

GW-094

**General
Correspondence**

YEAR(S): 2008 - 2013

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 05, 2011 2:10 PM
To: 'Puente, Otoniel A'
Subject: RE: NM OCD Inspection - 2011

Sumps mean, “an impermeable vessel, or a collection device incorporated within a secondary containment system, with a capacity less than 500 gallons, which remain predominately empty, serves as a drain or receptacle for de minimus releases on an intermittent basis and is not used to store, treat, dispose of or evaporate products or waste”

A below grade tank, “means a vessel, excluding sumps, and pressurized pipeline drip traps, where a portion of the tank’s sidewalls is below the surrounding ground surface’s elevation.. Below-grade tank does not include an above ground storage tank that is located above or at the surrounding ground surface’s elevation and is surrounded by berms”

There is confusion, this is for clarification. Thank you for the inspection data submitted. Just adhere to the definitions stated above. If it is determined that these areas are not in compliance GW-094 will be out of compliance.

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/ocd/>

From: Puente, Otoniel A [mailto:Otoniel.Puente@bakerhughes.com]
Sent: Monday, August 01, 2011 4:57 PM
To: Lowe, Leonard, EMNRD
Subject: Re: NM OCD Inspection - 2011

Thank you Mr. Lowe, I'll make sure we follow the sump definition.

Do you approve this year inspection?

From: Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us>
To: Puente, Otoniel A

Sent: Mon Aug 01 15:26:34 2011
Subject: RE: NM OCD Inspection - 2011

Otoniel Puente,

Thank you for the inspection information.

Ensure that "sumps" adhere to the sump definition: of 19.15.17.7 Part 17 (definitions).

Thank you.

llowe

Leonard Lowe

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

From: Puente, Otoniel A [<mailto:Otoniel.Puente@bakerhughes.com>]
Sent: Friday, July 29, 2011 3:37 PM
To: Lowe, Leonard, EMNRD
Cc: Britton, James H 'Jim'; Curler, Misty L; Scott, David A; Mendoza, Jesus D
Subject: RE: NM OCD Inspection - 2011

Mr. Lowe,

I am attaching a copy of the 2011 Sump Inspections report for the **Discharge Permit GW-094**. Please review the document and if you have any questions or concerns don't hesitate to contact me.

Could you please send me a confirmation of receipt and also a statement of your approval for this year inspection?

Otoniel Puente | Plant Engineer
Baker Hughes | Fluids & Chemicals/Hobbs Blend Plant
Office: +1 575.393.7751 | Fax: +1 575.393.6754
Cell: +1 575.602.1770 | otoniel.puente@bakerhughes.com
<http://www.bakerhughes.com> | *Advancing Reservoir Performance*

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From: Lowe, Leonard, EMNRD [<mailto:Leonard.Lowe@state.nm.us>]
Sent: Tuesday, July 12, 2011 1:29 PM
To: Puente, Otoniel A
Cc: VonGonten, Glenn, EMNRD
Subject: RE: NM OCD Inspection - 2011

Otoniel Puente

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, July 12, 2011 1:28 PM
To: 'Puente, Otoniel A'
Cc: VonGonten, Glenn, EMNRD
Subject: RE: NM OCD Inspection - 2011

Otoniel Puente

Notification is confirmed.

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/ocd/>

From: Puente, Otoniel A [<mailto:Otoniel.Puente@bakerhughes.com>]
Sent: Tuesday, July 12, 2011 1:06 PM
To: Lowe, Leonard, EMNRD
Subject: NM OCD Inspection - 2011

Good morning Mr. Lowe,

It is the time of the year when we need to do the annual inspection to our sumps here at our **BJ Chemical Services Facility/BHI (Discharge Permit GW-094)**. According to the procedure I need to contact you before I start the inspection and notify you 72 hrs. prior our inspection.

Please consider this email as my notification of our inspection this upcoming Saturday July the 16th.

Could you please send me a confirmation of this notification?

If you have any questions or comments please don't hesitate to contact me.

Otoniel Puente | Plant Engineer
Baker Hughes | Fluids & Chemicals/Hobbs Blend Plant
Office: +1 575.393.7751 | Fax: +1 575.393.6754
Cell: +1 575.602.1770 | otoniel.puente@bakerhughes.com
<http://www.bakerhughes.com> | *Advancing Reservoir Performance*

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, August 05, 2010 3:43 PM
To: 'Joshua.Morrisette@bjservices.com'
Subject: RE: Minor Modification Request for GW-94

Mr. Morrisette,

OCD approves your modification. Please annotate this change on your next application renewal for GW-094.

