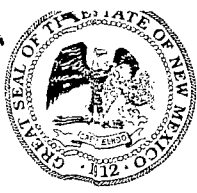


**GW -** 245

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
2007 - 1995



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

March 29, 2007

Tommy Clayton  
District Manger  
Basic Energy Services, Inc. – Rental & Fishing Division  
213 North College  
Snyder, Texas 79549

Re: Discharge Permit GW245 Renewal  
Basic Energy Services, Inc. – Hobbs Main Shop and Wash Bay Facility

Dear Mr. Clayton:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Basic Energy Services, Inc. (owner/operator) Basic Energy Services, Inc. – Hobbs Main Shop and Wash Bay Facility (GW245) located in the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Edward J. Hansen of my staff at (505-476-3489) or E-mail [edwardj.hansen@state.nm.us](mailto:edwardj.hansen@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price

Environmental Bureau Chief

LWP/ejh  
Attachments-1  
xc: OCD District Office

**ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL**  
**Basic Energy Services, Inc. – Main Shop and Wash Bay Facility (GW245)**  
**DISCHARGE PERMIT APPROVAL CONDITIONS**  
**March 29, 2007**

**Please remit a check for \$1700.00 made payable to Water Quality Management Fund:**

**Water Quality Management Fund  
c/o: Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505**

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division (“OCD”) has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$1700.00 renewal permit fee for a oil and gas service company.
- 2. Permit Expiration and Renewal:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on July 19, 2011** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 12, 2007 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

**5. Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

**6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

**B. Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

**7. Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

**8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

**9. Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

**10. Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

**11. Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**12. Underground Process/Wastewater Lines:**

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**13. Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

**14. Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

**17. Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. *An unauthorized discharge is a violation of this permit.*

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferror shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22. Closure:** The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

**23. Certification: Basic Energy Services, Inc., (Owner/Operator),** by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- signature

Title\_\_\_\_\_

Date:\_\_\_\_\_





## Highlander Environmental Corp.

Midland, Texas

2007 MAR 20 PM 2:03  
March 16, 2007

Mr. Ed Hansen  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal Application, GW-245, Basic Energy Services, Inc. (former Davis Tool Company facility), 4710 Carlsbad Highway, Hobbs, New Mexico

Dear Mr. Hansen:

Enclosed on behalf of Basic Energy Services, Inc. is the affidavit of publication with regard to the above facility. Please advise if we can be of further assistance.

Thank you very much.

Very truly yours,

James C. Hunnicutt  
Vice President

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, Kenneth Norris

Advertising Manager

of the Hobbs News-Sun, a news-  
paper published at Hobbs, New  
Mexico, do solemnly swear that  
the insert attached hereto was  
Inserted once a week in the regu-  
lar and entire issue of said paper,  
and not a supplement thereof for a  
period

of \_\_\_\_\_

1 day(s).

Beginning with the issue dated

March 06, 2007

and ending with the issue dated

March 06, 2007

Kenneth Norris

Advertising Manager

Sworn and subscribed to before

me this 12th day of

March, 2007

Notary Public.

My Commission expires  
(Seal)



OFFICIAL SEAL  
DORA MONTZ  
NOTARY PUBLIC  
STATE OF NEW MEXICO

My Commission Expires: \_\_\_\_\_

This newspaper is duly qualified to  
publish legal notices or advertise-  
ments within the meaning of  
Section 3, Chapter 167, Laws of  
1937, and payment of fees for  
said publication has been made.

**Highlander Environment**  
**1910 N. Big Spring**  
**Midland, TX 79705**

## PUBLIC NOTICE

Basic Energy Services, Inc. - Rental & Fishing Division, 213 North College, Snyder, Texas 79549, Attention: Mr. Tommy Clayton, District Manager, has submitted a renewal application for the previously approved discharge plan (GW-245) for its Carlsbad Highway facility, located at 4700 Carlsbad Highway (Highway 62/180), Hobbs, New Mexico, being a tract of land out of the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, approximately one mile west of the intersection of Highway 62/180 and West County Road. Approximately 5,000 barrels of wash-down water are generated on site annually, which are collected and temporarily stored in containment vessels prior to transport and disposal at an NMOCD approved facility. Additionally, an estimated 660 gallons of used oil and one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil and filter recycler. Empty drums are to be taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 120 feet, with a reported total dissolved solids concentration of approximately 860 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information, submit comments or request to be placed on a facility specific mailing list for future notices by contacting Edward J. Hansen at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3489. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

## ANUNCIO AL PUBLICO

Basic Energy Services, Inc. Sección de Alquiler y Pesca, 213 North College, Snyder, Texas 79549, Con atención a: Señor Tommy Clayton, Gerente del Distrito, ha entregado una solicitud para el plan previo de descargo (GW-245) para sus instalaciones en Carlsbad, localizadas al 4700 Carlsbad Highway (62/180), Hobbs, Nuevo Mexico, siendo parte de una área del SE/4 de la sección 36, Township 18 al Sur, Sección 37 al Este, NMPM, Condado de LEA, Nuevo Mexico, aproximadamente a una milla al Oeste de la intersección de las calles 62/180 y la West County Road. Aproximadamente 5,000 barriles de agua para lavado se generan ahí a base anual, que se coleccionan y se almacenan temporariamente antes de su transportación y descarga en una instalación aprobada por la NMOCD. También, se generan aproximadamente 660 galones de aceite usado y un tambo de 55 galones de filtros ya usados para el aceite a base anual. Los desechos se recogen por un un reciclador de aceite usado y filtros usados. Los tambos vacíos se regresan al dueño de la química o el aceite de donde vino. El agua que tenga mas probabilidad de ser afectado por un derrame, un chorreo o un accidente está a una profundidad de aproximadamente 120 pies, todo con una concentración de sólidos disueltos de unos 860 mg/l. El plan de descarga habla de cómo se manejarán cuidadosamente a los productos del campo de aceite y sus desechos para conservar la seguridad del agua fresco. Cualquier persona que tenga interés en conseguir mas información, dejar comentarios o pedir que le agriegen a la lista de anuncios, debe contactarse con el señor Edward J. Hansen en la OCD de Nuevo Mexico en la 1220 South St. Francia Drive, Santa Fe, Nuevo Mexico 87505, teléfono: (505) 476-3489. Se acepta la OCD comentarios y manifestaciones de interés con referencia a la renovación y se creara una lista de anuncios para las personas que quieran recibir noticias en el futuro.

## THE DIGESTIVE DISEASE INSTITUTE

*Announces that*

# SHAMS TABREZ, MD

*Will be serving the patients of Hobbs and Lovington through Nor Lea General*

# AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a  
newspaper published at  
Hobbs, New Mexico, do solemnly  
swear that the clipping attached  
hereto was published once a  
week in the regular and entire  
issue of said paper, and not a  
supplement thereof for a period.

of 1

weeks.

Beginning with the issue dated

February 17 2007

and ending with the issue dated

February 17 2007

*Kathi Bearden*

Publisher

Sworn and subscribed to before

me this 20th day of

February 2007

Notary Public.

My Commission expires  
February 07, 2009  
(Seal)



OFFICIAL SEAL  
DORA MONTZ  
NOTARY PUBLIC  
STATE OF NEW MEXICO

My Comm. Expires: \_\_\_\_\_

This newspaper is duly qualified  
to publish legal notices or adver-  
tisements within the meaning of  
Section 3, Chapter 167, Laws of  
1937, and payment of fees for  
said publication has been made.

LEGAL NOTICE  
February 17, 2007

## 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 (20.6.2.3106 NMAC), the following discharge permit renewal application has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW245) Basic Energy Services, Inc. - Rental & Fishing Division, 213 North College, Snyder, Texas 79549, Attention: Mr. Tommy Clayton, District Manager, has submitted a renewal application for the previously approved discharge plan (GW-245) for the Basic Energy Services, Inc., Main Shop and Wash Bay Facility (oil and gas service company) located in the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, approximately one mile east of the intersection of Highway 62/180 and West County Road. Approximately 5000 barrels of wash-down water are generated on site annually, which are collected and temporarily stored in containment vessels prior to transport and disposal at an NMOCD-approved facility. Additionally, an estimated 660 gallons of used oil and one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil and filter recycler. Empty drums are to be taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 120 feet below ground surface, with a total dissolved solids concentration of approximately 860 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energía, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of February, 2007.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL

#23040

Mark Fesmire, Director

01101546000

02591479

OIL CONSERVATION DIVISION \*  
1220 S. SAINT FRANCIS  
SANTA FE, NM 87505

# Advertising Receipt

2007 MAR 9 PM 1 49

Hobbs Daily News-Sun

201 N Thorp  
P O Box 850  
Hobbs, NM 88241-0850  
Phone: (505) 393-2123  
Fax: (505) 397-0610

EDWARD J. HANSEN  
OIL CONSERVATION DIVISION \*  
EMNRD  
1220 S. SAINT FRANCIS  
SANTA FE, NM 87505

**Cust#:** 01101546-000  
**Ad#:** 02591479  
**Phone:** (505)476-3489  
**Date:** 03/05/07

**Ad taker:** C2      **Salesperson:** 08      **Classification:** 673

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	02/17/07	02/17/07	1	122.64		122.64
Bold						1.00
Affidavit for legals						3.00

**Payment Reference:**

LEGAL NOTICE  
February 17, 2007

NOTICE OF PUBLICATION

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

**Total:** □ 126.64

**Tax:** 0.00

**Net:** 126.64

**Prepaid:** 0.00

**Total Due** 126.64

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit renewal application has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW245) Basic Energy Services, Inc. – Rental & Fishing Division, 213 North College, Snyder, Texas 79549, Attention: Mr. Tommy Clayton, District Manager, has submitted a renewal

**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 (20.6.2.3106 NMAC), the following discharge permit renewal application has been submitted to the Director of the New Mexico Oil Conservation Division

("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW245) Basic Energy Services, Inc. - Rental & Fishing Division, 213 North College, Snyder, Texas 79549, Attention: Mr. Tommy Clayton, District Manager, has submitted a renewal application for the previously approved discharge plan (GW-245) for the Basic Energy Services, Inc., Main Shop and Wash Bay Facility (oil and gas service company) located in the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, approximately one mile east of the intersection of Highway 62/180 and West County Road. Approximately 5000 barrels of wash-down water are generated on site annually, which are collected and temporarily stored in containment vessels prior to transport and disposal at an NMOCD-approved facility. Additionally, an estimated 660 gallons of used oil and one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil and filter recycler. Empty drums are to

be taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 120 feet below ground surface, with a total dissolved solids concentration of approximately 860 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at

the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held,

the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energía, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New Mexico (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of February, 2007.

**STATE OF  
NEW MEXICO  
OIL CONSERVATION  
DIVISION**

S E A L  
Mark Fesmire,  
Director  
Legal #80418  
Pub. Feb. 19, 2007

THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

RECEIVED

FEB 26 2007

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

NM EMNRD OIL CONSERV

ATTN: Edward Hansen  
1220 S ST FRANCIS DR  
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689

AD NUMBER: 00203312 ACCOUNT: 00002212

LEGAL NO: 80418 P.O. #: 52100-00044

340 LINES 1 TIME(S) 190.40

AFFIDAVIT: 6.00

TAX: 14.98

TOTAL: 211.38

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, R. Lara, 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 # 80418 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/19/2007 and 02/19/2007 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 19th day of February, 2007 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Rafael Lara  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 19th day of February, 2007

Notary Hector M. Valdez

Commission Expires: 2509

OK to pay  
Edward F. Hansen

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, February 14, 2007 9:21 AM  
**To:** Stone, Ben, EMNRD  
**Subject:** GW245 draft permit OCD website posting  
**Attachments:** GW245PermitNotice2\_23\_2007.pdf; GW245DischargePlan\_draft\_approval\_02\_23\_07.pdf;  
GW245\_AdminCompLetter2\_14\_07.pdf

Ben,  
Please post the attached three documents on the OCD website.  
Thank you.

2/14/2007



**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, February 14, 2007 9:25 AM  
**To:** 'legals@sfnewmexican.com'  
**Subject:** GW245 Public Notice - Santa Fe New Mexican  
**Attachments:** GW245PermitNotice2\_23\_2007.DOC

Dear Sir or Madam:

Please publish the attached notice(s) once in the classified-legal notice section of the newspaper. PO # is 52100-0000000044 Account # 56689 (account # included for Santa Fe paper only). Please mail an affidavit of proof of publication for the notice. Please contact me if you have questions. Thank you.

The Oil Conservation Division (OCD) appreciates the ad placement services that you provide to our agency. In order to streamline the review and approval process for newspaper ad invoices, the OCD requests that you send the original invoice with an original affidavit of proof of posting directly to the OCD requestor (contact info. usually at the bottom of e-mails or letters). This will help the proper OCD staff person responsible for the ad placement to promptly receive invoices from newspaper companies and quickly approve invoices for payment.

The OCD appreciates your cooperation and we look forward to working with you in the future. Please contact me if you have questions or need further assistance in this matter.

Edward J. Hansen  
Oil Conservation Division  
EMNRD  
1220 S. St. Francis Dr.  
Santa Fe, New Mexico 87505

505-476-3489

2/14/2007

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, February 14, 2007 9:24 AM  
**To:** 'classifieds@hobbsnews.com'  
**Subject:** GW245 Public Notice  
**Attachments:** GW245PermitNotice2\_23\_2007.DOC

Dear Lisa,

Please publish the attached notice(s) once in the classified-legal notice section of the newspaper. PO # is 52100-0000000040. Please mail an affidavit of proof of publication for the notice. Please contact me if you have questions. Thank you.

The Oil Conservation Division (OCD) appreciates the ad placement services that you provide to our agency. In order to streamline the review and approval process for newspaper ad invoices, the OCD requests that you send the original invoice with an original affidavit of proof of posting directly to the OCD requestor (contact info. usually at the bottom of e-mails or letters). This will help the proper OCD staff person responsible for the ad placement to promptly receive invoices from newspaper companies and quickly approve invoices for payment.

The OCD appreciates your cooperation and we look forward to working with you in the future. Please contact me if you have questions or need further assistance in this matter.

Edward J. Hansen  
Oil Conservation Division  
EMNRD  
1220 S. St. Francis Dr.  
Santa Fe, New Mexico 87505

505-476-3489

2/14/2007

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, February 14, 2007 9:30 AM  
**To:** Thompson, Bruce C., DGF; Shendo, Benny, DIA; 'ddapr@nmda.nmsu.edu'; 'Linda\_Rundell@nm.blm.gov'; 'sthompson@ago.state.nm.us'; 'r@rthicksconsult.com'; 'sricdon@earthlink.net'; 'nmparks@state.nm.us'; Dantonio, John, OSE; 'seligman@nmoga.org'; Martinez, Elysia, NMENV; 'lwa@lwasf.com'; 'lazarus@glorietageo.com'; Stone, Marissa, NMENV; 'ron.dutton@xcelenergy.com'; 'cgarcia@fs.fed.us'; 'jbarnett@barnettwater.com'; Bearzi, James, NMENV; 'mschulz@theitgroup.com'; 'bsg@garbhall.com'; 'jcc\_crb@pacbell.net'; Olson, Bill, NMENV; 'claudette.horn@pnm.com'; 'ekendrick@montand.com'; 'ken@carihobbs.com'  
**Subject:** GW245: Public Notice for Renewal of Discharge Permit  
**Attachments:** GW245PermitNotice2\_23\_2007.pdf

STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

Field Supervisor  
US Fish & Wildlife Service  
2105 Osuna Road, Northeast  
Albuquerque, NM 87113-1001

STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

RECEIVED *sent*  
FEB 14 2007  
Environmental Bureau  
Oil Conservation Division

*GW245 Public Notice*

Dr. Harry Bishara  
P. O. Box 748  
Cuba, NM 87013

STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

Elmo Baca  
State Historic Preservation Officer  
228 East Palace Avenue  
Villa Rivera Room 101  
Santa Fe, NM 87503

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 (20.6.2.3106 NMAC), the following discharge permit renewal application has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**(GW245) Basic Energy Services, Inc. – Rental & Fishing Division, 213 North College, Snyder, Texas 79549, Attention: Mr. Tommy Clayton, District Manager, has submitted a renewal application for the previously approved discharge plan (GW-245) for the Basic Energy Services, Inc., Main Shop and Wash Bay Facility (oil and gas service company) located in the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, approximately one mile east of the intersection of Highway 62/180 and West County Road. Approximately 5000 barrels of wash-down water are generated on site annually, which are collected and temporarily stored in containment vessels prior to transport and disposal at an NMOCD-approved facility. Additionally, an estimated 660 gallons of used oil and one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil and filter recycler. Empty drums are to be taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 120 feet below ground surface, with a total dissolved solids concentration of approximately 860 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

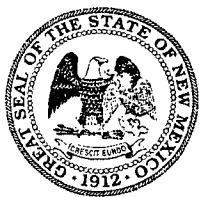
Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23<sup>rd</sup> day of February, 2007.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

February 14, 2007

Tommy Clayton  
District Manger  
Basic Energy Services, Inc. – Rental & Fishing Division  
213 North College  
Snyder, Texas 79549

**RE: Discharge Permit (GW-245) Renewal  
Basic Energy Services, Inc. – Main Shop and Wash Bay Facility  
Lea County, New Mexico  
Determination of Administratively Complete**

Dear Mr. Clayton:

The New Mexico Oil Conservation Division (OCD) has received the Basic Energy Services, Inc. application, dated February 12, 2007, to renew the discharge permit, GW245, for the Basic Energy Services, Inc. – Main Shop and Wash Bay Facility (formally, Davis Tool Company Facility) located in the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The application and filing fee were received on February 13, 2007. The application provided the required information in order to deem the application “administratively” complete.

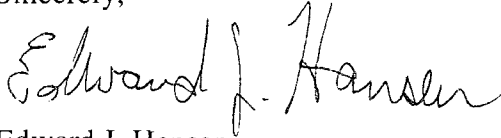
Now that the submittal is deemed “administratively” complete, the New Mexico Water Quality Control Commission regulations (WQCC) public notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The OCD hereby approves your submitted draft version of the public notice (with one exception) for translation into Spanish and publication in the specified newspaper in both English and Spanish. The notice must be edited to strike the phrase “...with a reported chloride concentration of approximately 127 mg/l.” and replace with the phrase “with a reported total dissolved solids concentration of approximately 860 mg/L.” This edit must be completed prior to translation and publication.

The public notice must be given no later than March 16, 2007. Once the notice has been given, then please submit to the OCD within 15 days of public notice:

- 1) proof that the notice was published in the newspaper in both English and Spanish (affidavit of publication from the newspaper) and
- 2) proof that the notice was sent via certified mail to each landowner [signed certified mail receipt (green card) by each landowner – *this is not required if you are the landowner*].

If you have any questions regarding this matter, please do not hesitate to contact me at (505) 476-3489 or [edwardj.hansen@state.nm.us](mailto:edwardj.hansen@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit renewal review.

Sincerely,

A handwritten signature in cursive script that reads "Edward J. Hansen".

Edward J. Hansen  
Hydrologist  
Environmental Bureau

EJH:ejh



## Highlander Environmental Corp.

2007 FEB 13 AM 10 22  
Midland, Texas

February 12, 2007

Mr. Ed Hansen  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal Application, GW-245, Basic Energy Services, Inc. (former Davis Tool Company facility), 4710 Carlsbad Highway, Hobbs, New Mexico

Dear Mr. Hansen:

Enclosed on behalf of Basic Energy Services, Inc. is the renewal application for the above facility. Also enclosed is a check for the \$100.00 application fee. Please call me if you need any further information. Please advise when the time is proper for running the public notice in the Hobbs newspaper.

Thank you very much.

Very truly yours,

James C. Hunnicutt  
Vice President



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)

☐ New ☒ Renewal ☐ Modification

1. Type: Oil and gas service company
2. Operator: Basic Energy Services, Inc., Rental & Fishing Division  
Address: 4710 Carlsbad Highway, Hobbs, New Mexico  
Contact Person: Tommy Clayton, District Manager Phone: (325) 573-8837
3. Location: SE/4 SE/4\* Section 36, Township 18-S, Range 37 E  
9.2 acres of land out of the SE/SE  
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: Lyn Sockwell Title: Director of Safety

Signature: [Signature] Date: 2/12/07

E-mail Address: lyn.sockwell@basicenergyservices.com

ATTACHMENT  
To Application for Renewal of Discharge Plan  
Basic Energy Services, Inc.

- 1-3. See form for information.
4. Basic Energy Services, Inc. – Rental & Fishing Division  
213 North College  
Snyder, Texas 79549  
(325) 573-8837
5. See enclosed facility diagram. This is a renewal application of existing permit No. GW-245.
6. This is a renewal of existing permit No. GW-245. Please see the permit on file. A site representative (Mr. Butch McCarty, formerly of Davis Tool) has advised that there have been no changes in materials stored or used at the facility since the prior permit was issued.
7. This is a renewal of existing permit existing permit No. GW-245. Please see the permit on file. A site representative (Mr. Butch McCarty, formerly of Davis Tool) has advised that there have been no changes in waste streams or material changes in volumes of wastewater since the prior permit was issued.
8. This is a renewal of existing permit existing permit No. GW-245. Please see the permit on file. There have reportedly been no changes since the prior permit was issued.
9. Basic Energy Services, Inc. acquired the subject property on or about January 15, 2007. Basic plans to implement the following upgrades at the facility:
  - a. Construction of a concrete stem or ramp at the eastern entrance of the main shop wash bay. This is planned in order to minimize the risk of wash water from equipment washing operations flowing out of the wash bay and onto the asphalt pad on the east side of the building. Basic plans to have this stem constructed by the end of the first quarter of 2007, subject to contractor availability.
  - b. Construction of a concrete or other impermeable containment for drum storage on site. Current plans are to place the containment area on the north end of the main shop building, unless it is consolidated with the waste water tank containment, further discussed under subparagraph d below. Basic plans to have this containment constructed by the end of the first quarter of 2007, subject to contractor availability.
  - c. Basic is considering replacing the existing waste water tank, which is located inside an earthen dike with a plastic liner, with a 210-bbl. closed top tank and automatic

shut-off system. If done, this replacement should take place by the end of the second quarter of 2007.

- d. There is a second sump, located on the concrete pad located on the south side of the smaller shop located east of the facility's main shop building. This sump's location is reflected on the attached plat. The sump contains a submersible pump that transfers waste water via an aboveground plastic line to an open steel tank located on the south side of the concrete pad.

This sump was not noted on the original discharge plan application. It is a two-chambered sump, with each chamber approximately 3' x 4' in area, and approximately 4' deep. It was cleaned out and inspected as part of Basic's due diligence on December 11, 2006. No holes or cracks were noted at that time.

Basic is considering what to do with regard to this sump. If it closes the sump, the sump will be filled with concrete. Basic will notify NMOCD at least 72 hours in advance and allow NMOCD personnel opportunity to visually inspect the empty sump prior to closure.

If Basic elects to continue use of this sump, it plans to construct a concrete containment sufficiently large to contain a steel or fiberglass waste water tank (probably 210-bbls in capacity) and the facility's drum storage. If it elects to retain the sump, it will construct the above containment, as well as sufficient curbing to minimize the risk of runoff from the pad reaching the ground, by the end of the first quarter of 2007 (subject to contractor availability).

10. Basic will implement a routine inspection system to assure permit compliance, as follows:

- a. Basic will perform an annual visual inspection of both sumps on site, with at least 72 hours prior notice to the NMOCD.
- b. At least once every five years, Basic will test the underground wastewater line (which extends from the main shop building wash bay to the waste water tank northwest of the building), with at least 72 hours prior notice to the NMOCD.
- c. Basic will perform monthly inspections of the containments on site and maintain a record of same. Basic will implement this policy effective February 2007.

11. Basic will prepare a Spill Prevention Control and Countermeasure (SPCC) plan for the subject facility by the end of the first quarter of 2007. Basic will also review the facility for the implementation of a storm water discharge plan

12. This is a renewal of existing permit No. GW-245. Please see the permit on file.

13. This is a renewal of existing permit No.GW-245. Please see the permit on file.

14. Basic will commit to complying with the terms and conditions of the renewal permit, as described in the discharge permit attachments previously provided by the NMOCD.

Also enclosed is a draft of the public notice that Basic plans to place in the *Hobbs News-Sun* newspaper.

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. \_\_\_\_\_ dated 2/9/07

or cash received on \_\_\_\_\_ in the amount of \$ 100<sup>00</sup>

from BASIC Energy Services

for GW-245

Submitted by: Lawrence Romero Date: 2/14/07

Submitted to ASD by: Lawrence Romero Date: 2/14/07

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee ☒ New Facility \_\_\_\_\_ Renewal ☒

Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

## PUBLIC NOTICE

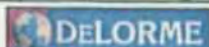
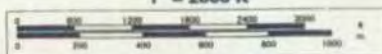
Basic Energy Services, Inc. – Rental & Fishing Division, 213 North College, Snyder, Texas 79549, Attention: Mr. Tommy Clayton, District Manager, has submitted a renewal application for the previously approved discharge plan (GW-245) for its Carlsbad Highway facility, located at 4700 Carlsbad Highway (Highway 62/180), Hobbs, New Mexico, being a tract of land out of the SE/4 of the SE/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, approximately one mile west of the intersection of Highway 62/180 and West County Road. Approximately 5,000 barrels of wash-down water are generated on site annually, which are collected and temporarily stored in containment vessels prior to transport and disposal at an NMOCD approved facility. Additionally, an estimated 660 gallons of used oil and one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil and filter recycler. Empty drums are to be taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 120 feet, with a reported chloride concentration of approximately 127 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information, submit comments or request to be placed on a facility specific mailing list for future notices by contacting Edward J. Hansen at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3489. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.



**FIGURE NO. 1**  
**LEA COUNTY, NEW MEXICO**  
**DAVIS TOOL**  
**TOPOGRAPHIC MAP**

Scale 1 : 24,000

1" = 2000 ft



© 2002 DeLorme, 3-D TopoQuads®. Data copyright of content owner.  
[www.delorme.com](http://www.delorme.com)

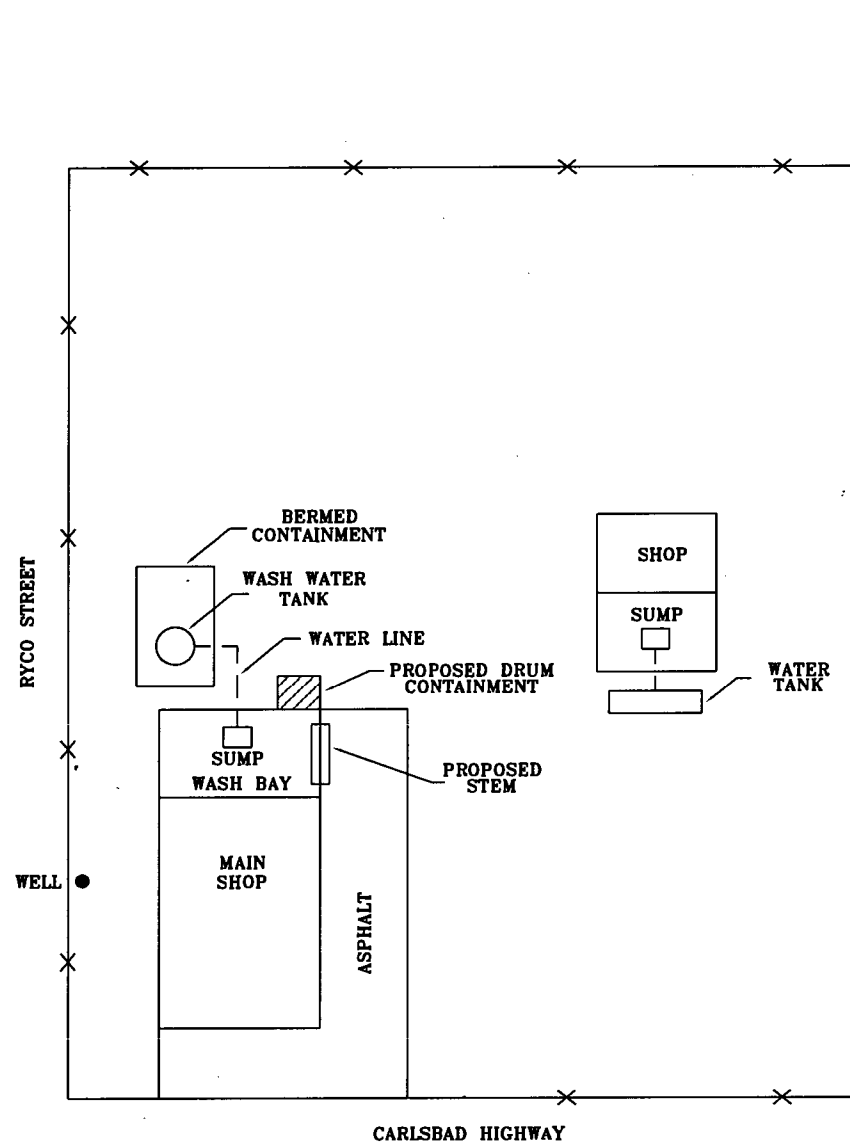


FIGURE NO. 2

LEA COUNTY, NEW MEXICO

DAVIS TOOL  
4710 CARLSBAD HWY.  
HOBBS, NEW MEXICO

HIGHLANDER ENVIRONMENTAL CORP.  
MIDLAND, TEXAS

DATE:  
2/6/07  
DWN. BY:  
JJ  
FILE:  
C:\JRM\2822  
SITE MAP

NOT TO SCALE



**Price, Wayne, EMNRD**

---

**From:** Price, Wayne, EMNRD  
**Sent:** Tuesday, January 30, 2007 3:38 PM  
**To:** 'jhunnicutt@hec-enviro.com'  
**Cc:** Johnson, Larry, EMNRD  
**Subject:** Davis Tool now Basic Engergy GW-245  
**Attachments:** Renewal WQCC Notice Regs.pdf; Final Template for Discharge Plan approvals\_01\_05\_07.doc

OCD extends your filing deadline to Feb 15, 2007.

Wayne Price  
Environmental Bureau Chief  
Oil Conservation Division  
1220 S. Saint Francis  
Santa Fe, NM 87505  
505-476-3490  
Fax: 505-476-3462

1/30/2007

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, December 13, 2006 10:42 AM  
**To:** 'davistoolcompany@zianet.com'  
**Subject:** Renewal of Discharge Permit GW245  
**Attachments:** Renewal WQCC Notice Regs.pdf; Discharge Plan App Form.pdf; Guidelines For Discharge Plans.pdf; PN Flow Chart.20.6.2renewal.pdf

Dear Discharge Permit (GW245) Holder:

The Oil Conservation Division's (OCD) records indicate that your discharge plan has expired. New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. You may be operating without a permit. Please submit a permit renewal application with a filing fee (20.6.2.3114 NMAC) of \$100.00 by December 31, 2006. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. An application form and guidance document is attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Please contact me by phone 505-476-3489 or email <mailto:edwardj.hansen@state.nm.us> if you have any questions regarding this matter.

