

**NM1 - \_\_\_\_\_ 63 \_\_\_\_\_**

**Cell 1**

**Movement of Oil  
Field Waste and  
Discovery of Tear  
in Liner System**

**Jones, Brad A., EMNRD**

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**From:** Jones, Brad A., EMNRD  
**Sent:** Wednesday, August 10, 2022 9:23 AM  
**To:** tshreve@ndblandfill.com; mkingsley@Parkhill.com  
**Cc:** Barr, Leigh P EMNRD  
**Subject:** RE: [EXTERNAL] OWL NDBL Cell 1 and 2 Tie-In

Tim and Matt,

Thank you for notifying OCD of the shifting oil field waste event and informing the agency of the discovered tear to the liner system in Cell 1. OCD has determined that the event in Cell 1 needs to be documented in the administrative record for reference and in case liquids begin to appear to the leak detection sump of Cell 1 in the future.

Please submit a report that documents when and where the movement of oil field waste has occurred in Cell 1, provides photo documentation of the tear(s) discovered in the liner system (including GPS coordinates), provides written and photo documentation of the repair(s), including any associated QA/QC testing results (if applicable), and provides a written summary of the work performed to investigate the liner system and to assess it for further damage. The report should be updated periodically until the investigation and the repairs of the liner system have been completed.

OCD is also requesting the submittal of a surface waste management facility landfill cell development and construction plan that will specify a waste height and slope limit that must not be exceeded prior to completing the tie-in to the next landfill cell. It should include a protocol to immediately notify OCD when OWL personnel discover any signs of shifting oil field waste. Please submit the surface waste management facility landfill cell development and construction plan for review and consideration of approval within 30 days of this request.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Brad Jones

**Brad A. Jones** • Environmental Scientist Specialist - Advanced  
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**From:** Matt Kingsley <[mkingsley@Parkhill.com](mailto:mkingsley@Parkhill.com)>  
**Sent:** Thursday, August 4, 2022 3:47 PM  
**To:** Barr, Leigh P EMNRD <[leighp.barr@state.nm.us](mailto:leighp.barr@state.nm.us)>  
**Cc:** Timothy Shreve <[tshreve@ndblandfill.com](mailto:tshreve@ndblandfill.com)>  
**Subject:** [EXTERNAL] OWL NDBL Cell 1 and 2 Tie-In

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Leigh,

As discussed this morning, we have been working towards completing the tie-in between Cells 1 and 2 at the OWL NDBL Surface Waste Management Facility. In July of last year we completed construction of approximately five of the eight acres that comprise Cell 2. We stopped short along the east side of Cell 2 at that time as the adjacent Cell 1 slope had slid out to the edge of the lined area of Cell 1. This had prevented us from bringing the two geosynthetic liner systems together at that time. We also held a meeting with Jim Griswold and Emily Hernandez of the OCD and Tim Shreve of OWL via video call to inform them of these conditions. No waste materials were outside the liner system or outside the containment of Cell 1.

Since this time OWL continued development by constructing Cell 3 in the fall of 2021. However, OWL has continuously worked to remove material from the Cell 1 area to expose liner material as their work forces had availability. OWL then proceeded in January 2022 to hire an outside contractor to expedite removal of the overburden from the west edge of the Cell 1 geosynthetic liner system. OWL has successfully exposed 80% of the west edge of Cell 1 at this time. I have inspected the exposed geosynthetic liner over the last several months and have found everything intact and in the correct location according to the as-builts recorded at the time of construction.

Today as we exposed the very center of the Cell 1 west slope a tear was observed in the geosynthetics. We have removed the waste materials in and around this area and continue to investigate the remaining geosynthetics in this vicinity. The waste material lying directly on top of the liner system is very soil like and has no free liquids.

In order to assure that we expose fully competent liner in this area we are proposing to complete the following:

1. We will excavate back to the nearest geomembrane seam that is east (to the inside of the cell) of the observed tear.
2. We will inspect the seam to assure integrity between the two adjacent sheets of HDPE geomembrane.
3. We will use a micrometer measuring device to sample the exposed edge of the 60 mil HDPE geomembrane for thickness. The micrometer we have is a dial caliper style and is accurate to 1 mil. We will measure and record the thickness at least every ten feet along the exposed edge of the geomembrane. We will also measure any areas that visually appear to be damaged in any way. Our goal here is to assure that the 60 mil HDPE geomembrane has not stretched and become thinner indicating additional possibilities for tears.

It is OWL's desire to be transparent regarding these events and to communicate corrective action plans to the department in a timely manner. We would appreciate your feedback and advice on the proper reporting method for this event.

Much appreciated,

Matt Kingsley, P.E.  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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CONDITIONS

Action 132674

**CONDITIONS**

Operator: OWL LANDFILL SERVICES, LLC 8214 Westchester Drive Dallas, TX 75225	OGRID: 371820
	Action Number: 132674
	Action Type: [C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)

**CONDITIONS**

Created By	Condition	Condition Date
bjones	None	8/10/2022