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/ocd/>

From: Joshua.Morrisette@bjservices.com [mailto:Joshua.Morrisette@bjservices.com]
Sent: Thursday, August 05, 2010 3:33 PM
To: Lowe, Leonard, EMNRD
Subject: RE: Minor Modification Request for GW-94

When do you intend to initiate change over of tanks? **The change actually began on July 16, 2010.**

What do you intend to do with the removed tanks? **The other tank is no longer usable and will be disposed of using an approved waste vendor.**

Josh

BJ Services Company, USA
J. Morrisette
HSE Specialist
11211 FM 2920
Tomball, TX 77375
Office: 281.357.2573
Mobile: 713.705.4875
Fax: 281.357.2585

"Lowe, Leonard, EMNRD" <Leonard.Lowe@state.nm.us>

08/05/2010 01:38 PM

To <Joshua.Morrisette@bjservices.com>

cc

Subject RE: Minor Modification Request for GW-94

Josh,

When do you intend to initiate change over of tanks?

What do you intend to do with the removed tanks?

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/ocd/>

From: Joshua.Morrisette@bjservices.com [<mailto:Joshua.Morrisette@bjservices.com>]
Sent: Thursday, August 05, 2010 10:43 AM
To: Lowe, Leonard, EMNRD
Subject: Minor Modification Request for GW-94
Importance: High

Leonard - Our Hobbs manufacturing facility is exchanging one of the current product aboveground storage tanks. Here is the information for the tank exchange at the Hobbs location, GW-94:

Current AST

Material Stored - RS410/STEPFAC
Capacity - 5,500 gallons
Tank Type - Vertical, poly, aboveground
Height - 9.5 ft
Diameter - 10 ft
Containment - 60,000 gallons, concrete

Replacement AST

Material Stored - RS410/STEPFAC
Capacity - 8,500 gallons
Tank Type - Vertical, poly, aboveground (see attached figure)
Height - 16.75 ft
Diameter - 10 ft
Containment - 60,000 gallons, concrete

The Discharge Plan and the SPCC will be updated accordingly. This tank and containment will be inspected on a quarterly basis, at a minimum.

Let me know if any other information is needed. Please let me know if this minor modification is approved. Thanks Leonard.

Josh

BJ Services Company, USA
J. Morrisette
HSE Specialist
11211 FM 2920
Tomball, TX 77375
Office: 281.357.2573
Mobile: 713.705.4875
Fax: 281.357.2585

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, August 04, 2010 2:15 PM
To: 'Otoniel.Puente@bjservices.com'
Subject: RE: NM OCD Inspection - 2010

Tony,

OCD approves your testing results.

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/ocd/>

From: Otoniel.Puente@bjservices.com [mailto:Otoniel.Puente@bjservices.com]
Sent: Tuesday, August 03, 2010 9:00 AM
To: Lowe, Leonard, EMNRD
Cc: JBritton@bjservices.com; David.Scott@bjservices.com
Subject: NM OCD Inspection - 2010

Mr. Lowe,

I have finished the sump inspection for our facility, I included pictures with the inspection as you requested. Please see attached file.

Please review the document and if you have any questions or concerns don't hesitate to contact me.

Could you please send me a confirmation of receipt and also a statement of your approval of this year inspection report?

Regards,

Otoniel "Tony " Puente
Plant Engineer

BJ Chemical Services
707 N.Leech St., P.O. BOX 1499
Hobbs, NM, 88240
Office: (575)393-7751
Direct: (575)391-2336
Mobile: (575)602-1770
Fax: (575)393-6754

8.3.10 Email Attachment 4:



Chemical Services

Tuesday, August 3, 2010

Leonard Lowe
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

**Subject: New Mexico Oil and Conservation Division (NM OCD) - 2010
Sump Inspections- BJ Chemical Services- Discharge permit
GW-094.**

Dear Mr. Lowe:

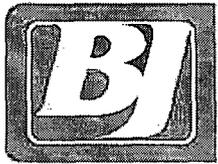
Attached are the forms for the 2010 Sump Inspection in our facility.
Please let me know if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Otoniel Puente'.

