

GW - 135

**INSPECTION
&
DATA**

RECEIVED

2009 FEB 19 PM 1 48



Baker Petrolite

February 14, 2009

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St, Francis Drive
Santa Fe, New Mexico 87505

P.O. Box 4104
Grand Junction, CO 81502
Tel 970-433-8331
Fax 970-639-2538

David Langley
HSE Specialist
Western Divide

Re: Bloomfield, NM- Baker Petrolite Facility
Corrective Actions *GW-135*

Dear Mr. Lowe,

Thank you for the guidance and investment of time that you and Mr. Powell took by visiting and inspection our facility in Bloomfield, New Mexico. We understand as individuals and as an organizational family, the importance of being a good steward of the community and to the environment.

Although, your inspection report letter, dated December 30, 2008, indicated an "Overall Good Condition" report, we have diligently worked on the suggested corrective actions recommended in your letter of GW-135 and we are pleased to submit our completion of those tasks.

In response to concern #1:

- On January 7, 2009, we conducted official SWPPP training for the 4 Corners BPC employees. This SWPPP training will be an annual delivery from that point forward.

With this training, all employees understand:

1. That Stormwater may be discharged from Secondary Containment areas **only** after the water has been tested to ensure it is uncontaminated/ unpolluted.
 2. All spills will be cleaned immediately.
 3. No open containers are allowed.
 4. Stormwater carries away all residuals from our facility. Therefore, we will do our best to eliminate any exposures.
- The water hose you witnessed has been removed from the secondary containment area and will not be placed in that fashion again.

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- All empty drums will be completely empty and stored in a way that bungs are in the 3 & 9 o'clock positions. The tops of all empties will be cleaned of residual product to ensure no seepage into containment floor.

In response to concern #2:

- To ensure we follow Section #14 (Housekeeping in the GW-135) all sumps have been drained, cleaned and rinsed.
- This is a challenge with snow and ice. However, our Code Consultant (Frank Cavaliere) has determined, with your guidance, this is an excepted issue during winter months.
- Our sumps will be cleaned, drained and rinsed. All weather conditions allowing removal of liquids within 72 hours will be adhered to.

In response to concern #3:

- Erosion around containment area has been corrected by re-grading our entire yard. Additionally, the entire perimeter has been rebuilt.
- The area around our Secondary Containment, Empties and Hazardous Materials has been leveled and built up with new gravel, dirt and berming. This will ensure no wash into containment that will displace the volume capacity.
- All sand and dirt has been removed from secondary containments and facility will be inspected/ cleaned weekly.

In response to concern #4:

- All ground staining has been removed and fresh dirt/ gravel has been replaced.
- BMP (Best management Practice) is established at this facility to ensure clean up of any and all spills immediately.

In response to concern #5:

- Secondary Containment areas will be free of all liquids within 72 hours of a rain event or spill event.



Baker Petrolite

Please contact me if the need for a re-inspection exists. It will be my pleasure to escort you during your next visit.

Again, we thank you for your guidance and recommendations for our Bloomfield, NM facility.

Sincerely,

A handwritten signature in cursive script that reads "David Langley".

David Langley
HSE Specialist
Western Divide
Baker Petrolite
(901) 237-4267 office
(970) 433-8331 cell