Sincerely,

Edward J. Hansen  
Hydrologist  
Environmental Bureau

12/13/2006

THE SANTA FE  
**NEW MEXICAN**

Founded 1849

NEW MEXICO OIL CONSERVATION DIVISION  
ATTN: ED MARTIN

AD NUMBER: 206814      ACCOUNT: 56689  
LEGAL NO: 69263      P.O.#: 01199000033  
179 LINES      1 time(s) at \$ 78.91  
AFFIDAVITS: 5.25  
TAX: 5.26  
TOTAL: 89.42

**NOTICE OF  
PUBLICATION**

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505. Telephone (505) 476-3440:

(GW-245) - Davis Tool Co., Mr. Clifford R. McCarty, P.O. Box 2037, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Hobbs Service facility located in the NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. All effluent discharge will be collected in a closed receptacle prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 55 feet with a total dissolved solids concentrations ranging from 200 to 860 mg/l. The discharge plan addresses how spill, 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 thru 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 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 hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 17th day of April, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director  
Legal #69263  
Pub. May 18, 2001

**AFFIDAVIT OF PUBLICATION**

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE**

I, MM Weideman 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 #69263 a copy of which is hereto attached was published in said newspaper 1 day(s) between 05/18/2001 and 05/18/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 18 day of May, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

MM Weideman

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
18 day of May A.D., 2001

Notary

Laura R. Hardy

Commission Expires

11/23/03

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a  
newspaper published at  
Hobbs, New Mexico, do solemnly  
swear that the clipping attached  
hereto was published once a  
week in the regular and entire  
issue of said paper, and not a  
supplement thereof for a period.

of 1

weeks.

Beginning with the issue dated

May 18 2001

and ending with the issue dated

May 18 2001

*Kathi Bearden*

Publisher

Sworn and subscribed to before

me this 18th day of

May 2001

*Jodi Benson*

Notary Public.

My Commission expires  
October 18, 2004  
(Seal)

This newspaper is duly qualified  
to publish legal notices or adver-  
tisements within the meaning of  
Section 3, Chapter 167, Laws of  
1937, and payment of fees for  
said publication has been made.

NOTICE OF PUBLICATION

May 18, 2001

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Reg-  
ulations, the following discharge plan application has been submitted to the Director of the Oil  
Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Tele-  
phone (505) 476-3440:

(GW-245) - Davis Tool Co., Mr. Clifford R. McCarty, P.O. Box 2037, Hobbs, New Mexico  
88240, has submitted a discharge plan renewal application for their Hobbs Service facility,  
located in the NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea  
County, New Mexico. Any effluent discharge will be collected in a closed receptacle prior  
to transport to an OCD approved off-site disposal facility. Groundwater most likely to be  
affected by an accidental discharge is at a depth of approximately 55 feet with a total dis-  
solved solids concentrations ranging from 200 to 860 mg/l. The discharge plan addresses  
how spill, 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 giv-  
en above. The discharge plan application may be viewed at the above address between 8:00  
a.m. and 4:00 p.m., Monday thru 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 af-  
ter 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. Request for public hearing shall set  
forth the reasons why a hearing shall be held.  
A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on  
this 17th day of April, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL  
LORI WROTENBERY, Director  
#18188

01100060000

02547125

State of New Mexico Oil &  
1220 S. St. Francis  
Santa Fe, NM 87505

## **Ford, Jack**

---

**From:** Martin, Ed  
**Sent:** Monday, May 14, 2001 8:51 AM  
**To:** 'Santa Fe New Mexican'  
**Cc:** Ford, Jack; Olson, William  
**Subject:** Legal Notices

Attn: Betsy Perner

Please publish the attached notices one time only immediately upon receipt of this request.  
Upon completion of publication, please send the following to this office:

1. Publisher's affidavit
2. Invoice. Our purchase order number is **01199000033**

Please publish the notice no later than Friday, May 18, 2001.

Thank you.



Publ. Notice GW-326



Publ. Notice GW-245



Publ. Notice GW-198



Publ. Notice GW-078



Publ. Notice  
GW-060,062,087

## NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**(GW-245) – Davis Tool Co., Mr. Clifford R. McCarty, P.O. Box 2037, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Hobbs Service facility located in the NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. Any effluent discharge will be collected in a closed receptacle prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 55 feet with a total dissolved solids concentrations ranging from 200 to 860 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

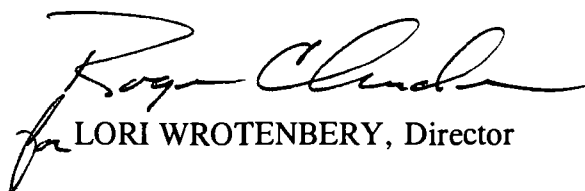
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru 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. Request for public hearing shall set forth the reasons why a hearing shall be held.

A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 17th day of April, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

SEAL

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 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 January 24, 2001 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)

New

Renewal

Modification

RECEIVED

APR 16 2001

Environmental Bureau  
Oil Conservation Division

1. Type:

OIL & GAS SERVICE Co

2. Operator:

Davis Tool Co.

Address:

P.O. Box 2037 Hobbs, NM  
88240

Contact Person:

D.G. Williams 505-397-0162 Phone:

3. Location: NE4 NE4 14 SE4 SE4 14 Section 36 Township

18S Range 37E

Submit large scale topographic map showing exact location.

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

NO CHANGE

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

NC

6. Attach a description of all materials stored or used at the facility.

NC

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

NC

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

NC

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

NC

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

NC

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

NC

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:

Charles W. [Signature]  
President/Owner

Signature:

Title:

Date:

3/2/01

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 2/27/01,  
or cash received on                      in the amount of \$ 1,700.00  
from Davis Tool  
for Hobbs Service Facility GW-245  
Submitted by: [Signature] Date: 3/29/01  
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           

DAVIS TOOL  
CARLSBAD HIGHWAY  
P.O. BOX 2037 397-2000  
HOBBS, NM 88241-2037

DATE 2-27-01

95-183/1122

PAY TO THE ORDER OF NM Energy, Minerals & Natural Resources Dept. \$ 1,700.00\*\*\*\*

REGISTERED 8055618 700.00 DOLLARS

 **Lea County State Bank**  
P.O. Box 400 • Hobbs, New Mexico 88241

FOR Permit                     

SF



ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 2/27/01  
or cash received on \_\_\_\_\_ in the amount of \$ 100.00  
from Davis Tool  
for Hobbs Service Facility GW-245  
Submitted by: [Signature] Date: 3/29/01  
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 \_\_\_\_\_

DAVIS TOOL  
CARLSBAD HIGHWAY  
P.O. BOX 2037 397-2000  
HOBBS, NM 88241-2037

DATE 2-27-01

95-183/1122

PAY TO THE ORDER OF NM Energy, Minerals & Natural Resources Dept. \$ 100.00\*\*\*\*\*

REGISTERED 3055618 51000000

DOLLARS



Lea County State Bank

P.O. Box 400 • Hobbs, New Mexico 88241

FOR Filing Fee

SF

DAVIS TOOL

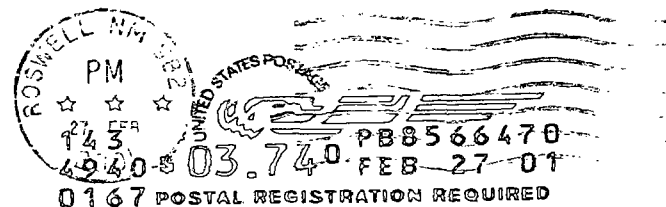
P.O. Box 2037

Albbs, New Mexico 88240

CERTIFIED

P 209 878 964

MAIL



NMED-WATER QUALITY MANAGEMENT  
1220 SOUTH ST. FRANCIS DR.  
SANTA FE, NEW MEXICO 87505

8780384000





# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

February 12, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 0142**

Mr. Clifford R. McCarty  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

**RE: Discharge Plan Renewal Notice for the Davis Tool Facility**

Dear Mr. McCarty:

Davis Tool has the following discharge plan, which expires during the current calendar year.

**GW-245 expires 7/19/2001 – Hobbs 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 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00. After January 15, 2001 renewal discharge plans require a flat fee equal to the flat fee schedule for oil field service facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114. A copy of the revised fee schedule is included for your assistance. The \$100.00 filing fee is to be submitted with each discharge plan renewal application and is nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on NMED's website at [www.nmenv.state.nm.us](http://www.nmenv.state.nm.us).

If any 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 Davis Tool has any questions, please do not hesitate to contact Mr. Jack Ford at (505) 476-3489.

Sincerely,



Roger C. Anderson  
Oil Conservation Division

RCA/wjf

cc: OCD Hobbs District Office

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>C. McCarty</i>	
Street, Apt. No.; or PO Box No. <i>Davis Tool</i>	
City, State, ZIP+ 4 <i>97024</i>	
PS Form 3800, July 1999 See Reverse for Instructions	

7099 3220 0000 5051 0142

Postmark Here



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

August 8, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-583**

Mr. Clifford R. McCarty, President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

**RE: Approval-Class V Closure**  
**Davis Tool, GW-245**  
**Hobbs Facility**  
**Lea, New Mexico**

Dear Mr. McCarty:

The OCD has received the letter dated July 31, 1997 regarding the Class V well investigation for the Davis Tool Hobbs facility located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The facility was permitted by the OCD under discharge plan GW-245 on July 19, 1996 with conditions of approval which were accepted by Davis Tool on July 29, 1996. Based on the information contained in the letter dated July 31, 1997 from Davis Tool and the E-mail letter from Mr. Wayne Price with the OCD dated August 8, 1997 the OCD hereby approves of the closure of the Class V well with the following conditions:

1. The soil removed from the class V well will be remediated as proposed - the soil will be sampled next August, 1998 to confirm the BTEX and TPH levels. The Benzene must not exceed 5 mg/Kg, BTEX must not exceed 50 mg/Kg, and the TPH cannot exceed 100 mg/Kg if the soil is to be spread on the facility.

**Note:** All sampling will be in accordance with EPA methods such as those included in SW-846.

2. Mr. Wayne Price of the Hobbs OCD District office will be notified 72 hours in advance of any field activity. Phone (505)-393-6161.
3. Davis Tool will obtain approval from the OCD Santa Fe Office prior to ceasing the bioremediation of the soil.

Mr. Clifford McCarty  
Davis Tool, GW-245  
Class V, Closure  
August 8, 1997  
Page - 2

Be advised that OCD approval of this closure does not relieve Davis Tool from liability should it be later found that contamination exists beyond the scope of this closure. Further, OCD approval does not relieve Davis Tool from responsibility to comply with other federal, state, and local rules and regulations that may apply.

If you have any questions, please feel free to give me a call at (505)-827-7152.

Sincerely,



Roger C. Anderson  
Bureau Chief,  
Environmental Bureau - OCD

RCA/pws

c: Mr. Wayne Price, Environmental Engineer - OCD Hobbs District.

P 326 936 583

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

DAVIS TOOL CLASS V. APR

Street & Number  
Mr. McCarty

Post Office, State, & ZIP Code  
GW-245

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

**Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Friday, August 08, 1997 10:00 AM  
**To:** Pat Sanchez  
**Cc:** Chris Williams  
**Subject:** Davis Tool GW-245 Class V investigation

Meeting with Dan Williamson: (consultant) on Aug 7, 1997.

Dan delivered the letter dated 7/31/97 with analyticals for the bottom hole.

It appears the bottom hole samples are acceptable for closure. Therefore I recommend we allow them to close & backfill the excavated area with non-contaminated soils.

Dan indicated they will stage all of the contaminated soils on plastic in back part of their property and remediated until levels are acceptable. I recommended that Davis build a berm around the staging area.

Davis should propose what contaminants are in the soil and what clean-up levels should or will be attained including a time schedule for final closure.

cc: Dan Williamson  
Davis Tool  
P.O. Box 2037  
Hobbs, NM 88240

RECEIVED

AUG - 8 1997

Environmental Bureau  
Oil Conservation Division



RECEIVED  
AUG - 5 1997

**DAVIS TOOL**  
*Fishing Tools -- Reverse Units*  
P.O. BOX 2037  
Carlsbad Highway  
Hobbs, NM 88240

TELEPHONE  
(505) 397-2000

7/31/97

RECEIVED

AUG - 6 1997

Environmental Bureau  
Oil Conservation Division

Mr. Patricio W. Sanchez  
Petroleum Eng. Spec.  
NMOCD  
2040 South Pacheco Street  
Santa Fe, NM 87505

Re: Discharge Plan GW-245  
NOD - Class V Investigation  
Hobbs Facility  
Lea, New Mexico

Dear Mr. Sanchez:

This letter is in response to your correspondence dated May 5, 1997 and our conversation of 6/25/97 concerning the Davis Tool Hobbs facility discharge plan GW-245 located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico as approved on July 19, 1996.

As a brief review, your letter referred to a "Phase-I Investigation Plan" and recommended a sampling plan for the following constituents of concern:

- A. WQCC 3103 A., B. and C., Constituents
- B. Hazardous Constituents as defined in 40 CFR Part 261.


The results of this sampling investigation were to be submitted to the OCD by June 30, 1997. On June 11, Davis Tool Co. contracted a trackhoe and operator to excavated the leach pit. Mr. Wayne Price surveyed the hole that was approximately 35' deep. It was decided that a more representative sample could be obtained by drilling using a split spoon sampling technique.

On June 25, as per our telephone conversation, it was agreed this sampling would be obtained prior to July 15, 1997. On July 7, Harrison Drilling and Environmental was contracted to obtain the split spoon sample. This was completed and sent by Harrison to Trace Analysis of Lubbock. The preliminary results were returned to Davis on July 25<sup>th</sup>. I enclose a copy of the final results received 7/30/97.

Pending final approval and closure, Davis Tool Co. anticipates moving the excavated contaminated soil to the north end of Davis property and placing it on 12-mil plastic liner. The excavation and leach holding tanks will be filled with clean, uncontaminated soil and the surface will then be incorporated in the Davis storage yard.

Please review the enclosed results and if approved, Davis Tool Co. would formally request a final closure to the Class V Well located on our facility. If you have any questions or require further information, please do not hesitate to call me at (505) 397-2000.

Sincerely:

A handwritten signature in cursive script, appearing to read "Clifford R. McCarty".

Clifford R. McCarty  
Davis Tool Co.

RECEIVED

AUG - 6 1997

JUL-25-97 07:09A

Environmental Bureau  
Oil Conservation Division

P.01

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

Date: Jul 14, 1997

Date Rec: 7/9/97

Project: 001

Proj Name: Leach Field

Proj Loc: 4700 Carlsbad Hwy, Hobbs

ANALYTICAL RESULTS FOR

Harrison Drilling & Environmental Services, Inc

Attention Claiborne Harrison

3206 Enterprise Dr

Hobbs

NM 88240

Lab Receiving # : 9707000175

Sampling Date: 7/7/97

Sample Condition: Intact and Cool

Sample Received By: JH

TA#	Field Code	MATRIX	TRPHC (mg/Kg)
T77127	43' Split Spoon	Soil	<10.0
QC			100
RPD			10
% Extraction Accuracy:			104
% Instrument Accuracy:			100

Reporting Limit:

10

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
TRPHC	EPA 3550	7/9/97	EPA 418.1	7/10/97	MS	100	250

*BS*

Director, Dr. Blair Leftwich

7-14-97

Date

# TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

July 24, 1997

Receiving Date: 07/09/97

Sample Type: Soil

Project No: 001

Project Location: Hobbs, NM

## ANALYTICAL RESULTS FOR

HARRISON DRILLING & ENVIRONMENTAL SERVICES, INC.

Attention: Claiborne Harrison

3206 Enterprise Drive

Hobbs, NM 88240-1056

Prep Date: 07/21/97

Analysis Date: 07/21/97

Sampling Date: 07/07/97

Sample Condition: Intact & Cool

Sample Received by: JH

Project Name: Leach Field

TA#	FIELD CODE	SPECIFIC				
		CYANIDE (mg/kg)	CONDUCTANCE (uMHOs/cm)	CHLORIDE (mg/kg)	NITRATE-N (mg/kg)	SULFATE (mg/kg)
T77127	43' Split Spoon	<0.50	410	330	<20	<200
QC	Quality Control	0.04	1,414	25.4	9.8	22.8
RPD		5	5	8	2	4
% Extraction Accuracy		103	—	102	98	94
% Instrument Accuracy		103	100	99	98	92
REPORTING LIMIT		0.50	—	1.0	20	200

METHODS: EPA 335.2, 120.1, 300.0,

CHEMIST: RC/JS

SPIKE: 1.0 mg/kg CN-; 25 mg/kg Chloride, Sulfate; 10 mg/kg Nitrate.

QC: 0.04 mg/L CN-; 24 mg/L Chloride; 23 mg/L Sulfate; 9.8 mg/L Nitrate.



Director, Dr. Blair Leftwich

7-24-97

Date

Jul-25-97 07:09A

P.02

# TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

## ANALYTICAL RESULTS FOR HARRISON DRILLING & ENVIRONMENTAL SERVICES

Attention: Claiborne Harrison  
3206 Enterprise Drive  
Hobbs, NM 88240-1056

Prep Date: 07/15/97  
Analysis Date: 07/22/97  
Sampling Date: 07/07/97  
Sample Condition: Intact & Cool  
Sample Received by: JH  
Project Name: Leach Field

July 24, 1997  
Receiving Date: 07/09/97  
Sample Type: Soil  
Project No: 001  
Project Location: Hobbs, NM

### TOTAL METALS (mg/kg)

TA#	FIELD CODE	As	Se	Cd	Cr	Pb	Ag	Ba	Al	Co	Cu	Fe	Mn	Mo	Ni
T77127	43' Split Spoon	<10	<10	<2.0	6.5	<10	<0.50	<20	1,530	<3.0	8.2	1,610	14	<10	<20
QC	Quality Control	5.6	5.2	4.9	5.0	5.2	1.05	5.2	5.3	5.1	5.2	5.1	5.0	5.1	5.0
REPORTING LIMIT		10	10	2.0	5.0	10	0.5	20	20	3.0	2.0	3.0	0.1	10	20
RPD		9	8	5	4	12	6	10	0	6	5	0	4	8	6
% Extraction Accuracy*		72	61	62	69	60	33	62	70	65	60	118	62	68	63
% Instrument Accuracy		111	104	98	99	105	105	104	106	102	104	101	100	101	100

\*Extraction Accuracy below preferred accuracy of 75-125%.

METHODS: EPA 200.7, 245.1.

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba, Al, Cu, Zn: RR Hg: HC

TOTAL METALS SPIKE: 200 mg/kg As, Se, Cd, Cr, Pb, Ba, Al, Co, Fe, Mn, Mo, Ni; 40 mg/kg Ag; 100 mg/kg Cu.

TOTAL METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba, Al, Cu, Zn, Ni; 1.0 mg/L Ag.



Director, Dr. Blair Leftwich

7-24-97

DATE

Jul-25-97 07:09A

**ANALYTICAL RESULTS FOR  
HARRISON DRILLING & ENVIRONMENTAL  
Attention: Claiborne Harrison  
3206 Enterprise Drive  
Hobbs, NM 88240-1056**

July 24, 1997  
Receiving Date: 07/09/97  
Sample Type: Soil  
Sampling Date: 07/07/97  
Sample Condition: I & C  
Sample Received by: JH  
Project Name: Leach Field  
Project Location: Hobbs, NM  
Extraction Date: 07/15/97  
Analysis Date: 07/19/97

TA # T77127

Field Code: 43' Split Spoon

EPA 8270	Reporting	Concentration	QC	RPD	%EA	%IA
	Limit	(mg/kg)				
N-Nitrosodimethylamine	0.25	ND				
2 Picoline	0.25	ND				
Methyl methanesulfonate	0.25	ND				
Ethyl methanesulfonate	0.25	ND				
Phenol	0.25	ND	72	16	44	90
Aniline	1.25	ND				
bis(2-Chloroethyl)ether	1.25	ND				
2-Chlorophenol	1.25	ND		18	44	
1,3-Dichlorobenzene	0.25	ND				
1,4-Dichlorobenzene	0.25	ND	85	20	43	106
Benzyl alcohol	1.25	ND				
1,2-Dichlorobenzene	0.25	ND				
2-Methoxyphenol	0.25	ND				
bis(2-chloroisopropyl)ether	1.25	ND				
4-Methylphenol/3-Methylphenol	0.25	ND				
Acetophenone	1.25	ND				
n-Nitrosodi-n-propylamine	0.25	ND		15	47	
Hexachloroethane	0.25	ND				
Nitrobenzene	0.25	ND				
N-Nitrosopiperidine	1.25	ND				
Isophorone	1.25	ND				
2-Nitrophenol	1.25	ND	79			99
2,4-Dimethylphenol	1.25	ND				
bis(2-Chloroethoxy)methane	0.25	ND				
Benzoic acid	2.5	ND				
2,4-Dichlorophenol	1.25	ND	78			98
1,2,4-Trichlorobenzene	0.25	ND		24	40	
o,o-Dimethylphenethylamine	2.5	ND				
Naphthalene	0.25	ND				

**TRACE ANALYSIS, INC.**

A Laboratory for Advanced Environmental Analysis

Project Location: Hobbs, NM

Project Name: Leach Field

TA# T77127

FIELD CODE: 43' Split Spoon

EPA 8270	Reporting	Concentration	QC	RPD	%EA	%LA
	Limit	(mg/kg)				
4-Chloroaniline	1.25	ND				
2,6-Dichlorophenol	1.25	ND				
Hexachlorobutadiene	0.25	ND	87			109
N-Nitroso-di-n-butylamine	1.25	ND				
4-Chloro-3-methylphenol	1.25	ND	78	6	53	98
2-Methylnaphthalene	0.25	ND				
1,2,4,5-Tetrachlorobenzene	0.25	ND				
Hexachlorocyclopentadiene	0.25	ND				
2,4,6-Trichlorophenol	1.25	ND	77			96
2,4,5-Trichlorophenol	1.25	ND				
2-Chloronaphthalene	0.25	ND				
1-Chloronaphthalene	0.25	ND				
2-Nitroaniline	1.25	ND				
Dimethylphthalate	0.25	ND				
Acenaphthylene	0.25	ND				
2,6-Dinitrotoluene	0.25	ND				
3-Nitroaniline	1.25	ND				
Acenaphthene	0.25	ND	80	8	55	100
2,4-Dinitrophenol	1.25	ND				
Dibenzofuran	1.25	ND				
Pentachlorobenzene	0.25	ND				
4-Nitrophenol	1.25	ND		4	66	
1-Naphthylamine	1.25	ND				
2,4-Dinitrotoluene	0.25	ND		4	62	
2-Naphthylamine	1.25	ND				
2,3,4,6-Tetrachlorophenol	1.25	ND				
Fluorene	0.25	ND				
Diethylphthalate	0.25	ND				
4-Chlorophenyl-phenylether	0.25	ND				
4-Nitraniline	1.25	ND				
4,6-Dinitro-2-methylphenol	0.25	ND				
n-Nitrosodiphenylamine & Diphenylamine	0.25	ND	77			96
Diphenylhydrazine	1.25	ND				

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TRACE ANALYSIS, INC.  
ATTN: MS. JENNIFER O. HARDELL  
6701 ABERDEEN AVENUE  
LUBBOCK, TEXAS 79424  
FAX: 806-794-1298

Receiving Date: 07/17/97  
Reporting Date: 07/18/97  
Project Name: LEACH FIELD. 001  
Project Location: 4700 CARLSBAD HWY, HOBB5  
Field Code: 77127 43' SPLIT SPOON

Analysis Date: 07/17/97  
Sampling Date: 07/07/97  
Sample Type: SOIL  
Sample Condition: C&I

Volatiles EPA SW 846-8240. (ppm) Compounds	ELT# 11779	PQL	% IA	Method Blank	% EA
Chloromethane	ND	0.001	117	ND	
Vinyl chloride	ND	0.001	107	ND	
Bromomethane	ND	0.001	108	ND	
Chloroethane	ND	0.001	115	ND	
Trichlorofluoromethane	ND	0.001	105	ND	
Acetone	ND	0.01	85	ND	
1,1-Dichloroethene	ND	0.001	117	ND	118
Iodomethane	ND	0.01	112	ND	
Vinyl Acetate	ND	0.01	105	ND	
Carbon Disulfide	ND	0.001	107	ND	
Methylene Chloride	ND	0.001	102	ND	
trans-1,2-Dichloroethene	ND	0.001	110	ND	
1,1-Dichloroethane	ND	0.001	110	ND	
2-Butanone	ND	0.01	78	ND	
Chloroform	ND	0.001	105	ND	
1,1,1-Trichloroethane	ND	0.001	114	ND	
Carbon Tetrachloride	ND	0.001	111	ND	
Benzene	ND	0.001	109	ND	106
1,2 Dichloroethane	ND	0.001	111	ND	
Trichloroethene	ND	0.001	105	ND	101
1,2-Dichloropropane	ND	0.001	109	ND	
Dibromomethane	ND	0.001	96	ND	
Bromodichloromethane	ND	0.001	111	ND	
2-Chloroethyl Vinyl ether	ND	0.01	93	ND	
4-Methyl 2-Pentanone	ND	0.01	87	ND	
cis 1,3 Dichloropropene	ND	0.001	116	ND	
Toluene	ND	0.001	109	ND	103
trans 1,3-Dichloropropene	ND	0.001	113	ND	
1,1,2-Trichloroethane	ND	0.001	105	ND	
Dibromochloromethane	ND	0.001	91	ND	



TRACE ANALYSIS, INC.  
ATTN: MS. JENNIFER O. HARDELL  
6701 ABERDEEN AVENUE  
LUBBOCK, TEXAS 79424  
FAX: 806-794-1298

Receiving Date: 07/17/97  
Reporting Date: 07/18/97  
Project Name: LEACH FIELD, 001  
Project Location: 4700 CARLEAD I HWY. 110003  
Field Code: 77127 43' SPLIT SPOON

Analysis Date: 07/17/97  
Sampling Date: 07/07/97  
Sample Type: SOIL  
Sample Condition: U&I

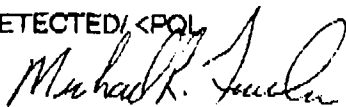
Volatiles EPA SW 846-8240. (ppm) Compounds	ELT# 11779	PQL	% IA	Method Blank	% EA
Tetrachloroethene	ND	0.001	107	ND	
Chlorobenzene	ND	0.001	106	ND	105
Ethylbenzene	ND	0.001	106	ND	
m&p Xylene	ND	0.001	111	ND	
o-Xylene	ND	0.001	106	ND	
Styrene	ND	0.001	103	ND	
Bromoform	ND	0.001	109	ND	
1,1,2,2-Tetrachloroethane	ND	0.001	97	ND	
1,2,3-Trichloropropane	ND	0.001	100	ND	

## SYSTEM MONITORING COMPOUNDS

## % RECOVERY

Dibromofluoromethane	104
Toluene-d8	107
4-Bromofluorobenzene	96

ND= NOT DETECTED, &lt;PQL

  
Michael R. Fowler

7-21-97  
Date

**HARRISON DRILLING & ENVIRONMENTAL**

Project Location: Hobbs, NM

Page 3 of 4

Project Name: Leach Field

TA# T77127

FIELD CODE: 43' Split Spoon

EPA 8270	Reporting	Concentration	QC	RPD	%EA	%IA
	Limit	(mg/kg)				
4-Bromophenyl-phenylether	0.25	ND				
Phenacetin	1.25	ND				
Hexachlorobenzene	0.25	ND				
4-Aminobiphenyl	1.25	ND				
Pentachlorophenol	1.25	ND	80	21	52	100
Pentachloronitrobenzene	1.25	ND				
Pronamide	0.25	ND				
Phenanthrene	0.25	ND				
Anthracene	0.25	ND				
Di-n-butylphthalate	0.25	ND				
Fluoranthene	0.25	ND	80			100
Benzidine	2.5	ND				
Pyrene	0.25	ND		2	67	
p-Dimethylaminoazobenzene	0.25	ND				
Butylbenzylphthalate	0.25	ND				
Benzo[a]anthracene	0.25	ND				
3,3-Dichlorobenzidine	0.25	ND				
Chrysene	0.25	ND				
bis(2-Ethylhexyl)phthalate	0.25	ND				
Di-n-octylphthalate	0.25	ND	64			80
Benzo[b]fluoranthene	0.25	ND				
7,12-Dimethylbenz[a]anthracene	0.25	ND				
Benzo[k]fluoranthene	0.25	ND				
Benzo[a]pyrene	0.25	ND	81			101
3-Methylcholanthrene	0.25	ND				
Dibenzo[a,j]acridine	0.25	ND				
Indeno[1,2,3-cd]pyrene	0.25	ND				
Dibenz[a,h]anthracene	0.25	ND				
Benzo[g,h,i]perylene	0.25	ND				

Project Location: Hobbs, NM  
Project Name: Leach Field  
TA #T77127  
Field Code: 43' Split Spoon

EPA 8270	Reporting	Concentration	QC	RPD	%EA	%IA
	Limit					
a-BHC	0.0001					
b-BHC	0.0001					
g-BHC	0.0001					
d-BHC	0.0001					
Heptachlor	0.0001					
Aldrin	0.0001					
Heptachlor epoxide	0.0001					
Endosulfan-I	0.0001					
Endosulfan-2	0.0001					
P,P'-DDE	0.0001					
Dieldrin	0.0001					
Endrin	0.0001					
P,P'-DDD	0.0001					
Endrin Aldehyde	0.0005					
Endosulfan Sulfate/P,P'-DDT	0.0005					
Endrin Ketone	0.0005					
Methoxychlor	0.005					
a-Chlordane	0.0001					
g-Chlordane	0.0001					
Toxaphene	0.0025					
PCBs	0.0001					

ND = NOT DETECTED

SURROGATES	% RECOVERY
2-Fluorophenol SURR	47
Phenol-d6 SURR	49
Nitrobenzene-d5 SURR	49
2-Fluorobiphenyl SURR	54
2,4,6-Tribromophenol SURR	43
Terphenyl-d14 SURR	97

METHODS: EPA SW 846-8270, 8080, 3550.  
CHEMIST: HW/CC/NIB

  
\_\_\_\_\_  
Director, Dr. Blair Leftwich

7-24-97  
\_\_\_\_\_  
Date

6701 Aberdeen Avenue  
Lubbock, Texas 79424  
806•794•1286  
FAX 806•794•1298

Analytical Results for  
HARRISON DRILLING & ENVIRONMENTAL  
Attention: Claiborne Harrison  
3206 Enterprise Drive  
Hobbs, NM 88240

July 29, 1997  
Receiving Date: 07/09/97  
Project: 001  
Name: Leach Field  
Loc: 4700 Carlsbad Hwy.  
Hobbs, NM

Sampling Date: 07/07/97  
Analysis Date: 07/28/97  
Project Name: Leach Field  
Sample Received by: JH  
Sample Condition: I & C

SAMPLE NO.	FIELD CODE	TOTAL Zn (mg/kg)	TOTAL B (mg/kg)	TOTAL U (mg/kg)
T77127	43' Split Spoon	10.1	14	<200
QC	Quality Control	5.1	5.2	5.1
Reporting Limit		2.0	3.0	200
RPD		2	4	2
% Extraction Accuracy		56	78	90
% Instrument Accuracy		101	105	108

CHEMIST: RR  
METHODS: EPA 200.7  
METALS SPIKE: 200.0 mg/kg B,U, Zn.  
METALS QC: 5.0 mg/L B, U, Zn.