Otoniel Puente
Plant Engineer

1/3/11



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puento- Plant Engineer
Designation and Location of Item Inspected:	Sump located in Area 1 (Alcohols tank farm)
Date Inspected:	07/24/10

Sump Information	
Volume:	9.4 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs NM Yearly Average

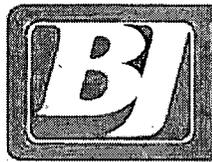
70 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task. Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth 2.5" of dirt and sand
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed

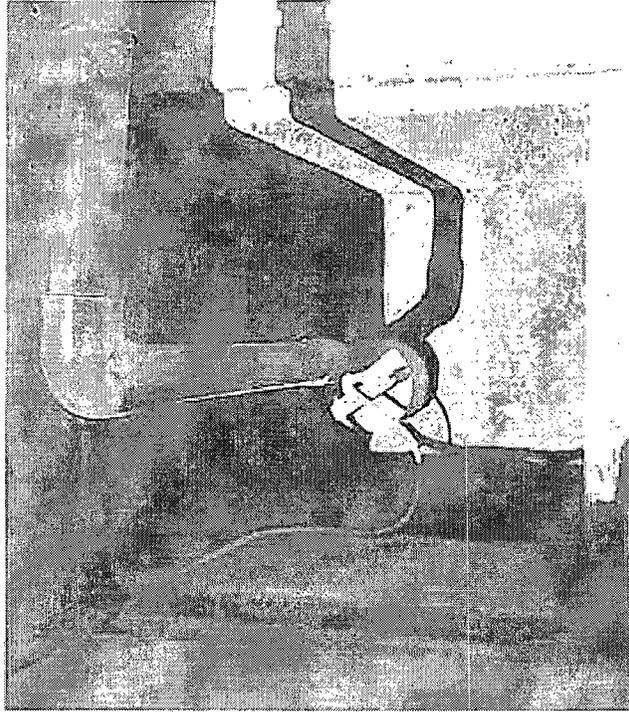
***Note:** See Images attached.

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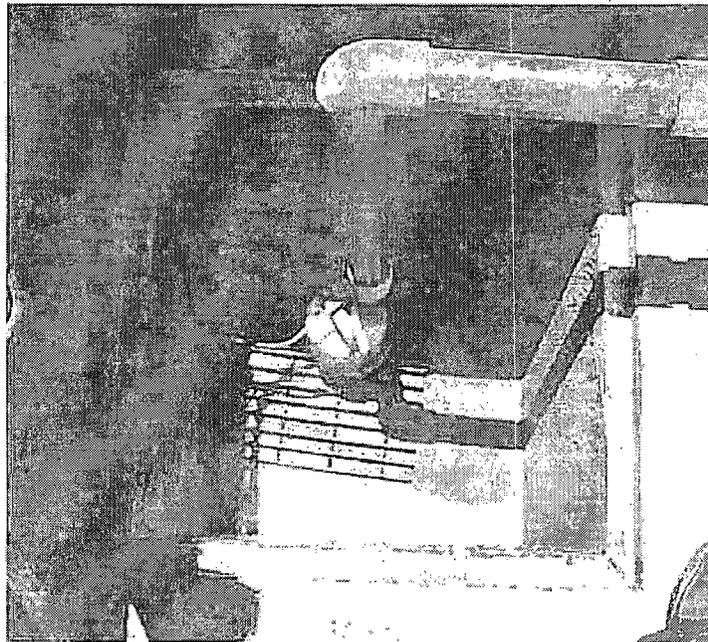


Chemical Services

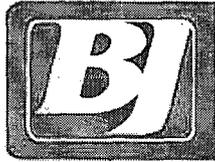
Before Inspection



After Inspection



30/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Area 2 (Oil Tank Farm)
Date Inspected:	07/24/10

Sump Information	
Volume:	88.3 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs NM Yearly Average

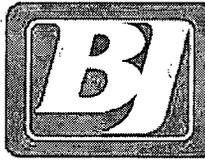
660.5 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task. Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good Condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was less than 1/2" of dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