Cc: Lacy Rosson
Mark Kaulen
Jess Foshee
Michael Geherty



Baker Petrolite

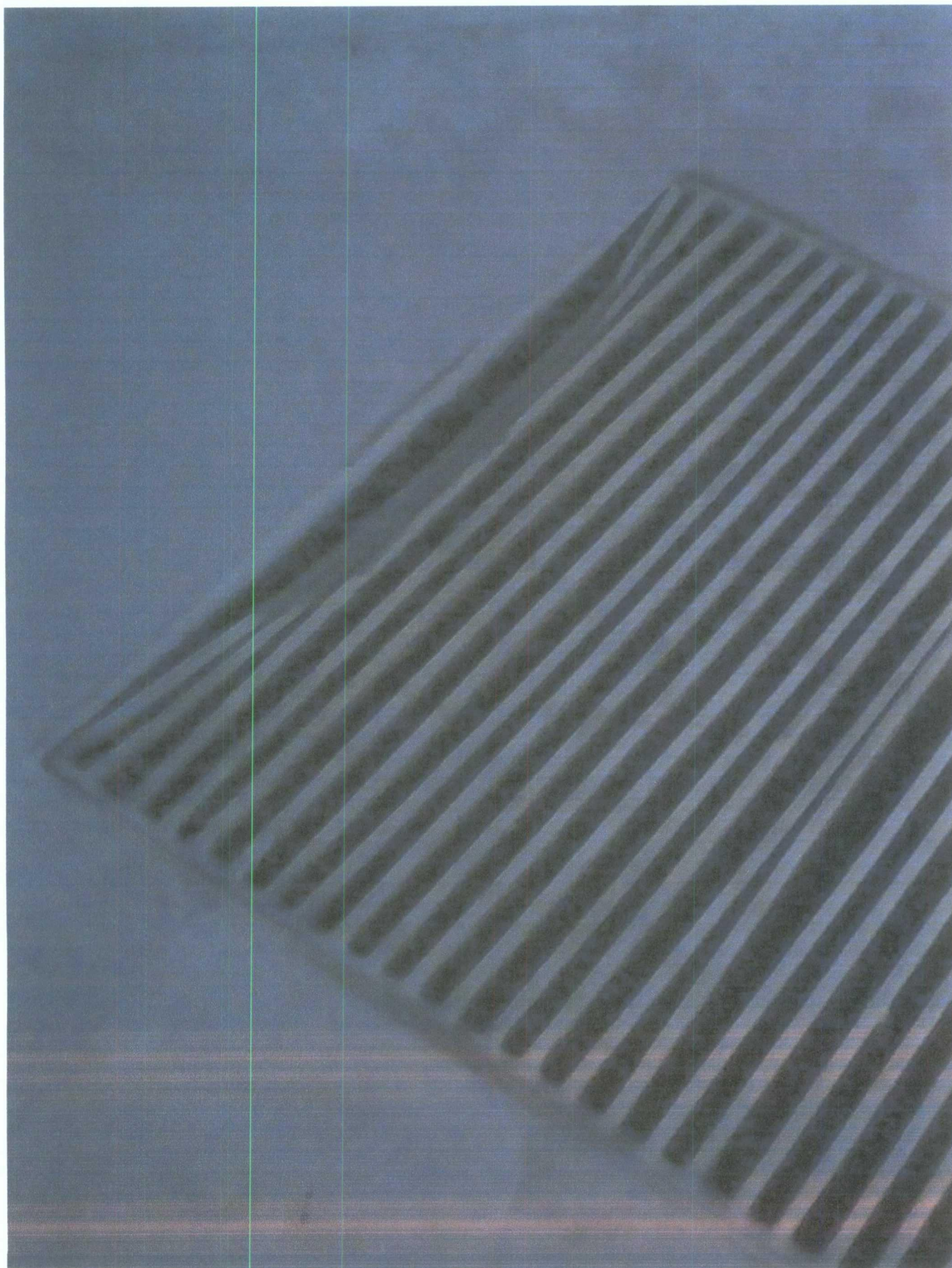
Training Information and Sign-In Sheet

Division WESTERN Area Western America
 Location Western Divide District -- 4 Corners Bloomfield, NM & Aneth, UT
 Training Conducted by David Langley Date of Meeting January 7, 2009
 Employee Submitting Report REGINA HART Phone No. (970) 433-8331

