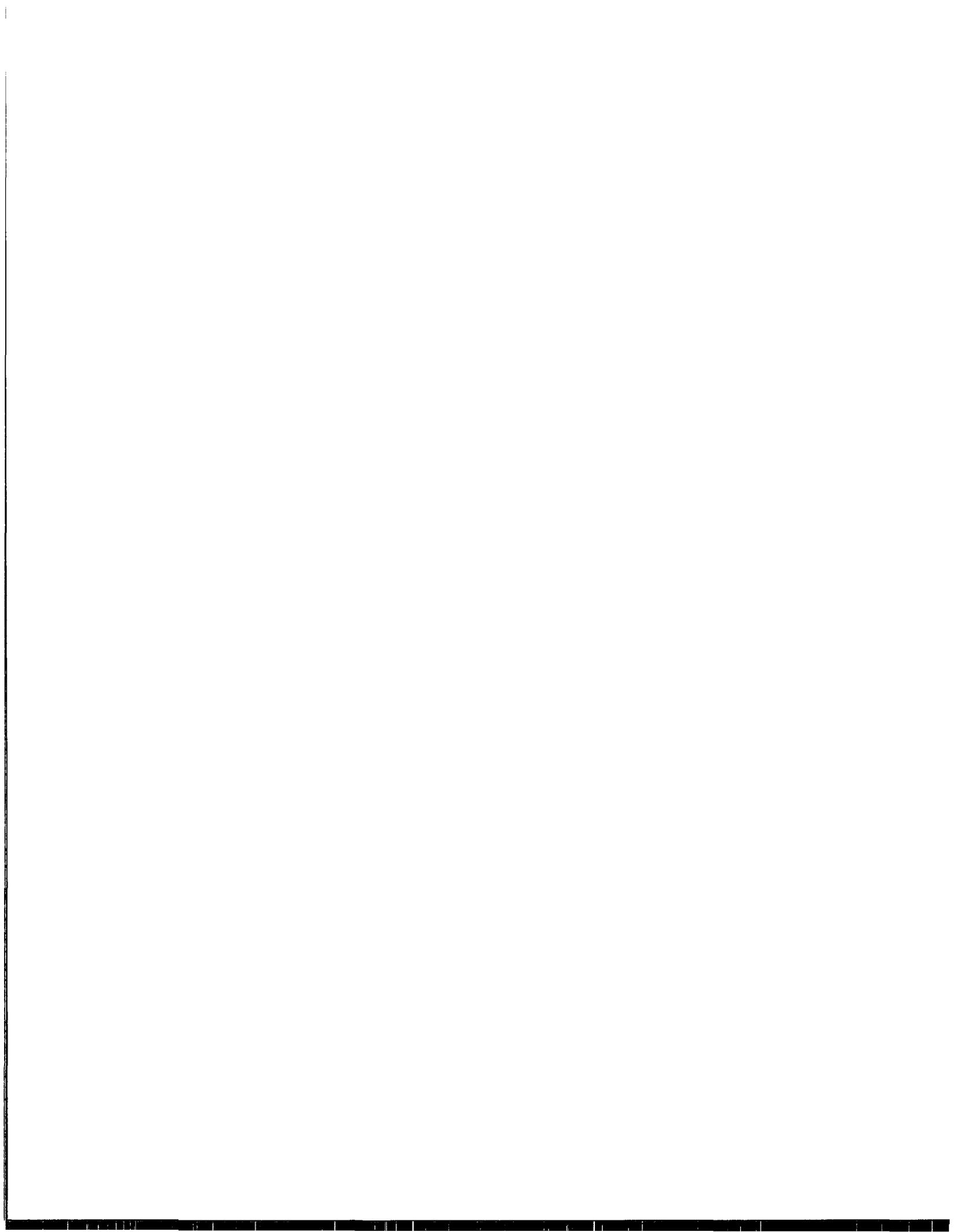
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14. CERTIFICATION

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

Name: _____ Title: _____

Signature: _____ Date: _____



Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertising Director of **THE LOVINGTON DAILY LEADER**, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled Legal Notice was published in a regular and entire issue of **THE LOVINGTON DAILY LEADER** and not in any supplement thereof, for one (1) day, beginning with the issue of August 15, 2000 and ending with the issue of August 15, 2000.

And that the cost of publishing said notice is the sum of \$ 55.00 which sum has been (Paid) as Court Costs.

Joyce Clemens
Subscribed and sworn to before me this 16th day of August 2000

Debbie Schilling
Debbie Schilling
Notary Public, Lea County, New Mexico
My Commission Expires June 22, 2002

**LEGAL NOTICE
NOTICE OF
PUBLICATION
STATE OF
NEW MEXICO
ENERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(G W - 203) - Baker Petrolite (formerly Petrolite Corporation), Mr. Roy Young, 12645 West Airport Boulevard, Sugar Land, Texas 77478, has submitted a Discharge Plan Renewal Application for their Hobbs Warehouse Facility located in the NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be stored in a closed top receptacle and transported offsite for disposal at an OCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address

given above. The discharge plan application(s) may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan application(s), the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of August, 2000.

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION
LORI WROTENBERY,
Director
SEAL

Published in the Lovington Daily Leader August 15, 2000.

THE SANTA FE
NEW MEXICAN

Founded 1849

AUG 18

NM OIL CONSERVATION DIVISION
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 165047 ACCOUNT: 56689
LEGAL NO: 67901 P.O.#: 0019900278
182 LINES 1 time(s) at \$ 80.23
AFFIDAVITS: 5.25
TAX: 5.34
TOTAL: 90.82

AFFIDAVIT OF PUBLICATION

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 8th day of August, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

Legal #67901
Pub. August 14, 2000

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, Betsy Reuner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67901 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/14/2000 and 08/14/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 14 day of August, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ Betsy Reuner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
14 day of August A.D., 2000

Notary Laura E. Harding

Commission Expires 11/23/03

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of August 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

S E A L



Baker Petrolite
12645 West Airport Blvd.
Sugar Land, TX 77478

JUL 20 2000

June 30, 2000

Certified Receipt # P662 833 369

Mr. Jack Ford
NM Energy, Minerals & Natural Resource Department
Oil Conservation Division
240 South Pacheco Street
Santa Fe, NM 87505

Re: Renewal of Discharge Plan GW-203 for Hobbs and Jal, NM Facilities
Renewal of Discharge Plan GW-204 for Artesia, NM Facility

Dear Mr. Ford,

Please see enclosed Discharge Plan renewal applications for Baker Petrolite facilities located in Hobbs, Jal and Artesia, NM. I have included the original renewal along with one copy. Included are copies of each facility's Emergency Response and Employee Contingency Plans for your reference and information. Also enclosed is a check for \$100 to cover the filing fee for both GW-203 and GW-204 Discharge Plan renewals. A copy of each renewal will be submitted to the appropriate ODC district offices as well.

Please note that our corporate office address has changed for our Hobbs, Jal, Artesia and Bloomfield, New Mexico facilities. This new address is:

Baker Petrolite
12645 West Airport Blvd.
Sugar Land, TX 77478

Please contact me at (281) 275-7259 if you have any questions. Thank you for all your assistance.

Sincerely,

Tina Proctor
HSE Specialist

Enclosed: GW-203 Discharge Plan Renewal (Hobbs and Jal): Emergency Response Plans, Topographical maps
GW-204 Discharge Plan (Artesia): Emergency Response Plan, Topographical map
Filing fee for \$100

GW-203 copy to: OCD
1625 N. French Dr.
Hobbs, NM 88240

GW-204 copy to: OCD
811 South First
Artesia, NM 88210

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 7-17-00,
or cash received on _____ in the amount of \$ 100.00

from Baker Hughes Enterprise Services
for Artesia Service Facility GW-204
Hobbs Service Facility GW-203

Submitted by: [Signature] Date: 8-4-00
(Family Name) (DP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment _____

THIS MULTI-TONE BLUE SECURITY AREA OF THE DOCUMENT CHANGES GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM



BAKER HUGHES ENTERPRISE SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
Houston, TX 77267-4427
(281) 209-7500

CHASE BANK OF TEXAS

32-115
1110

Check No. [REDACTED]
Date 07/17/2000

CHECK AMOUNT
\$*****100.00*

PAY *** ONE HUNDRED USD***

TO THE ORDER OF

USD

NM ENERGY, MINERALS & NATURAL
RESOURCE DEPT - OIL CONSERVATION
240 SOUTH PACHECO STREET
SANTE FE NM 87505

[Signature]

BAKER HUGHES ENTERPRISE SERVICES
ACCOUNTS PAYABLE
PO BOX 674427
HOUSTON, TX 77267-4427
(281)209-7500

Check Information	
Check No. / Date	
Your account with us	

Payment is made on behalf of Baker Petrolite Corp., .

Document	Your document	Date	Gross amount	Deductions	Net amount
1900001146	063000	06/30/2000	100.00	0.00	100.00
Sum total			100.00	0.00	100.00

*For GW-203
& GW-204
Renewal filing fee*



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

April 11, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9528

Mr. Joseph Hofbauer
Baker Petrolite
P.O. Box 5050
Sugarland, Texas 77487

RE: Discharge Plan Renewal Notice for Baker Petrolite Facilities

Dear Mr. Hofbauer:

Baker Petrolite failed to notify the New Mexico Oil Conservation Division (OCD) Santa Fe office of your change of address and the original notification of renewal was returned to this office. It is the responsibility of the owner/operator of an approved discharge plan facility to notify the OCD Santa Fe office of **any** changes to the information provided in the discharge plan application or modifications to the facility which might affect the terms or conditions expressed in the approved discharge plan. Henceforth any change of address or contact personnel is to be promptly reported to the OCD Santa Fe office.

Baker Petrolite have the following discharge plans which expire during the current calendar year.

GW-203 expires 8/29/2000 – Hobbs Facility

GW-204 expires 8/29/2000 – Artesia Facility

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for oil field service company facilities. The \$50.00 filing fees are to be submitted with the discharge plan renewal applications and are nonrefundable.

Mr. Joseph Hofbauer
April 11, 2000
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit, for each, the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs (GW-203) or Artesia (GW-204) District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the discharge plan application form are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is available on OCD's website at www.emnrd.state.nm.us/oed/).

If either of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Baker Petrolite has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 827-7156 as he has been assigned the responsibility for reviewing these discharge plans.

Sincerely,



Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office
OCD Artesia District Office

7099 3220 0000 5050 9528

U.S. Postal Service		CERTIFIED MAIL RECEIPT		OCD	
(Domestic Mail Only - No Insurance Coverage Provided)					
Article Sent To:					
Postage	\$				
Certified Fee					
Return Receipt Fee (Endorsement Required)					
Restricted Delivery Fee (Endorsement Required)					
Total Postage & Fees	\$				
Postmark Here					
Name (Please Print Clearly) (To be completed by addressee)					
J. Hofbauer					
Street, Apt. No. or P.O. Box No.					
Baker Petrolite					
City, State, ZIP+4					
Sugarland TX 75088					
PS Form 3800 (July 1999) See Reverse for Instructions					



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

March 13, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9313

Mr. Joseph Hofbauer
Baker Petrolite
P.O. Box 27714
Houston, Texas 77227-7714

RE: Discharge Plan Renewal Notice for Baker Petrolite Facilities

Dear Mr. Hofbauer:

Baker Petrolite have the following discharge plans which expire during the current calender year.

GW-203 expires 8/29/2000 – Hobbs Facility
GW-204 expires 8/29/2000 – Artesia Facility

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for oil field service company facilities. The \$50.00 filing fees are to be submitted with the discharge plan renewal applications and are nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit, for each, the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs (GW-203) or Artesia (GW-204) District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the discharge plan application form are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is available on OCD's website at www.emnrd.state.nm.us/ocd/).

Mr. Joseph Hofbauer
March 13, 2000
Page 2

If either of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Baker Petrolite has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office
OCD Artesia District Office

7099 3220 0000 0505 9317

U.S. POSTAL SERVICE	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only. No Insurance Coverage Provided)	
Article Sent To:	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Name (Please Print Clearly) (To be completed by mailer) <i>J. Hofbauer</i>	
Street, Apt. No., or PO Box No. <i>Baker Petrolite</i>	
City, State, ZIP+4 <i>Houston TX 77003</i>	
PS Form 3800, July 1999	
See Reverse for Instructions	

SANTA FE NM 87502
MAR 14 2000
Postmark Here

95 AUG 28 AM 8 52

August 24, 1995

RECEIVED

AUG 28 1995

Environmental Bureau
Oil Conservation DivisionPat Sanchez
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505Certified Mail —
Receipt RequestedRE: Discharge Plan GW-203
Petrolite Corporation, Hobbs facility
Lea County, New Mexico

Dear Mr. Sanchez:

I am writing in reply to your letter dated June 22, 1995, requesting additional information for the subject Petrolite Corporation discharge plan. The request by the OCD and Petrolite's response to each item is listed below.