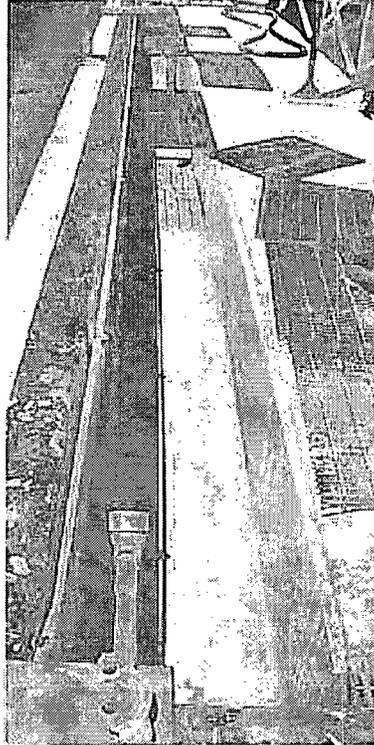
*Note: See Images attached.

X 8/21

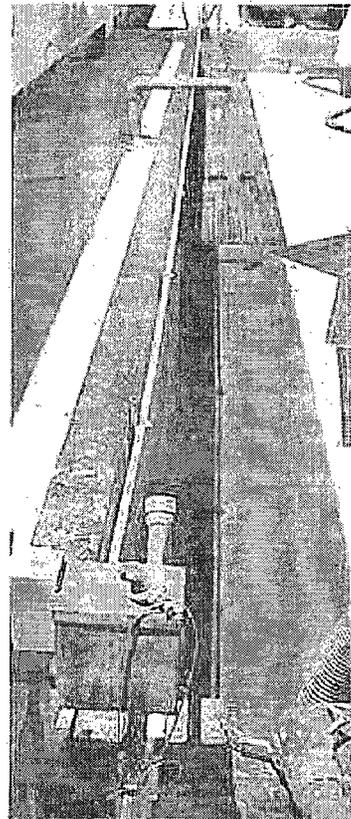


Chemical Services

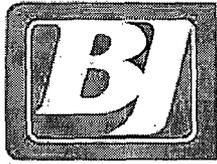
Before inspection:



After Inspection:



5/21/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump located in Area 3 (Soft Water Tank Farm)
Date Inspected:	07/24/10

Sump Information	
Volume:	208.9 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs NM Yearly Average

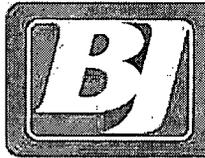
1562.7 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task. Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment was less than 1/4 " of sand and dirt
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping
Perform Hydrostatic Test <ol style="list-style-type: none"> 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch. 	Hydrostatic test passed.

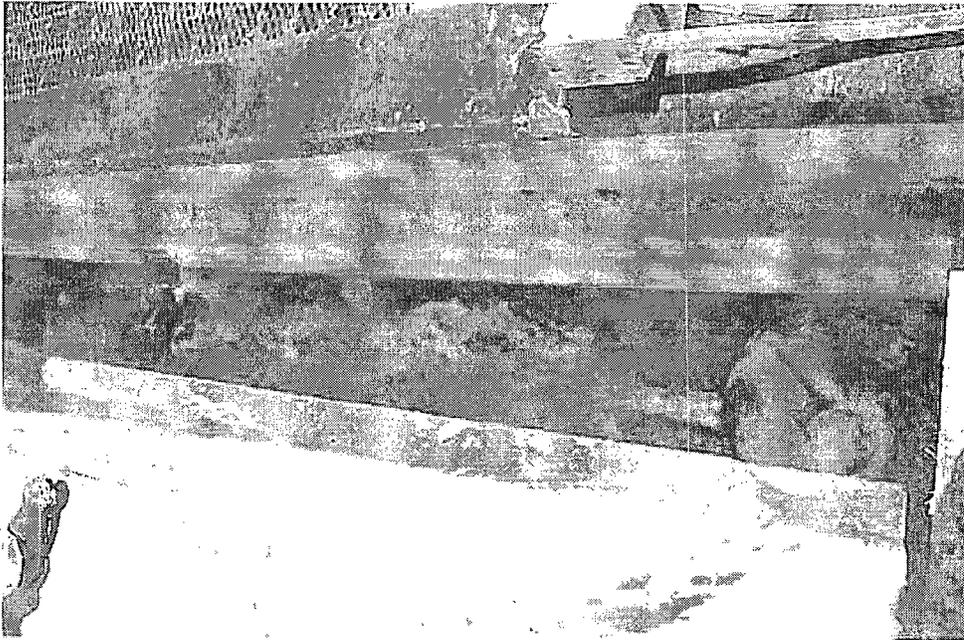
*Note: See Images attached.