*For 1 ps  
return*



Director, Dr. Blair Leftwich

7-29-97

DATE

**TRACE ANALYSIS, INC.**

A Laboratory for Advanced Environmental Research and Analysis

Project Name: Leach Field

TA #T77427

Field Code: 43' Split Spoon

EPA 8270	Reporting	Concentration				
	Limit	(mg/L)	QC	RPD	%EA	%IA
a-BHC	0.0001	ND	0.018	20	111	72
b-BHC	0.0001	ND	0.017	7	130	68
c-BHC	0.0001	ND	0.018	0	107	72
d-BHC	0.0001	ND	0.017	13	115	68
Heptachlor	0.0001	ND	0.021	13	112	84
Aldrin	0.0001	ND	0.016	16	76	64
Heptachlor epoxide	0.0001	ND	0.020	13	91	80
Endosulfan-1	0.0001	ND	0.039	14	103	78
Endosulfan-2	0.0001	ND	0.037	15	92	74
P,P'-DDE	0.0001	ND	0.032	8	91	64
Dieldrin	0.0001	ND	0.038	4	101	76
Endrin	0.0001	ND	0.043	6	132*	86
P,P'-DDD	0.0001	ND	0.032	12	51	84
Endrin Aldehyde	0.0005	ND	0.034	36	133*	68
Endosulfan Sulfate/P,P' DDT	0.0005	ND	0.041/0.036	17/20	106/125	82/72
Endrin Ketone	0.0005	ND	0.037	17	100	74
Methoxychlor	0.005	ND	0.18	12	82	72
a-Chlordane	0.0001	ND	0.020	8	91	80
g-Chlordane	0.0001	ND	0.020	3	86	80
Toxaphene	0.0025	ND	1.37	55*	68	68
PCBs	0.25	ND	0.48	10	90	90

\*NOTE: Elevated reporting limits due to sample matrix interference.

ND = NOT DETECTED

## SURROGATES

## % RECOVERY

2-Fluorophenol SURR

47

Phenol-d6 SURR

49

Nitrobenzene-d5 SURR

49

2-Fluorobiphenyl SURR

54

2,4,6-Tribromophenol SURR

43

Terphenyl-d14 SURR

97

METHODS: EPA SW 846-8270, 8080, 3550.

CHEMIST: HW/CC/MB



Director, Dr. Blair Leftwich

7-31-97

Date

## **Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Tuesday, July 08, 1997 2:56 PM  
**To:** Pat Sanchez  
**Cc:** Chris Williams  
**Subject:** Davis Tool- Leach field bottom hole sampling  
**Importance:** High

Attention: Pat Sanchez;

Davis Tool's consultant Dan Williamson called yesterday evening at approx 3:30 pm, informed me that the drilling rig was going to be on-site at 4-5 pm and should have sample at approx 7pm. I ask then if they could schedule it tomorrow, he indicated this was the only time they were able to obtain rig.

I ok'd. I did not witness.

Also the drilling contractor called this morning and has been delegated the responsibility for taking and analyzing the sample. Harrison Drilling requested info on which test to run. Please see attachments for response.



WPHDDAVI.WPD

<WP Attachment Enclosed>

July 8, 1997

Clayton Harrison  
Harrison Drilling Co.  
Fax #; 505-392-9151

Re: Your request for a copy of WQCC Human Health Standards-Ground Water (numerical standards) and Toxic Pollutant List (Risk-based health standards).-see attachments.

Please note I have checked the Davis Tool file and the last correspondence indicates that the bottom hole sample should be tested for 20 NMAC 6.2.3103 A, B, and C (i.e. WQCC 3103 A.,B., and C.) Constituents. If you have any further questions on this matter please call Mr. Pat Sanchez at 505-827-7156.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor-email  
Pat Sanchez-Environmental Bureau, Santa Fe, NM-email

file: wphddavis

attachments: pg's 24-25 WQCC A,B,C.; pg's 7-9 WQCC "toxic pollutants".

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 10:35 AM

Date 6/25/97

Originating Party

Other Parties

Mr. Dan Williamson - Representing  
Davis Tool.

Pat Sanchez - OCD

Subject Class V Investigation - Bottomhole Sample  
from excavation. (Davis Tool Co.) GW-245

Discussion

Mr. Williamson wants to bore beside the  
excavation and obtain a bottom hole sample  
per 20 NMAC 6.2, Subpart III, 3103 constituents.  
He needs an extension until July 15, 1997  
to make arrangements for getting a boring  
Machine.

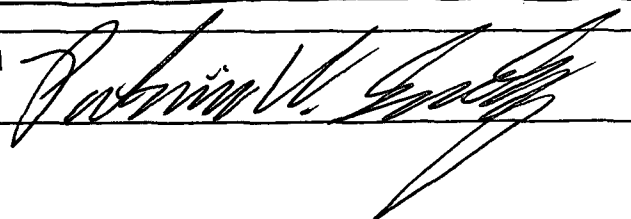
Conclusions or Agreements

I told Dan (Mr. Williamson) they  
have until the 15th of July, 1997 to "bore" sample  
hole - with the condition that Mr. Wayne Price  
of the Hobbs OCD be notified to witness the  
Sampling.

Distribution

File, Mr. Wayne Price.

Signed





**Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Friday, June 20, 1997 3:43 PM  
**To:** Pat Sanchez  
**Cc:** Chris Williams  
**Subject:** Davis Tool

**Field Trip Report:**

Dan Williams requested me to inspect the leach field removal project:

Davis has excavated the leach field out, hole is approximately 32 ft. deep and approx. 20-25 ft in dia.

Due to possible contaminates falling back into bottom of hole and cross contaminating bottom hole sample, Davis is considering taking bottom hole sample using a soil boring rig just adjacent to hole.

I agreed with this approach.

Davis will either take bottom hole or drill for bottom hole sample. The sample will be analyzed for WQCC constituents. The contaminated dirt pile if left on site or used as backfill will be sampled for WQCC also.

## **Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Monday, June 02, 1997 2:10 PM  
**To:** Pat Sanchez  
**Cc:** Chris Williams  
**Subject:** Davis Tool Leach field closure progress report.  
**Importance:** High

Davis Tool's consultant (Dan Williamson) requested an on-site visit to up-date the NMOCD on the closure activities of the existing leach field.

There have been two bore holes using an auger rig to determine the lateral and horizontal extent of the contamination. No soil samples were collected only visual observations were made. The holes were approximately 20 feet deep. One bore hole was located just adjacent to the old leach system, the other was approximately 15 feet away. Both holes were located SE of the leach field.

Davis has excavated the overlain material and removed most of the visually contaminated soil from inside of the leach system. They have reached the vertical limit of the small backhoe. There is still some visual contamination remaining in the hole at the base of the leachfield system and several contaminated cinder blocks. The bottom of the hole appears to be indurated caliche with no visual contamination.

Their plans are to obtain the necessary equipment to obtain a bottom hole soil sample a minimum of three feet below the base of the leachfield system. They will notify NMOCD to witness sample event. They are planning on running full WQCC constituents. If the sample analysis reflect a clean condition then they are planning on removing the rest of the leachfield system and backfill with clean soil.

They have not decided on how they want to handle the contaminated soil but will notify NMOCD for approval.

They indicated they will plug the bore holes to prevent a future conduit.

They are going to have their laboratory call me for the proper sampling & analysis protocol.

The two concrete vaults used as a primary/secondary collection system will be emptied and filled with an inert material for closure.

Davis will take pictures and submit a request for closure to your office and CC Hobbs-OCD.

CC: Davis Tool- Dan Williamson



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

May 5, 1997

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-288-258-782**

Mr. Clifford R. McCarty, President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

**RE: Work Plan Approval-Class V Investigation.  
GW-245  
Hobbs Facility  
Lea, New Mexico**

Dear Mr. McCarty:

The OCD has received the letter dated April 24, 1997 regarding the Class V well investigation for the Davis Tool Hobbs facility located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The facility was permitted by the OCD under discharge plan GW-245 on July 19, 1996 with conditions of approval which were accepted by Davis Tool on July 29, 1996. Discharge plan GW-245 permit condition number 9 stated:

- *Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.*

*Davis Tool will submit a "Phase-I Investigation Plan" of the Class V well by September 25, 1996. The plan will be submitted in duplicate to the Santa Fe OCD office with a copy to the OCD Hobbs District office. The plan will include a sampling plan for the following constituents of concern:*

- A. WQCC 3103 A,B. and C., Constituents*
- B. Hazardous Constituents as defined in 40 CFR Part 261.*

*(Note: The above analysis will conform with EPA approved methods per SW-846.)*

Mr. Pat Sanchez and Mr. Wayne Price of the OCD met with Davis Tool on April 10, 1997 to discuss the required "Phase-I Investigation Plan" regarding the Class V well. Davis Tool on

Mr. Clifford R. McCarty  
Davis Tool, GW-245  
Class V-Investigation  
May 5, 1997  
Page 2

April 10, 1997 provided the OCD with a TCLP/RIC of the septic sludge that showed the septic to be non-hazardous in terms of RCRA Subtitle C. However, Davis Tool still needs to sample the vadose zone for WQCC 3103 A., B., and C. parameters to insure that the groundwater has not been impacted by the prior use of the class V well. Based on the information received on April 10, 1997 and the letter dated April 24, 1997 from Davis Tool, the OCD hereby approves of the work plan with the following conditions:

1. Bottom hole samples will be based upon 20 NMAC 6.2.3103 A,B, and C ( i.e. WQCC 3103 A., B., and C.) constituents.

Note: All sampling will be in accordance with EPA methods such as those included in SW-846.

2. Mr. Wayne Price of the Hobbs OCD District office will be notified 72 hours in advance of any field activity. Phone (505)-393-6161.
3. A report with the results of the investigation will be submitted to the OCD by June 30, 1997. The report will include the bottomhole sample results and a recommendation regarding the status of the class V well.
4. Davis Tool will obtain approval from the OCD Santa Fe Office prior to ceasing the bioremediation of the soil.

Be advised that OCD approval of this work plan does not relieve Davis Tool from liability should it be latter found that contamination exists beyond the scope of this work plan. Further, OCD approval does not relieve Davis Tool from responsibility to comply with other federal, state, and local rules and regulations that may apply.

If you have any questions, please feel free to give me a call at (505)-827-7152.

Sincerely,



Roger C. Anderson  
Bureau Chief,  
Environmental Bureau - OCD

RCA/pws

c: Mr. Wayne Price, Environmental Engineer - OCD Hobbs District.

P 288 258 782

US Postal Service

Receipt for Certified Mail -

No Insurance Coverage Provided.

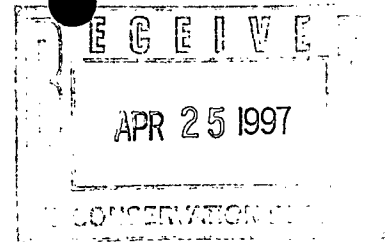
Do not use for International Mail (See reverse)

Sent to	
DAVIS - Tool, Mr. McIntyre	
Street & Number	
CLASS - V - W.P.	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

**DAVIS TOOL**  
*Fishing Tools -- Reverse Units*  
P. O. BOX 2037  
CARLSBAD HIGHWAY  
HOBBS, NEW MEXICO 88240

TELEPHONE  
(505)397-2000



April 24, 1997

Mr. Patricio W. Sanchez  
Petroleum Eng. Spec.  
NMOCD  
2040 South Pacheco Street  
Santa Fe, NM 87505

**RECEIVED**

**APR 28 1997**

Environmental Bureau  
Oil Conservation Division

Re: Discharge Plan Review-GW-245 Response  
Davis Tool - Hobbs Facility  
Lea County, New Mexico

Dear Mr. Sanchez,

This letter is in response to our meeting on 4/10/97 and follow-up discussions via telephone last week. We feel these personal discussions were very fruitful. We have evaluated the many options that were discussed and are prepared to pursue the following proposals if acceptable.

Basically, this proposal follows our Phase-I Investigation Plan with the exception of determining the delineation of the vertical and horizontal extent of contamination. We propose to take a backhoe and attempt to dig down beside the circular leach cinder block tank. If the backhoe is capable of digging and determining the vertical extent, then we will remove all contaminants and bioremediate on site. This remediation will be done by preparing a bermed area with a plastic liner on north side of the Davis yard. This soil will be treated with manure, disked and watered. Testing will determine when this soil will be acceptable.

If the backhoe is unable to dig to a depth that is acceptable for testing, we would like to initiate further discussions and options. We anticipate close contact with Wayne Price during the excavation process. We will probably start digging within the next week and will let you know how we're doing.

Hopefully these responses are adequate. If there are any further questions or concerns, please don't hesitate to contact us.

Sincerely,



Clifford R. McCarty  
President/Davis Tool Company

.cc Wayne Price

RECEIVED

APR 28 1997

Environmental Bureau  
Oil Conservation Division

MEMORANDUM OF MEETING OR CONVERSATION

☐ Telephone ☒ Personal

Time 8:00 AM

Date APRIL 10, 1997

Originating Party

Other Parties

Pat Sanchez/Wayne Price - OCD

Clifford McCarty / Dan Williams  
Davis Tool (GW-245)

Subject Met at the facility to discuss the class V well on the site - and what their work plan options/scenarios would be.

Discussion (1) OCD - Wayne/Pat gave a discussion explaining RCRA, WQA, and SDWA (WIC).

(2) Mr. McCarty provided us with a TCLP/RIC of the Septic Sludge (Attached) to verify that the "well" is Non-Hazardous.

(3) Discussed various options to satisfy the WQA (WACL) requirements for investigating the "Class V" well.

Conclusions or Agreements

ON number (3) above Mr. McCarty w/ Davis Tool indicated that he would submit a work plan to address the WACL/class V issues in terms of assessing the class V well extent (Vertical/horizontal) and possible closure.

Distribution File, Wayne Price.

Signed





# TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

## ANALYTICAL RESULTS FOR

DAVIS TOOL COMPANY

Attention: Dan Williamson

Box 2037

Hobbs, NM 88240

January 16, 1997

Receiving Date: 01/02/97

Sample Type: Soil

Project No: NA

Project Location: Davis Tool Co.

Prep Date: 01/08/97

Analysis Date: 01/09/97

Sampling Date: 12/30/96

Sample Condition: I & C

Sample Received by: ML

Project Name: Leach Field

*Davis Tool  
septic sludge  
Analysis.  
PMB  
4-1-97*

## TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cd	Cr	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	1.0	5.0	5.0	5.0	100.0	0.20
T65249	N. of Office	<0.10	<0.10	<0.05	0.09	<0.10	<0.05	0.57	<0.01
QC	Quality Control	5.5	5.2	5.0	4.8	4.9	1.0	4.9	0.0046
Reporting Limit		0.10	0.10	0.05	0.05	0.10	0.05	0.20	0.01
RPD		6	1	0	0	2	2	1	2
Extraction Accuracy		104	108	108	107	111	75	113	104
Instrument Accuracy		109	103	99	97	98	101	99	94

CHEMIST: As, Se, Cd, Cr, Pb, Ag, Ba: RR

Hg: CB

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 2.5 mg/L As, Se; 2.0 mg/L Cd, Cr, Pb, Ba; 0.5 mg/L Ag; 0.05 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Cd, Cr, Pb, Ba; 1.0 mg/L Ag; 0.005 mg/L Hg.

*BS*

Director, Dr. Blair Leftwich  
Director, Dr. Bruce McDonell

*1-16-97*

Date

RECEIVED

APR 10 1997

Environmental Bureau  
Oil Conservation Division

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR  
DAVIS TOOL COMPANY  
Attention: Dan Williamson  
Box 2037  
Hobbs, NM 88240

January 15, 1997  
Receiving Date: 01/02/97  
Sample Type: Soil  
Project No: NA  
Project Location: Davis Tool Co.

Extraction Date: 01/02/97  
Analysis Date: 01/06/97  
Sampling Date: 12/30/96  
Sample Condition: I & C  
Sample Received by: ML  
Project Name: Leach Field


TCLP VOLATILES (mg/L)	EPA LIMIT	Reporting Limit	T65249 N. of Office	QC	RPD	%EA	%IA
Vinyl chloride	0.2	0.05	ND	0.093	5	86	93
1,1-Dichloroethene	0.7	0.05	ND	0.096	6	105	96
Methyl Ethyl Ketone	200.0	0.5	ND	0.091	9	84	91
Chloroform	6.0	0.05	ND	0.091	7	100	91
1,2-Dichloroethane	0.5	0.05	ND	0.095	6	92	95
benzene	0.5	0.05	ND	0.091	6	99	91
Carbon Tetrachloride	0.5	0.05	ND	0.091	7	108	91
Trichloroethene	0.5	0.05	ND	0.091	6	103	91
Tetrachloroethene	0.7	0.05	ND	0.088	3	106	88
Chlorobenzene	100.0	0.05	ND	0.090	4	99	90
1,4-Dichlorobenzene	7.5	0.05	ND	0.092	6	97	92

SURROGATES	% Recovery
Dibromofluoromethane	97
Toluene-d8	97
4-Bromofluorobenzene	92

ND = Not Detected

METHODS: EPA SW 846-1311, 8260.

CHEMIST: RP

  
\_\_\_\_\_  
Director, Dr. Blair Leftwich  
Director, Dr. Bruce McDonell

Environmental Bureau  
Oil Conservation Division

RECEIVED  
APR 10 1997

4/15/97  
\_\_\_\_\_  
DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

January 15, 1997

Receiving Date: 01/02/97

Sample Type: Soil

Project No: NA

Project Location: Davis Tool Co.

ANALYTICAL RESULTS FOR

DAVIS TOOL COMPANY

Attention: Dan Williamson

Box 2037

Hobbs, NM 88240

Extraction Date: 01/02/97

Analysis Date: 01/08/97

Sampling Date: 12/30/96

Sample Condition: I & C

Sample Received by: ML

Project Name: Leach Field

TCLP Semi-Volatiles (mg/L)	EPA Limit	Reporting Limit*	T65249 N. of Office	QC	RPD	%EA	%IA
Pyridine	5.0	2.5	ND	72	34	12	90
1,4-Dichlorobenzene	7.5	2.5	ND	72	12	29	90
o-Cresol	200.0	2.5	ND	86	8	38	108
m,p-Cresol	200.0	2.5	ND	87	7	31	109
Total Cresol	200.0	2.5	ND	---	---	---	---
Hexachloroethane	3.0	2.5	ND	80	5	41	100
Nitrobenzene	2.0	0.5	ND	79	7	38	99
Hexachlorobutadiene	0.5	0.5	ND	75	8	34	94
2,4,6-Trichlorophenol	2.0	0.5	ND	77	11	40	96
2,4,5-Trichlorophenol	400.0	2.5	ND	78	7	44	98
2,4-Dinitrotoluene	0.13**	0.5	ND	74	5	65	93
2,4-D	10.0	2.5	ND	82	18	62	103
Hexachlorobenzene	0.13**	0.5	ND	78	18	82	98
2,4,5-TP	1.0**	1.5	ND	87	17	79	109
Pentachlorophenol	100.0	2.5	ND	80	12	66	100
Chlordane	0.03	0.002	ND	---	3	69	96
Toxaphene	0.5	0.1	ND	---	6	94	99
Lindane	0.4	0.002	ND	---	5	80	96
Heptachlor	0.008	0.002	ND	---	0	80	98
Heptachlor epoxide	0.008	0.002	ND	---	5	80	96
Total Heptachlor	0.008	0.002	ND	---	---	---	---
Endrin	0.02	0.002	ND	---	0	88	105
Methoxychlor	10.0	0.2	ND	---	9	84	92

Surrogates

% RECOVERY

2-Fluorophenol 82  
Phenol-d6 77  
Nitrobenzene-d5 84  
2-Fluorobiphenyl 89  
2,4,6-Tribromophenol 66  
Terphenyl-d14 109

\*NOTE: Elevated reporting limits due to sample matrix interference.

\*\*NOTE: Reporting Limit above EPA Limit.

Methods: EPA SW 846-1311, 8270, 8080.

CHEMIST: RD/CC/MB

ND - Not Detected

Director, Dr. Blair Leftwich

Director, Dr. Bruce McDonell

RECEIVED  
APR 10 1997  
Environmental Bureau  
Oil Conservation Division

1/15/97  
DATE

TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

# TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR  
DAVIS TOOL COMPANY  
Attention: Dan Williamson  
Box 2037  
Hobbs, NM 88240

January 15, 1997  
Receiving Date: 01/02/97  
Sample Type: Soil  
Project No: NA  
Project Location: Davis Tool Co.

Prep Date: 01/09/97  
Analysis Date: 01/09/97  
Sampling Date: 12/30/96  
Sample Condition: Intact & Cool  
Sample Received by: ML  
Project Name: Leach Field

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY ---	pH (s.u.)	IGNITABILITY
	EPA LIMIT =	---	500	250	---	<2 >12.5	
T65249	N. of Office	Non-reactive	<10	<2.5	Non-corrosive	7.5	Nonignitable
QC	Quality Control	---	---	---	---	7.0	---
RPD							
% Extraction Accuracy		0	0	0	0	0	0
% Instrument Accuracy		---	---	---	---	---	---

RECEIVED

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.  
CHEMIST: JT

Director, Dr. Blair Leftwich  
Director, Dr. Bruce McDonell

DATE

# TraceAnalysis, Inc.

6701 Aberdeen Avenue Lubbock, Texas 79424  
Tel (806) 794 1296 Fax (806) 794 1298  
1 (800) 378 1296

## CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:

Dan Williamson

Phone #: 505-346-9182 (505)

FAX #: 505-346-6887 (505)

397-2000 DAVIS TOOL CO.  
397-4944 ANALYSIS REQUEST

SPECIAL  
HANDLING

Company Name & Address:

Satty First

Project #:

Project Name:

Leach Field

Project Location:

DAVIS TOOL CO.

Sampler Signature:

*[Signature]*

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATIVE METHOD				SAMPLING		BTEX, MTBE	TPH	Total Metals Ag As Bb Ba Cd Cr Pb Hg Se	TCLP Metals Ag As Bb Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	8240 / 8280	8270		Turn around # of days	Fax ASAP	Hold	
				WATER	SOIL	AIR	SLUDGE	HCL	HNO3	ICE	NONE	DATE	TIME														
	X	1	PT	X						X																	
105249	N. OF OFFICE	✓	✓	✓						✓			12/30/96	1:30 PM			✓	✓	✓	✓							
RECEIVED																											
APR 10 1997																											
Environmental Bureau Oil Conservation Division																											
A 100																											

Relinquished by:

Date:

Time:

Received by:

Date:

Time:

Relinquished by:

Date:

Time:

Received by:

Date:

Time:

Relinquished by:

Date:

Time:

Received at Laboratory by:

Date:

Time:

REMARKS

TCLP Vol Semi Vol Metals RCI

SPLP 8240 8270 Metals

12-1-2-97 10:35

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 3:05 pm

Date 3-19-97

Originating Party

397-2000

Other Parties

Mr. Butch McCarty, Davis Tool

Pat Sanchez - OCD

(Returned my call from yesterday)

Subject

Davis Tool Co., GWR-245 Class V well investigation.

- Set-up a Meeting Date at the Facility for 8:00 AM on Thursday April 10, 1997.

Discussion

- (1) Let Mr. McCarty know that Dan Williamson called me yesterday, Mr. McCarty said he had not spoke to Dan yet.
- (2) Discussed the deficiency (from OCD's point of view) regarding the "class V" investigation. Went over various scenarios w/ Mr. McCarty regarding the potential for contamination. - Also, Made him aware of the apparently rising concentration of CI at the facility. (see E-Mail from Wayne Price dated March 14, 1997.)
- (3) Told him we would like to re-sample the water well for "General chemistry". He agreed.

Conclusions or Agreements

- (4) Mr. McCarty agreed with the meeting but requested that OCD be flexible that week in scheduling. I told Mr. McCarty okay - And that I would try to contact him on other days during the week of April 7, 1997. In the meantime will still try to schedule

Distribution File, Wayne Price.

Signed

*Patricia W. Sanchez*

→ for Thursday Morning April 10, 1997 at 8:00 AM.

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time (2:05 PM) Left  
in message  
to call me back.  
3:30 PM

Date (3/18/97)

3/18/97

Originating Party

Pat Sanchez - OGD

Other Parties

(Mr. Butch McLarty - Davis Tool)

Dan Williamson Returned the call  
for Butch McLarty.

Subject

DAVIS TOOL - GW-245

Class V well.

Discussion

Note: I first called Mr. McLarty, and Left a Message  
for him to call me back.

Dan Williamson called back for Mr. McLarty - I discussed  
with Dan that I wanted to meet with Mr. McLarty  
on 4/10/97 Thursday at 8:00 AM at his facility.

The meeting would be to discuss the Class V well  
and try to resolve the issue, Then follow-up with  
appropriate action - Note: This facility is currently  
in violation of GW-245, but it appears that  
they are confused with what is required.

Conclusions or Agreements

Mr. Williamson agreed to get w/ Mr. McLarty to discuss  
the meeting date of Thursday April 10, 1997 at 8:00 AM.  
I let Mr. Williamson know that OGD would be sending  
a follow-up letter.

Distribution File, Wayne Price.

Signed

(Dan Williamson - Telephone 392-7443)

**Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Friday, March 14, 1997 3:36 PM  
**To:** Pat Sanchez  
**Cc:** Jerry Sexton  
**Subject:** Davis Tool Co. GW-245 Class V well closure.  
**Importance:** High

Dear Pat,

Per your request please find my comments below:

In Nov. 94 I performed a water well study in the Hobbs Airport-Carlsbad Highway area. Davis tool was part of that study. At that time Davis Tool was notified by me that they need to contact your department concerning discharging their wash water into an existing septic and leech field (class V well).

The water sampled at that time revealed chlorides of 127 ppm and TDS of 750 umhos.(no QA/QC). The sample taken by NMOCD 9 months later revealed a chloride of 200 ppm and TDS of 860 with QA/QC.

Good Ogallala water is normally less than 120 ppm chlorides. So there is an indication that the water at Davis Tool has elevated levels of Chlorides and TDS.

Since Davis Tool contends that the on site water well is down gradient of the leech field and will act as a viable monitor well, it might be construed that the leech field has already begin to impact the ground water.

Therefore ,I recommend that Davis Tool perform routine sampling of the water well to demonstrate any further impact and for them to present a plan for the septic/ leech field closure.

The other option is for them to close the septic/leech field and demonstrate that they have not impacted the vadose zone and/or groundwater directly below the septic/leech field system and forego the water well testing.

What ever we do I recommend that we have a meeting with Davis Tool to let them know our concerns and explain why and how we normally proceed with these type of closures. It appears they are confused over RCRA and WQCC sampling and testing requirements. We could gain valuable mutual understanding between both parties in this meeting.



**Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Wednesday, January 15, 1997 3:03 PM  
**To:** Pat Sanchez  
**Cc:** Jerry Sexton  
**Subject:** Davis Tool GW-245 Septic & Leach field closure.  
**Importance:** High

Re: Memorandum of office Visit.

Dan Williams consultant for Davis inquired about how to conduct a Phase I Investigation.

Discussed the difference between TCLP testing of present waste and groundwater testing and soil testing below leachfield.

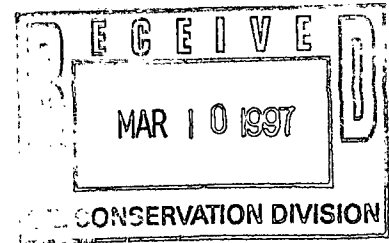
Discussed different methods of investigation, such as soil boring, surface samples, etc.

Mr. Williams will be submitting Phase I investigation plan to NMOCD Santa Fe for approval.

NMOCD offered to have public records available to assist him.

**DAVIS TOOL**  
*Fishing Tools -- Reverse Units*  
P. O. BOX 2037  
CARLSBAD HIGHWAY  
HOBBS, NEW MEXICO 88240

TELEPHONE  
(505)397-2000



March 6, 1997

Mr. Patricio W. Sanchez  
Petroleum Eng. Spec.  
NMOCD  
2040 South Pacheco Street  
Santa Fe, NM 87505

**RECEIVED**  
MAR 10 1997  
Environmental Bureau  
Oil Conservation Division

Re: Discharge Plan Review-GW-245 Response  
Davis Tool - Hobbs Facility  
Lea County, New Mexico

Dear Mr. Sanchez,

We have received your letter dated January 13, 1997 regarding the Phase-I Investigation Plan. As stated in our previous letter, undoubtedly there has been a misunderstanding. We felt we had satisfied the requirements for the Phase-I Investigation Plan. After further review, maybe we can clarify our response.

Our understanding was the Class V well located at our facility was to be closed unless it could be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. We felt this was proven by the testing of the water sample by the NMOCD. This sample was taken from the water well located adjacent to the abandoned Class V well. We also tested the liquid currently being used in the above ground tank located on the north end of the building. Once again this test was acceptable. After receiving your last letter, in an effort to actually determine a possible problem, we retrieved a sample of sludge from the Class V well. This sample was pulled from the center of the circular leach field. It was tested for Hazardous Constituents as defined in 40 CFR Part 261 and was determined to be within acceptable limits.

Based on all this testing which indicates no Hazardous Constituents, we feel that by monitoring the existing water well, we can be assured that no ground water contamination will occur in the foreseeable future.

However, a Phase-I Investigation Plan was requested.

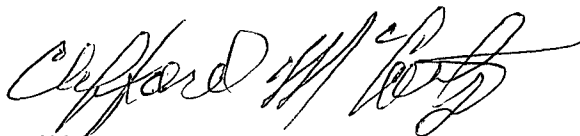
Davis Tool Discharge Plan GW-245 NOD2-Class V Investigation Plan

Phase I Investigation Plan addresses the following criteria:

1. Any wastewater that is contained within the septic tank will be tested for constituents as listed in WQCC 3103.
  - A. Response: It has been determined visually that the septic tank contains no wastewater. The leach field is no longer being used so it is anticipated that no water will accumulate to be tested. The water previously being injected into the leach field is now being stored and recycled above ground. This water was tested previously and found to be acceptable.
2. Any sludge that is on the bottom of the septic tank must be properly tested and characterized for Hazardous Constituents and Characteristics as defined in 40 CFR Part 261.
  - A. Response: A sludge sample was pulled from the center of this leach field. It has been properly tested for Hazardous Constituents and Characteristics as defined in 40 CFR Part 261.
3. The Plan must propose a method for delineation of the vertical and horizontal extent of the contamination associated with the septic tank and leach system (i.e. Class V well) based upon the sampling/testing discussed in 1 and 2 above.
  - A. Based on the testing of #1 and #2, and the determination that no contamination has occurred we feel it is not necessary to establish an extent of contamination. The sludge sample in #2 was taken from the center of the circular leach field. No contamination was found in this most likely spot, so reasonably no problems would be found at any distance away from the center.