A. Under ITEM IX. - Submit a plan for addressing the loading dock at the Jal facility that lacked pad/curb type containment.

Petrolite Corporation agrees to install secondary containment with curbing for the Jal, NM loading dock as per OCD guidelines. The anticipated schedule of completion is as follows:

1. Perform an engineering study to determine the size, type and specifications for the most cost effective containment program meeting OCD requirements.
1Q. 1996
2. Contact regional contractors to obtain competitive bids for the scope of work.
2Q. 1996
3. Prepare request for capital expenditure, obtain project funding.
3Q. 1996
4. Negotiate legal contract with contractor, relocate existing loading dock to a temporary location, perform scope of work for the construction of secondary containment, submit notification of compliance to OCD.
4Q. 1996 - 1Q. 1997

- B. Under ITEM XII. - The NMOCD used the following parameters in providing preliminary groundwater data for the public notice:
TDS (total dissolved solids) = 100 mg/l and depth to groundwater = 50 (feet)**

This is an administrative statement and does not require additional action by Petrolite.

- C. Under ITEM XIII. - Attach the enclosed information and include as part of the discharge plan.**

NOTE: The legal location for this facility is NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, per Mr. Ken Patterson.

The above information will be included in the referenced section of Petrolite's discharge plan and placed in the file for future reference.

Sincerely,

A handwritten signature in black ink, appearing to read "G. A. Cary", with a large, looping flourish extending from the end of the signature.

George A. Cary
Manager, Regional SHEA Operations
Tretolite Division

RECEIVED

NOTICE OF PUBLICATION

JUN 22 1995
6345
USFWS - NIMES
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-203) -PETROLITE CORPORATION, MR. DAN TARVER, P.O. BOX 740, Sundown, Texas, 79372-0740 has submitted a Discharge plan application for their Hobbs facility located in the NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-204) -PETROLITE CORPORATION, MR. DAN TARVER, P.O. BOX 740, Sundown, Texas, 79372-0740 has submitted a Discharge plan application for their Artesia facility located in the SE/4 SW/4, Section 33, Township 16 South, Range 26 East, NMPM, Eddy County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 2160 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-207) -BAKER PERFORMANCE CHEMICALS, INC., MR. JOHN COCKRUM, P.O. BOX 250, Lovington, NM, 88260 has submitted a Discharge plan application for their Lovington facility located in the NW/4, Section 21, Township 15 South, Range 36 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 450 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

by *William J. Lemay* Deputy Director

WILLIAM J. LEMAY, Director

S E A L

NO EFFECT FINDING
The described action will have no effect on listed species, wetlands, or other important wildlife resources.
Date July 10, 1995
Consultation # GW950CD1
Approved by *[Signature]*
U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

**NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT**

OIL CONSERVATION DIVISION

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(GW-207)-BAKER PERFORMANCE CHEMICALS, INC., MR. JOHN COCKRUM, P.O. BOX 250, Lovington, NM, 88260 has submitted a Discharge plan application for their Lovington facility located in the NW/4, Section 21, Township 15 South, Range 36 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 450 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearings held, the Director will approve or disapprove the

proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WILLIAM J. LEMAY, Director
Journal: June 27, 1995

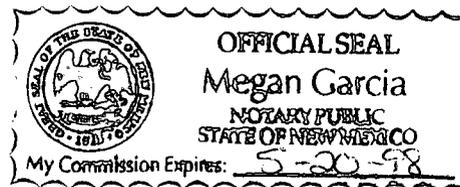
STATE OF NEW MEXICO

County of Bernalillo SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being of the 27th day of June, 1995, and the subsequent consecutive publications on _____, 1995

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 27th day of June 1995



PRICE \$46.85
Statement to come at end of month.

Megan Garcia

CLA-22-A (R-1/93) ACCOUNT NUMBER C80932



MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal Time 4:00pm Date 6/28/95

Originating Party

Other Parties

George Carry - Petrolite

Pat Sanchez
NMOB

Place Petrolite Artesia, Hobbs, Jal Facilities

Discussion
George was not aware of pad/curb - impermeable containment. I told him maybe it was my error for not mentioning during the inspection. He said this will put them out of business - I told him we did not have to put in the containment systems right away - he could put them in over time as their budget allows. OR I told him to write a justification for exempting them from the containment - I told him I did not think it would fly but he could Conclusions or Agreements per PUSC.

George will Iron out details with managers and follow up latter. He also asked if he could move the discharge plan to another area - I told him I didn't think so.

Discussion

Signed

Robert W. [Signature]



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

June 22, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-714

Mr. George A. Cary
Petrolite (Tretolite Division)
369 Marshall Avenue
St. Louis, MO 63119

RE: Discharge Plan GW-203
Petrolite Corporation, Hobbs facility
Lea County, New Mexico

Dear Mr. Cary:

The NMOCD has received the proposed Petrolite Corporation discharge plan application for the facility located in NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. The application filing fee in the amount of \$50 and flat fee in the amount of \$1,380 was received by the NMOCD along with the discharge plan application. The NMOCD has prepared and sent out the public notice for the Petrolite Corporation facility as stated in WQCC section 3-108 and has performed a preliminary review of the discharge plan as proposed by Petrolite Corporation as received by the OCD on June 9, 1995.

The following comments and request for additional information are based on the review of the Petrolite Corporation application. **Please note that unless otherwise stated, response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan application.**

Refer to the application page submitted by Petrolite Corporation as signed by Mr. George A. Cary on June 2, 1995.

- A. UNDER ITEM IX. - Submit a plan for addressing the loading dock at the Jal facility that lacked pad/curb type containment.

Mr. George A. Cary
June 22, 1995
Page 2

- B. UNDER ITEM XII. - The NMOCD used the following parameters in providing preliminary groundwater data for the public notice:
TDS (total dissolved solids)=100 mg/l and depth to groundwater=50'(feet)

NOTE: State Engineer in district II Roswell may be contacted at 1-800-231-8933 for groundwater and hydrological information.

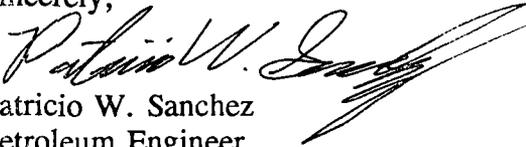
- C. UNDER ITEM XIII. - Attach the enclosed information and include as part of the discharge plan.

NOTE: The legal location for this facility is NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. per Mr. Ken Patterson.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,


Patricio W. Sanchez
Petroleum Engineer

xc: Mr. Wayne Price-Environmental Engineer



Petrolite Oil Field Chemicals Group

16010 Barker's Point Lane • Houston, Texas 77079
(713) 558-5200 • Telex 4620346 • Fax (713) 589-4737

Reply to: P.O. Box 60180
Midland, TX 79711-0180

FAX # 915-563-2066

DATE: 6-16-95

TO: Pat Sanchez

FROM: Kenneth Patterson

MESSAGE: Legal Description

NUMBER OF PAGES (including Cover Page): 3

Per our conversation

505 927 8177

Petrolite Oil Field Chemicals Group

16010 Barker's Point Lane • Houston, Texas 77079
(713) 556-5200 • Telex 4620346 • Fax (713) 589-4737

Reply to: 110 W. Louisiana
Suite 400
Midland, Texas 79701

ATT KEN PATTERSON

This is the LEGAL Description
on the ARTSIA stock location

S.E. 1/4 of SW 1/4 of Section
33, Township 16 South
Range 26 E.

I hope this is what you needed.

Thanks ML

PETROLITE™ Chemicals and Service

563+2066 P01

TO:

915 445 7591

915 445 7591

JUN 16 95 13:42 TRETOLITE CHEMICALS

6/16/95

06/16/95 3759

TRETOLITE

827 8177

MIDLAND WAREHOUSE

001

Inter-office Correspondence

Date: June 16, 1995

Copy to:

DESCRIPTION OF HOBBS WAREHOUSE

The property is described as follows:

located at Lots 4 and 5, Block 6, Unit 2, Del Norte Industrial Sub-division, NE 1/4, Section 7, T-18-S, R-38-E, Lea County, New Mexico. (Approximately 80 percent of the property is in the SE 1/4 of the NE 1/4 and approximately 20 percent is in the SW 1/4 of the NE 1/4.)

The center point of the property is at a latitude of 32° 45' 51" N and a longitude of 103° 10' 56" W.

GUIDELINES

FOR

REMEDICATION

OF

LEAKS, SPILLS AND RELEASES

(AUGUST 13, 1993)

New Mexico Oil Conservation Division

INTRODUCTION

The following document is to be used as a guide on all federal, state and fee lands when remediating contaminants resulting from leaks, spills and releases of oilfield wastes or products. The New Mexico Oil Conservation Division (OCD) requires that corrective actions be taken for leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property. These guidelines are intended to provide direction for remediation of soils and fresh waters contaminated as a result of leaks, spills or releases of oilfield wastes and products in a manner that assures protection of fresh waters, public health and the environment.

Fresh waters (to be protected) includes the water in lakes, playas, surface waters of all streams regardless of the quality of the water within any given reach, and all underground waters containing 10,000 milligrams per liter (mg/l) or less of total dissolved solids (TDS) except for which, after notice and hearing, it is found that there is no present or reasonably foreseeable beneficial use which would be impaired by contamination of such waters. The water in lakes and playas shall be protected from contamination even though it may contain more than 10,000 mg/l of TDS unless it can be shown that hydrologically connected fresh ground water will not be adversely affected.

Procedures may deviate from the following guidelines if it can be shown that the proposed procedure will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted. Specific constituents and/or requirements for soil and ground water analysis and/or remediation may vary depending on site specific conditions. Deviations from approved plans will require OCD notification and approval.

****** Note:** Notification to OCD of leaks, spills and releases does not relieve an operator of responsibility for compliance with any other federal, state or local law and/or regulation regarding the incident. Other agencies (ie. BLM, Indian Tribes, etc) may also have guidelines or requirements for remediation of leaks spills and releases.

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a. Sampling Procedures

b. Analytical methods

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4. Sampling Procedures

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a. Analytical Methods

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ii. Insitu Soil Treatment

iii. Alternate Methods

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b. Dissolved Phase Contamination

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B. GROUND WATER

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FINAL CLOSURE

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FINAL REPORT

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 - B. FACILITY
 - C. TIME OF INCIDENT
 - D. DISCHARGE EVENT
 - E. TYPE OF DISCHARGE
 - F. QUANTITY
 - G. SITE CHARACTERISTICS
 - H. IMMEDIATE CORRECTIVE ACTIONS
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 - C. SITE STABILIZATION
- III. SITE ASSESSMENT
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 - a. Ranking Criteria
 - b. Recommended Remediation Level
 - B. GROUND WATER

I. NOTIFICATION OF LEAK, SPILL OR RELEASE

Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to the OCD pursuant to OCD Rule 116 (Appendix A) or New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Appendix B). Appendix C contains the phone numbers and addresses for reporting incidents to the OCD district and Santa Fe offices. Notification will include all information required under the respective rule or regulation. Below is a description of some of the information required:

A. RESPONSIBLE PARTY AND LOCAL CONTACT

The name, address and telephone number of the person/persons in charge of the facility/operation as well as the owner and/or operator of the facility/operation and a local contact.

B. FACILITY

The name and address of the facility or operation where the incident took place and the legal location listed by quarter-quarter, section, township and range, and by distance and direction from the nearest town or prominent landmark so that the exact site location can be readily located on the ground.

C. TIME OF INCIDENT

The date, time and duration of the incident.

D. DISCHARGE EVENT

A description of the source and cause of the incident.

E. TYPE OF DISCHARGE

A description of the nature or type of discharge. If the material leaked, spilled or released is anything other than crude oil, condensate or produced water include its chemical composition and physical characteristics.

F. QUANTITY

The known or estimated volume of the discharge.

G. SITE CHARACTERISTICS

The relevant general conditions prevailing at the site including precipitation, wind conditions, temperature, soil type, distance to nearest residence and population centers and proximity of fresh water wells or watercourse (ie. any river, lake, stream, playa, arroyo, draw, wash, gully or natural or man-made channel through which water flows or has flowed).

H. IMMEDIATE CORRECTIVE ACTIONS

Any initial response actions taken to mitigate immediate threats to fresh waters, public health and the environment.

II. INITIAL RESPONSE ACTIONS

Upon learning of a leak, spill or release of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property, the responsible party (RP) should take the following immediate actions unless the actions could create a safety hazard which would result in a threat to personal or public injury:

A. SOURCE ELIMINATION AND SITE SECURITY

The RP should take the appropriate measures to stop the source of the leak, spill or release and limit access to the site as necessary to reduce the possibility of public exposure.

B. CONTAINMENT

Once the site is secure, the RP should take steps to contain the materials leaked, spilled or released by construction of berms or dikes, the use of absorbent pads or other containment actions to limit the area impacted by the event and prevent potential fresh water contaminants from migrating to watercourses or areas which could pose a threat to public health and safety.