u 8/21

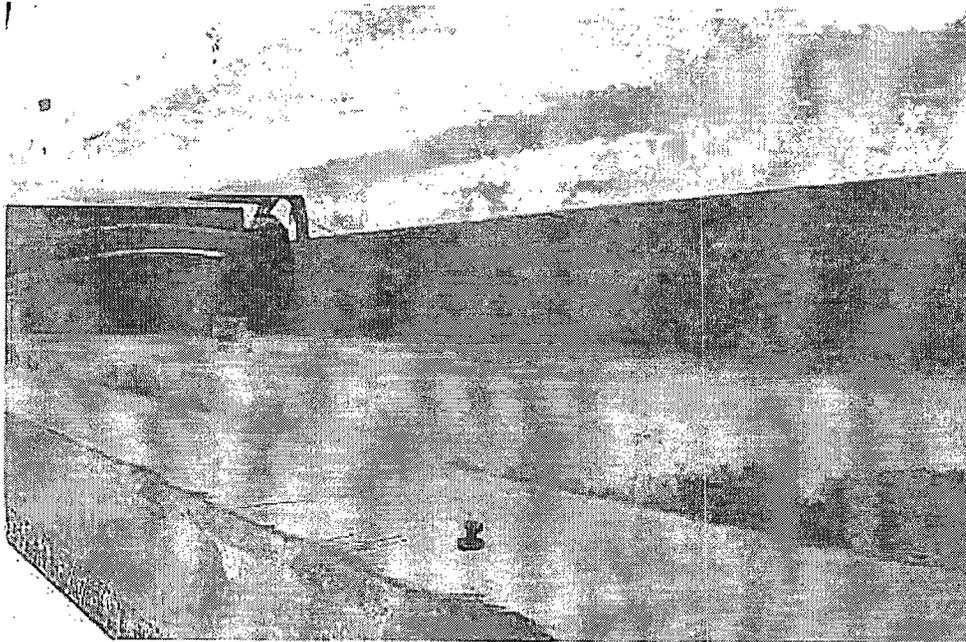


Chemical Services

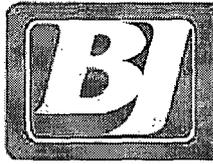
Before Inspection:



After Inspection:



7/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump located in Area 4 (Water soluble Tank Farm)
Date Inspected:	07/24/10

Sump Information	
Volume:	406.6 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs Yearly Average

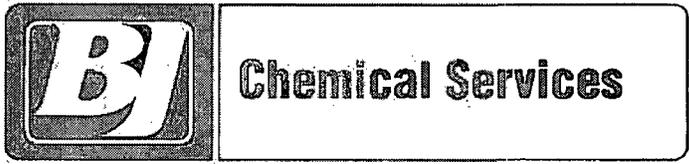
3037.1 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

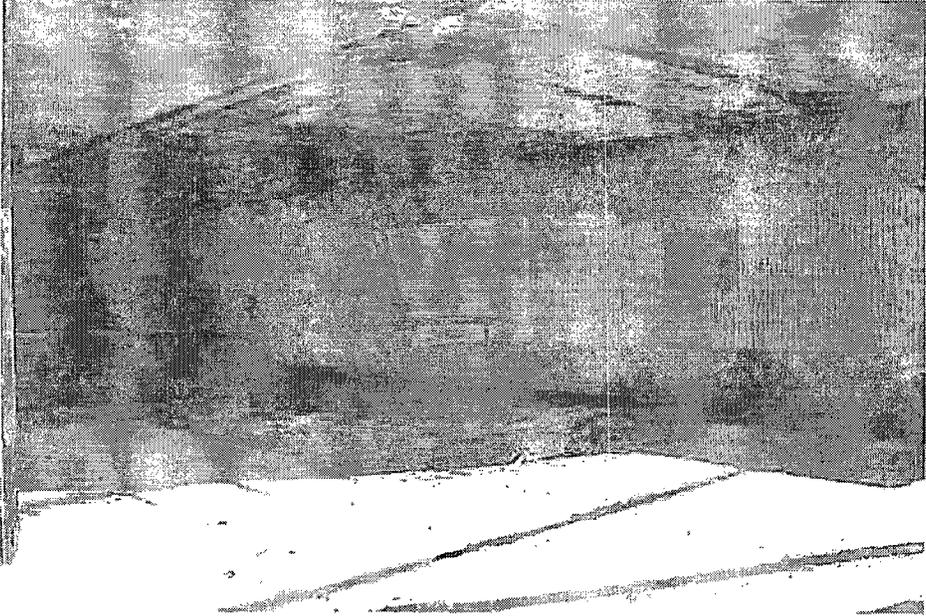
Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was 4" of mud.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

