

**NM1 - 5**

**PART 35  
REQUESTS**

**2011- 2015**

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**David Martin**  
Cabinet Secretary

**Brett F. Woods, Ph.D.**  
Deputy Cabinet Secretary

**Jami Bailey, Division Director**  
Oil Conservation Division



October 28, 2014

Mr. John Volkerding  
Basin Disposal, Inc.  
P.O. Box 100  
Aztec, New Mexico 87410

RE: Determination Request of Non-Domestic Waste Status  
Commercial Surface Waste Management Facility Permit NM1-005  
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West  
NMPM, San Juan County, New Mexico

Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated October 21, 2014, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill. The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC (review of the Corrosivity results) and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us).

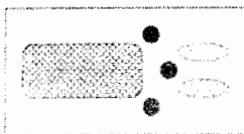
Sincerely,

A handwritten signature in black ink, appearing to read "BAJ", with a large, sweeping flourish underneath.

Brad A. Jones  
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec



# BASIN DISPOSAL, INC.

"SPECIALIZING IN DISPOSAL OF PRODUCED WATER AND DRILLING MUD

P.O. BOX 100 - AZTEC, NEW MEXICO 87410 - PHONE: (505) 334-3013

RECEIVED  
OCD

2014 OCT 23 PM 2:59

21 October 2014

Brad Jones  
EMNRD/OCD  
Environmental Bureau  
1220 South St. Francis Dr.,  
Santa Fe, New Mexico 87505

RE: Non-Domestic Waste, Subsection (D), Paragraph 2 of Section 19.15.9.712 NMAC.

Dear Mr. Jones;

Paragraph C of 19.15.9.712 NMAC states:

"Waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility after testing and prior written authorization of the division. Before authorization is granted, copies of test results must be provided to the division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the division. In appropriate cases and so long as a representative sample is tested, the division may authorize disposal of a waste stream listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC without individual testing of each delivery."

Subsection D, Paragraph 2 (m) lists : Produced water filters must be tested for Corrosivity (and drained and then air-dried for at least 48 hours before testing).

Prior to injection of the produced water from Basin Disposal, the water is filtered through a set of 20um and a set of 5um filters. Basin Disposal requests permission to dispose of these filters at the San Juan County Regional Landfill operated by Waste Management.

The Corrosivity analysis of both the 5um and a 20um filters is attached for the OCD's review and approval.

The approval granted by the OCD November 7, 2011 on did not explicitly list an annual renewal requirement nor could I find a frequency specified in 19.15.9.712 NMAC, Waste Management has requested that the OCD review the attached analysis and provide an updated approval.

I thank you for your help and if you have any questions, please feel free to phone me at 334-3013 or 320-2840 or via email at [jvolkerding@basindisposalinc.com](mailto:jvolkerding@basindisposalinc.com)

Sincerely;

  
John Volkerding  
General Manager

Encl:

1. Envirotech Analysis
2. OCD Approval dated 12/13/2010
3. Waste Management Request

Cc:

1. Brandon Powell, OCD/Aztec, 1000 Rio Brazos, Aztec, NM 87410
2. File



## Analytical Report

### Report Summary

Client: Basin Disposal Inc.

Chain Of Custody Number: 17875

Samples Received: 10/13/2014 12:10:00PM

Job Number: 03058-0003

Work Order: P410047

Project Name/Location: Filters

Entire Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Tim Cain', is written over a horizontal line.

Date: 10/17/14

Tim Cain, Laboratory Manager

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



Basin Disposal Inc. PO Box 100 Aztec NM, 87410	Project Name: Filters Project Number: 03058-0003 Project Manager: Basin Disposal Inc.	<b>Reported:</b> 17-Oct-14 12:48
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### Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
5mm	P410047-01A	Solid	10/10/14	10/13/14	Glass Jar, 4 oz.
20mm	P410047-02A	Solid	10/10/14	10/13/14	Glass Jar, 4 oz.

Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc.



Basin Disposal Inc. PO Box 100 Aztec NM, 87410	Project Name: Filters Project Number: 03058-0003 Project Manager: Basin Disposal Inc.	<b>Reported:</b> 17-Oct-14 12:48
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**5mm**

**P410047-01 (Solid)**

Analyte	Result	Reporting		Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit	Units						

**Cation/Anion Analysis**

pH @21.3°C	8.16		pH Units	1	1442007	10/13/14	10/13/14	EPA 9045D	
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Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc.