C. SITE STABILIZATION

After containment, the RP should recover any products or wastes which can be physically removed from the surface within the containment area. The disposition of all wastes or products removed from the site must be approved by the OCD.

III. SITE ASSESSMENT

Prior to final closure (Section VIII), soils into which nonrecoverable products or wastes have infiltrated and which have a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property should be assessed for their potential environmental impacts and remediated according to the procedures contained in the following sections. Assessment results form the basis of any required remediation. Sites will be assessed for severity of contamination and potential environmental and public health threats using a risk based ranking system.

The following characteristics should be determined in order to evaluate a sites potential risks, the need for remedial action and, if necessary, the level of cleanup required at the site:

A. GENERAL SITE CHARACTERISTICS

1. Depth To Ground Water

The operator should determine the depth to ground water at each site. The depth to ground water is defined as

the vertical distance from the lowest contaminants to the seasonal high water elevation of the ground water. If the exact depth to ground water is unknown, the ground water depth can be estimated using either local water well information, published regional ground water information, data on file with the New Mexico State Engineer Office or the vertical distance from adjacent ground water or surface water.

2. Wellhead Protection Area

The operator should determine the horizontal distance from all water sources including private and domestic water sources. Water sources are defined as wells, springs or other sources of fresh water extraction. Private and domestic water sources are those water sources used by less than five households for domestic or stock purposes.

3. Distance To Nearest Surface Water Body

The operator should determine the horizontal distance to all downgradient surface water bodies. Surface water bodies are defined as perennial rivers, streams, creeks, irrigation canals and ditches, lakes, ponds and playas.

B. SOIL/WASTE CHARACTERISTICS

Soils/wastes within and beneath the area of the leak, spill or release should be evaluated to determine the type and extent of contamination at the site. In order to assess the level of contamination, observations should be made of the soils at the surface and samples of the impacted soils should be taken in the leak, spill or release area. Observations should note whether previous leaks, spills or releases have occurred at the site. Additional samples may be required to completely define the lateral and vertical extent of contamination. Soil samples should be obtained according to the sampling procedures in Sections V.A. and V.B. This may be accomplished using a backhoe, drill rig, hand auger, shovel or other means.

Initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A.

Varying degrees of contamination described below may co-exist at an individual site. The following sections describe the degrees of contamination that should be documented during the assessment of the level of soil contamination:

1. Highly Contaminated/Saturated Soils

Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.

2. Unsaturated Contaminated Soils

Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated, as described above, but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release. Action levels and sampling and analytical methods for determining contaminant concentrations are described in detail in Sections IV. and V.

(NOTE: Soils contaminated as a result of spills, leaks or releases of non-exempt wastes must be evaluated for all RCRA subtitle C hazardous waste characteristics. The above definitions apply only to oilfield contaminated soils which are exempt from federal RCRA Subtitle C hazardous waste provisions and nonexempt oilfield contaminated soils which are characteristically nonhazardous according to RCRA subtitle C regulations. Any nonexempt contaminated soils which are determined to be characteristically hazardous cannot be remediated using this guidance document and will be referred to the New Mexico Environment Department Hazardous Waste Program.)

C. GROUND WATER QUALITY

If ground water is encountered during the soil/waste characterization of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality. Ground water samples should be obtained using the sampling procedures in Section V.C. Monitor wells may be required to assess potential impacts on ground water and the extent of ground water contamination, if there is a reasonable probability of ground water contamination based upon the extent and magnitude of soil contamination defined during remedial activities.

IV. SOIL AND WATER REMEDIATION ACTION LEVELS

A. SOILS

The sections below describe the OCD's recommended remediation action levels for soils contaminated with petroleum hydrocarbons. Soils contaminated with substances other than petroleum hydrocarbons may be required to be remediated based upon the nature of the contaminant and it's potential to impact fresh waters, public health and the environment.

1. Highly Contaminated/Saturated Soils

All highly contaminated/saturated soils should be remediated insitu or excavated to the maximum extent practicable. These soils should be remediated using techniques described in Section VI.A to the contaminant specific level listed in Section IV.A.2.b.

2. **Unsaturated Contaminated Soils**

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

<u>Depth To Ground Water</u>	<u>Ranking Score</u>
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source, or;	
<200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

<200 horizontal feet	20
200 - 1000 horizontal feet	10
>1000 horizontal feet	0

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	<u>Total Ranking Score</u>		
	<u>>19</u>	<u>10 - 19</u>	<u>0 - 9</u>
<u>Benzene (ppm) *</u>	10	10	10
<u>BTEX (ppm) *</u>	50	50	50
<u>TPH (ppm) **</u>	100	1000	5000

* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

** The contaminant concentration for TPH is the concentration above background levels.

B. GROUND WATER

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

V. SOIL AND WATER SAMPLING PROCEDURES

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional

constituents must be required based upon the nature of the contaminant which was leaked, spilled or released.

A. HIGHLY CONTAMINATED OR SATURATED SOILS

The following method is used to determine if soils are highly contaminated or saturated:

1. Physical Observations

Study a representative sample of the soil for observable free petroleum hydrocarbons or immiscible phases and gross staining. The immiscible phase may range from a free hydrocarbon to a sheen on any associated aqueous phase. A soil exhibiting any of these characteristics is considered highly contaminated or saturated.

B. UNSATURATED CONTAMINATED SOILS

The following methods may be used for determining the magnitude of contamination in unsaturated soils:

1. Soil Sampling Procedures for Headspace Analysis

A headspace analysis may be used to determine the total volatile organic vapor concentrations in soils (ie. in lieu of a laboratory analysis for benzene and BTEX but not in lieu of a TPH analysis). Headspace analysis procedures should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD procedures are as follows:

- a) Fill a 0.5 liter or larger jar half full of sample and seal the top tightly with aluminum foil or fill a one quart zip-lock bag one-half full of sample and seal the top of the bag leaving the remainder of the bag filled with air.
- b) Ensure that the sample temperature is between 15 to 25 degrees Celsius (59-77 degrees Fahrenheit).
- c) Allow aromatic hydrocarbon vapors to develop within the headspace of the sample jar or bag for 5 to 10 minutes. During this period, the sample jar should be shaken vigorously for 1 minute or the contents of the bag should be gently massaged to break up soil clods.
- d) If using a jar, pierce the aluminum foil seal with the probe of either a PID or FID organic vapor meter (OVM), and then record the highest (peak) measurement. If using a bag, carefully open one end of the bag and insert the probe of the OVM into the bag and re-seal the bag around the probe as much as possible to prevent vapors from escaping. Record the peak measurement. The OVM must be calibrated to assume a benzene response factor.

2. Soil Sampling Procedures For Laboratory Analysis

a. Sampling Procedures

Soil sampling for laboratory analysis should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD soil sampling procedures and laboratory analytical methods are as follows:

- i) Collect samples in clean, air-tight glass jars supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier.
- ii) Label the samples with a unique code for each sample.
- iii) Cool and store samples with cold packs or on ice.
- iv) Promptly ship sample to the lab for analysis following chain of custody procedures.
- v) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

b. Analytical Methods

All soil samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are laboratory analytical methods commonly accepted by OCD for analysis of soil samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or released has been anything other than petroleum based fluids or wastes.

- i) Benzene, toluene, ethylbenzene and xylene
 - EPA Method 602/8020
- ii) Total Petroleum Hydrocarbons
 - EPA Method 418.1, or;
 - EPA Method Modified 8015

C. GROUND WATER SAMPLING

If an investigation of ground water quality is deemed necessary, it should be conducted according to OCD approved industry standards or other OCD-approved procedures. The following methods are standard OCD accepted methods which

should be used to sample and analyze ground water at RCRA Subtitle C exempt sites (Note: The installation of monitor wells may not be required if the OCD approves of an alternate ground water investigation or sampling technique):

1. Monitor Well Installation/Location

One monitor well should be installed adjacent to and hydrologically down-gradient from the area of the leak, spill or release to determine if protectable fresh water has been impacted by the disposal activities. Additional monitor wells, located up-gradient and down-gradient of the leak, spill or release, may be required to delineate the full extent of ground water contamination if ground water underlying the leak, spill or release has been found to be contaminated.

2. Monitor Well Construction

a) Monitor well construction materials should be:

- i) selected according to industry standards;
- ii) chemically resistant to the contaminants to be monitored; and
- iii) installed without the use of glues/adhesives.

b) Monitor wells should be constructed according to OCD approved industry standards to prevent migration of contaminants along the well casing. Monitor wells should be constructed with a minimum of fifteen (15) feet of well screen. At least five (5) feet of the well screen should be above the water table to accommodate seasonal fluctuations in the static water table.

3. Monitor Well Development

When ground water is collected for analysis from monitoring wells, the wells should be developed prior to sampling. The objective of monitor well development is to repair damage done to the formation by the drilling operation so that the natural hydraulic properties of the formation are restored and to remove any fluids introduced into the formation that could compromise the integrity of the sample. Monitoring well development is accomplished by purging fluid from the well until the pH and specific conductivity have stabilized and turbidity has been reduced to the greatest extent possible.

4. Sampling Procedures

Ground water should be sampled according to OCD accepted standards or other OCD approved methods. Samples should be collected in clean containers supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier. Samples for

different analyses require specific types of containers. The laboratory can provide information on the types of containers and preservatives required for sample collection. The following procedures are accepted by OCD as standard sampling procedures:

- a) Monitor wells should be purged of a minimum of three well volumes of ground water using a clean bailer prior to sampling to ensure that the sample represents the quality of the ground water in the formation and not stagnant water in the well bore.
- b) Collect samples in appropriate sample containers containing the appropriate preservative for the analysis required. No bubbles or headspace should remain in the sample container.
- c) Label the sample containers with a unique code for each sample.
- d) Cool and store samples with cold packs or on ice.
- e) Promptly ship sample to the lab for analysis following chain of custody procedures.
- f) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

5. **Ground Water Laboratory Analysis**

Samples should be analyzed for potential ground water contaminants contained in the waste stream, as defined by the WQCC Regulations. All ground water samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are OCD accepted laboratory analytical methods for analysis of ground water samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or release has been anything other than a petroleum based fluid or waste.

a. Analytical Methods

i.) Benzene, Toluene, Ethylbenzene and Xylene

- EPA Method 602/8020

ii.) Major Cations and Anions

- Various EPA or standard methods

iii.) Heavy Metals

- EPA Method 6010, or;

- Various EPA 7000 series methods

VI. REMEDIATION

The following discussion summarizes recommended techniques for remediation of contaminated soil and ground water as defined in Section IV.A. and IV.B. OCD approval for remediation of an individual leak, spill or release site is not required if the company is operating under an OCD approved spill containment plan. All procedures which deviate from the companies spill containment plan must be approved by OCD.

A. SOIL REMEDIATION

When RCRA Subtitle C exempt or RCRA nonhazardous petroleum contaminated soil requires remediation, it should be remediated and managed according to the criteria described below or by other OCD approved procedures which will remove, treat, or isolate contaminants in order to protect fresh waters, public health and the environment.

In lieu of remediation, OCD may accept an assessment of risk which demonstrates that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh waters, public health and the environment.

1. Contaminated Soils

Highly contaminated/saturated soils and unsaturated contaminated soils exceeding the standards described in Section IV.A. should be either:

- a) Excavated from the ground until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level listed in Section IV.A.2.b or an alternate approved remediation level, or;
- b) Excavated to the maximum depth and horizontal extent practicable. Upon reaching this limit a sample should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants, or;
- c) Treated in place, as described in Section VI.A.2.b.ii. - Treatment of Soil in Place, until a representative sample is below the contaminant specific remediation level listed in Section IV.A.2.b, or an alternate approved remediation level, or;
- d) Managed according to an approved alternate method.

2. Soil Management Options

All soil management options must be approved by OCD. The following is a list of options for either on-site treatment or off-site treatment and/or disposal of contaminated soils:

a. Disposal

Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

b. Soil Treatment and Remediation Techniques

i. Landfarming

Onetime applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lift within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary, upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation.

In some high risk areas an impermeable liner may be required to prevent leaching of contaminants into the underlying soil.

Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation.

ii. Insitu Soil Treatment

Insitu treatment may be accomplished using vapor venting, bioremediation or other approved treatment systems.

iii. Alternate Methods

The OCD encourages alternate methods of soil remediation including, but not limited to, active soil aeration, composting, bioremediation, solidification, and thermal treatment.