Hopefully these responses are adequate. If there are any further questions or concerns, please don't hesitate to contact us.

Sincerely,



Clifford R. McCarty  
President/Davis Tool Company

.cc Wayne Price

RECEIVED

MAR 10 1997

Environmental Bureau  
Oil Conservation Division



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 13, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-736**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

**RE: Discharge Plan GW-245  
NOD2 - Class V Investigation  
Hobbs Facility  
Lea, New Mexico**

Dear Mr. McCarty:

The OCD has received the letter dated December 3, 1996 regarding the Class V well investigation for the Davis Tool Hobbs facility located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The facility was permitted by the OCD under discharge plan GW-245 on July 19, 1996 with conditions of approval which were accepted by Davis Tool on July 29, 1996. Discharge plan GW-245 permit condition number 9 stated:

- ***Class V Wells:** Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.*

***Davis Tool will submit a "Phase-I Investigation Plan" of the Class V well by September 25, 1996. The plan will be submitted in duplicate to the Santa Fe OCD office with a copy to the OCD Hobbs District office. The plan will include a sampling plan for the following constituents of concern:***

- A. WQCC 3103 A,B. and C., Constituents***
- B. Hazardous Constituents as defined in 40 CFR Part 261.***

*(Note: The above analysis will conform with EPA approved methods per SW-846.)*

Mr. Clifford R. McCarty  
Davis Tool, GW-245  
Class V, NOD2  
January 13, 1997  
Page 2

The OCD on November 22, 1996 sent Davis Tool a reminder letter regarding the "Phase I Investigation Plan" for the Class V well which was due for submittal to the OCD by September 25, 1996. Davis Tool sent a letter dated December 3, 1996 which attempted to address the OCD requirement for submittal of "Phase I Investigation Plan" as required by the letter dated November 22, 1996 from OCD to Davis Tool. However, Davis' letter did not contain the appropriate work elements. Based upon review of the letter from Davis Tool dated December 3, 1996, the OCD requires Davis Tool to submit a "Phase I Investigation Plan" that addresses the following criteria:

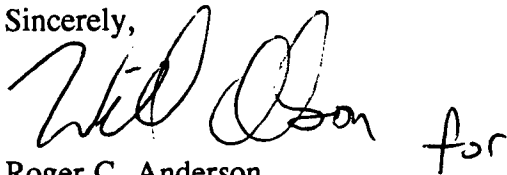
1. Any wastewater that is contained within the septic tank will be tested for constituents as listed in WQCC 3103.
2. Any sludge that is on the bottom of the septic tank must be properly tested and characterized for Hazardous Constituents and Characteristics as defined in 40 CFR Part 261.
3. The Plan must propose a method for delineation of the vertical and horizontal extent of contamination associated with the septic tank and leach system (i.e. Class V well) based upon the sampling/testing discussed in 1 and 2 above.

Note: All sampling will be in accordance with EPA methods such as those included in SW-846.

The "Phase I Investigation Plan" will be submitted to the OCD Santa Fe Division Office, with a copy to Mr. Wayne Price at the OCD Hobbs District Office by March 10, 1997 and will include all of the items listed in 1, 2, and 3.

If you have any questions, please feel free to give me a call at (505)-827-7152.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roger C. Anderson", followed by the word "for" in a cursive script.

Roger C. Anderson  
Bureau Chief  
Environmental Bureau - OCD

RCA/wo/pws

xc: Mr. Wayne Price, Environmental Engineer - OCD Hobbs District.

P 288 258 736

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>DAVIS TOOL - McIntyre</i>	
Street & Number <i>6W-245. CLASSV</i>	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Ristricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

**DAVIS TOOL**  
*Fishing Tools -- Reverse Units*  
P.O. BOX 2037  
Carlsbad Highway  
Hobbs, NM 88240

TELEPHONE  
(505) 397-2000

RECEIVED

JAN - 2 1997

Environmental Bureau  
Oil Conservation Division

Mr. Patricio W. Sanchez  
Petroleum Eng. Spec.  
NMOCD  
2040 South Pacheco Street  
Santa Fe, NM 87505

Re: Discharge Plan GW-245  
NOD - Class V Investigation  
Hobbs Facility  
Lea, New Mexico

Dear Mr. Sanchez:

The discharge plan GW-245 for the Davis Tool Hobbs facility located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico as approved on July 19, 1996 contained the enclosed attachment as described in your letter dated November 22, 1996. Upon receipt of the final approval letter dated July 19, 1996, we contacted the Hobbs office and talked with Wayne Price as you suggested concerning condition number 9, page 4.

After discussions with Wayne we conducted the fluid testing of the above ground holding tank located at the north end of the facility. This was reported on 7/25/96 and copied to Wayne Price at the Hobbs, OCD office. This analytical summary did not indicate any problems nor did the water sampling conducted by the NMOCD at the initial facility inspection.

Based on these finding, we concluded that Davis Tool had satisfied the requirements of the item 9, page 4, "Phase-I Investigation Plan".

Additionally, based on the remote possibility of groundwater contamination, Davis Tool has reconfigured the Below Grade Sump system to utilize recycling of the water supply. This further indicates Davis Tool's willingness to do everything possible to provide a safe and sound environment.

RECEIVED

JAN - 2 1997

Environmental Bureau  
Oil Conservation Division

Mr. Patricio W. Sanchez  
Petroleum Eng. Spec.  
NMOCD  
2040 South Pacheco Street  
Santa Fe, NM 87505

Perhaps we have had a misunderstanding but our attempt was to comply with the sampling plan of the constituents of concern. The testing was conducted conforming to the EPA approved methods per SW-846.

Please contact us again if this fails to explain or suffice for the "Phase -I Investigation Plan".

Sincerely:



Clifford R. McCarty  
Davis Tool Co.



MEMORANDUM OF MEETING OR CONVERSATION



Telephone



Personal

Time 6:05 AM

Date 12-3-96

Originating Party

Other Parties

Pat Sanchez - OCD, Returned

Dan Williamson - Consultant

\*Call from yesterday (Voice Mail)

for Davis Tool (392-7443)

Subject

Davis Tool GW-245 (Nov. 22, 1996 - NVD letter from OCD.)

Discussion

① Mr. Williamson had some questions regarding the class V well - He said that Davis had abandoned the well and thought that was good enough. I explained to Mr. Williamson that permit condition No. 9 had (regarding the class V well) not been received by the OCD (Sept. 25, 1996 Due date.) and that they needed to submit a plan to that meets condition No. 9 for OCD approval and then investigate the class V well. ② Mr. Williamson said he had already sent a letter \* (yesterday - Dec. 2, 1996) to explain Conclusions or Agreements why they had not yet submitted the requirement for No. 9.

① Mr. Williamson will follow-up with Davis Tool.

Distribution File, Wayne Price.

Signed

*Dan Williamson*



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

November 22, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-702**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

**RE: Discharge Plan GW-245**  
**NOD - Class V Investigation**  
**Hobbs Facility**  
**Lea, New Mexico**

Dear Mr. McCarty:

The discharge plan GW-245 for the Davis Tool Hobbs facility located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, was approved on July 19, 1996 under the conditions contained in the enclosed attachment. The OCD has yet to receive the work plan as described in condition number 9, page 4 of the approval letter dated July 19, 1996. Please submit a work plan by January 10, 1997 to the OCD Santa Fe Division Office in duplicate, with a copy to the attention of Mr. Wayne Price at the OCD Hobbs District Office.

The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan did not relieve Davis Tool of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Sincerely,

Patricio W. Sanchez  
Petroleum Engineering Specialist  
Environmental Bureau - OCD  
(505)-827-7156

**Attachment** - Permit Conditions dated July 19, 1996.  
**xc:** Mr. Wayne Price - OCD Hobbs District I

P 288 258 702

US Postal Service  
Receipt for Certified Mail  
No Insurance Coverage Provided. =  
Do not use for International Mail (See reverse)

Sent to Davis Tool - McCauley	
Street & Number NOD - Class V Invest.	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Mr. Clifford McCarty  
GW-245 Approval  
Davis Tool  
July 19, 1996  
Page 3

**RECEIVED**

AUG 05 1996

Environmental Bureau  
Oil Conservation Division

**ATTACHMENT TO DISCHARGE PLAN GW-245**  
**Davis Tool - Hobbs Facility**  
**DISCHARGE PLAN REQUIREMENTS**  
(July 19, 1996)

1. **Davis Tool Commitments:** Davis Tool will abide the following commitments and requirements made in the following: The discharge plan application from Davis Tool dated April 19, 1996, the "Discharge Plan Review" letter from OCD dated May 20, 1996, and the "Discharge Plan Review-Response" from Davis Tool dated June 24, 1996, and this approval letter with conditions of approval from OCD dated July 19, 1996.

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

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

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

4. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.

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

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

Mr. Clifford McCarty  
GW-245 Approval  
Davis Tool  
July 19, 1996  
Page 4

RECEIVED

AUG 05 1996

Environmental Bureau  
Oil Conservation Division

7. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

8. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing so that an OCD representative may witness the testing.

9. **Class V Wells:** Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protect able groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

Davis Tool will submit a "Phase-I Investigation Plan" of the Class V well by September 25, 1996. The plan will be submitted in duplicate to the Santa Fe OCD office with a copy to the OCD Hobbs District office. The plan will include a sampling plan for the following constituents of concern:

- A. WQCC 3103 A.,B. and C., Constituents
- B. Hazardous Constituents as defined in 40 CFR Part 261.

(Note: The above analysis will conform with EPA approved methods per SW-846.)

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

Any solid wastes that are collected at the facility will be tested for hazardous constituents and characteristics, and after receiving OCD approval, will be disposed of at an OCD approved site.

RECEIVED

Mr. Clifford McCarty  
GW-245 Approval  
Davis Tool  
July 19, 1996  
Page 5

AUG 05 1996

Environmental Bureau  
Oil Conservation Division

Any waste that is Hazardous by Characteristics, Constituents, or Listing will have to be reported to the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau, telephone at (505)-827-1558, for proper disposal/treatment guidance for Hazardous Waste.

Any soils that are bioremediated onsite will utilize a method that has been proposed in writing to the Santa Fe OCD office, and approved of by the OCD Santa Fe office.

11. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Hobbs OCD District Office at (505)-393-6161.

12. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

13. **New Mexico Oil Conservation Division Inspections:** Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.

14. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. **Conditions accepted by:**

Clifford McCarty  
Company Representative

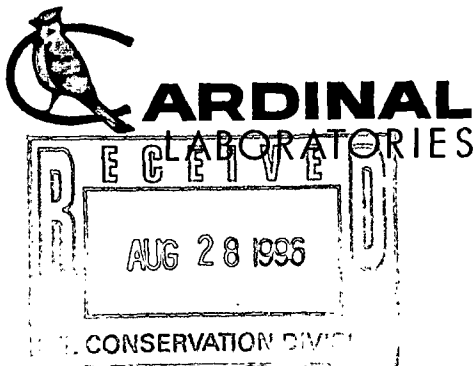
7/29/96  
Date

Seibert  
Title

RECEIVED

AUG 05 1996

Environmental Bureau  
Oil Conservation Division



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR  
DAVIS TOOL CO.  
ATTN: DAN WILLIAMSON  
CARLSBAD HWY  
HOBBS, NM  
FAX TO:

Receiving Date: 07/19/96  
Reporting Date: 07/25/96  
Project Number: NOT GIVEN  
Project Name: CONTAINMENT VESSEL  
Project Location: DAVIS TOOL YD.  
Lab Number: H2583-1  
Sample ID: TOOL CO YARD

Analysis Date: 07/22/96  
Sampling Date: 07/19/96  
Sample Type: LIQUID  
Sample Condition: INTACT  
Sample Received By: GP  
Analyzed By: AK

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H2583-1	Method Blank	QC	%IA	True Value QC
Vinyl Chloride	0.20	<0.1	<0.1	NR		NA
1,1-Dichloroethylene	0.7	<0.05	<0.05	0.103	103	0.100
Methyl Ethyl Ketone	200	<0.50	<0.50	NR		NA
Chloroform	6.0	<0.05	<0.05	0.088	88	0.100
1,2-Dichloroethane	0.5	<0.05	<0.05	NR		NA
Benzene	0.5	<0.05	<0.05	0.102	102	0.100
Carbon Tetrachloride	0.5	<0.05	<0.05	NR		NA
Trichloroethylene	0.5	<0.05	<0.05	0.087	87	0.100
Tetrachloroethylene	0.7	<0.05	<0.05	0.092	92	0.100
Chlorobenzene	100	<0.05	<0.05	0.094	94	0.100
1,4-Dichlorobenzene	7.5	<0.05	<0.05	NR		NA

% RECOVERY

1,2-Dichloroethane-d4	103
Toluene-d8	101
Bromofluorobenzene	103

METHODS: EPA SW 846-8260

RECEIVED

AUG 28 1996

Burgess J. A. Cooke, Ph. D.

7/25/96  
Date

Environmental Bureau  
Oil Conservation Division



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR  
DAVIS TOOL CO.  
ATTN: DAN WILLIAMSON  
CARLSBAD HWY  
HOBBS, NM  
FAX TO:

RECEIVED

AUG 13 1996

Environmental Bureau  
Oil Conservation Division

Receiving Date: 07/19/96  
Reporting Date: 07/25/96  
Project Number: NOT GIVEN  
Project Name: CONTAINMENT VESSEL  
Project Location: DAVIS TOOL YD.  
Lab Number: H2583-1  
Sample ID: TOOL CO YARD


Analysis Date: 07/22/96  
Sampling Date: 07/19/96  
Sample Type: SLUDGE  
Sample Condition: COOL & INTACT  
Sample Received By: SR  
Analyzed By: AK


TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H2583-1	Method Blank	QC	% True Value Recovery	QC
Pyridine	5.00	<0.05	<0.05	0.067	67	0.100
1,4-Dichlorobenzene	7.50	<0.05	<0.05	NR		NA
o-Cresol	200	<0.05	<0.05	0.100	100	0.100
m, p-Cresol	200	<0.10	<0.10	0.190	95	0.200
Hexachloroethane	3.00	<0.05	<0.05	0.101	101	0.100
Nitrobenzene	2.00	<0.05	<0.05	0.111	111	0.100
Hexachloro-1,3-butadiene	0.500	<0.05	<0.05	0.100	100	0.100
2,4,6-Trichlorophenol	2.00	<0.50	<0.50	0.097	97	0.100
2,4,5-Trichlorophenol	400	<0.50	<0.50	0.069	69	0.100
2,4-Dinitrotoluene	0.130	<0.05	<0.05	0.092	92	0.100
Hexachlorobenzene	0.130	<0.05	<0.05	0.108	108	0.100
Pentachlorophenol	100	<0.50	<0.50	NR		NA

% RECOVERY

Fluorophenol	34
Phenol-d5	29
Nitrobenzene-d5	62
2-Fluorobiphenyl	56
2,4,6-Tribromophenol	108
Terphenyl-d14	62

METHODS: EPA SW 846-8270

  
Burgess J. A. Cooke, Ph. D.

  
Date





PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR  
DAVIS TOOL CO.  
ATTN: DAN WILLIAMSON  
CARLSBAD HWY  
HOBBS, NM  
FAX TO:

Receiving Date: 07/19/96  
Reporting Date: 07/26/96  
Project Number: NOT GIVEN  
Project Name: CONTAINMENT VESSEL  
Project Location: DAVIS TOOL YD.

Sampling Date: 07/19/96  
Sample Type: LIQUID  
Sample Condition: INTACT  
Sample Received By: GP  
Analyzed By: WL

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
------------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------

ANALYSIS DATE:	7/25/96	7/22/96	7/26/96	7/23/96	7/26/96	7/23/96	7/24/96	7/24/96
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H2583-1 TOOL CO. YARD	<0.01	<0.1	<5	<0.5	<1	<1	<0.025	<0.025
Quality Control	46.4	0.53	9.12	1.06	2.63	2.08	26.1	46.1
True Value QC	50.0	0.50	10.00	1.00	2.50	2.00	25.0	50.0
% Accuracy	92.8	106	91.2	106	105.2	104	104.4	92.1
Relative Percent Difference	10.7	0	4.4	5.2	0	3.4	0	6

METHODS: EPA 1311, 600/4-91/	200.7	200.7	200.7	200.7	200.7	200.7	245.1	200.7
------------------------------	-------	-------	-------	-------	-------	-------	-------	-------

Wei Li  
Wei Li, Chemist

7-27-96  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

MEMORANDUM OF MEETING OR CONVERSATION

Certified Mail No. P-594-835-289

☒ Telephone ☐ Personal

Time  
1:40 PM

Date 8/5/96

Originating Party

Pat Sanchez - NMOC

Other Parties

Mr. McCarty - Davis Tool

Subject

Discharge Plan GW-245 permit approval.

Discussion

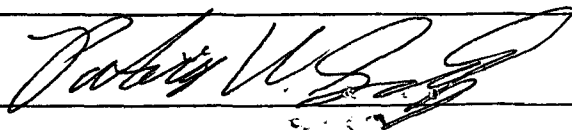
OCD will re-mail permit to Mr. McCarty. Davis should of kept entire original and sent a copy of signed permit conditions to OCD.

Conclusions or Agreements

OCD will re-mail to Davis Tool - discharge Plan approval letter. OCD did keep signed original permit conditions.

Distribution File, Mr. McCarty

Signed



P 594 835 289

US Postal Service  
Receipt for Certified Mail  
No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to DAVIS Tool - Mr. McCarthy.	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

30 1996

July 19, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-594-835-283**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88241

**RE: Discharge Plan Approval GW-245  
Hobbs Facility  
Lea, New Mexico**

**RECEIVED**

AUG 05 1996

Environmental Bureau  
Oil Conservation Division

Returned to  
Mr. Clifford McCarty  
on August 5, 1996  
by *[Signature]*

Dear Mr. Davis:

The discharge plan GW-245 for the Davis Tool Hobbs facility located in NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application from Davis Tool dated April 19, 1996, the "Discharge Plan Review" letter from OCD dated May 20, 1996, and the "Discharge Plan Review-Response" from Davis Tool dated June 24, 1996, and this approval letter with conditions of approval from OCD dated July 19, 1996. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within five working days of receipt of this letter.

The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve Davis Tool of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

**Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Friday, July 26, 1996 7:26 AM  
**To:** Pat Sanchez  
**Subject:** FW: Davis Tool  
**Importance:** High

corrected SDW to SWD:  
-----

**From:** Wayne Price  
**To:** Pat Sanchez  
**Cc:** Jerry Sexton  
**Subject:** Davis Tool  
**Date:** Thursday, July 25, 1996 4:30PM  
**Priority:** High

Dear Pat,

Per your request I recently met with Dan Williamson in our NMOCD office. I explained to Dan how NMOCD handles non-exempt Service Co. waste and the C-138 process used and required of the NMOCD permitted disposal facilities. I gave Dan the RCRA hazardous waste characteristics list of chemicals that will be required to be sampled for the waste accumulated in the waste tank at Davis tool. The sampling should be conducted per EPA protocols per SW-846 procedures.

I also notified him that non-exempt service co. waste cannot be disposed of in a Class II SWD.

Dan indicated to me that he was not sure of how the past disposal practices were handled at Davis Tool but will notify his client of the new procedures.

cc: Dan Williamson

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time 1:30 PM

Date 7-18-96

Originating Party

Other Parties

Mr. Cliff McCarty - Davis Tool

Pat Sanchez - CCD

GW-245

Subject

Approval of GW-245 - permit conditions.

Service company wastes are NON-Exempt.

Discussion

(1) Wash Tank water needs to be tested for Hazardous constituents/ characteristics - Non-exempt - cannot go down class II. (Look at pg. 11 under NON-Exempt waste of EPA530-K-95-003, May 1995.)

(2) Will put a deadline on assessing the Class II well on Discharge Plan requirements

(3) Work w/ Wayne at the District on Sampling - I told Mr. ~~Cliff~~ McCarty that the Analysis could cost between \$500 to \$1,000.

Conclusions or Agreements

Mr. Davis will Notify his consultant - Dan Williamson and Wayne Price. I will call Wayne Price.

Distribution File Wayne price

Signed

*John V. [Signature]*

**DAVIS TOOL**  
*Fishing Tools -- Reverse Units*  
P. O. BOX 2037  
CARLSBAD HIGHWAY  
HOBBS, NEW MEXICO 88240

TELEPHONE  
(505)397-2000

RECEIVED

JUN 26 1996

June 24, 1996

Mr. Patricio W. Sanchez  
Petroleum Eng. Spec.  
NMOCD  
2040 South Pacheco Street  
Santa Fe, NM 87505

RECEIVED

JUN 27 1996

Environmental Bureau  
Oil Conservation Division

Re: Discharge Plan Review-GW-245 Response  
Davis Tool - Hobbs Facility  
Lea County, New Mexico

Dear Mr. Sanchez,

We here at Davis Tool Company appreciate your timely response to our Discharge Plan application. Our initial attempt to furnish all the information required in a plan seems to have fallen short but we hope to continue our efforts to provide additional data.

We would like to address each item described in your letter dated May 20, 1996 as follows: (also reference initial inspection letter dated September 19, 1995.)

- Item #1: Mr. Williamson has been designated Safety and Environmental Coordinator for Davis Tool Company but is essentially working as a consultant. In the future, all correspondence will come from me, Clifford R. McCarty.
- Item # 2: No contaminated soil sites have been disturbed as of this time. If acceptable, we would like to bioremediate these areas on site. We would seek advisement from Wayne Price and disc the locations as standard to field locations.  
Note: See timeframe attachment
- Item # 3: The sump fluid generated at Davis results from the washing of oilfield rental equipment such as reverse units, air units, blowout preventer, etc. Zep Sodium Carbonate soap and fresh water are used to steam the units. The fluid, after entering the sump is pumped to a surface holding tank. The fluid is removed as necessary from this surface holding tank by Steve Carter, Inc. They haul

this fluid to the Loco Hills Disposal. We are assuming this fluid to be exempt based on our understanding of "knowledge of process". To our knowledge no hazardous, non exempt waste is introduced into our system, but this fluid has not been tested. Although difficult to interpret, we are basing this on our understanding of the EPA guidebook (EPA530-K-95-003) Crude Oil and Natural Gas Exploration and Production Wastes: Exemption from RCRA Subtitle C Regulation. As per our conversation, the statement that the sump was still being installed was a misunderstanding. It was meant that this same "style" of sump was still being installed.

Item # 4: The leach field has been out of use since 1994. At that time there was no formal closure or site assessment.

Note: It is anticipated that no wastes will be shipped off-site from Davis Tool Co. with the exception of sump fluids as noted above. All other contaminants will be maintained or remediated on-site.

Item # 5: Any used oil on-site will be placed in drums with proper storage until picked up by EE Enterprises of Brownfield.

Hopefully these responses are adequate. If there are any further questions or concerns, please don't hesitate to contact us.

Sincerely:

A handwritten signature in black ink, appearing to read "Clifford R. McCarty", written in a cursive style.

Clifford R. McCarty

Attachment: Timeframe



June 24, 1996

DISCHARGE PLAN GENERAL REQUIREMENTS APPROXIMATE TIMEFRAME

Item	Approx. Compliance Date	Comments
1. Drum Storage:	August 1, 1996	Should be in total compliance
2. Process Areas:	In compliance	
3. Above Ground Tanks:	January 1, 1997	Will install berm
4. Above Ground Saddle Tanks:	August 1, 1996	We need to move one tank
5. Tank Labeling:	August 1, 1996	
6. Below Grade Tanks/Sumps:	January 1, 1997	Sump to be integrity tested by cleaning and visually inspected.
7. Underground Process/Wastewater Lines:	All lines are above ground or can be visually inspected.	
8. Class V Wells:	Needs further discussion. The fresh water well located at Davis is in close proximity to the Class V well. Testing of this fresh water well by the NMOCD shows no contamination from the Class V well. Based on these results, and since the operation of the Class V well has been discontinued since 1994, we feel the Class V well is not a hazard.	
9. Housekeeping:	January 1, 1997	Contaminated soils to be bioremediated on-site
10. Spill Reporting:	This will be done pursuant to OCD Rule 116 and WQCC 1203.	
11. Transfer of Discharge Plan:	This is not anticipated at this time.	
12. Closure:	This is not anticipated at this time.	

## **Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Thursday, June 13, 1996 11:59 AM  
**To:** Pat Sanchez  
**Subject:** Davis Tool  
**Importance:** High

RE: Office visit by Dan Williamson

Dear Pat,

Dan Williamson requested information concerning letter dated May 20, 1996 from Pat Sanchez to Mr. McCarty.

Q. Page 2 item 3 under C. -

Ans. I pointed out to Dan that item C is in guidelines.

Q. Page 1 #2. What will be considered sufficient clean-up on contaminated soils and how should they go about doing it.

Ans. I recommended to Dan to give you a call since you are the permit writer.

Q. page 2 item 4. - Does NMOCD want us to investigate.

Ans. I recommend to Dan to research Davis records and submit what they have. If the leech field has not been closed then state so. Also provide any information they have on previous disposal.. He indicated they have no records. I ask him if they any knowledge of who disposed of waste and where it went. He said yes it was Steve Carter & Sons trucking and it went to Loco Hills.

DATE: 6/4/96

To PAT SANCHEZ  
NMOC

From

WAYNE PRICE - ENVIRONMENTAL ENGR. - NMOC DISTRICT I

Energy &amp; Minerals Department

Telephone Number 505-393-6161 Fax # 505-393-0720

- |   |   |
|---|---|
| <input type="checkbox"/> For Your Files                 | <input type="checkbox"/> Prepare a Reply for My Signature |
| <input type="checkbox"/> For Your Review and Return     | <input checked="" type="checkbox"/> For Your Information  |
| <input type="checkbox"/> For Your Handling              | <input type="checkbox"/> For Your Approval                |
| <input checked="" type="checkbox"/> As Per Your Request | <input type="checkbox"/> For Your Signature               |
| <input type="checkbox"/> Please Advise                  | <input type="checkbox"/> For Your Attention               |
- \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

POST OFFICE BOX 1880  
HOBBS, NEW MEXICO 88241-1880  
(505) 383-8181

Original: ☒Copy: ☐

New Mexico Oil Conservation Division (NMOCD)

ACKNOWLEDGEMENT OF RECEIPT OF ENCLOSED DOCUMENTS.

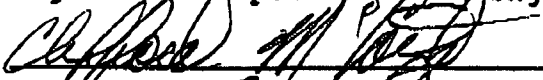
Re: Certified Mail Return Receipt No. Z-765-963-150; Dated May 20, 1996:

Due to problems in mailing and/or faxing;

The above referenced document it is being hand delivered to:

Davis Tool  
4710 W. Carlsbad hwy  
Hobbs, NM

Signature of person receiving documents:



Date: 6/11/96

Witness: 

Date: 6/11/96

**OIL CONSERVATION DIVISION-ENVIRONMENTAL BUREAU**

**TO:** Mr. McCarty

**FROM:** PATRICIO W. SANCHEZ , PETROLEUM ENGINEER 505-827-7156

**NUMBER OF PAGES INCLUDING THIS ONE:** 5

**MESSAGE:**

Mr. McCarty, Here is the letter I  
mailed you on the 20<sup>th</sup> of May, 1996  
that was refused. I will Hard copy  
another one in the mail to you.

**IF YOU HAVE ANY TROUBLE RECEIVING THIS FAX PLEASE CALL  
(505)-827-7133.**

**OCD FAX NUMBER: (505)-827-8177**

Note: On 6-10-96 I called Mr.  
McCarty regarding the returned letter-  
- He indicated that we had used the  
correct Address, So I remailed and  
attempted to Fax. No luck Fax'ing-  
- Had Wayne price on 6-11-96 Had  
deliver the Inspection report to  
Mr. McCarty. PWG 6-13-96



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

May 20, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-963-150**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88241

**RE: Discharge Plan Review-GW-245  
Davis Tool - Hobbs Facility  
Lea County, New Mexico**

Dear Mr. McCarty:

The New Mexico Oil Conservation Division on April 22, 1996 received the Discharge Plan application dated April 19, 1996 as signed by Mr. Dan G. Williamson, Safety and Environmental Coordinator for Davis Tool. The application as submitted can not be approved by the OCD until the following request for additional information and commitments from Davis Tool are received by the OCD Santa Fe Division office. **Davis Tool shall submit the additional information and commitments within 30 days of receipt of this letter.**

1. On the application page. Is Mr. Williamson an actual employee of designated responsibility for environmental affairs for Davis Tool, or is he acting in the capacity as a consultant? If he is acting as a consultant then Mr. Clifford R. McCarty needs to sign and submit the application.
2. Under part V. "Facility Description." Has Davis Tool cleaned up the contaminated soil sites on the surface of the facility that were outlined in the September 19, 1995" Discharge Plan Requirement Inspection" sent to Davis Tool from the OCD? If the soil(s) have not been cleaned up then Davis Tool shall submit a time frame in which these soils will be cleaned up. The OCD spill and leak Guidelines and may be used to address BTEX and TPH clean up levels, with WQCC Section 3103 considered so that percolation from possible contaminants will not exceed WQCC levels in groundwater.

Mr. Clifford R. McCarty  
Davis Tool GW-245  
May 20, 1996  
Page 2

3. Under "C. Existing Effluent and Solids Disposal 1. a. (1)" Please provide the OCD with the basis for identifying the fluid received by the sump as exempt? Further, for what regulatory Act is the fluid exempt from? Has this sump fluid and any sludge that is associated with it ever been tested for Hazardous Characteristics per 40 CFR Part 261? Has the effluent from this site ever been disposed of offsite? If so how often, where, and the last time removed from the site? Also, please provide the name and location of the facility that accepted the effluent. It is also stated that the sump " is still being approved and installed" - Who is approving of this installation? Note: the OCD has specific requirements for the installation of sumps. Any new sump must be installed with secondary containment and leak detection with approval from the Santa Fe OCD Division office.
4. Under "C. Existing Effluent and Solids Disposal 1.a.(2)" The OCD understands that the leach field has been out of use since 1994, Please provide the OCD with the investigation results from the site assessment of the Class V well along with the closure plan for the abandonment and who approved of the closure.

**Note: Any sludge, contaminated soils, or waste effluents that are to be disposed of offsite must be characterized for Hazardous Characteristics and approved by the OCD. Please provide a commitment to due as such.**

5. Under "C. Existing Effluent and Solids Disposal 1.a.(b.)" How does Davis Tool plan to handle the used oil at the site?