Basin Disposal Inc. PO Box 100 Aztec NM, 87410	Project Name: Filters Project Number: 03058-0003 Project Manager: Basin Disposal Inc.	<b>Reported:</b> 17-Oct-14 12:48
--	---	-------------------------------------

**20mm**

**P410047-02 (Solid)**

Analyte	Result	Reporting		Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit	Units						

**Cation/Anion Analysis**

pH @21.4°C	8.23		pH Units	1	1442007	10/13/14	10/13/14	EPA 9045D	
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Basin Disposal Inc.  
PO Box 100  
Aztec NM, 87410

Project Name: Filters  
Project Number: 03058-0003  
Project Manager: Basin Disposal Inc.

**Reported:**  
17-Oct-14 12:48

#### Notes and Definitions

DET Analyte DETECTED  
ND Analyte NOT DETECTED at or above the reporting limit  
NR Not Reported  
dry Sample results reported on a dry weight basis  
RPD Relative Percent Difference

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# CHAIN OF CUSTODY RECORD

17875

Client: <b>Basin Disposal</b>		Project Name / Location: <b>Filters</b>		ANALYSIS / PARAMETERS																									
Email results to: <b>PGurulek@BasinDisposal-Ind.com</b>		Sampler Name:		TPH (Method 8015)		BTEX (Method 8021)		VOC (Method 8260)		RCRA 8 Metals		Cation / Anion		RCI		TCLP with H/P		CO Table 910-1		TPH (418.1)		CHLORIDE		Sample Cool		Sample Intact			
Client Phone No.: <b>320-7499-</b>		Client No.: <b>03058-0003</b>		Sample Date		Sample Time		Lab No.		No./Volume of Containers		Preservative																	
Sample No./ Identification		10/10		7:00am		P410047-01		1-4oz jar				HNO <sub>3</sub>												X		X			
20mm		10/10		7:00am		P410047-02		1-4oz jar				HCl												X		X			
Relinquished by: (Signature) <i>[Signature]</i>		Date		Time		Received by: (Signature) <i>[Signature]</i>		Date		Time		Received by: (Signature)		Date		Time													
Relinquished by: (Signature) <i>[Signature]</i>		10-13-14		12:00										10/13/14		2:10													
Sample Matrix																													
Soil <input type="checkbox"/> Solid <input type="checkbox"/> Sludge <input type="checkbox"/> Aqueous <input type="checkbox"/> Other <input checked="" type="checkbox"/> Filters																													
<input type="checkbox"/> Sample(s) dropped off after hours to secure drop off area.																													



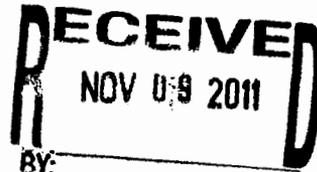
20.6 18.4

# New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**John H. Bemis**  
Cabinet Secretary-Designate

**Brett F. Woods, Ph.D.**  
Deputy Cabinet Secretary



November 7, 2011

**Jami Bailey**  
Division Director  
Oil Conservation Division



Mr. John Volkerding  
General Manager  
Basin Disposal, Inc.  
P.O. Box 100  
Aztec, New Mexico 87410

RE: Determination Request of Non-Domestic Waste Status  
Commercial Surface Waste Management Facility Permit NM-1-005  
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West  
NMPM, San Juan County, New Mexico

Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated November 4, 2011, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill. The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC (review of the Corrosivity results) and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Brad A. Jones". The signature is written over a large, circular scribble or stamp.

**Brad A. Jones**  
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec

## John Volkerding

---

**From:** TSCPhoenix@wm.com  
**Sent:** Saturday, October 11, 2014 5:15 AM  
**To:** John Volkerding  
**Subject:** [WMSolutions.com] 30 Day Expiration Notice for Profile 09652B



**THINK GREEN:**

OCTOBER, 11 2014

## RE: 30 Day Notice of Expiring Profile 09652B

Dear John Volkerding,

Your profile **09652B** will expire in **30** days.