B. GROUND WATER REMEDIATION

1. Remediation Requirements

Ground water remediation activities will be reviewed and approved by OCD on a case by case basis prior to commencement of remedial activities. When contaminated

ground water exceeds WQCC ground water standards, it should be remediated according to the criteria described below.

a. Free Phase Contamination

Free phase floating product should be removed from ground water through the use of skimming devices, total-fluid type pumps, or other OCD-approved methods.

b. Dissolved Phase Contamination

Ground water contaminated with dissolved phase constituents in excess of WQCC ground water standards can be remediated by either removing and treating the ground water, or treating the ground water in place. If treated waters are to be disposed of onto or below the ground surface, a discharge plan must be submitted and approved by OCD.

c. Alternate Methods

The OCD encourages other methods of ground water remediation including, but not limited to, air sparging and bioremediation. Use of alternate methods must be approved by OCD prior to implementation.

VII. TERMINATION OF REMEDIAL ACTION

Remedial action may be terminated when the criteria described below have been met:

A. SOIL

Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level for a particular site as specified in Section IV.A.2.b.

If soil action levels cannot practicably be attained, an evaluation of risk may be performed and provided to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

B. GROUND WATER

A ground water remedial action may be terminated if all recoverable free phase product has been removed, and the concentration of the remaining dissolved phase contaminants in the ground water does not exceed New Mexico WQCC water quality standards or background levels. Termination of remedial action will be approved by OCD upon a demonstration of completion of remediation as described in above.

VIII. FINAL CLOSURE

Upon termination of any required remedial actions (Section VII.) the area of a leak, spill or release may be closed by backfilling any excavated areas, contouring to provide drainage away from the site, revegetating the area or other OCD approved methods.

IX. FINAL REPORT

Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

APPENDIX A



A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

APPENDIX B

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required:

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of the discharge;
and

g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification/and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agent, in an effort to determine the division's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days.

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

8. In the event that the modified corrective action report also is unsatisfactory to the division, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the division director. The division director shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the director concerning the shortcomings of the modified corrective action report, the division may take whatever enforcement or legal action it deems necessary or appropriate.

B. Exempt from the requirements of this section are continuous or periodic discharges which are made;

1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or

2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies.

C. As used in this section:

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water;

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes;

4. "operator" means the person or persons responsible for the overall operations of a facility; and

5. "owner" means the person or persons who own a facility, or part of a facility.

D. Notification of discharge received pursuant to this regulation or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.

APPENDIX C

**TELEPHONE LISTING OIL CONSERVATION
FAX NO. 827-8177**

MAIN LINE - 827-7131

DIRECTOR'S OFFICE:

William LeMay 827-7132
Florene Davidson 827-7132
Sally Martinez 827-7133

GAS MARKETING

Ron Merrett 827-7146
Lyn Hebert 827-1364
Dorothy Phillips 827-7137
Angela Romero 827-7148
Chris Williams 827-7149

ADMINISTRATIVE BUREAU

Edwin Martin 827-7151
Mary Anaya 827-7150
Lupe Sherman 827-7178

ENVIRONMENTAL BUREAU

Roger Anderson 827-7152
Mark Ashley 827-7155
Pat Sanchez 827-7156
Chris Eustice 827-7153
William Olson 827-7154
Mobil No. 660-1067

RECORDS CENTER

Elizabeth Roybal 827-8164
Lawrence Romero 827-8166

HEARING ROOM - 827-7082

LEGAL BUREAU

Rand Carroll 827-8156
Diane Richardson 827-8153

ENGINEERING BUREAU

David Catanach 827-8184
Roy Johnson 827-8198
Michael Stogner 827-8185
Ben Stone 827-8186
Kathy Valdes 827-8182
Vacant 827-8183

KEY ENTRY SECTION

Becky Espy 827-8194
Rick Brown 827-1363
Fran Chavez 827-7158
Dolly Huffman 827-8196
Isabel Montoya 827-8195
Lynn Rivera 827-8197
Andrea Lauber 827-1362

ONGARD IMPLEMENTATION

Ed Martin 827-7151

DISTRICT OFFICES

Aztec 334-6178
Artesia 748-1283
Hobbs 393-6161

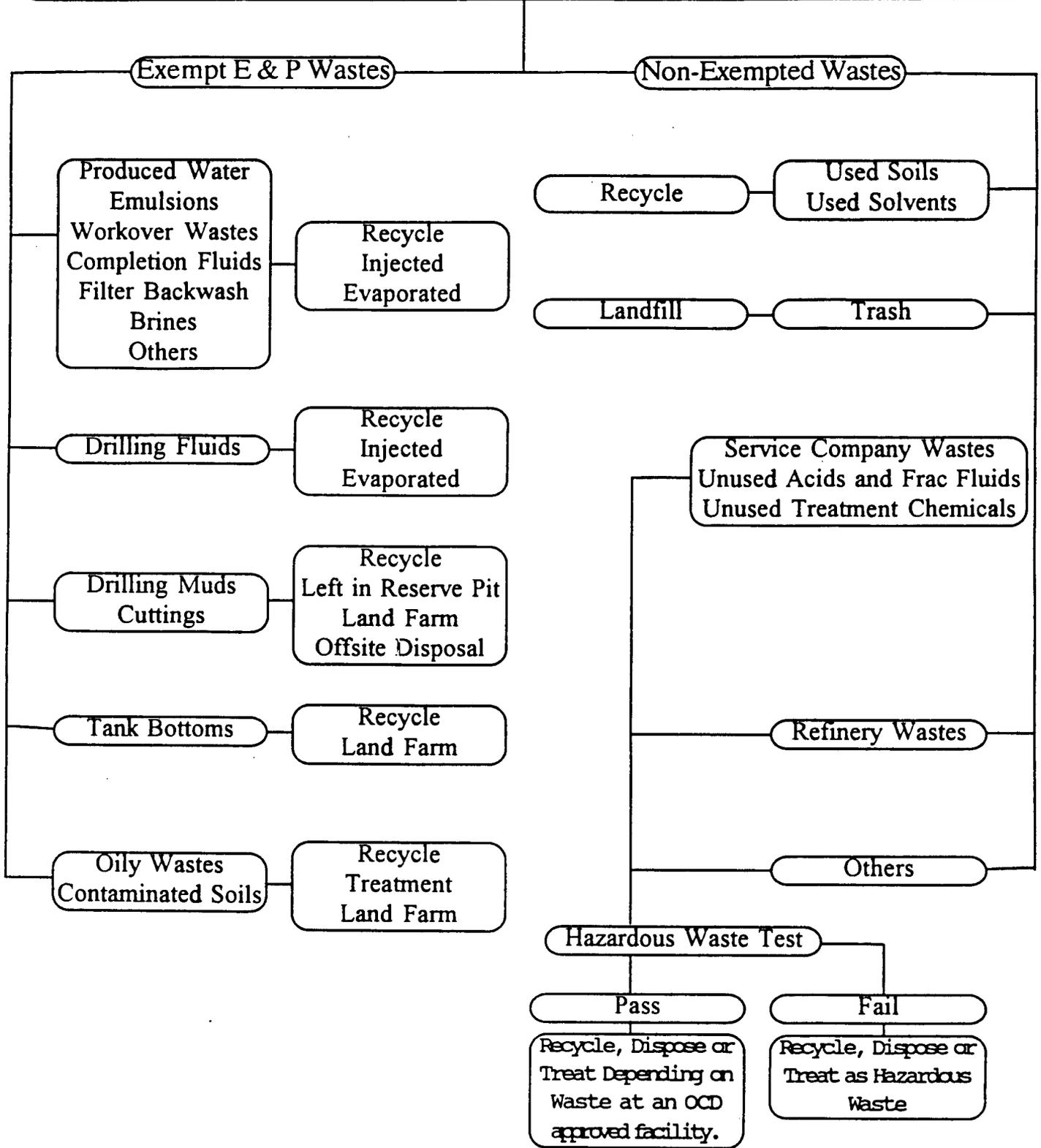
FAX NOS. FOR DISTRICTS

AZTEC 334-6170
ARTESIA 748-9720
HOBBS 393-0720

OIL FIELD WASTES

CATEGORIES AND DISPOSAL METHODS

OIL AND GAS EXPLORATION AND PRODUCTION WASTES



Please contact the Oil Conservation Division concerning any waste or disposal methods not listed.

EPA WASTE CLASSIFICATION O & G EXPLORATION AND PRODUCTION WASTES*

Oil and Natural Gas Exploration and Production Materials and Wastes Exempted by EPA from Consideration as "Hazardous Wastes" (provided non-exempt waste which is or may be "hazardous" has not been added):

Materials and Wastes Not Exempted (may be a "hazardous waste" if tests or EPA listing define as "hazardous") **:

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> Produced water; Drilling fluids; Drill cuttings; Rigwash; Drilling fluids and cuttings from offshore operations disposed of onshore; Geothermal production fluids; Hydrogen sulfide abatement wastes from geothermal energy production; Well completion, treatment, and stimulation fluids; Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste; Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments; Pit sludges and contaminated bottoms from storage or disposal of exempt wastes; Workover wastes; Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves; Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge; Cooling tower blowdown; | <ul style="list-style-type: none"> Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste steam); Packing fluids; Produced sand; Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation; Hydrocarbon-bearing soil; Pigging wastes from gathering lines; Wastes from subsurface gas storage and retrieval, except for nonexempt wastes listed below; Constituents removed from produced water before it is injected or otherwise disposed of; Liquid hydrocarbons removed from the production stream but not from oil refining; Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons; Materials ejected from a producing well during the process known as blowdown; Waste crude oil from primary field operations and production; Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment; <i>Liquid and solid wastes generated by crude oil and crude tank bottom reclaimers***.</i> | <ul style="list-style-type: none"> Unused fracturing fluids or acids; Gas plant cooling tower cleaning wastes; Painting wastes; Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids; Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste; Refinery wastes; <i>Liquid and solid wastes generated by refined oil and product tank bottom reclaimers***;</i> Used equipment lubrication oils; Waste compressor oil, filters, and blowdown; Used hydraulic fluids; Waste solvents; Waste in transportation pipeline-related pits; Caustic or acid cleaners; Boiler cleaning wastes; Boiler refractory bricks; Boiler scrubber fluids, sludges, and ash; Incinerator ash; Laboratory wastes; Sanitary wastes; Pesticide wastes; Radioactive tracer wastes; Drums, insulation, and miscellaneous solids. |
|--|---|--|

* Source: Federal Register, Wednesday, July 6, 1988, p.25,446 - 25,459.

** See important note on 1990 disposal restrictions for non-exempt waste on reverse.

*** See reverse side for explanation of oil and tank bottom reclaimer listings.

COMMERCIAL SURFACE DISPOSAL FACILITIES

SOUTHEAST

COMPANY	ORDER NO.	LOCATION	WASTE	DATE
Burro Pipeline	R-3238	Lane Salt Lake S13 T10S R32E	PW	1967
C & C	R-9769-A	S02 T20S R37E	LF	1993
CRI	R-9166	S27 T20S R32E	PW TP S M	1990
Daugherty	R-5464	Crosby Salt Lake S24 T08S R29E S19 T08S R30E	PW	1977
ESSR	---	S01 T26S R31E	LF	1993
Loco Hills	R-6811-A	S16 T17S R30E	PW TP	1982
Parabo	R-5516	S29 T21S R38E	PW TP S M	1977 1983
R & R Inc.	---	S05 T02N R01E	PW	1993
Unichem	R-7113	S26 T23S R29E	PW	1982

NORTHWEST

COMPANY	ORDER NO.	LOCATION	WASTE	DATE
Basin Disposal	---	S03 T29N R11W	PW	1985
Envirotech No. 1	---	S26 T27N R11W	LF	1990
Envirotech No. 2	---	S06 T26N R10W	LF	1992
SWWD	---	S04 T29N R09W	PW	1988
Sunco	R-9485-A	S02 T29N R12W	PW	1991
TNT Construction	---	S08 T25N R03W	PW LF	1990 1992
Tierra	R-9772	S02 T29N R12W	LF	1992

PW - Produced Water
TP - Waste Oil Treating Plant
S - Solids
LF - Landfarm (Solids)
M - Drilling Muds

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-203) -PETROLITE CORPORATION, MR. DAN TARVER, P.O. BOX 740, Sundown, Texas, 79372-0740 has submitted a Discharge plan application for their Hobbs facility located in the NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-204) -PETROLITE CORPORATION, MR. DAN TARVER, P.O. BOX 740, Sundown, Texas, 79372-0740 has submitted a Discharge plan application for their Artesia facility located in the SE/4 SW/4, Section 33, Township 16 South, Range 26 East, NMPM, Eddy County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 2160 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

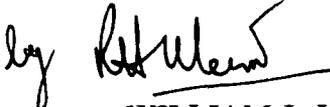
(GW-207) -BAKER PERFORMANCE CHEMICALS, INC., MR. JOHN COCKRUM, P.O. BOX 250, Lovington, NM, 88260 has submitted a Discharge plan application for their Lovington facility located in the NW/4, Section 21, Township 15 South, Range 36 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 450 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

by  Deputy Director

WILLIAM J. LEMAY, Director

S E A L



MEMORANDUM OF MEETING OR CONVERSATION

6w-203

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 3:50 pm	Date 6-12-45
---	-----------------------------------	-----------------	-----------------

<u>Originating Party</u>	<u>Other Parties</u>
Pert Sanchez - NMCD	George Carey Petrolite

Subject Legal Locations For 6w-203, 6w-204

Discussion

Told George I needed legal locations for Hobbs & Artesia. Told him he did not include Gov/ Hyd. Information - told him I would use state Engineer Numbers for the Facilities.