Training Topics Discussed	1. SWPPP TRAINING	Training Server Course Code		
	2.			
	3.			
	4.			
Questions / Follow-up	1.			
	2.			
	3.			
Materials Used (please list the complete titles of all materials used)				
Outline(s)		Handout(s)		
Video(s)		Other		
Name (print legibly)	Emp ID #	Status*	Cost Center	Signature
1. BANTER, DOUG	00113191	AF	350780600	<i>Doug Bainter</i>
2. BERGAL, NATHAN	00114357	AF	350780600	<i>Nathan Bergal</i>
3. BOOTH, BRIAN	00117186	AF	550544200_31712	<i>Brian Booth</i>
4. BURKE, DANNY	0017688	AF	350780600	<i>Danny Burke</i>
5. COOPER, JOSH	00124236	AF	350780600	<i>Josh Cooper</i>
6. GURULE, JOSEPH			350780600	<i>Joseph Gurule</i>
7. JOHNSON, ANTHONY	00056236	AF	350744104	<i>Anthony Johnson</i>
8. JOHNSON, JIMMY	00021900	AF	350780600	<i>Jimmy Johnson</i>
9. LITSUI, RAY	00117968	AF	350780600	<i>Ray Litsui</i>
10. MCGAHA, RAY	00114986	AF	350780600	<i>Ray McGaha</i>
11. RAMALHO, GREG	00059777	AF	550544200_31713	<i>Greg Ramalho</i>
12. ROBB, RICHARD	00124637	N-AF	350780600	<i>Richard Robb</i>
13. SHAY, THOMAS	00115837	AF	350780600	<i>Thomas Shay</i>
14. SMYTHE, JOHNNIE	00125896	N-AF	350780600	<i>Johnnie Smythe</i>
15. SNOW, TONY	00058869	AF	550544200_31710	<i>Tony Snow</i>
16. STUBBS, BRENNAN	00054734	AF	350780600	<i>Brennan Stubbs</i>
17. THOMAS, ERNIE	00126581	AF		<i>Ernie Thomas</i>
18. VELASQUEZ, SANTIAGO	00021948	AF	550544200_31711	<i>Santiago Velasquez</i>
19.				

*Status = AF (active/full time), T (temporary), C (contract), or V (visitor). Indicate new employees as follows: N-AF, N-T, N-C.

Notes about training / special circumstances









<https://webmail.bakerhughes.com/exchange/David.Langley/Inbox/FW:%20Feb%2013,%20...> 2/16/2009

















Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, December 30, 2008 3:08 PM
To: 'Lacy.Rosson@bakerpetrolite.com'
Cc: Hansen, Edward J., EMNRD; Powell, Brandon, EMNRD
Subject: GW-135, Baker Petro Inspection Letter
Attachments: GW-135, Inspection Letter.pdf; GW-135, Inspection Sheet.pdf

Ms. Rosson,

Please find the attached documents pertaining to the OCD inspection conducted at the Bloomfield Baker Hughes facility in November, 2008.

Submit your report to me within the prescribed time identified in the letter.

Thank you for your attention.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/>



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



December 30, 2008

Ms. Lacy Rosson

Re: Inspection Report, GW-135
Baker Hughes – Baker Petrolite
100 Montana Street, Bloomfield, N.M.
San Juan County, New Mexico

Dear Ms. Rosson:

The New Mexico Oil Conservation Division Environmental Bureau performed an onsite inspection of Baker Hughes Oil and Gas Service Company located in Unit letter F of Section 3, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico on November 20, 2008. Mr. Jimmy Johnson and another Baker Hughes employee escorted me and Brandon Powell, OCD Aztec on this inspection. The OCD asks that Baker Hughes address a few concerns identified within this inspection.

Baker Hughes shall address the following concerns (reference photos in attachment):

1. **Photos 1 - 2:** The OCD is concerned that this hose **might** have been used to drain fluids from the empty barrel secondary containment area into a drainage ditch adjacent to the facility. Photo 4, clearly shows that "empty barrels" are not completely empty. Baker Hughes shall ensure that all its employees understand that discharging in such a manner is a clear violation of its discharge permit. The OCD request that Baker Hughes inform all of their employees of the permit conditions.
2. **Photos 3, 9, 10:** All sumps shall be properly maintained throughout this facility. At the time of inspection the sumps were in violation of the discharge permit. Please reference sumps in permit conditions for proper maintenance. Baker Hughes shall address all their sumps and low points within their secondary containment areas.
3. **Photos 5 - 6:** Erosion on the west side of the facility appears to be compromising the hazardous waste and empty barrel secondary containment areas. Eroded sand in the containment area is reducing the volume capacity of the containment. Erosion may "wash away" the cement berms. Baker Hughes shall properly maintain their facility drainage.
4. **Photo 7 - 8:** Baker Hughes shall control their yard staining at all times. Contaminated soil shall be properly disposed of as noted in the ir discharge plan application.
5. **Photo 11:** A secondary containment is not meant to contain fluids for an indefinite amount of time. Doing so violates the discharge plan permit conditions. Fluids shall be removed within 72 hours. Baker Hughes shall properly maintain all secondary containment areas.