If you are no longer the contact for this material, please forward this notice to the appropriate person. At Waste Management we strive to make managing your profiles fast and easy. With our new Smart Profile<sup>®</sup> Renewal Process many profile renewals can be completed in minutes! Your profile details are below:

**Profile Number** 09652B  
**Material Name** CARTRIDGE FILTERS  
**Generator Name** Basin Disposal Inc.  
**Disposal Facility** San Juan County Landfill  
**Expiration Date** 11/10/2014

**Renewal Requirements: New EZ Profile<sup>™</sup> is required.**

**Testing Parameter(s):**

- Corrosivity/pH

**Additional Comments:**

- Current NM OCD approval.



New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**John H. Bemis**  
Cabinet Secretary-Designate

**Brett F. Woods, Ph.D.**  
Deputy Cabinet Secretary

**Jami Bailey**  
Division Director  
Oil Conservation Division



November 7, 2011

Mr. John Volkerding  
General Manager  
Basin Disposal, Inc.  
P.O. Box 100  
Aztec, New Mexico 87410

RE: *Determination Request of Non-Domestic Waste Status*  
Commercial Surface Waste Management Facility Permit NM-1-005  
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West  
NMPM, San Juan County, New Mexico

Dear Mr. Volkerding:

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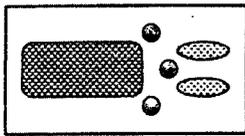
Sincerely,



Brad A. Jones  
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec



# BASIN DISPOSAL, INC.

"SPECIALIZING IN DISPOSAL OF PRODUCED WATER AND DRILLING MUD"  
P.O. BOX 100 - AZTEC, NEW MEXICO 87410 - PHONE: (505) 334-3013

RECEIVED OCD

2011 NOV -7 P 11:22

4 November 2011

Brad Jones  
EMNRD/OCD  
Environmental Bureau  
1220 South St. Francis Dr.,  
Santa Fe, New Mexico 87505

RE: Non-Domestic Waste, Subsection (D), Paragraph 2 of Section 19.15.9.712 NMAC.

Dear Mr. Jones;

Paragraph C of 19.15.9.712 NMAC states:

"Waste listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC may be disposed of at a solid waste facility after testing and prior written authorization of the division. Before authorization is granted, copies of test results must be provided to the division and to the solid waste facility where the waste is to be disposed. Disposal may commence only after written authorization of the division. In appropriate cases and so long as a representative sample is tested, the division may authorize disposal of a waste stream listed in Subsection D, Paragraph (2) of Section 19.15.9.712 NMAC without individual testing of each delivery."

Subsection D, Paragraph 2 (m) lists : Produced water filters must be tested for Corrosivity (and drained and then air-dried for at least 48 hours before testing).

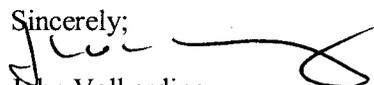
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The Corrosivity analysis of both the 5um and a 20um filters is attached for the OCD's review and approval.

The approval granted by the OCD December 13, 2010 on did not explicitly list an annual renewal requirement nor could I find a frequency specified in 19.15.9.712 NMAC, Waste Management has requested that the OCD review the attached analysis and provide an updated annual approval.

I thank you for your help and if you have any questions, please feel free to phone me at 334-3013 or 320-2840 or via email at [jvolkerding@basindisposalinc.com](mailto:jvolkerding@basindisposalinc.com)

Sincerely;

  
John Volkerding  
General Manager

Encl:

1. Envirotech Analysis
2. OCD Approval dated 12/13/2010

Cc:

1. Brandon Powell, OCD/Aztec, 1000 Rio Brazos, Aztec, NM 87410
2. File



## SUSPECTED HAZARDOUS WASTE ANALYSIS

Client:	Basin Disposal	Project #:	03058-0003
Sample ID:	20mm	Date Reported:	11-02-11
Lab ID#:	00154	Date Sampled:	10-26-11
Sample Matrix:	Solid	Date Received:	10-31-11
Preservative:		Date Analyzed:	11-01-11
Condition:	Intact	Chain of Custody:	12859

Parameter	Result
-----------	--------

**CORROSIVITY:**                      **Negative**                      **pH = 7.94**

### RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
-----------	---------------------------

**CORROSIVITY:**                      Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22.  
(i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)