Conclusions or Agreements

George will get legal location information - i.e. USGS 1/4 section Township & Range for the Facilities. I'll use state Engineer numbers for water quality (i.e. depth & TDS) - when George gets me the information then I'll do public notice.

Signed *Robert W. Gandy*

XC-6w-204

PETROLITE

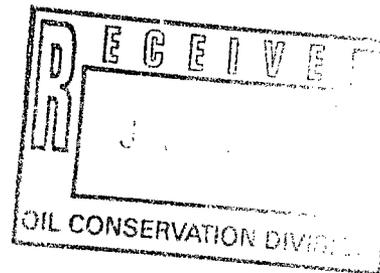
Gw-203

Petrolite Corporation
369 Marshall Avenue
St. Louis, MO 63119-1897

(314) 961-3500
Fax (314) 968-6219

June 2, 1995

Pat W. Sanchez
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505



Re: Discharge Plan Requirement
Artesia, Hobbs, and Jal Facilities

CERTIFIED MAIL RETURN RECEIPT

Dear Mr. Sanchez:

In compliance with the Water Quality Control Commission Regulations, Petrolite is submitting discharge plans for its Artesia, NM and combined Hobbs, NM and Jal, NM facilities. Enclosed please find two checks in the amount of \$1430.00 and three copies of each discharge plan. As per your instructions, Petrolite has combined the discharge plan applications for the Hobbs warehouse and Jal stock point. A copy of the Jal plot plan is attached to the back of the EPPCP & Spill Prevention Plan for the Hobbs facility.

Please address future correspondence and bills to:

Dan Tarver
Petrolite Corporation
P. O. Box 740
Sundown, TX 79372-0740

Should you have any questions, please do not hesitate to contact me at 314/968-6068.

Sincerely,

A handwritten signature in black ink, appearing to read "G. A. Cary". The signature is written over the word "Sincerely,".

George A. Cary
Manager, Regional SHEA Operations
Tretolite Division

Enclosures

RECEIVED

JUN 09 1995

Environmental Bureau
Oil Conservation Division

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 6-2-95,
or cash received on 6-13-95 in the amount of \$ 1430⁰⁰
from PETROLITE CORP
for HOBBS SERVICE FACILITY GW-203

Submitted by: _____ Date: _____
Submitted to ASD by: CHRIS EUSTICE Date: 6-13-95
Received in ASD by: [Signature] Date: 6-13-95
Filing Fee New Facility Renewal _____
Modification _____ Other _____
(applicable)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment _____



Petrolite Corporation
369 Marshall Avenue
St. Louis, MO 63119-1897

V#111208

No [REDACTED]

80-289
815

June 2, 19 95

PAY The sum of \$ 1,430 and 00/100 cts \$ 1,430.00
TO THE ORDER OF

NMED Water Quality Management
2040 South Pacheco
Santa Fe, NM 87505

PETROLITE CORPORATION
VOID AFTER SIX MONTHS

[Signature]
Steven B. Schock

AUTHORIZED SIGNATURE

TO BOATMEN'S®
BANK OF ROLLA, MO



State of New Mexico
Energy, Minerals, and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR OIL FIELD SERVICE FACILITIES
(Refer to OCD Guidelines for assistance in completing the application)

I. TYPE OF OPERATION:

Oil field chemical service company.

RECEIVED

JUN 09 1995

II. OPERATOR:

Petrolite Corporation

Environmental Bureau
Oil Conservation Division

Hobbs, NM Warehouse
5624 Lovington Highway
Hobbs, NM 79323-1639

Jal, NM Stockpoint
522 East Kansas
P.O. Box 1207
Jal, NM 88252

Fabian Nunez - Warehouse Foreman
(505)392-6711

Joe Mitchell, Driver
(505)395-2081

III. LOCATION:

See attached combined: "Emergency Preparedness, Prevention & Contingency Plan, and Spill Prevention Response Plan"

IV. Name and address of the landowner of the disposal facility site.

Hobbs, NM
Petrolite Corporation
369 Marshall Ave
St. Louis, MO 63119

Jal, NM
William R. Cates
Box 1207
Jal, NM 88252

V. Description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

See attached combined: "Emergency Preparedness, Prevention & Contingency Plan, and Spill Prevention Response Plan" for the Hobbs, NM site. A copy of the site plan for the Jal, NM location is attached.

VI. Description of all materials stored or used at site.

See Part VI. Form

VII./VIII. Description of present sources of effluent and waste solids, average quality and daily volume of waste water. Liquid and solid waste collection/treatment/disposal.

No waste water discharges.

See Combined Part VII. / VIII. Form

IX. Description of proposed modifications to existing collection/treatment/disposal systems.

No planned modifications.

X. Routine inspection and maintenance plan to ensure permit compliance.

Drums and tanks are inspected daily during the normal work week. Leaking drums are placed in salvage drums and returned to Midland, TX. Leaking tanks or piping systems are repaired immediately.

XI. Contingency plan for reporting and clean-up of spills or releases.

See attached combined: "Emergency Preparedness, Prevention & Contingency Plan, and Spill Prevention Response Plan"

XII. Geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.

Not applicable. No on-site dispoals.

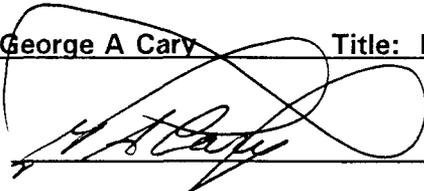
XIII. Other information as necessary to demonstrate compliance with any other OCI rules, regulations and/or orders.

None.

XIV. CERTIFICATION

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

Name: George A Cary Title: Manager Regional SHEA Operations

Signature:  Date: 6-2-95

Discharge Plan Application

Part VI. Form

Name	Solids (S) or Liquids (L)	Type of container (tank, drum, etc)	Estimated Volume	Location (yard, shop, drum storage, etc.)
Drilling Fluids		None	0	
Brines		None	0	
Acids/Caustics		None	0	
Detergents/Soaps		None	0	
Solvents & Degreasers xylene 1,1,1 trichloroethane chloroform (Hobbs, NM only)	L L L	bottle bottle bottle	5 gal 5 gal 1 gal	lab lab lab
Oil and water soluble oil field specialty organic chemicals used in demulsification, scale Inhibition, corrosion inhibition, paraffin dis- persion, water clarification, biocides, surfactants, hydrogen sulfide control, and others.	L	drums	300-400 drums	yard
Above chemicals used in contract treating operations	L	tanks	150 - 1,000 gallons	yard
Laboratory waste oil field sample collection tank (Hobbs, NM only)	L	tank	5 - 15 gallons per month	lab

Discharge Plan Applicaiton
Combined Part VII. / VIII. Form

Name / Waste Type	General Com- position and Source (sol- vents from parts cleaning, oil filters from trucks, etc.)	Volume per month (bbl or gal)	Major Addi- tives (eg de- greaser flu- ids from truck wash- ing, soap in steam clea- ners)	Method of Disposal
Truck Waste		None		
Truck, Tank & Drum Wa- shing		None		
Steam Cleaning of Parts, Equipment, Tanks		None		
Solvent/Degreaser Use (Hobbs, NM only)	Laboratory sol- vents, reagents and lab wastes containing: Xylene, 1,1,1-trichloro- ethane, chloroform, chromates, silver nitrate mercuric chloride	2-5 gallons per month	Oil field sa- mple analyses	RCRA TSDF
Spent Acids, Caustics, or Completion Fluids		None		
Waste Slop Oil		None		
Waste Lubrication and Motor Oils		None		
Oil Filters		None		
Solids & Sludges from Tru- cks (Describe types of mat- erials [e.g. crude oil tank bottoms, sands, etc.]		None		
Painting Wastes		None		

**Discharge Plan Application
Combined Part VII. / VIII. Form**

Name / Waste Type	General Composition and Source (solvents from parts cleaning, oil filters from trucks, etc.)	Volume per month (bbl or gal)	Major Additives (eg degreaser fluids from truck washing, soap in steam cleaners)	Method of Disposal
Other Waste Solids (Cement, construction materials, used drums) (Hobbs, NM only) Used Tires	Truck Operation	4-6 per year	None	Returned to supplier for recapping
Chemical transfer hoses	Contract treating operations.	8 - 12 per year	None	Returned to supplier for recycling
Wood pallets	Chemical delivery	6 - 12 per year	None	Landfill
DOT/ EPA Empty Drums	Petrolite product line	300-400 drums per month	None: water & oil soluble oil field chemicals	Recycled by authorized drum recon-ditioner
Empty new and used field storage tanks (110 - 250 gallon capacity).	Customer service bulk chemical field tanks	0 - 20	None to a few gallons of chemical residue per tank.	Residues still have treating capability and are used in contract treating operations.
Oil field oil and water samples	Crude oil and brine	10 - 20 gallon per month	None	Returned to customer's production system

**Discharge Plan Applicaiton
Combined Part VII. / VIII. Form**

Name / Waste Type	General Com- position and Source (sol- vents from parts cleaning, oil filters from trucks, etc.)	Volume per month (bbl or gal)	Major Addi- tives (eg de- greaser flu- ids from truck wash- ing, soap in steam clea- ners)	Method of Disposal
Laboratory supplies (gla- ssware, sample bottles, equipment, etc.) (Hobbs, NM only)	de minimus re- sidues of lab reagents and field samples	0 - 50 lbs per month.	oil residues, rinsed glass- ware, etc.	Glassware rinsed or dra- ined - sent to landfill. Pro- duct sample bottles retur- ned to Mid- land, TX wa- rehouse for TSDf dis- posal.
Paper wastes (Hobbs, NM only)	Office supplies and packing ma- terials	100 lbs per month	None	Landfill
Miscellaneous solid waste	General Opera- tions	Unknown	None	Landfill

Petrolite Corporation

Hobbs Warehouse
5624 Lovington Highway
Hobbs, NM

Version 1.0
May 1995

**Emergency Preparedness, Prevention &
Contingency Plan**

and

Spill Prevention Response Plan

Hobbs, NM Warehouse EMERGENCY TELEPHONE NUMBERS

In the event of a spill emergency, it is the Facility Manager's responsibility to contact the following agencies (if applicable):

Hobbs Fire Department
505/397-9308

Hobbs Police Department
505/397-9625

National Response Center
1/800-424-8802

Water Quality Control Comm.
505/827-2824

Hospital - Emergency Center
Lea Regional Hospital
505/392-6581

New Mexico State Police
505/392-5588

Lea County Sheriff

505/393-2515

Petrolite Emergency Information
(CHEMTREC)

1/800-424-9300

Primary Coordinator
Fabian Nunez Warehouse Foreman
603 SW 19th
Seminole, TX 79360

Work: 505/392-6711
Home: 915/758-6494

Secondary Coordinator:
Rozanne Johnson
412 E. Barrock
Lovington, N.M. 88260

Work: 505/392-6711
Mobile: 505/370-0740
Home:

Official Spokesperson/media rep.
Mike McPeak, Reg. Dist. Manager
11844 SW 3rd Terrace
Yukon, OK 73099-6930

Work: 1-405/728-9958
Home 1-405/324-5952

Regional Distribution Manager
Kenneth Patterson
4004 Norwood
Midland, TX 79707

Work: 915/563-2140
Home 915/697-1152
Mobile: 915/580-3736

Manager Regional SHEA Operations
George A Cary

Work: 314/968-6068
Home: 314/458-0982

Pager: 1-800-443-7243, ID# 008678

Edward M. Cox,
Corporate Environmental Engineer

Work: 314-968-6247
Home: 314-225-7443
Pager: 1-800-443-7243, ID# 008680

PETROLITE CORPORATION, Hobbs FACILITY
Emergency Preparedness, Prevention and Contingency Plan
&
Spill Prevention Response Plan

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 - 1.1 Description of Industrial or Commercial Activity
 - 1.2 Description of Existing Emergency Response Plans
- 2.0 Implementation Plan
 - 2.1 Organizational Structure
 - 2.3 Emergency Coordinators
 - 2.4 Duties of Emergency Coordinator:
 - 2.6 Chain of Command
- 3.0 Spill Leak Prevention and Response
 - 3.1 Pre-release Planning
- 4.0 Material Compatibility
- 5.0 Prevention and Maintenance
- 6.0 Housekeeping
- 7.0 Security
- 8.0 External Factor Planning
- 9.0 Internal & External Communications Systems
- 10.0 Employee Training

Appendix I

1.0 Fire

- 1.1 General Considerations
- 1.2 Specific Considerations
- 1.3 Housekeeping
- 1.4 Combustion Sources
- 1.5 Fire Response Procedures
- 1.6 Notifications
- 1.7 Follow-up Reporting
- 1.8 Record Retention

2.0 Medical Emergencies

- 2.1 General Considerations
- 2.2 Specific Considerations
- 2.3 Notifications
- 2.4 Follow-up Reporting
- 2.5 Record Retention
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3.0 Spills

- 3.1 General Considerations
- 3.2 Specific Considerations
- 3.3 Spill Response Procedures
- 3.4 Equipment
- 3.5 Contaminated Clothing & Equipment
- 3.6 Notifications
- 3.7 Follow-up Reporting
- 3.8 Record Retention

4.0 Evacuation

- 4.1 General Considerations
- 4.2 Specific Considerations
- 4.3 Emergency Alarm
- 4.4 Evacuation Route
- 4.5 Assembly Location
- 4.6 Authorized Personnel

Appendix II

PETROLITE CORPORATION, Hobbs FACILITY

Emergency Preparedness, Prevention and Contingency Plan & Spill Prevention Response Plan

1.0 Description of Facility

1.1 Description of Industrial or Commercial Activity

The Petrolite Hobbs facility is located at 5624 Lovington Highway, Hobbs, NM. The facility is comprised of an office/sales field laboratory, product storage yard, contract treating and product loading/unloading area. Petrolite owns the property. The facility occupies approximately 1.9 acres. A plot plan of the facility can be found in Appendix I.