Oil Conservation Division * 1220 South St. Francis Drive
* Santa Fe, New Mexico 87505

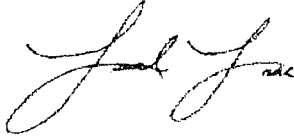
* Phone: (505) 476-3440 * Fax (505) 476-3462* <http://www.emnrd.state.nm.us>



Mr. Lacy Rosson
December 30, 2008
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The OCD has concluded that the facility is overall in **good condition**, but there is room for improvement. Therefore Baker Hughes shall submit resolution/replies to **Items 1 – 5 within 60 days (by Monday March 2nd 2009)** of the inspection letter. If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or E-mail leonard.lowe@state.nm.us.

Sincerely,

A handwritten signature in cursive script, appearing to read 'L. Lowe', with a small 'nd' written at the end of the signature.

Leonard Lowe
Environmental Engineer

xc: OCD District III Office, Aztec

OCD Inspection: Baker Hughes, Bloomfield, GW - 135

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Jimmy Johnson and field hand

Date: 11/20/08

Time: 12:14 - 12:34

Page: 1



Photo 1: Empty barrel containment area with hose.

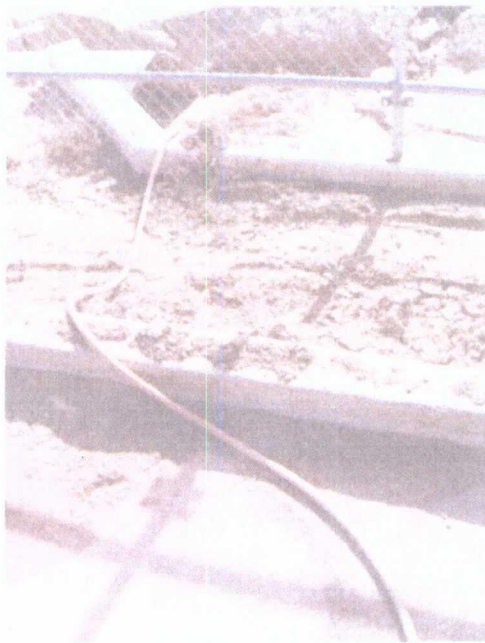


Photo 2: Hose lying from containment area to offsite facility culvert.



Photo 3: Sump in empty barrel containment area full of dirt.

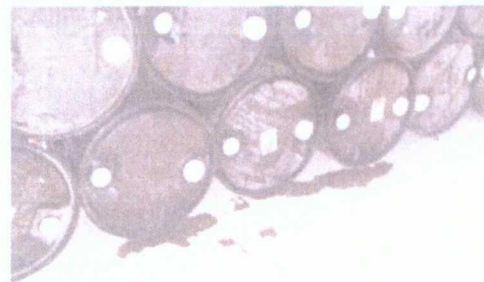


Photo 4: Empty barrel containment area.



Photo 5: Facility erosion north of "hazardous waste" area.

OCD Inspection: Baker Hughes, Bloomfield, GW - 135

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Photo 6: Erosion near containment area.

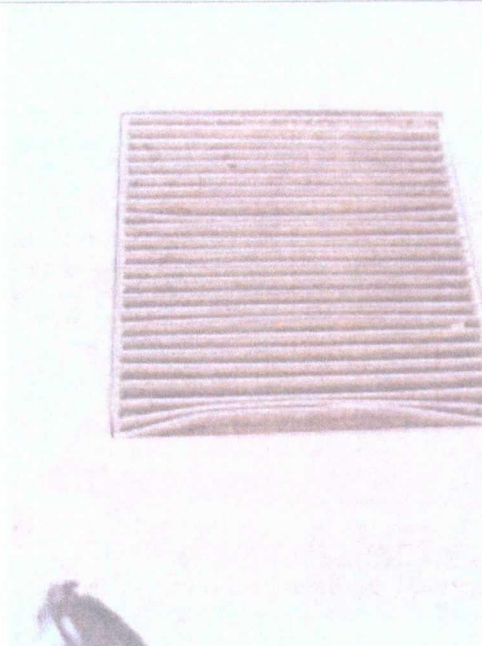


Photo 9: Sump in containment area has fluids.



Photo 7: Staining in yard, facing north.



Photo 10: Sump in corrosive drum area, holding fluids.



Photo 8: Staining on ground facing southwest.



Photo 11: Outside containment area secondary containment area holding fluids.