**Reference:**                              40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

**Comments:**                              **Filters**

Analyst

Review



## SUSPECTED HAZARDOUS WASTE ANALYSIS

Client:	Basin Disposal	Project #:	03058-0003
Sample ID:	5mm	Date Reported:	11-02-11
Lab ID#:	60155	Date Sampled:	10-26-11
Sample Matrix:	Solid	Date Received:	10-31-11
Preservative:		Date Analyzed:	11-01-11
Condition:	Intact	Chain of Custody:	12859

Parameter	Result
-----------	--------

**CORROSIVITY:**                      **Negative**                      **pH = 8.07**

### RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
-----------	---------------------------

**CORROSIVITY:**                      Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22.  
(i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)

**Reference:**                              40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

**Comments:**                              **Filters**

Analyst

Review

# CHAIN OF CUSTODY RECORD

12859

2/4

13:20:17 11-02-2011

Client: <u>Basin Disposal</u>			Project Name / Location: <u>Filters</u>				ANALYSIS / PARAMETERS												
Client Address: <u>200 Montrose</u>			Sampler Name: <u>Paul Burke</u>				TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	PCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE	Sensitivity	Sample Cool	Sample Intact
Client Phone No.: <u>505-632-8936</u>			Client No.: <u>03058-0003</u> <u>For results to</u> <u>505-320-7499 - 505-632-2215</u>																
Sample No/ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative													
<u>20mm</u>	<u>10-26-11</u>	<u>7:00am</u>	<u>60154</u>	<u>Soil</u> <u>Sludge</u> <u>Aqueous</u>														<u>2</u>	<u>Y</u>
<u>Same</u>	<u>↓</u>		<u>60155</u>	<u>Soil</u> <u>Sludge</u> <u>Aqueous</u>														<u>2</u>	<u>Y</u>
				<u>Soil</u> <u>Solid</u> <u>Aqueous</u>															
				<u>Soil</u> <u>Solid</u> <u>Aqueous</u>															
				<u>Soil</u> <u>Solid</u> <u>Aqueous</u>															
				<u>Soil</u> <u>Solid</u> <u>Aqueous</u>															
				<u>Soil</u> <u>Solid</u> <u>Aqueous</u>															
				<u>Soil</u> <u>Solid</u> <u>Aqueous</u>															
Relinquished by: (Signature) <u>[Signature]</u>			Date	Time	Received by: (Signature) <u>[Signature]</u>			Date	Time										
			<u>10/31/11</u>	<u>10:30 AM</u>				<u>10/31/11</u>	<u>10:30 AM</u>										
Relinquished by: (Signature)					Received by: (Signature)														
Relinquished by: (Signature)					Received by: (Signature)														



5798 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com

505-632-1865

# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor

**Jim Noel**

Cabinet Secretary

**Karen W. Garcia**

Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



RECEIVED  
DEC 15 2010  
BY:

December 13, 2010

Mr. John Volkerding  
General Manager  
Basin Disposal, Inc.  
P.O. Box 100  
Aztec, New Mexico 87410

**RE: Determination Request of Non-Domestic Waste Status  
Commercial Surface Waste Management Facility Permit NM-1-005  
Facility Location: SE/4 NW/4 of Section 3, Township 29 North, Range 11 West  
NMPM, San Juan County, New Mexico**

Dear Mr. Volkerding:

The Oil Conservation Division (OCD) has received and reviewed Basin Disposal, Inc.'s (Basin) request, dated December 9, 2010, to dispose of the produced water filters (20 um and 5 um filters) at a solid waste facility – the San Juan County Regional Landfill. The OCD has determined the laboratory analytical to demonstrate that the produced water filters satisfy the criteria specified in 19.15.35.8 NMAC and hereby grants the approval to dispose of the produced water filters at the solid waste facility identified above.

OCD approval does not relieve Basin of liability should its operations at this facility prove to have been harmful to fresh water, public health or the environment. Nor does it relieve Basin of its responsibility to comply with the rules and regulations of any other governmental entity.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Brad A. Jones".

Brad A. Jones  
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec

Oil Conservation Division  
1220 South St. Francis Drive • Santa Fe, New Mexico 87505  
Phone (505) 476-3440 • Fax (505) 476-3462 • [www.emnrd.state.nm.us/OCD](http://www.emnrd.state.nm.us/OCD)