The facility operates on a 9-hour (daylight), 5-day per week schedule. Operations are under the control of a Warehouse Foreman/Driver who assists in coordinating receiving and shipping activities. Facility operations consist of the Warehouse Foreman/Driver and two contract treating drivers. The Warehouse Foreman/Driver reports directly to the Regional Distribution Manager. This location also provides lab facilities for a sales technician and other sales personnel on an intermittent basis. The Regional Distribution Manager is responsible for maintaining and updating this plan as changes are made.

Petrolite sells and distributes a wide variety of specialty chemicals used as corrosion inhibitors, fuel additives, industrial water treating additives, and refinery process additives. Products are delivered to the facility via company truck or common carrier. Storage occurs in 55 gallon drums, or (3) 5 gallon pails. Semi-bulk containers ranging in capacity up to 1,000 gallons are used to store products used in contract treating. All chemicals are stored outside. Drums are placed directly on the ground and are stacked and arranged to take into account flammability code and pile size. Contract treating chemicals are stored inside fiberglass or concrete secondary storage basins.

Petrolite handles numerous specialty products at this facility. Material Safety Data Sheets are maintained on-site for all products. The majority of the products stored at the facility are solvent based and are hazardous substances due to flammability. A few products stored at the facility are hazardous due to their corrosive property.

The facility is listed as a conditionally exempt small quantity hazardous waste generator. Such wastes occur as a result of laboratory solvents and reagents used in the analysis and characterization of oil field samples. As a result, hazards posed by any accumulated wastes are identical to hazards posed by product storage and handling. Therefore the Emergency Control Procedures for products are applicable to waste products including those designated as hazardous waste. The facility also generates ordinary solid waste in the form of paper, plastic, boxes, towels, etc. from the office and warehousing operations. The facility generates a small amount of sanitary sewer waste from the office building commodes and sinks.

Appendix I contains a detailed plot plan of the facility showing the following:

- Location of the facility and site boundaries
- General site layout
- Loading and unloading operations
- Waste handling and storage
- Entrance and exit routes to the site
- Location of emergency equipment, i.e. fire extinguishers, gas and electric shutoffs, etc.

1.2 Description of Existing Emergency Response Plans

1.2.1 Four emergency plans currently exist for the Hobbs facility; Fire, Spill, Injury, and Evacuation. All elements of these plans are incorporated into this plan and are currently in-place.

2.0 Implementation Plan

2.1 Organizational Structure

2.1.1 The facility operations consist of the Warehouse Foreman/Driver, two contract teating drivers and a secretary.

2.1.2 The Regional Distribution Manager is in charge of the Fire, Spill, Injury, and Evacuation Plans. He is responsible (with guidance from the SHEA Department, located in St. Louis, Mo.) for the training of employees and for implementing response measures in the event of an incident. Training includes familiarizing employees with the provision of these plans, location, use, and maintenance of spill control equipment, safe routes for evacuation, and reporting requirements. The Facility Manager is also responsible

3.0 Spill Leak Prevention and Response

3.1 Pre-release Planning

3.1.1 The modes of operation at the facility make fire and soil contamination the most likely consequences of an emergency spill episode. The facility has been updated to prevent and/or minimize damage in the event of an occurrence.

3.1.2 To control spills from the truck and drum loading and unloading area, the drivers and operators are required to follow standard operating procedures. The drivers and operators are equipped with drip pans to contain any minor spills from equipment in use during normal operations.

4.0 Material Compatibility

4.1 All containers, tanks, and pumps are constructed of materials compatible with the products contained. Drums and portable containers conform with DOT requirements, and are labeled in conformance with applicable regulations. Materials and hazardous wastes stored in portable tanks, drums and pails are compatible to the extent that (in the event of a spill) no reactions will occur simply by mixing of products which will produce hazardous by-products or temperatures.

4.2 Material Safety Data Sheets for products stored at the facility are available in the office. These sheets contain chemical descriptions and hazardous identification of the products.

5.0 Prevention and Maintenance

5.1 All flow lines are aboveground and all tanks and lines are under daily visual observation. Transfer pumps are located on the contract treating and delivery trucks so that seals and connections can be readily observed during operations. It is the Warehouse Foreman's responsibility to have any leaking or damaged equipment repaired as soon as possible.

6.0 Housekeeping

6.1 The truck and drum loading and unloading areas are inspected daily for cleanliness. Trash containers are located within the work area to collect ordinary refuse. Regular trash pickup occurs once-

per-week at the facility. Transfer hoses are capped after each use and are placed inside the secondary containment basins to reduce spill potential. Contract treating truck loading is performed over a sloped concrete loading pad having a central spill catchment basin.

- 6.2 Spill response equipment, including a variety of tools, absorbents, and salvage drums are stored on the loading dock and next to the wooden storage shed near the contract treating tanks.

7.0 Security

- 7.1 The facility is surrounded by a chain link fence on all sides to restrict both pedestrian and vehicular access. All gates are locked when the site is not occupied and during non-working hours.

8.0 External Factor Planning

- 8.1 During natural disasters, such as flooding, power failure, storms, tornados, etc., it may be necessary to shut down operations of the facility. This decision will be made by the individual on the premise at the time, and conjunction with the Regional Distribution Manager. Insofar as practical, prior to shutdown, the on-site personnnel will have all equipment and large and small containers secured to minimize loss. In the event of a power failure, electrical equipment (where applicable) will be turned off or unplugged to avoid danger when power is restored.

9.0 Internal & External Communications Systems

- 9.1 The facility is small enough that effective verbal communications can be used to alert personnel to an emergency. In the event of an emergency requiring evacuation of personnel, the on-site personnel shall make notification via this method.
- 9.2 External notifications to outside emergency responders can be made via the facility telephone system.

10. Employee Training

- 10.1 During normal operations, zero to five persons are at the facility. Each facility employee has completed required OSHA Hazcom Training. All employees on-site have been trained in the use and implementation of this emergency plan, including the chain of

command and notification procedures, location of the plan, and the applicable evacuation routes and procedures. Each employee also attends a monthly safety meeting on a topic directly related to the safe operation and maintenance of the facility.

10.2 All employees are trained in the proper use of the following safety equipment and are issued the same to be used during daily facility operation:

- Approved steel toed shoes
- Safety glasses; if needed, prescription safety glasses
- Hardhats
- Safety goggles
- Faceshields

10.3 Replacement equipment for all the personal safety equipment listed above is available. except steel toed shoes, prescription safety glasses, and nomex coveralls. These items must be obtained from the appropriate vendors.

10.4 Personnel responsible for implementation of this plan (i.e. Primary and Secondary Emergency Coordinators) have been trained in subjects related to emergency preparedness and response, including the following:

- 10.4.1 Primary Coordinator:
- Hazardous Waste Management Under RCRA
 - Hazardous Materials Transportation - HM-126F:
 - The American Red Cross Standards (First Aid)
 - The Contingency Plan for the Hobbs Facility
 - Fire Extinguisher Use
 - Hazard Communication

- 10.4.2 Secondary Coordinator:
- Hazardous Waste Management Under RCRA
 - Hazardous Materials Transportation - HM-126F:
 - The American Red Cross Standards (First Aid)
 - The Contingency Plan for the Hobbs Facility
 - Fire Extinguisher Use

10.5 Many of these subjects are reinforced through annual training requirements under EPA and OSHA statutes, on-the-job training, or monthly safety meetings. Training documentation for all employees is maintained at the facility and at the corporate office located in St. Louis.

Appendix I
Emergency Control Procedures

Appendix I

Emergency Control Procedures

FIRE

1.0 Fire

1.1 General Considerations

1.1.1 No Petrolite employee shall attempt to extinguish any fire if such action might conceivably cause personal injury or death. The policy is to call for help FIRST by dialing **397-9308**. One should never hesitate to call the Fire Department if there is the slightest possibility they will be needed.

1.2 Specific Considerations

1.2.1 Emergency escape routes, facility layout, location of fire extinguishers and procedures for evacuation are designated in the facility diagram in Appendix I. Once out of the building, evacuees should proceed immediately through the west gates and assemble at the parking lot next to the Lovington Highway. Employees should move out of the path of any smoke, fumes or fire.

1.2.2 Procedures for employees who must attend critical operations before they can evacuate the facility - If possible, power to the facility should be shut off at the panel on the south side of the main building depending on the nature of the emergency.

1.2.3 Procedure to account for all employees following evacuation - The ranking manager/supervisor shall be responsible for making a head count. Immediately count at the assembly area at the northwest corner of the property.

1.2.4 Means of reporting fires and other types of emergencies - The primary means of reporting emergencies in the Hobbs facility is by VOICE.

1.2.4.1 **External Reporting** - All required assistance should be summoned through the fire department 397-9308 or 911 operator. The call to 911 is the responsibility of the individual witnessing the emergency.

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Emergency Control Procedures

- 1.2.4.2 **Internal Reporting** - The Facility Manager must be notified immediately, with follow-up notification to the Region Safety/Environmental Coordinator as soon as practical. The Safety/Environmental Coordinator will make all other required internal notifications.
- 1.2.5 Potential fire hazards and proper procedures for handling/storage, potential ignition sources and their control, and type(s) of fire protection/systems that can control a fire involving them - A considerable amount of chemical is stored and handled at this facility insofar as it is a major warehousing location. Chemical drums are stored outside.
- 1.2.6 The office area contains many different types of electrical appliances, including electric typewriters, computers, a copier, fax machine, coffee maker, and so on. Care must be taken to avoid overloading electrical outlets. Paper and other combustible trash must be removed on a regular basis.
- 1.2.7 The laboratory contains flammable solvent both in covered baths and metal containers. Standards of safe laboratory care are to be applied at all times. Special care is to be taken when working with open flames. Contaminated rags are to be stored in a covered metal container pending disposition.
- 1.2.8 All Petrolite facilities are designated as "**NO SMOKING**" areas, with the exception of defined smoking areas outside.
- 1.2.9 Job titles of those responsible for maintaining equipment and systems installed to prevent or control ignition of fires - The Facility Manager is responsible for maintenance of fire control/prevention equipment located at the facility.
- 1.2.10 Job titles of those responsible for the control of accumulation of flammable or combustible waste materials - The Facility Manager is responsible for controlling accumulation of waste materials.
- 1.3 Housekeeping**
- 1.3.1 Control measures to prevent build-up of flammable and/or combustible wastes and residues so they don't constitute a fire emergency - General inspections are carried out in the facility on a regular basis. All flammable waste is held in a covered

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container pending disposal. Grounding wires are fitted on all bulk containers for use while dispensing contents into smaller containers. Approved containers are used for all flammable materials being stored for use in small quantities.

1.3.2 All spills are to be cleaned up immediately.

1.4 Combustion Sources

1.4.1 Maintenance to prevent ignition of combustibles - All "hot work" must be carried out in compliance with the details of Corporate Safety Procedure (CSP) #4. This procedure deals with spark and heat producing equipment and tools in hazardous atmospheres. Replacement of electrical switches, sockets, breakers, and so on, shall be with equipment having at least equal safety characteristics.

1.4.2 In the event of a chemical spill, all spark and/or heat producing activities will cease immediately and will not be re-started until cleanup is completed and hazardous vapors dissipated.

1.5 Fire Response Procedures

1.5.1 Fire extinguishers are located in various places around the work areas. See attached facility layout for locations.