**Note: Wastes that are not Exempt from RCRA Subtitle C cannot be disposed of in Class II saltwater disposal wells.**

6. Listed below are the general discharge plan conditions of approval that will be part of the approval letter to Davis Tool from Director LeMay, once Davis Toll has addressed the issues outlined in this review letter. Make certain that the Davis Tool facility will comply with all of these general requirements. If Davis Tool is currently not in compliance with these general requirements submit a time frame in which all the requirements can be complied with.

#### **DISCHARGE PLAN GENERAL REQUIREMENTS**

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

Mr. Clifford R. McCarty  
Davis Tool GW-245  
May 20, 1996  
Page 3

2. **Process Areas**: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
3. **Above Ground Tanks**: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
4. **Above Ground Saddle Tanks**: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
5. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
6. **Below Grade Tanks/Sumps**: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.
7. **Underground Process/Wastewater Lines**: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD.
8. **Class V Wells**: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
9. **Housekeeping**: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.  
  
Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.
10. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office.



Mr. Clifford R. McCarty  
Davis Tool GW-245  
May 20, 1996  
Page 4

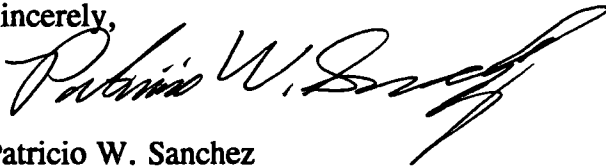
11. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

12. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

Davis Tool will respond in writing to the OCD Santa Fe Division Office within 30 days of receipt of this letter with a copy sent to the Hobbs OCD District office so that the approval process of the Discharge Plan GW-245 for Davis Tool can move forward.

If Davis Tool has any questions regarding this matter please feel free to call me at (505)-827-7156.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricio W. Sanchez", with a stylized flourish at the end.

Patricio W. Sanchez  
Petroleum Eng. Spec.

xc: Mr. Wayne Price.

State of New Mexico

ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

2040 South Pacheco

P.O. Box 6429

Santa Fe, New Mexico 87505-5472

Name

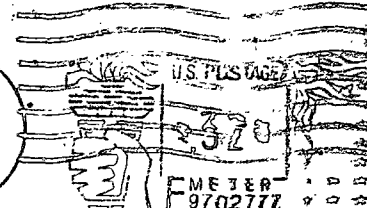
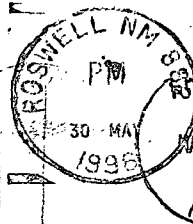
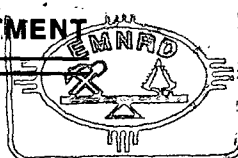
First Notice

Second Notice

Return

*return to sender 6-20*  
*Refused*  
*and OOD*

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88241



POSTAGE DUE 2.20

NAME  
JUN 22 1998  
1st Notice  
2nd Notice  
Return  
SERVICES DIVISION

Fold at line over top of envelope to the right of the return address

CERTIFIED

Z 765 963 150

MAIL

ADDRESS CHECKED  
TO  
WRITER  
No such street address  
No such office in state  
Do not include in this entry

RETURNED TO WRITER  
ADDRESS CHECKED  
No such street address  
No such office in state  
Do not include in this entry



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

May 20, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-963-150**

8 DWB  
6-10-96

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88241

**RE: Discharge Plan Review-GW-245  
Davis Tool - Hobbs Facility  
Lea County, New Mexico**

Dear Mr. McCarty:

The New Mexico Oil Conservation Division on April 22, 1996 received the Discharge Plan application dated April 19, 1996 as signed by Mr. Dan G. Williamson, Safety and Environmental Coordinator for Davis Tool. The application as submitted can not be approved by the OCD until the following request for additional information and commitments from Davis Tool are received by the OCD Santa Fe Division office. **Davis Tool shall submit the additional information and commitments within 30 days of receipt of this letter.**

1. On the application page. Is Mr. Williamson an actual employee of designated responsibility for environmental affairs for Davis Tool, or is he acting in the capacity as a consultant? If he is acting as a consultant then Mr. Clifford R. McCarty needs to sign and submit the application.
2. Under part V. "Facility Description." Has Davis Tool cleaned up the contaminated soil sites on the surface of the facility that were outlined in the September 19, 1995 "Discharge Plan Requirement Inspection" sent to Davis Tool from the OCD? If the soil(s) have not been cleaned up then Davis Tool shall submit a time frame in which these soils will be cleaned up. The OCD spill and leak Guidelines and may be used to address BTEX and TPH clean up levels, with WQCC Section 3103 considered so that percolation from possible contaminants will not exceed WQCC levels in groundwater.

Z 765 963 150



**Receipt for  
Certified Mail**

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

Sent to <i>2nd. Mailing</i>	
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

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 4/19/96

or cash received on \_\_\_\_\_ in the amount of \$ 1430.00

from Davis Tool

for Hobbs Sew Facility GW-245  
(Facility Name) (DP No.)

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Submitted to ASD by: R. C. Challen Date: 5/9/96

Received in ASD by: M. McGill Date: 5-20-96

Filing Fee ☒ New Facility ☒ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_  
(Specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment \_\_\_\_\_

DAVIS TOOL  
CARLSBAD HIGHWAY  
P. O. BOX 2037 397-2000  
HOBBS, NM 88240

4-19 19 96

95-183/1122  
5

PAY  
TO THE  
ORDER OF ENERGY, MINERALS & NATURAL RESOURCES DEPT.

\$ 1,430.00\*\*\*\*\*

REGISTERED GI 430000  
8U55618

DOLLARS



Lea County State Bank

P.O. Box 400 • Hobbs, New Mexico 88241

DAVIS TOOL

FOR Filing Fee 50.00/Discharge Fee 1380.00



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

May 20, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-963-150**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88241

**RE: Discharge Plan Review-GW-245**  
**Davis Tool - Hobbs Facility**  
**Lea County, New Mexico**

Dear Mr. McCarty:

The New Mexico Oil Conservation Division on April 22, 1996 received the Discharge Plan application dated April 19, 1996 as signed by Mr. Dan G. Williamson, Safety and Environmental Coordinator for Davis Tool. The application as submitted can not be approved by the OCD until the following request for additional information and commitments from Davis Tool are received by the OCD Santa Fe Division office. **Davis Tool shall submit the additional information and commitments within 30 days of receipt of this letter.**

1. On the application page. Is Mr. Williamson an actual employee of designated responsibility for environmental affairs for Davis Tool, or is he acting in the capacity as a consultant? If he is acting as a consultant then Mr. Clifford R. McCarty needs to sign and submit the application.
2. Under part V. "Facility Description." Has Davis Tool cleaned up the contaminated soil sites on the surface of the facility that were outlined in the September 19, 1995 "Discharge Plan Requirement Inspection" sent to Davis Tool from the OCD? If the soil(s) have not been cleaned up then Davis Tool shall submit a time frame in which these soils will be cleaned up. The OCD spill and leak Guidelines and may be used to address BTEX and TPH clean up levels, with WQCC Section 3103 considered so that percolation from possible contaminants will not exceed WQCC levels in groundwater.

Mr. Clifford R. McCarty  
Davis Tool GW-245  
May 20, 1996  
Page 2

3. Under "C. Existing Effluent and Solids Disposal 1. a. (1)" Please provide the OCD with the basis for identifying the fluid received by the sump as exempt? Further, for what regulatory Act is the fluid exempt from? Has this sump fluid and any sludge that is associated with it ever been tested for Hazardous Characteristics per 40 CFR Part 261? Has the effluent from this site ever been disposed of offsite? If so how often, where, and the last time removed from the site? Also, please provide the name and location of the facility that accepted the effluent. It is also stated that the sump " is still being approved and installed" - Who is approving of this installation? Note: the OCD has specific requirements for the installation of sumps. Any new sump must be installed with secondary containment and leak detection with approval from the Santa Fe OCD Division office.
4. Under "C. Existing Effluent and Solids Disposal 1.a.(2)" The OCD understands that the leach field has been out of use since 1994, Please provide the OCD with the investigation results from the site assessment of the Class V well along with the closure plan for the abandonment and who approved of the closure.

**Note: Any sludge, contaminated soils, or waste effluents that are to be disposed of offsite must be characterized for Hazardous Characteristics and approved by the OCD. Please provide a commitment to due as such.**

5. Under "C. Existing Effluent and Solids Disposal 1.a.(b.)" How does Davis Tool plan to handle the used oil at the site?

**Note: Wastes that are not Exempt from RCRA Subtitle C cannot be disposed of in Class II saltwater disposal wells.**

6. Listed below are the general discharge plan conditions of approval that will be part of the approval letter to Davis Tool from Director LeMay, once Davis Tool has addressed the issues outlined in this review letter. Make certain that the Davis Tool facility will comply with all of these general requirements. If Davis Tool is currently not in compliance with these general requirements submit a time frame in which all the requirements can be complied with.

#### **DISCHARGE PLAN GENERAL REQUIREMENTS**

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

Mr. Clifford R. McCarty  
Davis Tool GW-245  
May 20, 1996  
Page 3

2. **Process Areas**: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
3. **Above Ground Tanks**: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
4. **Above Ground Saddle Tanks**: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
5. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
6. **Below Grade Tanks/Sumps**: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.
7. **Underground Process/Wastewater Lines**: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD.
8. **Class V Wells**: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
9. **Housekeeping**: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.  
  
Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.
10. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office.

Mr. Clifford R. McCarty  
Davis Tool GW-245  
May 20, 1996  
Page 4

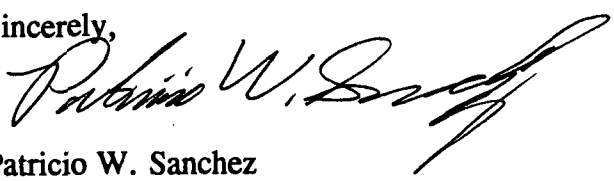
11. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

12. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

Davis Tool will respond in writing to the OCD Santa Fe Division Office within 30 days of receipt of this letter with a copy sent to the Hobbs OCD District office so that the approval process of the Discharge Plan GW-245 for Davis Tool can move forward.


If Davis Tool has any questions regarding this matter please feel free to call me at (505)-827-7156.

Sincerely,

  
Patricio W. Sanchez  
Petroleum Eng. Spec.

xc: Mr. Wayne Price.

Z 765 963 150

  
UNITED STATES  
POSTAL SERVICE

Receipt for  
Certified Mail  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse) *GW-245*

Sent to <i>DAVIS TOOL - Mr. McCarty</i>	
Street and No. <i>P.O. Box 2037</i>	
P.O., State and ZIP Code <i>Hobbs, NM 88241</i>	
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



# Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. 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

Notice Of Publication

and numbered

was published in a regular and

entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week for

one (1) day

beginning with the issue of

May 1, 19 96

and ending with the issue of

May 1, 19 96

And that the cost of publishing said notice is the sum of \$ 40.80

which sum has been (Paid) as Court Costs

Subscribed and sworn to before me this 8th day of May, 19 96

Notary Public, Lea County, New Mexico  
My Commission Expires Sept. 28, 19 98

## 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 the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico 87505, Telephone (505)827-7131:

(GW-245) - DAVIS TOOL, Mr. Clifford McCarty, (505)-397-2000, 4710 Carlsbad Highway, Hobbs, NM, 88240, has submitted a Discharge Plan Application for the Hobbs Davis Tool Facility located in the NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 860 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 applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru 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 a public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

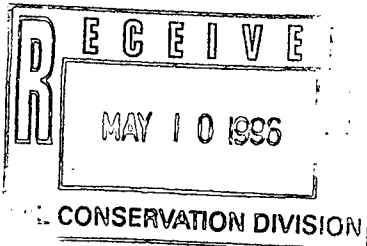
Given under the Seal of the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico on this 23rd day of April, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

William J. LeMay, Director

SEAL

Published in the Lovington Daily Leader May 1, 1996.



RECEIVED

APR 29 1996

4321  
USFWS - NMESCO**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 has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-245) - DAVIS TOOL, Mr. Clifford McCarty, (505)-397-2000, 4710 Carlsbad Highway, Hobbs, NM, 88240, has submitted a Discharge Plan Application for the Hobbs Davis Tool Facility located in the NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 860 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 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 based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of April, 1996.

**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**  
WILLIAM J. LEMAY, Director

WIL/pws

**NO EFFECT FINDING**

SEAL  
The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date May 2, 1996Consultation # GW960CD-1Approved by R. Mark Wilson (Acting Supervisor)**U.S. FISH and WILDLIFE SERVICE  
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE  
ALBUQUERQUE, NEW MEXICO**

'96 17A

## The Santa Fe New Mexican

Since 1849. We Read You.

NEW MEXICO CONSERVATION  
ATTN: SALLY MARTINEZ  
2040 S. PACHECO  
SANTA FE, NM 87505

AD NUMBER: 495594

ACCOUNT: 56689

LEGAL NO: 59552

P.O. #: 96199002997

RECEIVED

MAY 6 1996

165 LINES once at \$ 66.00

Affidavits: 5.25

Tax: 4.45

Total: \$ 75.70

NOTICE OF PUBLICATION 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 thru 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 the discharge plan application to him 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.

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

Notice is hereby given that the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of the discharge plan application to him 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.

(GW-245) - DAVIS TOOL, Mr. Clifford McCarty, (505)-397-2000, 4710 Carlsbad Highway, Hobbs, NM 88240, has submitted a Discharge Plan for the Hobbs Davis Tool Facility located in the NE 1/4 SE 1/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 860 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 State of New Mexico Oil Conservation Division, WILLIAM J. LEMAY, Director, Legal #59552, Pub. April 30, 1996.

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

## AFFIDAVIT OF PUBLICATION

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper 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 # 59552 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 30th day of APRIL 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
30th day of APRIL A.D., 1996



OFFICIAL SEAL

Candace C. Ruiz

NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 7/29/99

5-6-96  
okay to  
Pay  
pub

**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 has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(GW-245) - DAVIS TOOL, Mr. Clifford McCarty, (505)-397-2000, 4710 Carlsbad Highway, Hobbs, NM, 88240, has submitted a Discharge Plan Application for the Hobbs Davis Tool Facility located in the NE/4 SE/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 860 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 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 based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of April, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director

WJL/pws

S E A L

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

Director: William J. LeMay

Oil Conservation Division

2040 S. Pacheco

Santa Fe, NM 87505

OIL CONSERVATION DIVISION  
RECEIVED  
APR 22 1996 8 52

Enclosure: Filing Fee- \$50.00  
Discharge Fee- \$1380.00  
Total- \$1430.00

Davis Tool Co.

GW-245

RECEIVED

APR 22 1996

Environmental Bureau  
Oil Conservation Division

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
Director: William J. LeMay  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

OIL CONSERVATION DIVISION  
RECEIVED  
APR 22 1996 8 52

Enclosure: Filing Fee- \$50.00  
Discharge Fee- \$1380.00  
Total- \$1430.00

Davis Tool Co.  
GW-245

**RECEIVED**

APR 22 1996

Environmental Bureau  
Oil Conservation Division


GW-245

**DAVIS TOOL**  
CARLSBAD HIGHWAY  
P. O. BOX 2037 397-2000  
HOBBS, NM 88240

4-19 19 96 95-183/1122 5

PAY TO THE ORDER OF ENERGY, MINERALS & NATURAL RESOURCES DEPT. \$ 1,430.00\*\*\*\*\*

REGISTERED 8U55618 **430000** DOLLARS

 **Lea County State Bank**  
P.O. Box 400 • Hobbs, New Mexico 88241

DAVIS TOOL

FOR Filing Fee 50.00/Discharge Fee 1380.00

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

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

Revised 12/1/95  
Submit Original  
Plus 1 Copies  
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: Oil and Gas Service Company

2. Operator: Davis Tool Company

Address: 4710 Carlsbad Highway, Hobbs, NM 88240

Contact Person: Clifford McCarty Phone: (505) 397-2000


3. Location: NE/4 SE/4 Section: 36 Township: 18 Range: 37

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 indication 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: Dan G. Williamson Title: Safety and Environmental Coordinator  
Signature:  Date: 4/19/96

## DAVIS TOOL COMPANY DISCHARGE PLAN

### I. Type of Operation

Indicate the major purpose(s) of the facility.

**Response: Oilfield Rental Equipment and Servicing**

### II. Name of Operator or Legally Responsible Party and Local Representative

Include address and telephone number.

**Response: Davis Tool Co.**

**4710 Carlsbad Hwy**

**Hobbs, NM 88240**

**(505) 397-2000**

### III. Location of Discharge

Give a legal description of the location (i.e. 1/4, 1/4, Section, Township, Range) and county. Use state coordinates or latitude/longitude on unsurveyed land. Submit a large scale topographic map facility site plan, or detailed aerial photograph for use in conjunction with the written material. If within an incorporated city, town or village provide a street location and map.

**Response: NE/4, SE/4, Sec. 36, T-18-S, R-37-E**

**4710 Carlsbad Highway**

**Hobbs, NM**

### IV. Landowners

Attach the name and address of the landowner(s) of record of the facility site.

**Response: Davis Tool Co.**

**4710 Carlsbad Hwy**

**Hobbs, NM 88240**

**(505) 397-2000**

### V. Facility Description

Attach description of the facility with a diagram indication location of fences, pits, berms, and tanks on the facility. The diagrams of the facility should depict the locations of discharges, storage facilities, disposal facilities, processing facilities and other relevant areas including drum storage. Show the facility/property boundaries on the diagram.

**Response: See Attachment**

### VI. Materials Stored or Used at the Facility

For each category of material listed below provide information on the general composition of the material or specific information (including brand names if requested), whether a solid or liquid, type of container (tank, drum, etc.), estimated volume stored, and location (yard, ship, drum storage, etc.). The Part VI form attached to these guidelines may be used to provide this information. Its use is optional, but the information requested must be provided. **MSD sheets need only be provided as requested; sheets for all chemicals should be maintained at the facility.**

**Response: See Part VI form Attachment**



VII. Sources and Quantities of Effluent and Waste Solids Generated at the Facility

For each source include types of major effluent (e.g. salt water, spent completion fluids, hydrocarbons, sewage, etc.) estimated quantities in barrels or gallons per month, and types and volumes of major additives (e.g. acids, biocides, detergents from steam cleaner, degreasers, etc.) The part VII form attached to these guidelines may be used to provide this information. Its use is optional, but the information requested must be provided.

**Response: See Part VII form Attachment**

VII. Description of Current Liquid and Solid Waste Collection/Storage/Disposal Procedures

A. Summary Information.

For each source listed in Part VII, provide summary information about onsite collection, storage and disposal systems. Indicate whether collection/storage/disposal location is tank or drums, floor drain or sump, lined or unlined pit, onsite injection well, leach field, or offsite disposal. Use of the attached Part VIII form is encouraged but optional. However, the requested information must be provided.

**Response: See Part VIII form Attachment**

B. Collection and Storage Systems.

1. For collection and storage systems named in Part A, provide sufficient information to determine what water contaminants may be discharged to the surface and subsurface within the facility. Water and wastewater flow schematics may be used provided they have sufficient detail to show individual treatment units. Information desired includes whether tanks, piping, and pipelines are pressurized, above ground or buried. If fluids are drained to surface impoundment's, oil skimmer pits, emergency pits, shop floor drains, sumps, etc. for further transfer and processing, provide size and indicate if these collection units are lined or unlined. If lined describe lining material (e.g. concrete, steel tank, synthetic liner, etc.).

**Response: See Part VIII form Attachment**

2. Tankage and Chemical Storage Areas- Storage tanks for fluids other than fresh water must be bermed to contain a volume one-third more than the largest tank. If tanks are interconnected, the berm must be designed to contain a volume one-third more than the total volume of the interconnected tanks. Chemical and drum storage areas must be paved, curbed and drained such that spills or leaks from drums are contained on the pads or in lined sumps.

**Response:** The sump is piped to a surface containment vessel which currently consists of a steel reverse pit tank. This tank is not bermed but it has been placed on a concrete pad. It is proposed to eliminate this tank and replace it with a 250 bbl. storage tank. This tank will be bermed and comply with all rules and regulations.

3. Facilities over 25 years of age must demonstrate the integrity of buried piping. If the facility contains underground process or wastewater pipelines (i.e. produced water pipelines), the age and specifications (i.e., wall thickness, fabrication material, etc.) of said pipelines should be submitted. Upon evaluation of such information, mechanical integrity testing of said pipelines may be necessary as a condition for discharge plan approval. If such testing (e.g. hydrostatic tests) has already been conducted, details of the program should be submitted.

**Response:** The integrity of the sump system was tested by establishing a liquid level and monitoring for a minimum 4 hr. period. No discernible decrease in the level was noted.

#### C. Existing Effluent and Solids Disposal.

##### 1. On-Site Facilities

- a. Describe existing on-site facilities used for effluent or solids disposal of water, sludge's, waste oils, solvents, etc., including surface impoundment's, disposal pits, leach fields, floor drains, injection wells, etc. (If effluents and solids are shipped off-site for recycling or disposal, see C.2. below.) Locate the various disposal areas on the facility site plan or topographic map. Provide technical data on the design elements of each disposal method:

- (1) Surface impoundment's - date built, use, type and volume of effluent stored, area, volume, depth, slope of pond sides, sub-grade description, liner type and thickness, compatibility of liner and effluent, installation methods, leak detection methods and frequency checked, freeboard, runoff/run-on protection.

**Response:** A sump is located as noted on the facility plan attachment. It was installed when the building was built in approx. 1979. It is a conventional concrete 2 compartment sump that is still being approved and installed. The approx. size is 6' wide x 8' long x 4 deep. Only exempt effluents are introduced into this system which is used to wash tools with ZEP biodegradable soap and fresh water.

- (2) Leach fields - Type and volume of effluent, leach field are and design layout. If non-sewage or mixed flow from any process units or internal drains is, or has been, sent to the leach fields, include dates of use and disposition of septic tank sludge's.

**Response:** The leach field has been abandoned. It was used for sump disposal prior to 1994.

- (3) Injection wells - Describe effluent injected, volume, depth, formation, OCD order number and approval date. The effluent must not be classified as a hazardous waste at the time of injection. (Note - Any sump, floor drain or hole deeper than wide used for subsurface emplacement of fluids may be considered an injection well unless its integrity to contain fluids can be demonstrated). Class II injection wells are required to have an OCD permit and can only inject produced water or other waste fluids brought to the surface from an oil or gas well. Part 5 WQCC discharge plan approval will be required if the injection well is used to dispose of industrial effluent from service companies, and it can not be classified as a hazardous waste.

**Response:** Based on the integrity testing conducted annually on the sump, this would not be considered an injection well.

- (4) Drying beds or other pits - Types and volumes of waste, area, capacity, liner, clean-out interval and method, and ultimate disposal location.

**Response:** None

- (5) Solids disposal - Describe types volumes frequency and location of on-site solids dried disposal. Types solids include sands, sludge's, filters, containers, cans and drums.

**Response:**

**Drums: Returned to vendor or Hobbs Iron and Metal**

**Filters: Dried and picked up by EE Enterprises**

**Paint Cans: Dried and picked up by Waste Management of SE NM**

**Containers: Waste Management of SE NM**

**Sand/Sludge's: Steve Carter and Sons, Loco Hills Disposal**

- b. For leach fields, pits, and surface impoundment's having single liners of any composition, clay liners or that are unlined and not proposed to be modified or closed as part of this discharge plan:

- (1) Describe the existing and proposed measures to prevent or retard seepage such that ground water at any place of present or future use will meet the WQCC Standards of Section 3--103, and not contain any toxic pollutant as defined in Section 1-101,ZZ.

**Response: Annual Integrity testing has been initiated. Documentation of this testing will be on site.**

**Note: Also see SPCC plan**

- (2) Provide the location and design of site(s) and method(s) to be available for effluent sampling. and for measurement or calculation of flow rates.

**Response: Sump and above ground containment vessel sampling along with integrity testing of both.**

- (3) Describe the monitoring system existing or proposed in the plan to detect leakage or failure of the discharge system. If ground water monitoring exists or is proposed, provide information on the number, location, design, and installation of monitoring wells.

**Response: See SPCC plan**

- (4) If operations at the facility are expected to be discontinued during the period that this discharge plan is in effect, describe the measures proposed to prevent ground water contamination after the cessation of operation, including possible post-operational monitoring.

**Response: The operations at the facility do not plan to be discontinued.**

2. Off-Site Disposal.

If wastewater's, sludge's, solids etc. are pumped or shipped off-site, indicate general composition (e.g. waste oils), method of shipment (e.g. pipeline, trucked), and final disposition (e.g. recycling plant, OCD permitted Class II disposal well, or domestic landfill). Include name, address, and location of receiving facility. If receiving facility is a sanitary or modified landfill show operator approval for disposal of the shipped wastes.

**Response: The wastewater, sludge's and solids generally consist of some waste oils washed from tools, some sands and mud, ZEP biodegradable soap and fresh water. These items are trucked by Steve Carter and Sons to the Loco Hills Disposal System located in Loco Hills NM.**

IX. Proposed Modifications

- A. If collection and storage systems do not meet the criteria of Section VIII B. above, or if protection of ground water cannot be demonstrated pursuant to Section BIII C.1.b.(1) above, describe what modification of that particular method (including closure), or what new facility, is proposed to meet the requirements of the Regulations. Describe in detail the proposed changes. Provide the information requested in VIII B, and C.1.a and b. above for the proposed facility modifications and proposed time schedule of construction and completion. (Note: OCD has developed specific guidelines for lined surface impoundment's that are available on request.)

**Response: No proposed modifications are anticipated at this time however if necessary our full cooperation can be assured.**

- B. For ponds, pits, leach fields, etc. where protection of ground water cannot be demonstrated, describe the proposed closure of such units so that existing fluids are removed, and emplacement of additional fluids and runoff/run-on of precipitation are prevented. Provide a proposed time schedule for closure.

**Response: No proposed modifications are anticipated at this time however if necessary our full cooperation can be assured.**

X. Inspection, Maintenance and Reporting

- A. Describe proposed routine inspection procedures for surface impoundment's and other disposal units having leak detection systems. Include frequency of inspection, how records are to be maintained and OCD notification in the event of leak detection.

**Response:** Daily inspection of the facility activities are to be performed. Annual integrity testing of surface impoundment's will be performed. Records of the annual inspections will be documented and remain on site. Immediate reporting to the NMOCD will be in compliance within the 24 hr. mandate.

**Note:** See also SPCC plan.

- B. If ground water monitoring is used to detect leakage on failure of the surface impoundment's, leach fields, or other approved disposal systems provide:

**Response:** None detected at this time.

- C. Discuss general procedures for containment of precipitation and runoff such that water in contact with process areas does not leave the facility, or is released only after testing for hazardous constituents. Include information on curbing, drainage, disposition, notification, etc.

**Response:** Generally, all chemical and process items are to be stored inside buildings and will not come in contact with runoff. Drums stored outside are to be placed in impermeable containment vessels with curbing.

XI. Spill/Leak Prevention and Reporting Procedures (Contingency Plans).

It is necessary to include in the discharge plan submittal a contingency plan that anticipates where any leaks or spills might occur. It must describe how the discharger proposes to guard against such accidents and detect them when they have occurred. The contingency plan also must describe the steps proposed to contain and remove the spilled substance or mitigate the damage caused by the discharge such that ground water is protected, or movement into surface waters is prevented. The discharger will be required to notify the OCD Director of significant leaks and spills, and this commitment and proposed notification threshold levels must be included in the contingency plan.

NOTE: USE NMOCD RULE 116 AND WQCC section 1-203 for spill reporting.

- A. Describe proposed procedures addressing containment, cleanup and reporting in case of major and minor spills at the facility. Include information as to whether areas are curbed, paved and drained to sumps; final disposition of spill material; proposed schedule for OCD notification of spills; etc.

**Response:** See SPCC plan

- B. Describe methods used to detect leaks and ensure integrity of above and below round tanks, and piping. Discuss frequency of inspection and procedures to be undertaken if significant leaks are detected.

**Response:** See SPCC plan

- C. If an injection well is used for on-site effluent disposal, describe the procedures to be followed to prevent unauthorized discharges to the surface or subsurface in the event the disposal well or disposal line is shut-in for workover or repairs (e.g. extra storage tanks, emergency pond, shipment offsite, etc.). Address actions to be taken in the event of disposal pipeline failure, extended disposal well downtime, etc.

**Response: No on-site injection well**

## **XII. Site Characteristics**

- A. The following hydrologic/geologic information is required to be submitted with all discharge plan applications. Some information already may be on file with OCD and can be provided to the applicant on request.
1. Provide the name, description, and location of any bodies of water, streams (indicate perennial or intermittent), or other watercourses (arroyos, canals, drains, etc.); and ground water discharge sites (seeps, springs, marshes, swamps) within one mile of the outside perimeter of the facility. For water wells, locate wells within one-quarter mile and specify use of water (e.g. public supply, domestic, stock, etc.).  
**Response: None as per Johnny Hernandez/State Eng. Roswell**
  2. Provide the depth to and total dissolved solids (TDS) concentration (in mg/l) of the ground water most likely to be affected by and discharge (planned or unplanned). Include the source of the information and how it was determined. Provide a recent water quality analysis of the ground water, if available, including name of analyzing laboratory and sample date.  
**Response: 55' as per Johnny Hernandez/State Eng. Roswell**
  3. Provide the following information and attach or reference source information as available (e.g. driller's logs):
    - a. Soil type(s) (sand, clay, loam, caliche);  
**Response: Caliche**
    - b. Name of aquifer(s);  
**Response: Ogallala**
    - c. Composition of aquifer material (e.g. alluvium, sandstone, basalt, etc.); and  
**Response: Watersands**
    - d. Depth to rock at base of alluvium (if available)  
**Response: NA**

4. Provide information on:

- a. The flooding potential at the discharge site with respect to major precipitation and/or run-off events; and

**Response: Facility not located in flood plain. Past history has not indicated any flood potential.**

- b. Flood protection measures (berms, channels, etc.), if applicable.

**Response: None**

B. Additional Information

Provide any additional information necessary to demonstrate that approval of the discharge plan will not result in concentrations in excess of the standards of WQCC Section 3-103 or the presence of any toxic pollutant (Section 1-101.ZZ.) at any place of withdrawal of water for present or reasonably foreseeable future use. Depending on the method and location of discharge, detailed technical information on site hydrologic and geologic conditions may be required to be submitted for discharge plan evaluation. This material is most likely to be required for unlined surface impoundment's and pits, and leach fields. Check with OCD before providing this information. However, if required it could include but not be limited to:

1. Stratigraphic information including formation and member names, thickness, lithologies, lateral extent, etc.

**Response:**

2. Generalized maps and cross-sections;

**Response:**

3. Potentiometric maps for aquifers potentially affected;

**Response:**

4. Porosity, hydraulic conductivity, storativity and other hydrologic parameters of the aquifer;

**Response:**

5. Specific information on the water quality of the receiving aquifer; and

**Response:**

6. Information on expected alteration of contaminants due to sorption, precipitation or chemical reaction in the unsaturated zone, and expected reactions and/or dilution in the aquifer.

