

NM1 - ____5____

**Response to
OCD's Review
of the 2022
Annual Report**

____2022____

Jones, Brad, EMNRD

From: Jones, Brad, EMNRD
Sent: Friday, May 19, 2023 1:04 PM
To: Michael Montano
Subject: RE: [EXTERNAL] RE: *External* NM1-5 Basin Disposal Inc. 2022 Annual Report review

Michael,

Thank you for the quick response and update. You do not need to submit any follow-up reports. Please make sure everything is inspected in 2023 and reported in the 2023 Annual Report.

Sincerely,

Brad Jones

Brad A. Jones • Environmental Scientist Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
1220 S. Saint Francis Drive | Santa Fe, New Mexico 87505
(505) 469-7486 | brad.a.jones@emnrd.nm.gov
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From: Michael Montano <mmontano@basindisposalinc.com>
Sent: Friday, May 19, 2023 10:42 AM
To: Jones, Brad, EMNRD <brad.a.jones@emnrd.nm.gov>
Subject: [EXTERNAL] RE: *External* NM1-5 Basin Disposal Inc. 2022 Annual Report review

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Mr. Jones,

Thank you for your responses on the discrepancies to our Annual Report and I have addressed all of them. The T3, T4 and T5 tanks have been added to the report for next year and the T1 and T2 tanks were tested but not recorded and missed on the spread sheet this year. I have contacted Enterprise and will make sure pipeline is tested in 2023 and annually thereafter. Do you need any follow up reports from me as it pertains to this year's report? Or do I just need to apply all discrepancies to next year's report?
Thank you,

Michael Montano

General Manager
Basin Disposal Inc.
505-334-3013 - Office
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mmontano@basindisposalinc.com

From: Jones, Brad, EMNRD <brad.a.jones@emnrd.nm.gov>
Sent: Wednesday, May 17, 2023 3:24 PM
To: Michael Montano <mmontano@basindisposalinc.com>
Subject: *External* NM1-5 Basin Disposal Inc. 2022 Annual Report review

Mr. Montano,

The Oil Conservation Division (OCD) has completed the review of the 2022 Annual Report for Basin Disposal Inc.'s (Basin) surface waste management facility under permit NM1-5. The OCD discovered the following discrepancies during its review:

- The Annual Tank H2S Measurements inspection form indicates that Separation Tanks T1 and T2 were not assessed for H2S during 2022 annual sampling event. There are no H2S reading provided on the September 5, 2022 inspection form for Separation Tanks T1 and T2. Permit Condition 9H states "In addition to the commitments specified in the Hydrogen Sulfide (H2S) Prevention and Contingency Plan in Section 3 of Volume II of the approved Application, the Owner/Operator shall monitor at least once per year for hydrogen sulfide (H2S) at the vent of covered tanks or at the top of open tanks as specified in Attachment IH.1.F of the approved Application. The Owner/Operator shall comply with 19.15.11.12E NMAC as required. The Owner/Operator shall include the results of the annual hydrogen sulfide monitoring event in its Annual Report." OCD also noticed that open top Settling Tanks T3, T4, and T5 are not listed on the inspection form for H2S inspections. Update the Annual Tank H2S Measurements inspection form to include the 3 open top Settling Tanks T3, T4, and T5 and ensure that all tanks identified on the Annual Tank H2S Measurements inspection form are inspected during the next annual as required of Condition 9H of OCD's May 19, 2010 approval of permit NM1-5 and annually thereafter.
- Based upon the review of the Underground Process and Wastewater Pipelines Testing inspection form, the last annual inspection of the Enterprise Pipeline was performed on February 10, 2020 and is overdue. Please ensure that the Enterprise Pipeline is tested in 2023 and annually thereafter.
- In the future, please combine the annual report into single pdf file and submit as a "Non-Fee SWMF Submittal" through OCD Permitting for OCD's review.

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

Sincerely,

Brad Jones

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CONDITIONS

Action 231785

CONDITIONS

Operator: BASIN DISPOSAL INC P.O. Box 100 Aztec, NM 87410	OGRID:
	1739
	Action Number:
	231785
Action Type:	
[C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)	

CONDITIONS

Created By	Condition	Condition Date
bjones	None	6/22/2023