1.5.2 Small Fires (incipient stage):

1.5.2.1 An attempt will be made to extinguish small fires, which are at incipient stage, with the use of portable dry chemical fire extinguishers. The fire department shall be called regardless of whether the fire is extinguished or not. At the first indication of fire, the following steps shall be taken:

1.5.2.2 Call fire department;

1.5.2.3 Attempt to extinguish fire;

1.5.2.4 Shut off electrical power to pumps and motors;

1.5.2.5 If fire involves product, contact Emergency Response Group in St. Louis to stand by for technical assistance.

1.5.3 Large Fires (beyond incipient stage):

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- 1.5.3.1 No attempt should be made to extinguish the fire.
Evacuate all personnel and visitors.
- 1.5.3.2 Immediately notify fire department.
- 1.5.3.3 If possible, shut off power to building.
- 1.5.3.4 Stand by for fire department arrival. (Be prepared to assist with identification and location of products and facility contents.)
- 1.5.3.5 Contact Emergency Response Group in St. Louis for technical assistance.
- 1.5.3.6 Do not permit unauthorized individuals to enter company premises.

1.6 Notifications

- 1.6.1 Immediately upon discovery of a fire, yell "FIRE", call 911 or the local emergency number and get the Fire Department on its way. Only then should an employee trained in proper operation of fire extinguishers attempt to fight the fire. As soon as someone is available to call, the Facility Manager and Region Safety/Environmental Coordinator must be advised of the situation. The Region Safety/Environmental Coordinator will make other required notifications.

1.7 Follow-up Reporting

- 1.7.1 The Region Safety/Environmental Coordinator, in concert with the specific Facility Manager, will prepare any required written documentation of the incident.

1.8 Record Retention

- 1.8.1 All records will be maintained in the office of the Region Safety/Environmental Coordinator in accordance with relevant Federal and State laws and corporate guidelines.

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MEDICAL EMERGENCIES

2.0 Medical Emergencies

2.1 General Considerations

2.1.1 Whenever responding to a medical emergency, a rescuer must always be concerned first with his/her own safety. Upon entering the incident scene it is extremely important to be observant - especially if the victim is unconscious. The rescuer should always attempt to determine what hazards might be present that may have contributed to the problem. Specifically, electrical, chemical, and other physical hazards should be noted before proceeding. Where necessary, personal protective equipment may be required. Under no circumstance should an employee put himself/herself at unnecessary risk in order to provide medical assistance to another.

2.2 Specific Considerations

2.2.1 When rendering CPR and/or first aid, it is imperative that the rescuer adhere to accepted medical practice within the limits of his/her training. To guard against exposure to body fluids, the first aider should wear rubber medical gloves. In all cases a first responder shall yield control of the victim(s) to higher medical authority as it arrives.

2.2.2 Upon determination that the environment is safe for entry, the victim should be checked immediately to ensure his/her airway is clear, the victim is breathing, and has a pulse. If the victim is unresponsive, call 911 immediately to get Fire Department paramedics on their way. Following the initial check, and if CPR is not called for, first aid treatment for any other conditions may be delivered. The victim should not be moved unless an immediate hazard exists at the scene. The victim should be stabilized and comforted pending arrival of the ambulance.

2.2.3 In the case of direct contact with chemical, the skin shall be washed with water for at least 15 minutes. Contaminated clothing shall be removed. If eye contact occurs, the eyes shall be flushed with water for at least 15 minutes. Medical attention shall follow immediately. Material Safety Data Sheets for each product stored

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Emergency Control Procedures

at the facility are available in the office. Additional first aid and medical information can be obtained by calling the Petrolite Emergency Information number at 1-800-424-9300.

2.2.4 Based upon the seriousness of the accident, the Facility Manager shall decide whether hospital attention is required and, if so, the method of transporting the victim to the hospital.

2.3 Notifications

2.3.1 If immediate medical assistance is necessary, call 911 as indicated above in Section 2.2. You should next notify the Region Safety/ Environmental Manager, who will in turn notify the victim's supervisor of the incident. If the incident involves Distribution personnel, the Region Safety/Environmental Coordinator will notify the Region Distribution Manager. The Region Safety/ Environmental Manager will also be in contact with the Region Operations Manager and Corporate Safety Department as appropriate.

2.4 Follow-up Reporting

2.4.1 All medical incidents will be investigated by the Region Safety/Environmental Coordinator who will be responsible for writing the report. All reporting will be in compliance with Federal and State laws, as well as Corporate policy. Reports will include, but are not limited to, Workmen's Compensation reports, OSHA reports, State OSHA reports, OSHA recordkeeping, internal accident investigations, and internal accident/injury reporting, as required.

2.5 - Record Retention -

2.5.1 Copies of all reports of medical incidents will be retained in the Region Safety/Environmental Coordinator's office in compliance with Federal and State law.

2.6 SARA Notification

2.6.1 Arrangements have been made with the following Local Emergency Agencies and Hospitals which may be called to respond to a chemical fire, or medical emergency at the Hobbs facility:

Appendix I Emergency Control Procedures

Hobbs Police	505-397-9265
Lea County Sheriff's Department	505-393-2515
Hobbs Fire Department	505-397-9308
Lea Regional Hospital	505-392-6581

- 2.6.2 All above listed agencies have been provided with a copy of this plan. The Hobbs fire department is provided, on an annual basis, chemical inventory information as required by Section 312 of the Emergency Planning and Community Right-To-Know Act of 1986. This information is provided by the SHEA Department out of St. Louis, MO.

Appendix I Emergency Control Procedures

SPILLS

3.0 Spills

3.1 General Considerations

3.1.1 Nothing in this section is intended to countermand anything that is established in the Petrolite Spill Response Guide. All clean-up personnel responding to a major spill of hazardous material(s) must be certified with 24-hour HAZWOPER training. Within the limits of rational immediate response, an on-site person may attempt to contain a spill to the smallest possible area so long as there is no perceived threat to life or health. It is recommended that outside contractors be called to handle major spills within the site.

3.2 Specific Considerations

3.2.1 Whenever a spill emergency exists, the individual present should try to limit the extent of the spill if it can be done safely. This might be accomplished by closing a valve, shutting down a pump, diking, or some similar activity. Help should be solicited from the Facility Manager in order to decide what needs to be done. Regular inspections of chemical storage areas are to be carried out.

3.2.2 Since many of the products and hazardous waste stored at the facility contain volatile organic compounds that are both lighter and heavier than air, special precautions shall be taken before responding to spills of these materials. The responder shall first consult the Material Safety Data Sheet to determine the particular hazards of the chemical spilled and to determine the appropriate personal protective equipment that must be worn. This includes the selection of proper chemical resistant clothing and respirator. Any release resulting in an organic vapor emission, either on or off-site, shall be reported in accordance with *Corporate Safety Procedure #23* and the *Petrolite Spill Response Guide*.

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Emergency Control Procedures

- 3.2.3 Tanks and liquid transfer systems have been designed to minimize the possibility of spills. However, such design is dependent upon proper use and attention of the operator during filling and emptying operations. Before using any transfer equipment, the operator shall be certain that he is thoroughly familiar with the equipment and that all connections are properly and tightly made. Before filling any container, the operator shall ascertain that there is sufficient void in the container so that the volume of liquid to be added will not cause the container to overflow. Before breaking lines after filling a container, the operator will make certain that all valves are properly closed and that lines are clear to prevent spilling from the disconnected line. Company operators will make up and break transfer lines when delivery is received from, or made to non-company vehicles.
- 3.2.4 Due to the small volume of products and hazardous wastes stored at the warehouse and its proximity to major water sources, contamination of a waterway is unlikely. In the event that product or hazardous waste is spilled and enters drainage ditches surrounding the property, the person observing the spill will take immediate action to contain the flow of material. This shall include construction of earthen dams, stringing of spill booms, construction of an underflow, etc. to stop the flow of material. Once the flow has been stopped, the material shall be absorbed on spill pads or removed using a vacuum truck or portable pump. Contaminated soil will be excavated using a shovel or backhoe to the extent practical. All waste material will be containerized in 55 gallon drums and profiled for disposal.

3.3 Spill Response Procedures

- 3.3.1 If there is no immediate danger of the spill reaching or being washed into a waterway and the spill is:
- 3.3.1.1 Less than 100 gallons: The supervisor will have the spill covered with absorbent such as sucker pillows, snake tubes, Uni-sponge mats, as well as commercial granular absorbent. This will be collected for incineration, burial, or disposal in an approved manner.

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- 3.3.1.2 More than 100 gallons: The supervisor will have as much as possible of the liquid collected into drums or tanks using a portable pump or vacuum truck. Drums and a portable pump are stored at the warehouse. Vacuum truck services are available through TAD Trucking Company, 814 W. Marland, Hobbs, NM 88240, (505)393-1010. The non-collectable portion will be covered with absorbent such as sucker pillows, snake tubes, Uni-sponge mats, as well as commercial granular absorbent. This will then be collected for incineration, burial, or disposal in an approved manner. As soon as practical, the Facility Manager will notify the appropriate Local, State, and Federal agencies in accordance with the notification procedures in this plan. The Facility Manager will also notify the manager of Distribution and the Corporate Environmental Affairs department.
- 3.3.1.3 Contaminated soil will be excavated using a shovel or backhoe. Shovels are located in the warehouse. Backhoe services are available through TAD Trucking Company, 814 W. Marland, Hobbs, NM 88240, (505)393-1010. Waste will be profiled and stored for disposal in 55 gallon drums available in the warehouse in accordance with State and Federal regulations.
- 3.3.1.4 In the event of a spill of flammable material, the Facility Manager shall decide whether to notify the fire department. This decision will be based upon the volume of the spill and the potential for ignition.

3.4 Equipment

- 3.4.1 Spill response equipment, including a variety of tools, absorbents, and salvage drums are stored in the warehouse. The locations of emergency equipment, i.e. fire extinguishers, safety shower/eye wash systems, gas and electric shutoffs, etc. are marked and noted on the attached plat.
- 3.4.2 The following emergency response equipment is maintained on-site:

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Location	Description
Office/Lab	1 - 20 Lb Fire Extinguishers
Dock Area	1 - 20 Lb Fire Extinguisher
Fork Lift	1 - 2 Lb Fire Extinguisher
Trucks	1 - 10 Lb Fire Extinguishers
Hazardous Waste Accumulation Area	1 - 10 lb Fire Extinguisher

3.4.3 Items listed below are to be used in the event of a spill.

- 1 Bag of assorted wooden pegs.
- 16 Sucker Pillows (17" X 17")
- 12 Snake Tubes (48" X 3")
- 3 Booms (10' X 4")
- 2 Disposable Suits (Tyvek)
- 2 Pair Tyvek Gloves
- 1 Full Face Respirator (with Cartridges)
- 1 shovel
- 6 Salvage Drums.

3.4.4 The above material is stored inside the yellow emergency containment kit. which is located inside the shed on the loading dock. The facility also has at least 3 to 5 open head drums which should be used to collect contaminated soil. Additional shovels are available on the delivery trucks.

3.5 Contaminated Clothing & Equipment

3.5.1 Contaminated clothing and equipment will be cleaned or disposed of in a appropriate manner. Disposable clothing such as Tyvek suits, disposable gloves, etc. will be accumulated in a 55 gallon drum and profiled for disposal in accordance with applicable State and Federal waste disposal laws. Non disposable equipment will be washed with water and surfactant to remove contamination.

3.5.2 Wash waters from the decontamination of equipment will be collected using a portable pump or vacuum truck and drummed for proper disposal. Any solids generated from the decontamination effort will be combined with other contaminated soil or clothing for proper disposal.

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3.6 Notifications

3.6.1 The Facility Manager will make the required notifications following the Emergency Response Numbers listed at the front of this plan, and Chain of Command presented in this document. The Region Safety/Environmental Coordinator should be notified as soon as possible so a determination might be made as to the need for additional clean-up resources. The Region Safety/Environmental Coordinator will also make any additional notifications that need to be made.

3.7 Follow-up Reporting

3.7.1 The Facility Manager, in concert with the Region Safety/Environmental Coordinator, will prepare a written report when necessary. A copy of the report will be sent to corporate Environmental Affairs as well as Local, State, and Federal agencies depending upon their individual written reporting requirements.

3.8 Record Retention

3.8.1 A record of a spill and subsequent action taken will be made and kept on file. Records relating to spill incidents will be maintained in the office of the Facility Manager as well as in the office of the Region Safety/Environmental Coordinator. Records will be maintained as prescribed in corporate, State, and Federal guidelines.

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Emergency Control Procedures

EVACUATION

4.0 Evacuation

4.1 General Considerations

4.1.1 In the event evacuation is necessary, all persons at the facility will immediately leave by the safest route. All persons will assemble across the road directly opposite the building's front entrance and a head count will be made.