**Response:**

XIII. Other Compliance Information

Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. Examples include previous Division orders or letters authorizing operation of the facility or any surface impoundment's at the location. Also include NMOCD Rule 116 and WQCC Section 1-203 spill reporting.

**Response: Note: See SPCC Plan**



## DISCHARGE PLAN APPLICATION

### Oilfield Service Facilities

#### Part VI. Form (Optional)

Materials Stored or Used at the Facility-For each category of material listed below provide information on the general composition of the material or specific information (including brand names if requested), whether a solid or liquid, type of container, estimated volume stored and location. Submit MSD information for chemicals as requested. Use of this form is optional, but the information requested must be provided.

Name	General Makeup or Specific Brand Name (if requested)	Solids(S) or Liquids(L)?	Type of Container (tank Drum, etc.)	Estimated Volume Stored	Location (yard, shop, drum storage, etc.)
1. Drilling Fluids (include general makeup & types special additives [e.g. oil, chrome, etc.] )	None				
2. Brines-(KCL,NaCL,etc.)	None				
3. Acids/Caustics (Provide names & MSD sheets)	ZEP Sodium Hydroxide	Liquid	Vat	128 cu/ft	Shop
4. Detergents/Soaps	ZEP Sodium Carbonate	Powder	Cardboard drum	40 gal	Shop
5. Solvents & Degreasers (Provide names & MSD sheets)	None				
6. Paraffin Treatment/ Emulsion Breakers (Provide names & MSD sheets)	None				
7. Biocides (Provide names & MSD sheets)	None				
8. Others-Include other liquids & solids, e.g. cement etc.	Antifreeze Motor Oil Hydraulic Fluid	Liquid Liquid Liquid	5 gal buckets 55 gal drum 5 gal bucket	Consumer Quantity 55 gal 5 gal- 10 gal	Shop Shop Shop

## DISCHARGE PLAN APPLICATION

### Oilfield Service Facilities

#### Part VII. Form (Optional)

Sources and Quantities of Effluent and Waste Solids Generated at the Facility - For each source include types of effluents (e.g. salt water, hydrocarbons, sewage, etc.), estimated quantities in barrels or gallons per month, and types and volumes of major additives (e.g. acids, biocides, detergents, degreasers, etc.). Use of this form is optional, but the information requested must be provided.

Waste Type	General Composition and Source (solvents from small parts cleaning, oil filters from truck, etc.	Volume Per Month (bbl or gal)	Major Additives (e.g. degreaser fluids from truck washing, soap in steam cleaners)
1. Truck Wastes (Describe types of original contents trucked [e.g. brine, produced water, drilling fluids, oil wastes, etc] )	None		
2. Truck, Tank & Drum Washing	None		
3. Steam Cleaning of Parts, Equipment, Tanks	ZEP biodegradable soap and fresh water	420 bbls./mo.	Soap
4. Solvent/Degreaser Use	None		
5. Spent Acids, Caustics, or Completion Fluids (Describe)	ZEP Sodium Hydroxide	trace	water dilution

Waste Type	General Composition and Source (solvents from small parts cleaning, oil filters from truck, etc.	Volume Per Month (bbl or gal)	Major Additives (e.g. degreaser fluids from truck washing, soap in steam cleaners)
6. Waste Slop Oil	None		
7. Waste Lubrication and Motor Oils	lube oil and filters	1 drum lube oil	lube oil
8. Oil Filters	Vehicles	8-10 filters	
9. Solids and Sludges From Tanks (Describe types of materials [e.g. crude oil tank bottoms, sand, etc.] )	Disposed of in field		
10. Painting Wastes	Water base cans. Dried and sent to landfill.	20 gals	Water base
11. Sewage (Indicate if other wastes mixed with sewage; if no commingling, domestic sewage under jurisdiction of the NMED)	Domestic Sewage		
12. Other Waste Liquids (Describe in detail)	None		
13. Other Waste Solids (Cement, construction materials, used drums			
Trash	General	4 bins	paper, wood

## DISCHARGE PLAN APPLICATION

### Oilfield Service Facilities

#### Part VIII. Form (Optional)

Summary Description of Existing Liquid and Solids Waste Collection and Disposal- For each waste type listed in Part VII, provide summary information about onsite collection and disposal systems. Information on basic construction features, specific descriptions, and wastewater schematics should be provide as required in the Guidelines. The use of this form is optional, but the summary information requested must be provided.

Waste Type	Tank(T)/ Drum(S)S	Floor Drain/(F) Sump(S)	Pits- Lined(L) or Unlined(U)	Onsite Injection Well	Leach Field	Offsite Disposal
1. Truck Wastes	None					
2. Truck, Tank and Drum Washing	None					
3. Steam Cleaning of Parts, Equipment, Tanks		S				Loco Hills Disposal
4. Solvent/Degreaser Use	None					
5. Spent Acids, Caustics, or Completion Fluids		S-trace				Loco Hills Disposal
6. Waste Slop Oil	None					

Waste Type	Tank(T)/ Drum(S)	Floor Drain/(F) Sump(S)	Pits- Lined(L) or Unlined(U)	Onsite Injection Well	Leach Field	Offsite Disposal
7. Waste Lubrication and Motor Oils	Drum					EE Ent.
8. Oil Filters						EE Ent.
9. Solids and Sludge's From Tanks	None					
10. Painting Wastes	1-5 gal cans					Waste Mg. of NM
11. Sewage	Domestic					
12. Other Waste Liquids	None					
13. Other Waste Solids Trash						Waste Mg. of NM



# MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

12/05/95  
PAGE 1 OF 3

ZEP MANUFACTURING COMPANY  
PRODUCT IN MAINTENANCE PRODUCTS

ISSUE DATE: 06/15/88 R-10881  
SUPERSEDES: 11/14/86 PRODUCT NUMBER: 5491

## SECTION I - EMERGENCY CONTACTS

ZEP MANUFACTURING COMPANY TELEPHONE: (404) 352-1680 BETWEEN 8:00 AM-5:00 PM (EST)  
P.O. BOX 2015 NON-OFFICE HOURS, WEEKENDS, AND HOLIDAYS: AREA CODE 404  
ATLANTA, GEORGIA 30301 435-2973, 392-1480, 455-8160, 552-8836, 432-2873, 424-4789  
LOCAL POISON CONTROL CENTER .....  
TRANSPORTATION EMERGENCY: CHEMTREC: TOLL FREE 1-800-424-9300 ALL CALLS RECORDED  
404) 922-0923 or DISTRICT OF COLUMBIA (202) 483-7616 ALL CALLS RECORDED

## SECTION II - HAZARDOUS INGREDIENTS

DESIGNATIONS	TLV (PPM)	EFFECTS (SEE REVERSE)	% IN PROD.
** SODIUM CARBONATE ** soda ash; carbonic acid, di- sodium salt; CAS# 497-19-8; RTECS# VZ4050000; OSHA/ ACGIH DUST LIMIT= 15mg/m3	N/D	IRR	20-30
** SODIUM METASILICATE ** silicic acid (H2-Si-O3) di- sodium salt; water glass; CAS# 6834-92-0; RTECS# VV9275000; OSHA Dust Limit-2mg/m3 (for powders only).	N/D	COR	< 5
** NONYLPHENOXYPOLY(ETHYLENEOXY)ETHANOL ** npe; poly(oxy-1,2-ethanediyl), alpha-(nonylphenyl)-omega- hydroxy; CAS# 9016-45-9; RTECS# MD905000; OSHA PEL- N/D	N/D	EIR	< 5
** SODIUM DODECYLBENZENE SULFONATE ** linear alkyl aryl sodium sulfonate; CAS# 25155-30-0; RTECS# DB6825000; OSHA PEL N/D	N/D	IRR	< 5

## SECTION III - HEALTH HAZARD DATA

SPECIAL NOTE: MSDS data pertains to the product as dispensed from the container.  
Adverse health effects would not be expected under recommended conditions  
of use (diluted) so long as prescribed safety precautions are practiced.

### ACUTE EFFECTS OF OVEREXPOSURE:

THIS PRODUCT CAN BE AN EYE IRRITANT. INFLAMMATION OF EYE TISSUE IS CHARACTERIZED  
BY REDNESS, WATERING, AND/OR ITCHING.



# MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

PAGE 2 OF 3

ZEP MANUFACTURING COMPANY  
FLOOR TIE IN MAINTENANCE PRODUCTS

ISSUE DATE: 06/15/88 R-10881  
SUPERSEDES: 11/14/86 PRODUCT NUMBER: 5491

## SECTION III - HEALTH HAZARD DATA (CONTINUED)

### CHRONIC EFFECTS OF OVEREXPOSURE:

THERE ARE NO KNOWN EFFECTS FROM CHRONIC EXPOSURE TO THIS PRODUCT.  
NONE OF THE INGREDIENTS ARE LISTED AS CARCINOGENS BY IARC, NTP, OR OSHA.

EST'D PEL/TLV: NOT ESTABLISHED PRIMARY ROUTES OF ENTRY: N/A

HMIS CODES: HEALTH 1;FLAM. 0;REACT. 0;PERS. PROTECT. A ;CHRONIC HAZ. NO

### FIRST AID PROCEDURES:

SKIN : FLUSH CONTAMINATED SKIN WITH PLENTY OF WATER. CONSULT A PHYSICIAN  
IF IRRITATION DEVELOPS.  
EYES : IMMEDIATELY FLUSH EYES WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES, OC-  
CASIONALLY LIFTING UPPER AND LOWER LIDS. GET MEDICAL ATTENTION AT ONCE.  
INHALE: MOVE EXPOSED PERSON TO FRESH AIR. IF IRRITATION PERSISTS,  
GET MEDICAL ATTENTION PROMPTLY.  
INGEST: IF THIS PRODUCT IS SWALLOWED, DO NOT INDUCE VOMITING. IF VICTIM IS  
CONSCIOUS GIVE PLENTY OF WATER TO DRINK. GET MEDICAL ATTENTION AT ONCE.

## SECTION IV - SPECIAL PROTECTION INFORMATION

PROTECTIVE CLOTHING : THE USE OF NEOPRENE, NITRILE OR NATURAL RUBBER GLOVES IS  
STRONGLY RECOMMENDED, ESPECIALLY FOR PROLONGED CONTACT.  
EYE PROTECTION : Use of tight-fitting safety glasses or goggles is stron-  
gly recommended, especially when wearing contact lenses.  
RESPIRATORY PROTECTION: NO SPECIAL MEASURES ARE REQUIRED.  
VENTILATION : NO SPECIAL MEASURES ARE REQUIRED.

## SECTION V - PHYSICAL DATA

BOILING POINT (F)	: N/A	SPECIFIC GRAVITY	: N/A
VAPOR PRESSURE(MMHG):	N/A	PERCENT VOLATILE BY VOLUME (%)	: N/A
VAPOR DENSITY(AIR=1):	N/A	EVAPORATION RATE(	=1): N/A
SOLUBILITY IN WATER :	MAX.12 G/100ML	PH(CONCENTRATE)	: N/A
		PH(USE DILUTION OF 0.25	): 10.1-10.4

APPEARANCE AND ODOR :A DAMP PINK, FREE-FLOWING POWDER WITH A PLEASANT FRAGRANCE.

## SECTION VI - FIRE AND EXPLOSION DATA

FLASH POINT(F) (METHOD USED): None ( )  
FLAMMABLE LIMITS LEL N/A UEL N/A  
EXTINGUISHING MEDIA : NON-COMBUSTIBLE.  
SPECIAL FIRE FIGHTING: NONE  
UNUSUAL FIRE HAZARDS : NONE



# MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

PAGE 3 OF 3

ZEP MANUFACTURING COMPANY  
PRODUCT IN MAINTENANCE PRODUCTS

ISSUE DATE: 06/15/88 R-10881  
SUPERSEDES: 11/14/86 PRODUCT NUMBER: 5491

## SECTION VII - REACTIVITY DATA

STABILITY : STABLE  
INCOMPATIBILITY(AVOID) : None  
POLYMERIZATION : WILL NOT OCCUR.  
HAZARDOUS DECOMPOSITION: NONE

## SECTION VIII - SPILL AND DISPOSAL PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:  
OBSERVE SAFETY PRECAUTIONS IN SECTIONS 4 & 9 DURING CLEAN-UP. PICK UP SPILLED MATERIAL AND PLACE IN A SUITABLE WASTE CONTAINER. WASH AREA THOROUGHLY WITH A DETERGENT SOLUTION AND RINSE AREA WELL WITH WATER.

### WASTE DISPOSAL METHOD:

PRODUCT IS NOT CONSIDERED A HAZARDOUS WASTE UNDER RCRA. UNUSABLE MATERIAL SHOULD BE DRUMMED AND TAKEN TO A CHEMICAL OR INDUSTRIAL LANDFILL, OR IF PERMITTED PUT INTO SOLUTION WITH WATER AND FLUSHED INTO A SANITARY SEWER. NEUTRALIZATION OF PH MAY BE A PREREQUISITE FOR SEWER DISPOSAL. CONSULT LOCAL, STATE, AND FEDERAL AGENCIES FOR PROPER METHOD OF DISPOSAL IN YOUR AREA.

RCRA HAZ. WASTE NOS.: N/A

## SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN WHEN HANDLING AND STORING:  
KEEP PRODUCT AWAY FROM SKIN AND EYES.  
DO NOT BREATHE DUST.  
KEEP OUT OF THE REACH OF CHILDREN.

## SECTION X - TRANSPORTATION DATA

DOT PROPER SHIPPING NAME Small sizes one gallon or less may be shipped as ORM-D  
NONE

DOT HAZARD CLASS: N/A

DOT I.D. NUMBER : N/A DOT LABEL/PLACARD: NONE

DOT TSCA CHEMICAL INVENTORY - ALL INGREDIENTS ARE LISTED

DOT CWA 40CFR PART 117 SUBSTANCE(RQ IN A SINGLE CONTAINER): SODIUM

DODECYLBENZENE SULFONATE, 1000g





# MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

02/13/96  
PAGE 1 OF 3

7 MANUFACTURING COMPANY  
FLORIDA IN MAINTENANCE PRODUCTS

ISSUE DATE: 04/12/90 ZECO 40  
SUPERSEDES: 01/17/87 PRODUCT NUMBER: 0482

## SECTION I - EMERGENCY CONTACTS

ZEP MANUFACTURING COMPANY TELEPHONE: (404) 352-1680 BETWEEN 8:00 AM-5:00 PM (EST)  
P.O. BOX 2015 NON-OFFICE HOURS, WEEKENDS, AND HOLIDAYS: AREA CODE 404  
ATLANTA, GEORGIA 30301 435-2973, 392-1480, 455-8160, 552-8836, 432-2873, 424-4789  
LOCAL POISON CONTROL CENTER .....  
TRANSPORTATION EMERGENCY: CHEMTREC: TOLL FREE 1-800-424-9300 ALL CALLS RECORDED  
(404) 922-0923 or DISTRICT OF COLUMBIA (202) 483-7616 ALL CALLS RECORDED

## SECTION II - HAZARDOUS INGREDIENTS

DESIGNATIONS	TLV (PPM)	EFFECTS (SEE REVERSE)	% IN PROD.
** SODIUM HYDROXIDE ** caustic soda; soda lye; CAS# 1310-73-2; RTECS# WB4900000; OSHA/ACGIH CEILING LIMIT-2 MG/M3	N/D	TOX COR	70-80
** SODIUM CARBONATE ** soda ash; carbonic acid, di-sodium salt; CAS# 497-19-8; RTECS# VZ4050000; OSHA/ACGIH DUST LIMIT= 15mg/m3	N/D	IRR	10-20
** PROPRIETARY TERMINATED ALKYL ARYL ETHER NONIONIC SURFACTANT ** CAS# PROPRIETARY; RTECS# NONE; OSHA PEL-N/D	N/D	EIR	<5

## SECTION III - HEALTH HAZARD DATA

SPECIAL NOTE: MSDS data pertains to the product as dispensed from the container. Adverse health effects would not be expected under recommended conditions of use (diluted) so long as prescribed safety precautions are practiced.

### ACUTE EFFECTS OF OVEREXPOSURE:

Corrosive to skin and eyes. The amount of tissue damage depends on length of contact. Eye contact can result in corneal damage or blindness. Skin contact can produce inflammation and blistering. Inhalation of dust will produce irritation to gastrointestinal or respiratory tract, characterized by burning, sneezing and coughing. Severe over-exposure can produce lung damage, choking, unconsciousness or death.



# MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

PAGE 2 OF 3

ZEP MANUFACTURING COMPANY  
FLOOR IN MAINTENANCE PRODUCTS

ISSUE DATE: 04/12/90 ZECO 40  
SUPERSEDES: 01/17/87 PRODUCT NUMBER: 0482

## SECTION III - HEALTH HAZARD DATA (CONTINUED)

### CHRONIC EFFECTS OF OVEREXPOSURE:

Repeated exposure of the eyes to a low level of dust can produce eye irritation. Repeated skin exposure can produce local skin destruction or dermatitis. Repeated inhalation of dust can produce varying degrees of respiratory irritation or lung damage.

None of the hazardous ingredients are listed as carcinogens by IARC, NTP, & OSHA

EST'D PEL/TLV: NOT ESTABLISHED PRIMARY ROUTES OF ENTRY: INH, SKIN.

HMIS CODES: HEALTH 3;FLAM. 0;REACT. 1;PERS. PROTECT. X ;CHRONIC HAZ. YES

### FIRST AID PROCEDURES:

SKIN : IMMEDIATELY FLUSH CONTAMINATED SKIN WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION IMMEDIATELY.

EYES : IMMEDIATELY FLUSH EYES WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES, OCCASIONALLY LIFTING UPPER AND LOWER LIDS. GET MEDICAL ATTENTION AT ONCE.

INHALE: MOVE VICTIM TO FRESH AIR. FLUSH MOUTH AND NASAL PASSAGES WITH WATER REPEATEDLY. GET MEDICAL ATTENTION IF IRRITATION PERSISTS.

INGEST: IF THIS PRODUCT IS SWALLOWED, DO NOT INDUCE VOMITING. IF VICTIM IS CONSCIOUS GIVE PLENTY OF WATER TO DRINK. GET MEDICAL ATTENTION AT ONCE.

## SECTION IV - SPECIAL PROTECTION INFORMATION

PROTECTIVE CLOTHING : WEAR RUBBER, NEOPRENE, OR NITRILE GLOVES, ALKALI RESISTANT FOOTWEAR, FACE SHIELD, APRON, AND ARM COVERINGS.

EYE PROTECTION : USE TIGHT-FITTING, SPLASH-PROOF SAFETY GOGGLES. CONTACT LENSES SHOULD NOT BE WORN WHEN HANDLING THIS MATERIAL.

RESPIRATORY PROTECTION: USE NIOSH-APPROVED DUST MASK IF DUST IS PRESENT.

VENTILATION : IF DUST IS DETECTED, VENTILATE WORK AREA BY OPENING WINDOWS AND USING EXHAUST FANS.

## SECTION V - PHYSICAL DATA

BOILING POINT (F) : N/A	SPECIFIC GRAVITY : N/A
VAPOR PRESSURE(MMHG): N/A	PERCENT VOLATILE BY VOLUME (%) : <3.0%
VAPOR DENSITY(AIR=1): N/A	EVAPORATION RATE( =1): N/A
SOLUBILITY IN WATER : APP.24G/100ML	PH(CONCENTRATE) : N/A
	PH(USE DILUTION OF 1 $\frac{1}{2}$ /GAL. ): >13.0

APPEARANCE AND ODOR :WHITE TO LIGHT TAN GRAN.POWDER WITH CITRUS-SOLVENT ODOR.

## SECTION VI - FIRE AND EXPLOSION DATA

FLASH POINT(F) (METHOD USED): N/A ( )

FLAMMABLE LIMITS LEL N/A UEL N/A

EXTINGUISHING MEDIA : N/A

SPECIAL FIRE FIGHTING: NONE

UNUSUAL FIRE HAZARDS : PRODUCT MAY GENERATE STEAM WHEN SPRAYED WITH WATER.



# MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

PAGE 3 OF 3

ZEP MANUFACTURING COMPANY  
FLOOR IN MAINTENANCE PRODUCTS

ISSUE DATE: 04/12/90 ZECO 40  
SUPERSEDES: 01/17/87 PRODUCT NUMBER: 0482

## SECTION VII - REACTIVITY DATA

STABILITY : STABLE  
INCOMPATIBILITY(AVOID) : STRONG OXIDIZERS, ACIDS, AND ACTIVE METALS  
POLYMERIZATION : WILL NOT OCCUR.  
HAZARDOUS DECOMPOSITION: CARBON DIOXIDE, CARBON MONOXIDE, AND OTHER UNIDENTIFIED ORGANIC COMPOUNDS.

## SECTION VIII - SPILL AND DISPOSAL PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:  
OBSERVE SAFETY PRECAUTIONS IN SECTIONS 4 & 9 DURING CLEAN-UP. SWEEP POWDER OR ABSORB SPILLED TANK-SOLUTION ON INERT ABSORBENT MATERIAL (eg ZEP-O-ZORB) AND PLACE IN A CLEAN D.O.T. SPECIFICATION CONTAINER FOR DISPOSAL. WASH AREA THOROUGHLY WITH A DETERGENT SOLUTION AND RINSE WELL WITH WATER.

### WASTE DISPOSAL METHOD:

LIQUIDS CANNOT BE SENT TO LANDFILLS UNLESS SOLIDIFIED. NEVER DISPOSE OF THIS PRODUCT WITH GENERAL WASTE. UNUSABLE PRODUCT AND SPENT TANK-SOLUTIONS MAY REQUIRE DISPOSAL AS A HAZARDOUS WASTE AT A PERMITTED TREATMENT/STORAGE/DISPOSAL FACILITY. IN MOST STATES, HAZARDOUS WASTES IN TOTAL AMOUNTS OF 220 LBS. OR LESS PER MONTH MAY BE DISPOSED OF IN A CHEMICAL OR INDUSTRIAL WASTE LANDFILL. IF COMPANY EFFLUENT IS ULTIMATELY TREATED BY A PUBLICLY OWNED TREATMENT WORKS, NEUTRALIZATION OF SPENT TANK-SOLUTIONS WITH SUBSEQUENT DISCHARGE TO SEWER MAY BE POSSIBLE. CONSULT LOCAL, STATE, AND FEDERAL AGENCIES FOR PROPER DISPOSAL METHOD IN YOUR AREA.

RCRA HAZ. WASTE NOS.: D002 (SEE ABOVE)

## SECTION IX - SPECIAL PRECAUTIONS

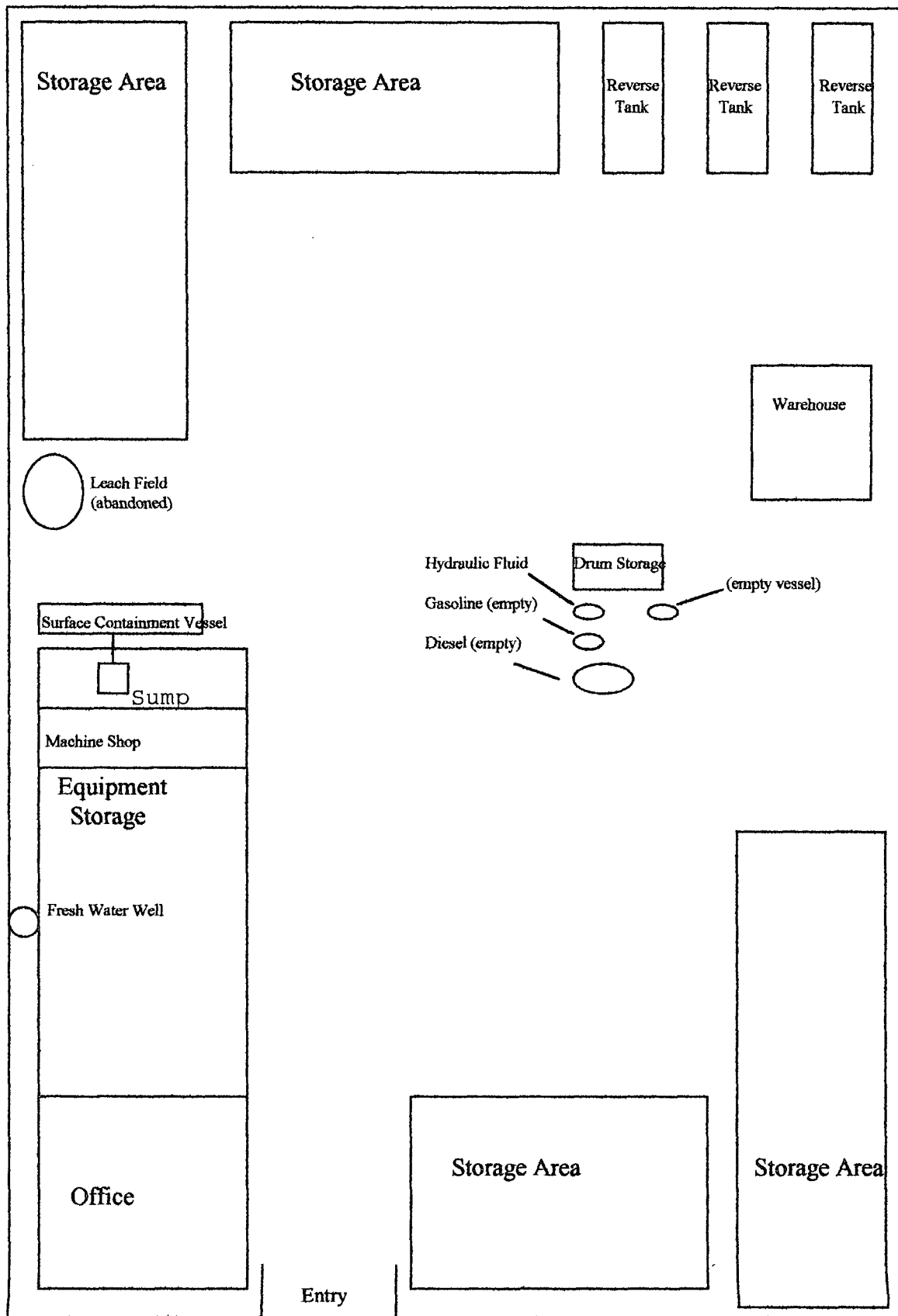
### PRECAUTIONS TO BE TAKEN WHEN HANDLING AND STORING:

Store tightly closed container in a dry area at temps. between 40-120 degrees F.  
Store away from strong acids and oxidizing compounds.  
DO NOT BREATHE DUST.  
Clothing or shoes which become contaminated with substance should be removed promptly and not reworn until thoroughly cleaned.  
ADD CHEMICAL TO SOLUTION SLOWLY.  
KEEP PRODUCT AWAY FROM SKIN AND EYES.  
KEEP OUT OF THE REACH OF CHILDREN.

## SECTION X - TRANSPORTATION DATA

DOT PROPER SHIPPING NAME Small sizes one gallon or less may be shipped as ORM-D CORROSIVE SOLIDS, BASIC, INORGANIC, N.O.S.(SODIUM HYDROXIDE)  
DOT HAZARD CLASS: 8  
DOT I.D. NUMBER : UN3262 DOT LABEL/PLACARD: CORROSIVE  
EPA TSCA CHEMICAL INVENTORY - ALL INGREDIENTS ARE LISTED  
EPA CWA 40CFR PART 117 SUBSTANCE(RQ IN A SINGLE CONTAINER): SODIUM HYDROXIDE 1000£

North



Davis Tool  
P.O. Box 2037  
Carlsbad Highway  
Hobbs, NM 88240  
397-2000

March 1, 1996

#### SPILL/LEAK CONTINGENCY PLAN

Davis Tool Company Spill/Leak Contingency plan will address all items located on the company premises located at 4710 Carlsbad Highway, Hobbs, NM. Should a spill/leak occur of reportable quantity as defined in OCD Rule 116 and WQCC 1203, the local NMOCD office will be notified within the designated 24 hr. period. Depending on the chemical and amount involved, A A Oilfield Inc., a certified Hazardous Materials Handling group will be notified and designated to assist or advise in cleanup and disposal.

All chemicals are to be stored inside the Davis Tool Company warehouse facility within secondary containment vessels. This means drum are set on cement flooring in fiberglass/or metal containers with 12" curbing. Any spill or leakage of the chemical container will be collected in the secondary containment vessel. Upon detection of any leakage into the secondary containment vessel, steps will be taken to cleanup and/or salvage any and all chemical.

All chemicals are also to be properly labeled and identified.

System Inspection: All spill collection/prevention vessels are to be inspected daily. All vessels are open topped within the building and can be visually inspected.

Employee Training: All Davis Tool Company employees are to be trained in spill prevention, cleanup(if applicable), and reporting. Davis Tool Company employees are to inspect the secondary containment vessels daily and report any leaks and/or spills to their immediate supervisor. The Davis Tool Company supervisor will then determine the quantity and follow the prescribed actions of notifying the NMOCD if spill is a reportable quantity. Davis Tool Company supervisor will also determine the necessary cleanup and disposal procedure.

Training is to be conducted annually beginning April 1996. Training also is conducted annually in HAZWOPER AND HAZCOM. This training will also include onsite MSDS's.

Items normally stored at Davis Tool Company Facility include the following:

1. ZEP- Sodium Hydroxide
2. ZEP- Sodium Carbonate
3. Antifreeze
4. Shell- Rotella Motor Oil
5. Shell- Don-x Hydraulic Fluid

Continued:

The handling of any onsite chemicals not listed above and used for a limited time, will be discussed with employees. Any questions or concerns pertaining to any of the above items will be referred to the applicable MSDS.

**Storm Water Runoff:**

As all chemical inventory of Davis Tool Company is to be stored inside the warehouse facility and in secondary containment vessels, the possibility of storm water contacting the items is remote. Employees are to be cautioned not to store any chemicals outside this area even on a temporary basis. Should storm water contamination occur, spill/leak reporting, cleanup, etc. will be initiated.

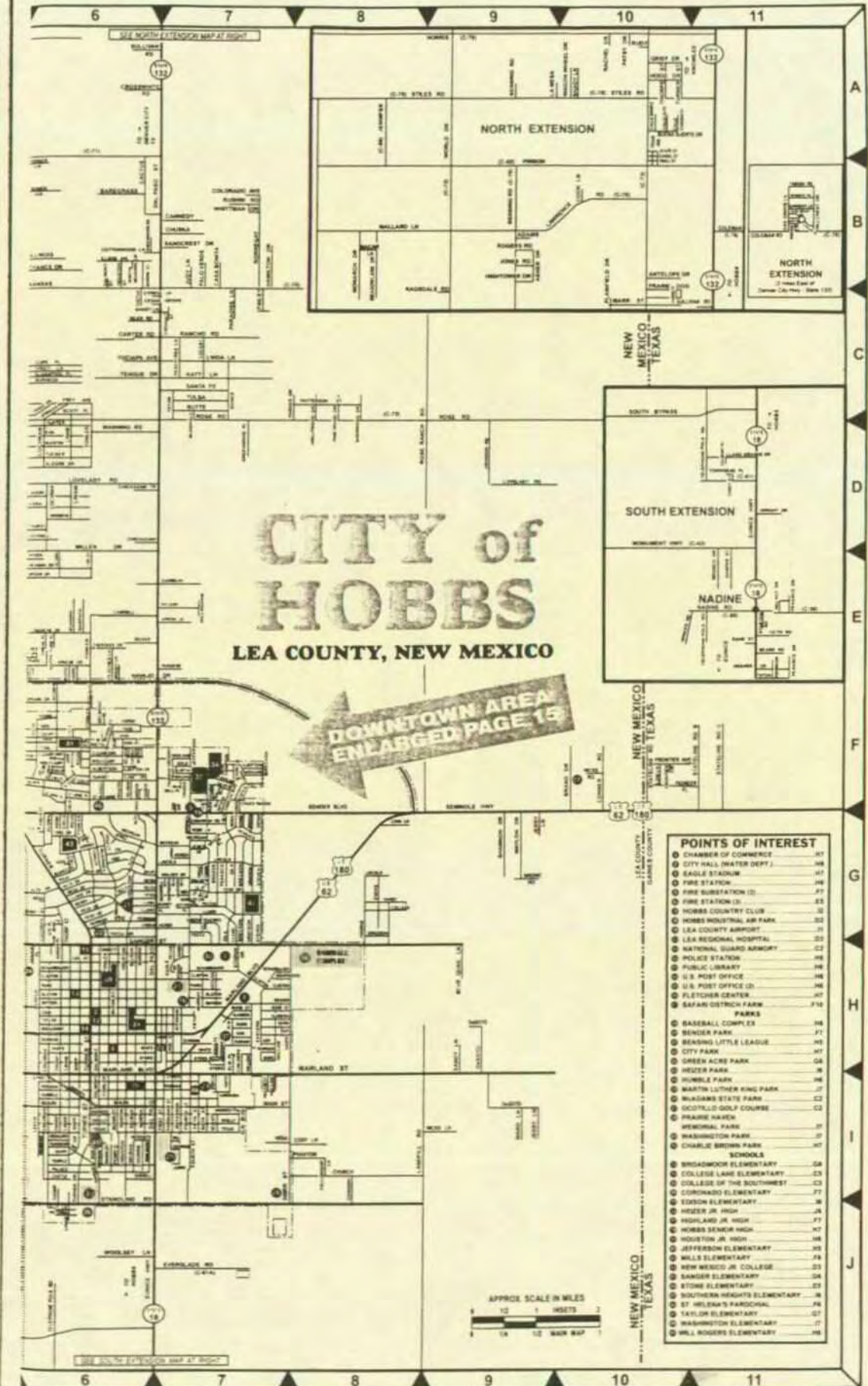
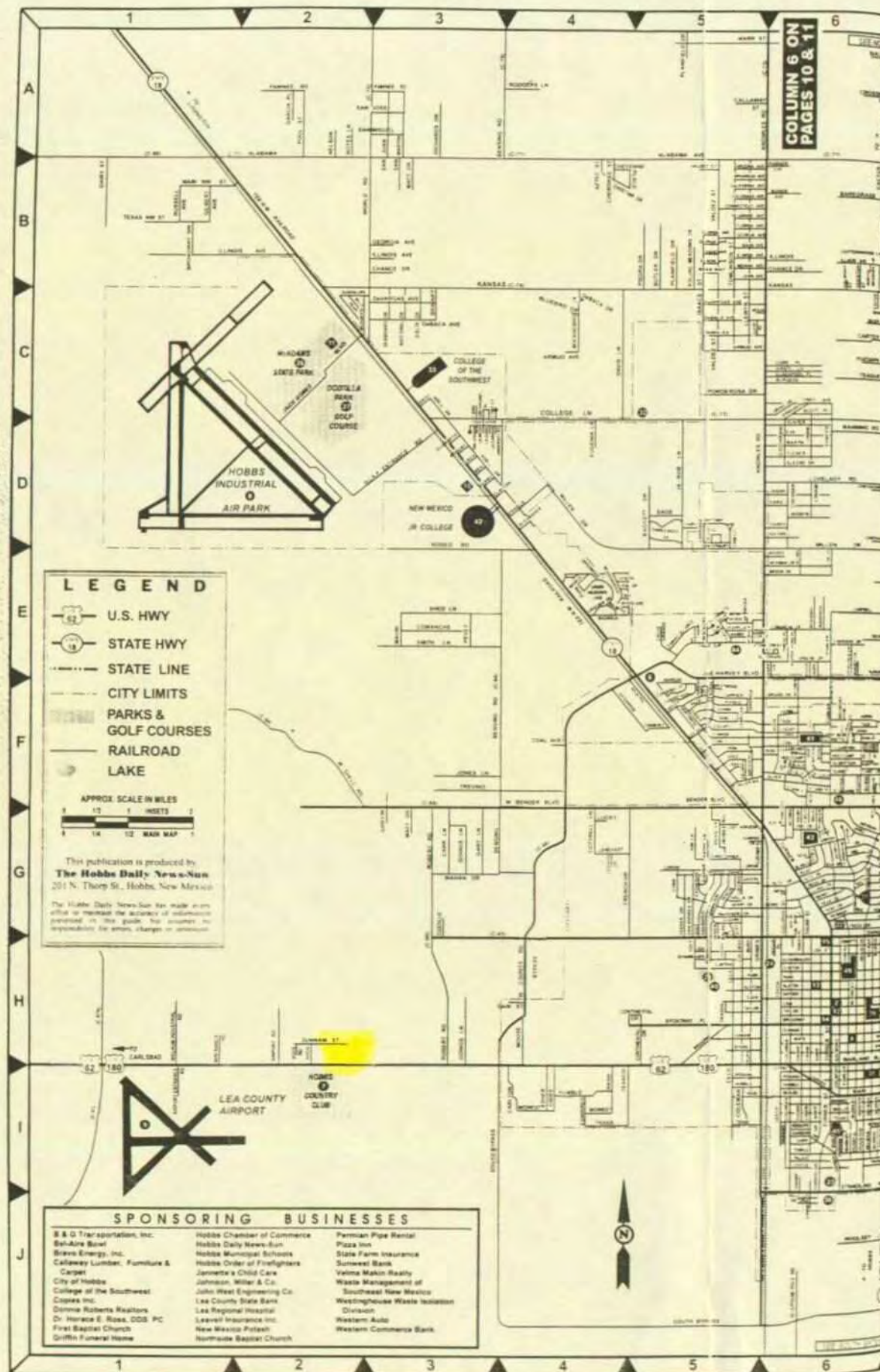
Questions concerning any aspects of this plan are to be addressed during annual training and a copy will be provided to each employee included in the employee handbook.

I, the undersigned, have read thoroughly and do understand this Davis Tool Company SPCC plan and chemical handling policy. My supervisor has addressed each item to me and instructed me on my responsibilities with respect to above.

-----  
Employee

-----  
Date









STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 24, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-963-002**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

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

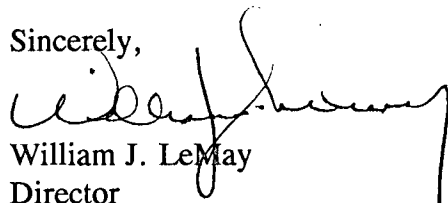
Dear Mr. McCarty:

The New Mexico Oil Conservation Division has received the request dated January 18, 1996 from Mr. Gary Don Reagan for an extension to submit the required discharge plan application for the above referenced facility.

Pursuant to Water Quality Control Commission (WQCC) Regulations 3106.A, and for good cause shown, an extension to April 26, 1996 for the submission of a discharge plan application for the Davis Tool, Hobbs facility is hereby approved.

Please be advised this extension does not relieve Davis Tool of liability should the operation of the Davis Tool facility in Hobbs result in pollution of surface waters, ground waters or the environment.

Sincerely,



William J. LeMay  
Director

xc: Mr. Gary Don Reagan Z-765-963-003, Mr. Wayne Price



Z 765 963 002



**Receipt for  
Certified Mail**

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

Sent to: <i>Mr. Clifford McCarty.</i>	
Street and No. <i>Davis Tool - Extension.</i>	
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

Z 765 963 003



**Receipt for  
Certified Mail**

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

Sent to: <i>Gary Don Reagan.</i>	
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

OIL CONSERVATION DIVISION  
LAW OFFICES OF  
GARY DON REAGAN, P.A.  
a professional corporation  
96 JAN 27 1996 (505) 397-6551 52

GARY DON REAGAN  
MARK TERRENCE SANCHEZ

NM LegalNet No. LGLREGAN  
Facsimile # (505) 393-2252  
P.O. BOX 780  
501 NORTH LINAM  
HOBBS, NEW MEXICO 88241

January 18, 1996

ENERGY, MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
Director: William J. LeMay  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

RECEIVED

JAN 22 1996

Environmental Bureau  
Oil Conservation Division

Dear Bill:

This firm has been contacted by Mr. Clifford McCarty (Davis Tool Company) and Mr. Dean Deming (Hydrostatic Pipe Testing) of Hobbs. They have received correspondence from the NMOCD concerning various items resulting from recent facility inspections. My understanding is that they have questions and concerns regarding some of these requirements including the filing of a Water Discharge Plan.

They have asked me to review these findings. To do so will require some research and examination on my part. Deadlines of January 26 for Davis Tool and February 13 for Hydrostatic Pipe Testing have been issued. I am serving in the current legislative session and will continue until about February 20. At that time, I will be returning to Hobbs and should be able to work with all involved parties to address any continuing issues. We hereby request an extension of these deadlines for further review on my part.

I look forward to working with members of the division. Hopefully we will be able to resolve things to everyone's satisfaction.

Very truly yours,

GARY DON REAGAN, P.A.

by

*Mark Terrence Sanchez*  
for Gary Don Reagan

GDR:gjf

cc: Mr. Clifford R. McCarty  
cc: Mr. Dean Deming  
cc: Mr. Dan Williamson

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time 2:00 pm

Date 12-12-95

Originating Party

Other Parties

Mr. Dan Williams - Consultant  
for Davis Tool

Pat Sanchez - OCD

Subject Discharge Plan for Davis Tool

Discussion

1. I advised Mr. Williams to utilize the WQCC reg's. book, Guidelines, Inspection report and other information given during the site inspection

2. I also advised him to privatize contamination/potential contamination at the facility and evaluate cause of action and propose time schedules.

3. Further - If the application deadline cannot be made - Send a letter to Mr. Lamay requesting

\* Conclusions or Agreements

an extension for good cause - I encouraged him to submit the application in a timely manner. I did recommend he utilize Wayne as well. \* Mr. Williams will proceed with the Discharge Plan preparation process.

Distribution File.

Signed

*Pat Sanchez*



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 6, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-962-984**

Mr. Clifford R. McCarty  
President  
Davis Tool  
P.O. Box 2037  
Hobbs, New Mexico 88240

**RE: Request for Discharge Plan Exemption**  
**Davis Tool - Hobbs Facility**  
**LEA COUNTY, NEW MEXICO**

Dear Mr. McCarty:

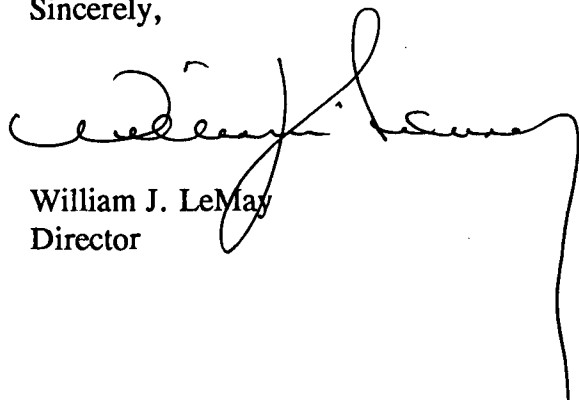
Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, Davis Tool was notified by a certified letter dated September 26, 1995 from the Oil Conservation Division (OCD) that the filing of a discharge plan would be required for the Davis Tool facility at 4710 Carlsbad HWY Hobbs, New Mexico. The notification letter required the submittal of a discharge plan within 120 days of receipt of the notification letter from OCD dated September 26, 1995, our records show the letter was received by Davis Tool on October 5, 1995 and therefore the discharge plan application shall be submitted to the OCD by February 2, 1996.

**The request for an exemption from the WQCC regulations must be denied based on the contaminant potential and the existence of the Class V well at the facility.** Davis Tool should use the inspection report dated September 19, 1995 as well as the guidelines and other environmental information that was made available to Davis Tool during the site inspection on September 12, 1995 by OCD staff. Pursuant to WQCC section 3106A. Davis Tool may request an extension for submittal of the Discharge Plan Application "for good cause" shown if after working on the preparation of the application it is not possible to meet the 120 day deadline of February 2, 1995. Also, the OCD encourages applicants to consider and prioritize permit modifications and objectives over the five year life of the permit, with the main inadequacies addressed earlier on in the permit and capital intensive secondary containment modifications committed to over time.

Mr. Clifford R. McCarty  
Davis Tool  
December 6, 1995  
Page 2

If Davis Tool has any questions regarding this matter, contact Patricio W. Sanchez at (505) 827-7156 if you have any questions as he is assigned responsibility for review of this service facility discharge plan.

Sincerely,



William J. LeMay  
Director

xc: Mr. Wayne Price and Mr. Jerry Sexton

Z 765 962 984



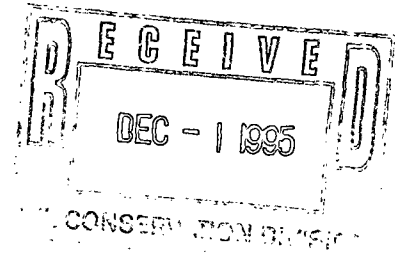
Receipt for  
Certified Mail  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to: Denial. Davis Tool	
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

**Davis Tool**  
*Fishing Tools - Reverse Units*  
P.O. Box 2037  
CARLSBAD HIGHWAY  
HOBBS, NEW MEXICO 88240

TELEPHONE  
(505)397-2000



November 28, 1995

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
Director: William J. LeMay  
~~Oil Conservation Division~~  
2040 S. Pacheco  
Santa Fe, NM 87505

Re: Discharge Plan Requirement  
Hobbs Facility  
Lea County, NM

**RECEIVED**

DEC 1 1995

Environmental Bureau  
Oil Conservation Division

Dear Sir,

We have received your letter dated 9/19/95 concerning Water Quality Control Commission Regulations as it pertains to Davis Tool facility. This letter was our notification of a discharge plan requirement pursuant to Section 3-104 and 3-106 of the WQCC regulations.

Upon extensive review of the inspection document, Davis Tool has chosen to address each item listed and attempt to comply with all directives. Please refer to your letter dated 9/19/95.

- Item #1- No lab at facility--- Not required by WQCC per this facility.
- Item #2-Below grade sump present in the shop area.---Revisions have been made to make this an enclosed system. The integrity of the system has been checked and will continue to be inspected and documented yearly. The leech line noted is to be removed.
- Item #3- Class V. injection well at the facility(i.e.) old leech field---Initial installation of this leech line was approved at the time and as noted above the line is to be removed.
- Item #4- No surface impoundments---none needed
- Item #5- Provide the NMOCD with a copy of the shop solvent--- This will be done. Soap being used is Biodegradable.
- Item #6- All tank, drums, and etc. need to meet OCD guidelines for secondary containment---The items listed will be either eliminated or contained as specified.

Item #7- No written spill contingency plan-- N/A as items are to be eliminated.

Item #8- Empty paint cans are air dried before going into the waste management dumpster--- Disposal complies with Waste Mgmt. of NM.

Item #9- Empty drums, used oil, used filters need to be stored and disposed of in a manner approved by OCD---All drums are to be returned to vendor, and oil and filters are to be disposed of by approved vendor.

Item #10- Items need to be properly and clearly labeled.---This has been completed.

Item #11- Oil contaminated soil needs to be cleaned up according to NMOCD spill and leak guidelines---This will be done according to NMOCD guidelines by aeration and bioremediation.

Item #12- The water stored in the outdoor tank needs to be sampled and tested for hazardous characteristics per 40 CFR part 261.---No hazardous material is introduced into the closed system thus not requiring this testing.

Item #13- The contaminated oily soil on the NE part of the property needs to be sampled and have a TCLP, TPH and BTEX analysis on it---This can be done but no contaminants have been introduced into this area.

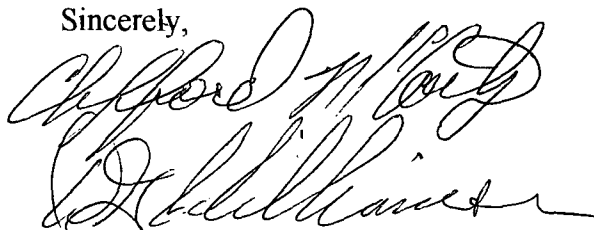
Item #14- The same applies to the soil off of the pavement and soil under the used oil storage area.--- This can be done but no contaminants have been introduced into this area.

Hopefully all items of concern have been or will be remedied in the near future. Based on these assurances, we feel justified in asking for an exemption of filing a formal Discharge Plan. The enclosed system along with the integrity inspections should make assurances that no contamination will occur.

As this is being considered and in order to further implement and evaluate the concerns, we would also request an extension of six months from the 120 day filing notice.

We here at Davis Tool are dedicated to improving our environment and maintaining our continuing programs as we have in the past.

Sincerely,

Two handwritten signatures are present. The first signature, in cursive, appears to read 'Clifford R. McCarty'. The second signature, also in cursive, appears to read 'D. G. Williamson'.

Clifford R. McCarty/President

D. G. Williamson/Safety & Environmental Consultant



Analytical Technologies, Inc.

OIL CONSERVATION DIVISION  
RECEIVED

2709-D Pan American Freeway, NE Albuquerque, NM 87107  
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. 509351

October 16, 1995

NMOCD  
2040 S. Pacheco  
Santa Fe, NM 87505

RECEIVED

OCT 18 1995

Environmental Bureau  
Oil Conservation Division

Project Name/Number: DAVIS TOOL

Attention: Pat Sanchez

On 09/15/95, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze aqueous samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

EPA method 6010 and 610 analyses were performed by Analytical Technologies, Inc., 225 Commerce Drive, Fort Collins, CO.

EPA method 601/602 analyses were performed by Analytical Technologies, Inc., Albuquerque, NM.

All other analyses were performed by Analytical Technologies, Inc., 9830 S. 51st Street, Suite B-113, Phoenix, AZ.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill  
Project Manager

H. Mitchell Rubenstein, Ph.D.  
Laboratory Manager

MR:jt

Enclosure





Analytical Technologies, Inc.

CLIENT : NMOCD  
PROJECT # : (NONE)  
PROJECT NAME : DAVIS TOOL

DATE RECEIVED : 09/15/95

REPORT DATE : 10/16/95

ATI ID: 509351

	ATI PHX ID #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	509351-01	9509121100	AQUEOUS	09/12/95
02	NA	9509121105	AQUEOUS	09/12/95
03	NA	9509121105	AQUEOUS	09/12/95
04	NA	9509121105	AQUEOUS	09/12/95
05	NA	TRIP BLANK	AQUEOUS	09/06/95

---TOTALS---

MATRIX  
AQUEOUS

#SAMPLES  
5

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.



Analytical Technologies, Inc.

# GENERAL CHEMISTRY RESULTS

ATI I.D. : 509753

CLIENT : ANALYTICAL TECHNOLOGIES, INC-NM  
PROJECT # : 509351  
PROJECT NAME : DAVIS TOOL

DATE RECEIVED : 09/19/95

REPORT DATE : 10/16/95

PARAMETER	UNITS	01
CARBONATE (CACO3)	MG/L	<1
BICARBONATE (CACO3)	MG/L	209
HYDROXIDE (CACO3)	MG/L	<1
TOTAL ALKALINITY (AS CACO3)	MG/L	209
BROMIDE (EPA 300.0)	MG/L	1.4
CHLORIDE (EPA 325.2)	MG/L	200
CONDUCTIVITY, (UMHOS/CM)		1230
FLUORIDE (EPA 340.2)	MG/L	0.84
PH (EPA 150.1)	UNITS	7.2
SULFATE (EPA 375.2)	MG/L	140
T. DISSOLVED SOLIDS (160.1)	MG/L	860



Analytical Technologies, Inc.

## GENERAL CHEMISTRY - QUALITY CONTROL

CLIENT : ANALYTICAL TECHNOLOGIES, INC-NM  
PROJECT # : 509351  
PROJECT NAME : DAVIS TOOL

ATI I.D. : 509753

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE	SPIKE CONC	% REC
CARBONATE	MG/L	50967901	<1	<1	NA	NA	NA	NA
BICARBONATE	MG/L		277	276	0.4	NA	NA	NA
HYDROXIDE	MG/L		<1	<1	NA	NA	NA	NA
TOTAL ALKALINITY	MG/L		277	276	0.4	NA	NA	NA
BROMIDE	MG/L	50950101	46	49	6	158	100	112
CHLORIDE	MG/L	50975401	340	340	0	660	310	103
CONDUCTIVITY (UMHOS/CM)		50975301	1230	1240	0.8	NA	NA	NA
FLUORIDE	MG/L	50970201	0.16	0.15	6	0.35	0.20	95
PH	UNITS	50975301	7.2	7.2	0	NA	NA	NA
SULFATE	MG/L	50975301	140	140	0	320	200	90
TOTAL DISSOLVED SOLIDS	MG/L	50967601	1400	1300	7	NA	NA	NA

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$



Analytical Technologies, Inc.

DATE: 10-05-95

# ION BALANCE

ATI ACCESSION NUMBER: 50975301  
SAMPLE IDENTIFICATION: 509351-01  
CLIENT: ANALYTICAL TECHNOLOGIES, INC-NM

ANIONS	RESULT MG/L	FACTOR ME/L	TOTAL
ALKALINITY (AS CaCO3)	209.000	0.02000	4.18000
CHLORIDE	200.000	0.02821	5.64200
FLUORIDE	0.840	0.05264	0.04422
NITRATE AS N	NA	0.01613	0.00000
SULFATE	140.000	0.02082	2.91480
TOTAL ANIONS			12.78102

CATIONS	RESULT	FACTOR	TOTAL
ALUMINUM	<0.2	0.11119	0.00000
CALCIUM	140.000	0.04990	6.986
POTASSIUM	3.000	0.02558	0.07674
MAGNESIUM	23.000	0.08229	1.89267
SODIUM	66.000	0.04350	2.87100
COPPER	<0.010	0.03147	0.00000
IRON	0.100	0.05372	0.00537
MANGANESE	<0.010	0.03640	0.00000
ZINC	<0.020	0.03059	0.00000
TOTAL CATIONS			11.83178

%RPD (<10%) 7.71

TOTAL ANIONS/CATIONS	(CALCULATED)	698.340		
TOTAL DISSOLVED SOLIDS	(ANALYZED)	860	%RPD (<15%)	-20.75
ELECTRICAL COND.		1230	TDS/EC RATIO (0.65+/-0.1)	0.69919



Analytical Technologies, Inc.

## TOTAL METALS

Sample ID

Lab Name: Analytical Technologies, Inc.

9509121105

Client Name: ATI-NM

Client Project ID: Davis Tool -- 509351

Date Collected: 09/12/95

Lab Sample ID: 95-09-190-01

Prep Date: 09/25/95

Sample Matrix: Water

Date Analyzed: 09/27, 28/95

Analyte	Modified Method	Concentration mg/L	Detection Limit mg/L
Aluminum	6010	ND	0.2
Antimony	6010	ND	0.02
Arsenic	6010	ND	0.01
Barium	6010	0.1	0.1
Beryllium	6010	ND	0.005
Boron	6010	0.2	0.1
Cadmium	6010	ND	0.005
Calcium	6010	140	1
Chromium	6010	ND	0.01
Cobalt	6010	ND	0.01
Copper	6010	ND	0.01
Iron	6010	0.1	0.1
Lead	6010	ND	0.003
Magnesium	6010	23	1
Manganese	6010	ND	0.01
Molybdenum	6010	ND	0.01
Nickel	6010	ND	0.02
Potassium	6010	3	1
Selenium	6010	0.008	0.005
Silicon	6010	22	0.05
Silver	6010	ND	0.01
Sodium	6010	66	1
Thallium	6010	ND	0.01
Vanadium	6010	0.03	0.01
Zinc	6010	ND	0.02

ND = Not Detected



Analytical Technologies, Inc.

## TOTAL METALS

Sample ID

Reagent Blank

Lab Name: Analytical Technologies, Inc.

Client Name: ATI-NM

Date Collected: N/A

Client Project ID: Davis Tool -- 509351

Prep Date: 09/25/95

Lab Sample ID: RB 95-09-190

Date Analyzed: 09/27, 28/95

Analyte	Modified Method	Concentration mg/L	Detection Limit mg/L
Aluminum	6010	ND	0.2
Antimony	6010	ND	0.02
Arsenic	6010	ND	0.01
Barium	6010	ND	0.1
Beryllium	6010	ND	0.005
Boron	6010	ND	0.1
Cadmium	6010	ND	0.005
Calcium	6010	ND	1
Chromium	6010	ND	0.01
Cobalt	6010	ND	0.01
Copper	6010	ND	0.01
Iron	6010	ND	0.1
Lead	6010	ND	0.003
Magnesium	6010	ND	1
Manganese	6010	ND	0.01
Molybdenum	6010	ND	0.01
Nickel	6010	ND	0.02
Potassium	6010	ND	1
Selenium	6010	ND	0.005
Silicon	6010	ND	0.05
Silver	6010	ND	0.01
Sodium	6010	ND	1
Thallium	6010	ND	0.01
Vanadium	6010	ND	0.01
Zinc	6010	ND	0.02

ND = Not Detected



Analytical Technologies, Inc.

# TOTAL METALS MATRIX SPIKE

Sample ID

Lab Name: Analytical Technologies, Inc.

In House

Client Name: ATI-NM

Lab Sample ID: 95-09-010-03

Prep Date: 09/25/95

Sample Matrix: Water

Date Analyzed: 09/27, 28/95

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Aluminum	2.0	< 0.2	2.1	105	See note
Antimony	0.50	< 0.02	0.51	102	
Arsenic	2.0	< 0.01	2.1	105	
Barium	2.0	< 0.1	2.0	100	
Beryllium	0.050	< 0.005	0.052	104	
Boron	1.0	0.5	1.5	100	
Cadmium	0.050	< 0.005	0.051	102	
Calcium	40	< 1	40	100	
Chromium	0.20	< 0.01 **	0.20	100	
Cobalt	0.50	< 0.01	0.49	98	
Copper	0.25	< 0.01	0.25	100	
Iron	1.0	< 0.1	1.0	100	
Lead	0.50	< 0.003	0.50	100	
Magnesium	40	< 1	40	100	
Manganese	0.50	< 0.01	0.49	98	
Molybdenum	1.0	< 0.01	1.0	100	
Nickel	0.50	< 0.02	0.49	98	
Potassium	40	< 1	40	100	
Selenium	2.0	< 0.005	2.2	110	
Silicon	0.50	2.4	3.0	120	
Silver	0.20	< 0.01	0.20	100	
Sodium	40	99	140	103	
Thallium	2.0	< 0.01	2.1	105	
Vanadium	0.50	< 0.01	0.51	102	
Zinc	0.50	0.04	0.54	100	

\*See note on following page.

**TOTAL METALS  
MATRIX SPIKE DUPLICATE**



Analytical Technologies, Inc.

Sample ID

In House

Lab Name: Analytical Technologies, Inc.

Client Name: ATI-NM

Lab Sample ID: 95-09-010-03

Prep Date: 09/25/95

Sample Matrix: Water

Date Analyzed: 09/27, 28/95

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120%)	Relative % Difference (limits 0-20%)	Flags
Aluminum	2.0	100	5	See note
Antimony	0.50	100	2	
Arsenic	2.0	100	5	
Barium	1.9	95	5	
Beryllium	0.047	94	10	
Boron	1.5	101	0	
Cadmium	0.050	100	2	
Calcium	40	100	0	
Chromium	0.19	95	5	
Cobalt	0.47	94	4	
Copper	0.24	96	4	
Iron	1.0	100	0	
Lead	0.47	94	6	
Magnesium	40	100	0	
Manganese	0.47	94	4	
Molybdenum	0.96	96	4	
Nickel	0.47	94	4	
Potassium	40	100	0	
Selenium	2.1	105	5	
Silicon	2.9	100	3	
Silver	0.20	100	0	
Sodium	140	103	1	
Thallium	2.0	100	5	
Vanadium	0.48	96	6	
Zinc	0.51	94	6	

Note: Due to the large concentration of analyte in the sample, matrix spike recovery may not be accurate. The Laboratory Control Sample (LCS) is included on a separate page to show that the digestion and analysis were in control.





Analytical Technologies, Inc.

**TOTAL METALS  
LABORATORY CONTROL SAMPLE**

Lab Name: Analytical Technologies, Inc.

Client Name: ATI-NM

Client Project ID: Davis Tool -- 509351

Work Order Number: 95-09-190

Date Analyzed: 09/27/95

Analyte	LCS Result mg/L	LCS True Value mg/L	LCS % Recovery	Limits
Silicon	0.50	0.50	100	80 - 120%



Analytical Technologies, Inc.