4.2 Specific Considerations

4.2.1 Internal Emergencies

4.2.1.1 When conditions become untenable, the Facility Manager or his designee shall activate the voice alert system signalling a need to evacuate. At the sound of a verbal command, all personnel shall immediately leave the premises for the assembly point.

4.2.2 External Emergencies and Power Failures:

4.2.2.1 During natural disasters, such as flooding, heavy storms, tornados or power failure, it may be necessary to shut down operations of the facility. This decision will be made by the Regional Distribution Manager. Insofar as practical, prior to shutdown, the Facility Manager shall have all equipment and small containers secured to minimize loss. In the event of an electrical power failure, electrical equipment will be turned off or unplugged to avoid danger when power is restored.

4.3 Emergency Alarm

4.3.1 Verbal commands will be used to warn of the need for facility evacuation.

4.4 Evacuation Route

4.4.1 Go through the front, side or rear doors of the office building. Proceed directly to the parking lot (front door) or through the gate (side, rear doors) and proceed to the designated assembly location.

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Emergency Control Procedures

4.4.2 From the yard proceed directly through the west gate and walk to the designated assembly location.

4.5 Assembly Location

4.5.1 Employees should assemble at the parking lot next to the Lovington Highway.

4.6 Authorized Personnel

4.6.1 Personnel authorized to take emergency action are:

4.6.1.1 Fabian Nunez

4.6.1.2 Rozanne Johnson

4.6.1.3 Any other Petrolite personnel

Date of last revision 5/95

This revision supersedes all previous copies of the Contingency Plan for the Hobbs, NM facility. Please discard all other copies.

Appendix II Utility Shut-off

UTILITY SHUT-OFFS FOR HOBBS WAREHOUSE

1.0 WATER SERVICE

1.1 The water shut-off is located on the southwest corner of the office building.

2.0 ELECTRICAL SERVICE

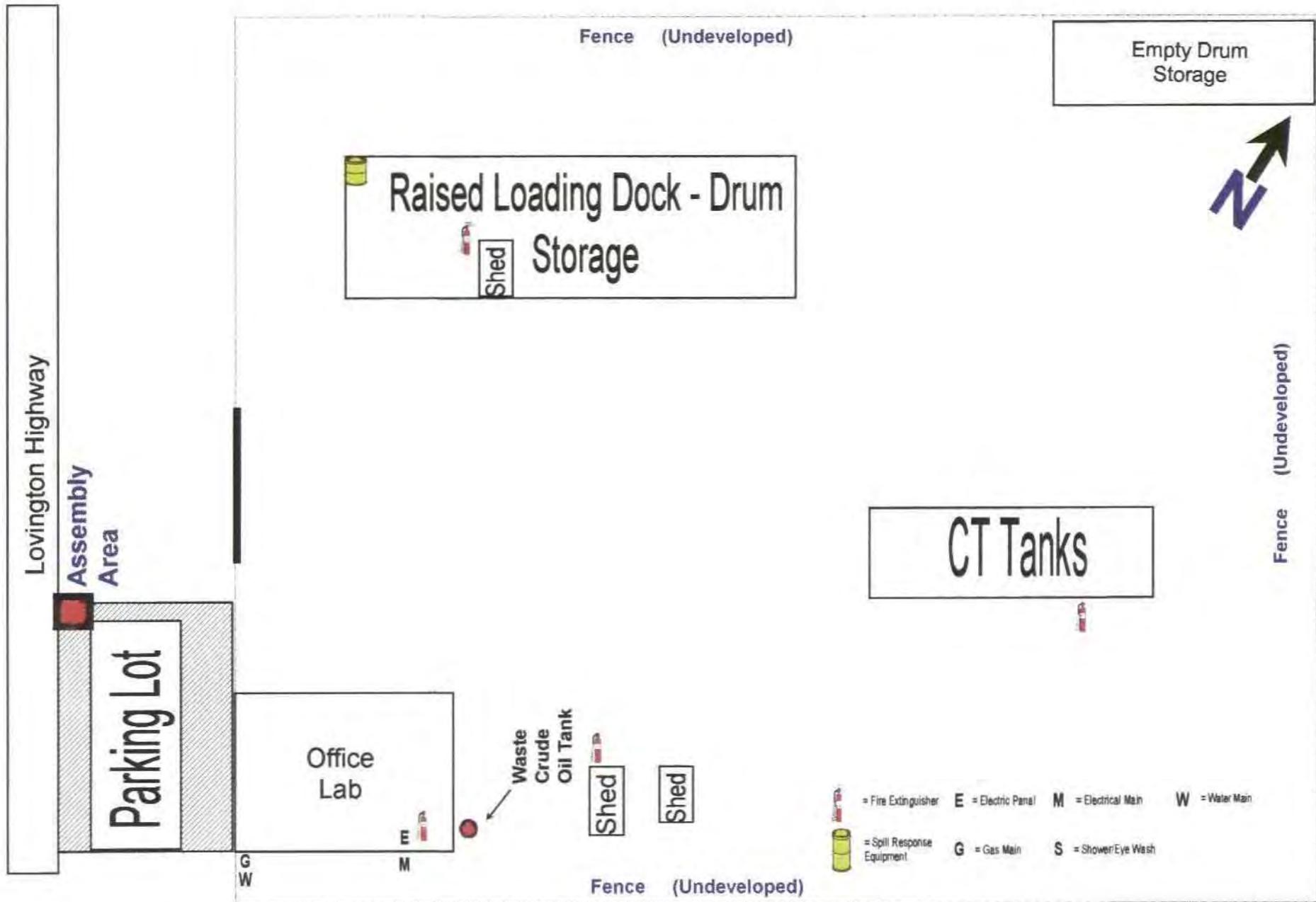
2.1 The MAIN shut-off is located on the south side of the office building. The main electrical panel for the office is located in the laboratory.

3.0 GAS SERVICE

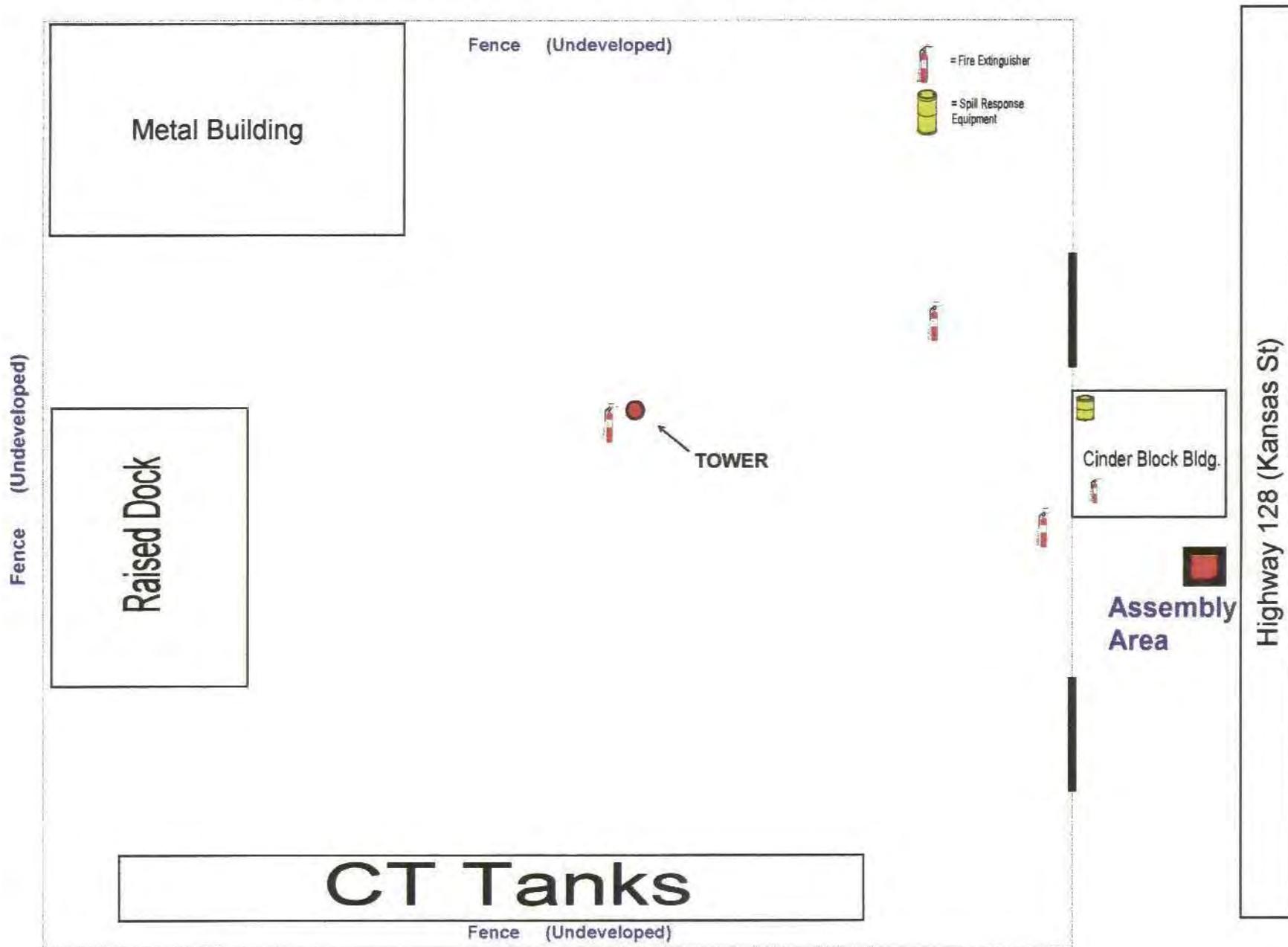
3.1 The natural gas main is located next to the water main on the southwest side of the office building.

**APPENDIX III
SITE MAP**

Tretolite Chemical Company - Hobbs, N.M.



Tretolite Chemical Company - Jal, N.M.





MEMORANDUM OF MEETING OR CONVERSATION

Telephone

Personal

Time

8:45 AM

Date

6-1-95

Originating Party

Other Parties

George Cary w/ Tretelite

Pat Sanchez

Subject Mailing Discharge Plans for Hobbs, Artesia and Jal.

Discussion Wanted to know how to submit Plans. I told him I would discuss with RCA and call right back. Talked with RCA and relayed the following to George:
Submit Hobbs and Jal as one - w/ one set of fees we would permit Jal as a satellite of Hobbs.

Conclusions or Agreements

George will mail Hobbs and Jal as one w/ one set of fees. Artesia will be separate.

Signature

Signed

Robert W. Smith



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

March 15, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-648

Mr. George A. Cary
Petrolite (Tretolite Division)
369 Marshall Avenue
St. Louis, MO 63119

RE: Discharge Plan(s)
Artesia and Hobbs Facilities
Eddy and Lea Counties, New Mexico

Dear Mr. Cary:

Enclosed is the additional information that you requested at the end of the field inspection of the Tretolite facilities located in South East New Mexico.

1. A copy of NMOCD rule 116 - spill notification.
2. Commercial surface disposal facilities.
3. New Mexico Oil Field Wastes - Categories and Disposal Methods.

If there are any questions please feel free to call me at (505)-827-7156 or Roger Anderson at (505)-827-7152.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricio W. Sanchez".

Patricio W. Sanchez
Petroleum Engineer - Environmental Bureau NMOCD



February 2, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-634

Mrs. Gail Parker
Tretolite Division
5624 Lovington HWY
Hobbs, NM 88240-9143

**RE: Discharge Plan Requirement
Hobbs Facility
Lea County, New Mexico**

Dear Mrs. Parker:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for Tretolites facility located at 5624 Lovington HWY in Hobbs, New Mexico.

The discharge plan is required pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.Q of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

Oil Conservation
827-7131

Mrs. Gail Parker
February 2, 1995
Page 2

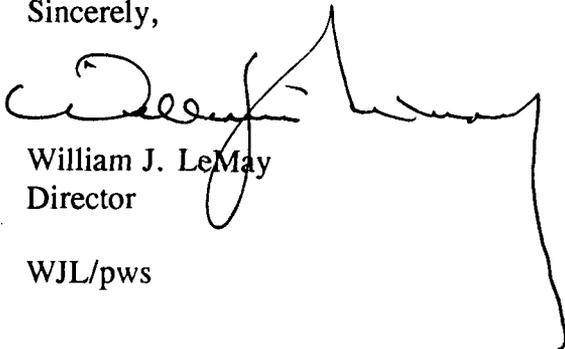
A copy of the regulations have been provided for your convenience. Also provided is an OCD guideline for the preparation of discharge plans at oil & gas service companies. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of one thousand, three hundred and eighty (\$1380) dollars for oil & gas service companies. The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

Please make all checks payable to: **NMED Water Quality Management** and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please feel free to contact Patricio Sanchez at 827-7156 or Roger Anderson at 827-7152.

Sincerely,



William J. LeMay
Director

WJL/pws

XC: OCD Hobbs Office

Z 765 962 634



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993