## GAS CHROMATOGRAPHY RESULTS

TEST : PURGEABLE HALOCARBONS/AROMATICS (EPA 601/602)  
CLIENT : NMOCD ATI I.D.: 509351  
PROJECT # : (NONE)  
PROJECT NAME : DAVIS TOOL

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
03	9509121105	AQUEOUS	09/12/95	NA	09/18/95	1
05	TRIP BLANK	AQUEOUS	09/12/95	NA	09/18/95	1

PARAMETER	UNITS	03	05
BENZENE	UG/L	<0.5	<0.5
BROMODICHLOROMETHANE	UG/L	<0.2	<0.2
BROMOFORM	UG/L	<0.5	<0.5
BROMOMETHANE	UG/L	<1.0	<1.0
CARBON TETRACHLORIDE	UG/L	<0.2	<0.2
CHLOROBENZENE	UG/L	<0.5	<0.5
CHLOROETHANE	UG/L	<0.5	<0.5
CHLOROFORM	UG/L	<0.5	<0.5
CHLOROMETHANE	UG/L	<1.0	<1.0
DIBROMOCHLOROMETHANE	UG/L	<0.2	<0.2
1,2-DIBROMOETHANE (EDB)	UG/L	<0.2	<0.2
1,2-DICHLOROBENZENE	UG/L	<0.5	<0.5
1,3-DICHLOROBENZENE	UG/L	<0.5	<0.5
1,4-DICHLOROBENZENE	UG/L	<0.5	<0.5
1,1-DICHLOROETHANE	UG/L	<0.2	<0.2
1,2-DICHLOROETHANE (EDC)	UG/L	<0.5	<0.5
1,1-DICHLOROETHENE	UG/L	<0.2	<0.2
CIS-1,2-DICHLOROETHENE	UG/L	<0.2	<0.2
TRANS-1,2-DICHLOROETHENE	UG/L	<1.0	<1.0
1,2-DICHLOROPROPANE	UG/L	<0.2	<0.2
CIS-1,3-DICHLOROPROPENE	UG/L	<0.2	<0.2
TRANS-1,3-DICHLOROPROPENE	UG/L	<0.2	<0.2
ETHYLBENZENE	UG/L	<0.5	<0.5
METHYL-t-BUTYL ETHER	UG/L	<2.5	<2.5
METHYLENE CHLORIDE	UG/L	<2.0	<2.0
1,1,2,2-TETRACHLOROETHANE	UG/L	<0.2	<0.2
TETRACHLOROETHENE	UG/L	<0.5	<0.5
TOLUENE	UG/L	<0.5	<0.5
1,1,1-TRICHLOROETHANE	UG/L	<1.0	<1.0
1,1,2-TRICHLOROETHANE	UG/L	<0.2	<0.2
TRICHLOROETHENE	UG/L	<0.2	<0.2
TRICHLOROFLUOROMETHANE	UG/L	<0.2	<0.2
VINYL CHLORIDE	UG/L	<0.5	<0.5
TOTAL XYLENES	UG/L	<0.5	<0.5

## SURROGATES:

BROMOCHLOROMETHANE (%)	104	111
TRIFLUOROTOLUENE (%)	109	112



Analytical Technologies, Inc.

## GAS CHROMATOGRAPHY RESULTS - QUALITY CONTROL

### REAGENT BLANK

TEST	: EPA 601/602	ATI I.D.	: 509351
BLANK I.D.	: 091895	MATRIX	: AQUEOUS
CLIENT	: NMOCD	DATE EXTRACTED	: NA
PROJECT #	: (NONE)	DATE ANALYZED	: 09/18/95
PROJECT NAME	: DAVIS TOOL	DIL. FACTOR	: 1

PARAMETER	UNITS	
BENZENE	UG/L	<0.5
BROMODICHLOROMETHANE	UG/L	<0.2
BROMOFORM	UG/L	<0.5
BROMOMETHANE	UG/L	<1.0
CARBON TETRACHLORIDE	UG/L	<0.2
CHLOROBENZENE	UG/L	<0.5
CHLOROETHANE	UG/L	<0.5
CHLOROFORM	UG/L	<0.5
CHLOROMETHANE	UG/L	<1.0
DIBROMOCHLOROMETHANE	UG/L	<0.2
1,2-DIBROMOETHANE (EDB)	UG/L	<0.2
1,2-DICHLOROBENZENE	UG/L	<0.5
1,3-DICHLOROBENZENE	UG/L	<0.5
1,4-DICHLOROBENZENE	UG/L	<0.5
1,1-DICHLOROETHANE	UG/L	<0.2
1,2-DICHLOROETHANE (EDC)	UG/L	<0.5
1,1-DICHLOROETHENE	UG/L	<0.2
CIS-1,2-DICHLOROETHENE	UG/L	<0.2
TRANS-1,2-DICHLOROETHENE	UG/L	<1.0
1,2-DICHLOROPROPANE	UG/L	<0.2
CIS-1,3-DICHLOROPROPENE	UG/L	<0.2
TRANS-1,3-DICHLOROPROPENE	UG/L	<0.2
ETHYLBENZENE	UG/L	<0.5
METHYL-t-BUTYL ETHER	UG/L	<2.5
METHYLENE CHLORIDE	UG/L	<2.0
1,1,2,2-TETRACHLOROETHANE	UG/L	<0.2
TETRACHLOROETHENE	UG/L	<0.5
TOLUENE	UG/L	<0.5
1,1,1-TRICHLOROETHANE	UG/L	<1.0
1,1,2-TRICHLOROETHANE	UG/L	<0.2
TRICHLOROETHENE	UG/L	<0.2
TRICHLOROFLUOROMETHANE	UG/L	<0.2
VINYL CHLORIDE	UG/L	<0.5
TOTAL XYLENES	UG/L	<0.5

#### SURROGATES:

BROMOCHLOROMETHANE (%)	106
TRIFLUOROTOLUENE (%)	108



Analytical Technologies, Inc.

# GAS CHROMATOGRAPHY - QUALITY CONTROL

## MSMSD

TEST : PURGEABLE HALOCARBONS/AROMATICS (EPA 601/602)  
MSMSD # : 50935203 ATI I.D. : 509351  
CLIENT : NMOCD DATE EXTRACTED : NA  
PROJECT # : (NONE) DATE ANALYZED : 09/18/95  
PROJECT NAME : DAVIS TOOL SAMPLE MATRIX : AQUEOUS  
REF. I.D. : 50935203 UNITS : UG/L

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
BENZENE	<0.5	10	8.7	87	9.5	95	9
CHLOROBENZENE	<0.5	10	8.7	87	9.9	99	13
1,1-DICHLOROETHENE	<0.2	10	6.3	63	7.2	72	13
TOLUENE	<0.5	10	8.7	87	9.7	97	11
TRICHLOROETHENE	<0.2	10	9.1	91	11	110	19

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

## POLYNUCLEAR AROMATIC HYDROCARBONS

Method 610



Analytical Technologies, Inc.

Lab Name: Analytical Technologies Inc.

Client Name: ATI - NM

Client Project ID: Davis Tool -- 509351

Lab Sample ID: 95-09-190-02

Sample Matrix: Water

Cleanup: N/A

Sample ID

9509121105

Date Collected: 9/12/95

Date Extracted: 9/19/95

Date Analyzed: 9/22/95

Sample Volume: 1000 mL

Final Volume: 1 mL

Analyte	Conc (ug/L)	Detection Limit (ug/L)
Naphthalene	ND	0.50
Acenaphthylene	ND	1.0
1-Methylnaphthalene	ND	1.0
2-Methylnaphthalene	ND	1.0
Acenaphthene	ND	1.0
Fluorene	ND	0.10
Phenanthrene	ND	0.050
Anthracene	ND	0.10
Fluoranthene	ND	0.10
Pyrene	ND	0.050
Benzo(a)anthracene	ND	0.050
Chrysene	ND	0.050
Benzo(b)fluoranthene	ND	0.10
Benzo(k)fluoranthene	ND	0.050
Benzo(a)pyrene	ND	0.050
Dibenzo(a,h)anthracene	ND	0.10
Benzo(g,h,i)perylene	ND	0.10
Indeno(1,2,3-c,d)pyrene	ND	0.10

## SURROGATE RECOVERY

Analyte	% Recovery	% Rec Limits
2-Chloroanthracene	82	15 - 117

ND = Not Detected at or above client requested detection limit.

pm

## POLYNUCLEAR AROMATIC HYDROCARBONS

Method 610



Analytical Technologies, Inc.

Lab Name: Analytical Technologies Inc.

Client Name: ATI - NM

Client Project ID: Davis Tool -- 509351

Lab Sample ID: WRB1 9/19/95

Sample Matrix: Water

Cleanup: N/A

Sample ID

Reagent Blank

Date Collected: N/A

Date Extracted: 9/19/95

Date Analyzed: 9/22/95

Sample Volume: 1000 mL

Final Volume: 1 mL

Analyte	Conc (ug/L)	Detection Limit (ug/L)
Naphthalene	ND	0.50
Acenaphthylene	ND	1.0
1-Methylnaphthalene	ND	1.0
2-Methylnaphthalene	ND	1.0
Acenaphthene	ND	1.0
Fluorene	ND	0.10
Phenanthrene	ND	0.050
Anthracene	ND	0.10
Fluoranthene	ND	0.10
Pyrene	ND	0.050
Benzo(a)anthracene	ND	0.050
Chrysene	ND	0.050
Benzo(b)fluoranthene	ND	0.10
Benzo(k)fluoranthene	ND	0.050
Benzo(a)pyrene	ND	0.050
Dibenzo(a,h)anthracene	ND	0.10
Benzo(g,h,i)perylene	ND	0.10
Indeno(1,2,3-c,d)pyrene	ND	0.10

## SURROGATE RECOVERY

Analyte	% Recovery	% Rec Limits
2-Chloroanthracene	79	15 - 117

ND = Not Detected at or above client requested detection limit.

PM

# POLYNUCLEAR AROMATIC HYDROCARBONS BLANK SPIKE

Method 610



Analytical Technologies, Inc.

Lab Name: Analytical Technologies Inc.

Lab Sample ID: WBS1,2 9/19/95

Client Name: ATI - NM

Date Extracted: 9/19/95

Client Project ID: Davis Tool -- 509351

Date Analyzed: 9/22/95

Sample Matrix: Water

Sample Volume: 1000 mL

Final Volume: 1 mL

Analyte	Spike Added (ug/L)	BS Concentration (ug/L)	BS Percent Recovery	QC Limits % Rec
Acenaphthylene	10	6.36	64	23 - 122
Phenanthrene	1.0	0.826	83	34 - 112
Pyrene	1.0	0.818	82	35 - 116
Dibenzo(a,h)anthracene	1.0	0.853	85	33 - 123
Benzo(k)fluoranthene	0.25	0.223	89	39 - 119

Analyte	Spike Added (ug/L)	BSD Concentration (ug/L)	BSD Percent Recovery	RPD	QC Limits RPD
Acenaphthylene	10	6.35	64	0	20
Phenanthrene	1.0	0.822	82	0	20
Pyrene	1.0	0.830	83	1	20
Dibenzo(a,h)anthracene	1.0	0.850	85	0	20
Benzo(k)fluoranthene	0.25	0.227	91	2	20

## SURROGATE RECOVERY BS/BSD

Analyte	% Recovery(BS)	% Recovery(BSD)	% Rec Limits
2-Chloroanthracene	85	81	15 - 117

ND = Not Detected

*fm*





## Chain of Custody

DATE 9/18 PAGE 1 OF 1

[illegible]

PROJECT INFORMATION		SAMPLE RECEIPT		SAMPLES SENT TO:	RELINQUISHED BY: 1.	RELINQUISHED BY: 2.
PROJECT NUMBER: 509351	TOTAL NUMBER OF CONTAINERS: 1			SAN DIEGO	Signature: [Signature] Time: 1630	Signature: [Signature] Time: [Blank]
PROJECT NAME: Davis Tool	CHAIN OF CUSTODY SEALS: Y			FT. COLLINS	Printed Name: Andrew Barker Date: 9/18	Printed Name: [Blank] Date: [Blank]
QC LEVEL: STD. IV	INTACT?: Y			RENTON	Analytical Technologies, Inc.	Company: [Blank]
QC REQUIRED: MS MSD BLANK	RECEIVED GOOD COND./COLD: BLUE			PENSACOLA	Albuquerque	
TAT: STANDARD RUSH!	LAB NUMBER 509753			PORTLAND	<b>RECEIVED BY: (LAB) 1.</b>	<b>RECEIVED BY: (LAB) 2.</b>
				PHOENIX X	Signature: [Blank] Time: [Blank]	Signature: [Blank] Time: 1009
				FIBERQUANT	Printed Name: [Blank] Date: [Blank]	Printed Name: Melanie [Signature] Date: 9/19/99
					Company: [Blank]	Company: [Signature]
DUE DATE: 9/28						
RUSH SURCHARGE: [Blank]						
CLIENT DISCOUNT: Quote %		IWO # KM927				



## Chain of Custody

DATE 9/18 PAGE 1 OF 1

NETWORK PROJECT MANAGER: ~~LETITIA KRAKOWSKI~~

**COMPANY:** Analytical Technologies, Inc.  
**ADDRESS:** 2709-D Pan American Freeway, NE  
Albuquerque, NM 87107

**CLIENT PROJECT MANAGER:**

Kim McNeill

[illegible]

PROJECT INFORMATION		SAMPLE RECEIPT		SAMPLES SENT TO:		RELINQUISHED BY: 1.		RELINQUISHED BY: 2.	
PROJECT NUMBER: 509351		TOTAL NUMBER OF CONTAINERS	3	SAN DIEGO		Signature:	Time:	Signature:	Time:
PROJECT NAME: DAVIS TOOL		CHAIN OF CUSTODY SEALS	4	FT. COLLINS	X	<i>Andrew Parker</i>	1330		
QC LEVEL: (STD) IV		INTACT?	4	RENTON		Printed Name:	Date:	Printed Name:	Date:
QC REQUIRED: MS MSD BLANK		RECEIVED GOOD COND. COLD	4	PENSACOLA		<i>Andrew Parker</i>	9/18		
TAT: (STANDARD) RUSHI		LAB NUMBER	95-09-196	PORTLAND		Analytical Technologies, Inc. Albuquerque		Company: <i>Fed Ex</i>	
				PHOENIX		RECEIVED BY: (LAB) 1.		RECEIVED BY: (LAB) 2.	
						Signature:	Time:	Signature:	Time:
				FIBERQUANT				<i>[Signature]</i>	9:30
						Printed Name:	Date:	Printed Name:	Date:
								<i>[Signature]</i>	9-19-91
						Company: <i>Fed Ex</i>		Company: <i>ATT</i>	
DUE DATE: 9/28									
RUSH SURCHARGE:									
CLIENT DISCOUNT: <i>Quote</i> %				Two # km929					

OIL CONSERVATION DIVISION

September 26, 1995

**CERTIFIED MAIL**

**RETURN RECEIPT NO.Z-765-963-064**

Mr. Bob Harrell  
Davis Tool  
P.O. BOX 2037  
Hobbs, NM 88241

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

Dear Mr. Harrell:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, Davis Tool is hereby notified that the filing of a discharge plan is required for the Davis Tool facilities located at the 4710 Carlsbad HWY 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.

Mr. Bob Harrell  
September 26, 1995  
Page 2

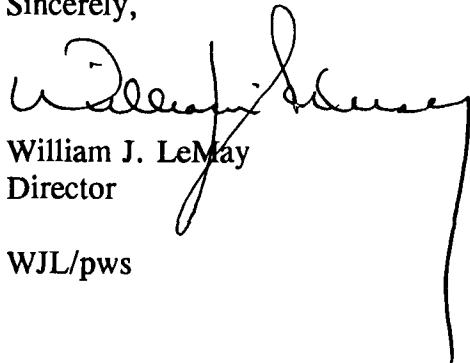
A copy of the regulations and guidelines have been provided to Davis Tool at a recent field inspection by OCD staff. Enclosed Davis Tool will find an application form to be used with the guidelines for the preparation of discharge plans at oil & gas service companies. The guideline addresses berming 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.

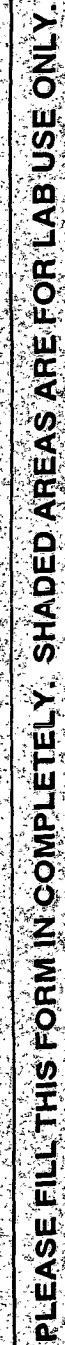
Sincerely,

A handwritten signature in dark ink, appearing to read 'William J. LeMay', is written over the typed name and title. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

William J. LeMay  
Director

WJL/pws

XC: Mr. Wayne Price and Mr. Jeery Sexton



50935

NUMBER CONTAINERS

Analytical Technologies, Inc.

# MEMORANDUM OF MEETING OR CONVERSATION

TELEPHONE X PERSONAL TIME 10:45 (AM) PM DATE 9/26/95

ORIGINATING PARTY: Pat Sanchez  
OTHER PARTIES: Roger Anderson, Mark Ashley. } NMOC

SUBJECT: Discharge Plan Inspections / Reg. letters.

DISCUSSION: DAVIS, MacLuskey, PATE, Hydro test,  
T/C TANK Rental, AND ROTARY welding

DISCUSS NEED FOR Discharge Plans.

CONCLUSIONS/AGREEMENTS: All these facilities will be  
required to submit discharge plans.

PATRICIO W. SANCHEZ:

XC: FILE,

*Patricio W. Sanchez*  
*R. Anderson*  
*Mark Ashley*

## OIL CONSERVATION DIVISION

September 19, 1995

**CERTIFIED MAIL****RETURN RECEIPT NO.Z-765-963-054**

Mr. Bob Harrell  
 Davis Tool  
 P.O. BOX 2037  
 Hobbs, NM 88241

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

Dear Mr. Harrell:

Outlined below are the observations and findings made by the NMOCD team that recently inspected the Davis Tool facility at 4710 Carlsbad HWY in Hobbs, New Mexico.

1. No lab at the facility.
2. Below grade sump present in the shop area.( Needs to cleaned and inspected yearly and documented and isolated from the leech area by removing the line.)
3. Class V. injection well at the facility(i.e.) old leech field - this will have to be investigated in order to determine the extent of possible groundwater contamination.

**note:** At the inspection on 9/12/95 Davis Tool was given a copy of the OCD closure guidelines for unlined surface impoundment closure - use the guidelines along with 40 CFR part 261 testing requirements and WQCC 3-103 A., B., and C., for groundwater standards.

4. No surface impoundments.
5. Provide the NMOCD with a copy of the shop solvent.
6. All tanks, drums, and etc. need to meet OCD guidelines for secondary containment - i.e. fuel area and waste/wash water storage tank, empty drum storage area.
7. No written spill contingency plan.
8. Empty paint cans are air dried before going into the waste management dumpster.
9. Empty drums, used oil , used filters need to be stored and disposed of in a manner approved by OCD.
10. Items need to be properly and clearly labelled.

Mr. Bob Harrell  
September 19, 1995  
Page 2

11. Oil contaminated soil needs to be cleaned up according to NMOCD spill and leak guidelines - a copy of which was made available by the NMOCD inspectors.
12. The water stored in the outdoor tank needs to be sampled and tested for hazardous characteristics per 40 CFR part 261. ( This is non-exempt water) The sludge in the tank also needs to be tested per TCLP. (This sludge is non-exempt)
13. The contaminated oily soil on the North East part of the property needs to be sampled and have a TCLP, TPH and BTEX analysis on it - then OCD can determine proper disposal for the soil.
14. The same applies to the soil off of the pavement and soil under the used oil storage area.

If Davis Tool has any questions regarding this matter please feel free to call me at (505)-827-7156. See the attached diagram for reference.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricio W. Sanchez", with a long, sweeping horizontal stroke extending to the right.

Patricio W. Sanchez  
Petroleum Engineer

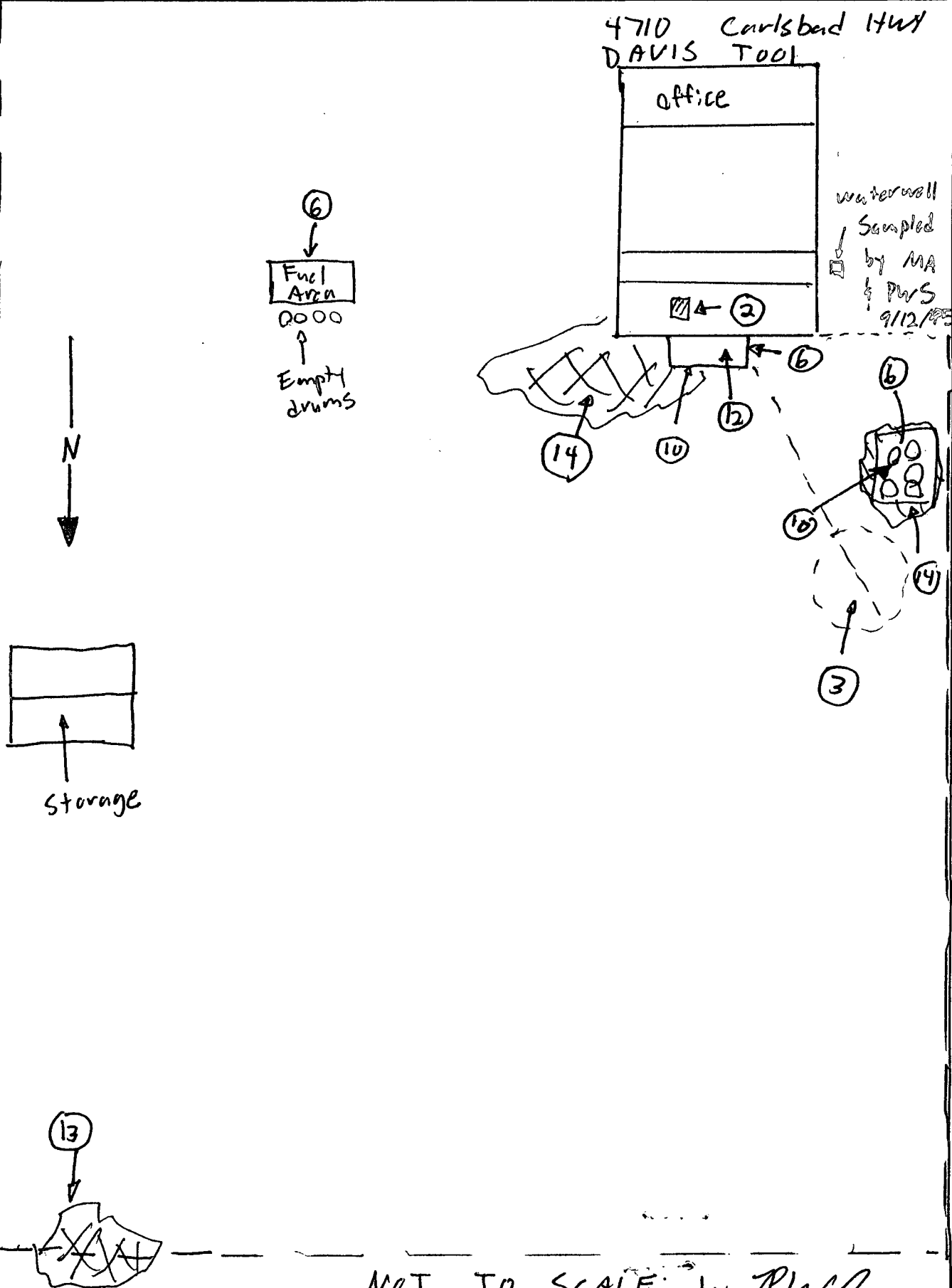
xc: Mr. Wayne Price and Mr. Jerry Sexton.



Hobbs

CARLSBAD HWY

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



NOT TO SCALE: by PWS

Z 765 963 054



Receipt for  
Certified Mail

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

Sent to	
Inspection.	
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

## INSPECTION CHECKLIST FOR OILFIELD SERVICE COMPANIES

FACILITY NAME: DAVIS TOOL CO. OPERATOR: <sup>BOB</sup>HARRELL DATE: 9/12/95  
 LOCATION: 4910 W CARLSBAD HWY  
 COMPANY REP(S): BOB HARRELL / PAUL THOMAS  
 NMOCD REP(S): PAL SANCHEZ / WAYNE PRICE / MARK ABNEY  
 SERVICE COMPANY TYPE: OIL FIELD RENTAL

1. LAB PRESENT ( YES / NO )
2. Below grade sumps or tanks. ( YES / NO )
3. Class IV or V Injection well(s). ( YES / NO )
4. Surface impoundments (pits) of any kind. ( YES / NO )
5. Hazardous shop solvents present. ( YES / NO ) TBD
6. All tank/drum/fuel/lube oils stored onsite meet OCD guidelines for service company facilities. (i.e. berming and pad and curb type containments.) ( YES / NO )
7. A written spill contingency plan posted/available and implemented at the facility. ( Can be viewed at the facility by OCD ) ( YES / NO )
8. Wet paint waste stored at the facility-all paint cans dried before disposal. ( YES / NO )
9. All wash facilities for vehicles on a pad and curb type containment. ( YES / NO )
10. Maximum volumes: ( YES / NO )
  - A. Chemical type drums < 25 @ 55 gal/drum or an aggregate volume of 1375 gal of chemical product.
  - B. Fuel < 660 gal in above grade tank(s)
  - C. Used oil < 660 gal in above grade tank(s)
  - D. Lube oil < 660 gal in above grade tank(s)
  - E. Maximum total volume of A thru D < 3355 gal
11. All wastes such as empty drums, buckets, oil filters, and etc stored/disposed by an OCD approved method. ( YES / NO )
12. All items that contain fluids are properly labelled. ( YES / NO )
13. All stormwater contained within the facility. ( YES / NO )

COMMENTS: SAMPLED water well.

OLD LEECH FIELD ON SITE - WASTE WATER  
FROM WASH BAY DISCHARGED FOR PAST  
14-15 YEARS; ~ 6 MONTHS AGO LEECH FIELD  
DISCONTINUED & ISOLATED! WASTE WATER  
& SLUDGE BEING STORED INSIDE 30' STEEL PIT!  
WATER IS RECYCLED UNTIL UNUSABLE, THEN AKERS  
TO DISPOSAL; A-A, CARBON + SOILS, FOR CO. SEPTIC (SLUDGE ONLY)  
SUMP ONLY

DATE: 9/12/95

TIME: 10:05 AM

DAVIS TOOL CO.

Paul Thomas -

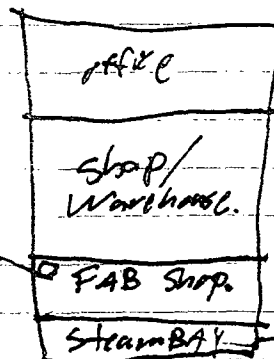
Bob Hannell -

Street.

4710 Carlsbad Hwy.

Mail: P.O. Box 2037

Hobbs, NM 88241



Fishing - Rental

Tool Co. - BOPS / Jaws /

Reverse units.

- Office Trash - Waste Management.

(A) Solvent - do have MSDS -

E & E picks up used solvent  
and oil

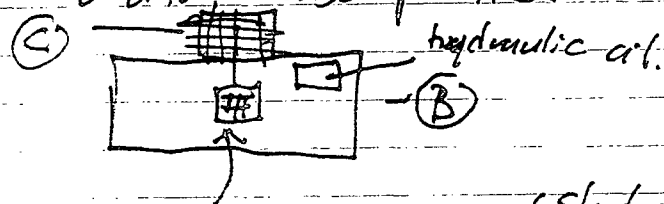
DATE: 9/12/95

TIME: 10:15 AM

oil Filters turned outside -  
hauled to a scrap metal -  
Hobbs Iron/Metal

- Small welding dust goes to  
Waste Management.

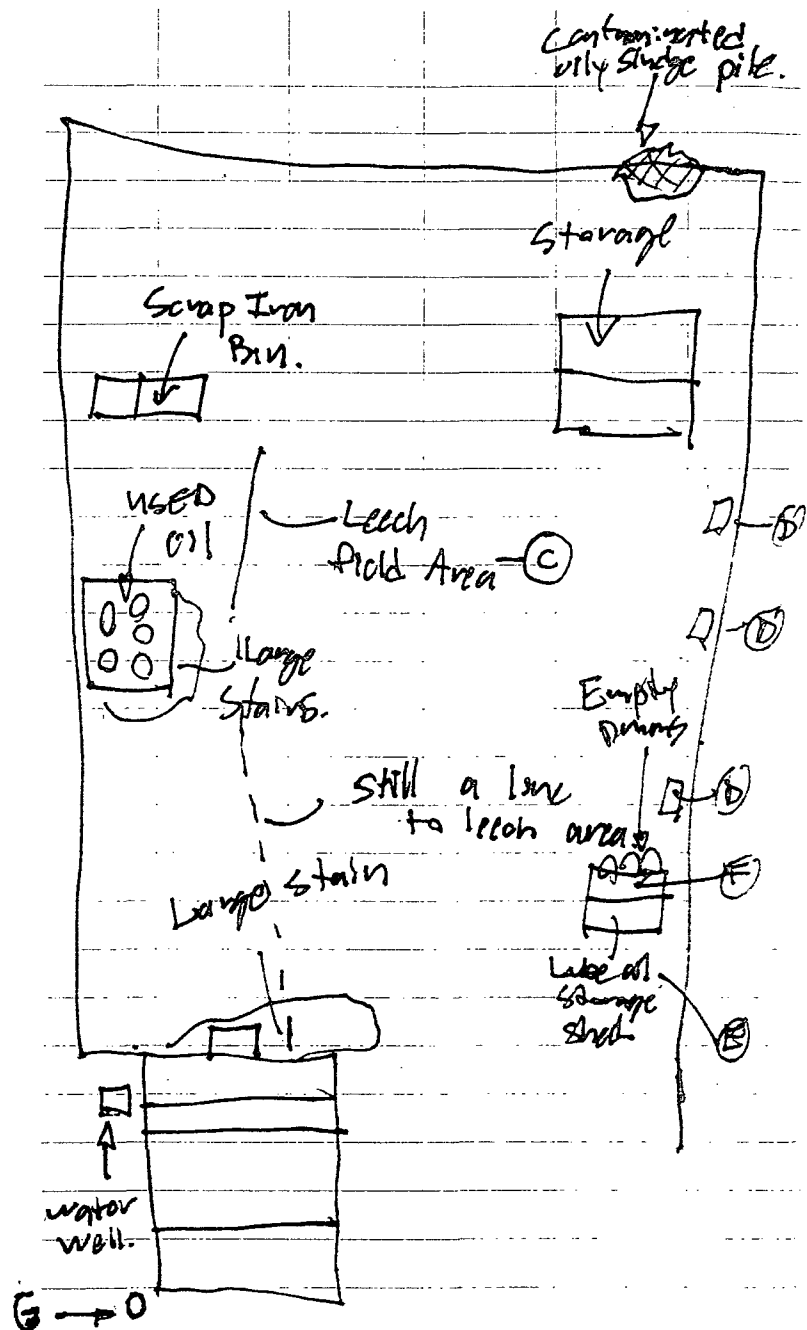
(B) Hot Water Washer -  
Water base paints.



- hauled by Taylor & A.A.  
E Sator  
- Paint thinner used up.

(C) Square tank -  
water hauled by  
Loco Hills / A.A. oil fields

Disposal Not Sure Need a  
Name.  
Steve Carter  
Transports.



DATE: 9/12/95 TIME: 10:25 AM

Use a Metal Mechanical Solids. Screener on outflow tank. (TANK is netted).

Davis Tool Inc. original facility (Bob Davis) now owned by Butch Macartay.

- (C) Not sure about leach field plans.
- Leach field No longer in use. (About < 1 yr.)
- Not sure how leach line was closed.

Old times go to ?

(D) EMPTY Drums.

(E) Lube/Diesel Storage.

(F) Batteries.

DATE: 9/12/95

TIME: 10:45 AM

- water well provides - Domestic.
- Had water analyzed.

⑥ Septic Tank.

Will send water analysis  
to Davis Tool.

**DAVIS**

**TOOL**

HOBBS, NEW MEXICO

Fishing Tools

Reverse Units

Rental Tools

Blowout Preventers

**R. W. (BOB) HARRELL**

Bus. (505) 397-2000

Res. (505) 393-8211