***Note:** See Images attached.

400/21



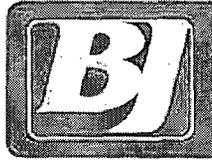
Before Inspection:



After inspection:



9 01/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump Located in Area 5 (Oil Tank Farm)
Date Inspected:	07/24/10

Sump Information	
Volume:	152.7 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs NM Yearly Average

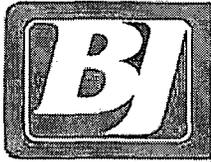
1142.3 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition
Check Sediment depth and remove manually or by vacuum truck.	Thin layer of sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than ½ inch.	Hydrostatic test passed

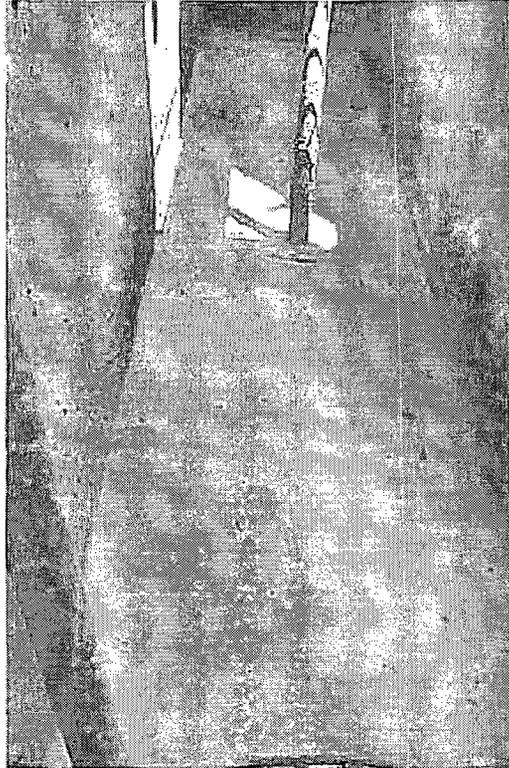
*Note: See Images attached.

10/21

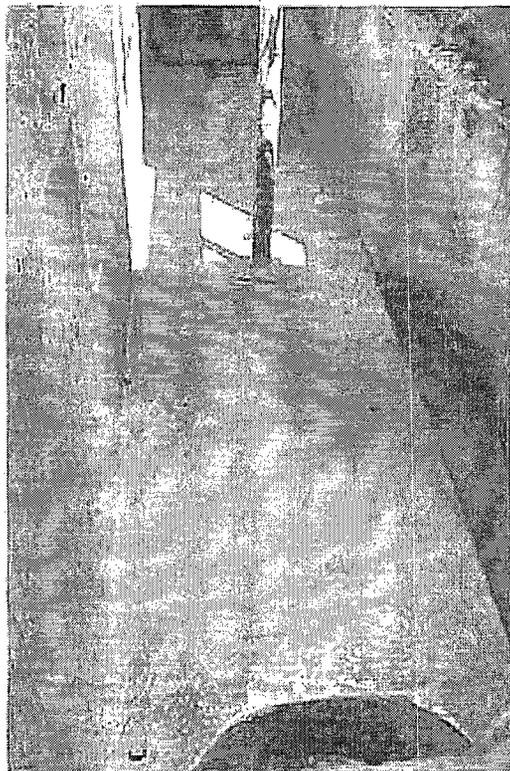


Chemical Services

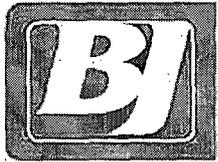
Before Inspection:



After Inspection:



11/13/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump located in Hot House (Storage of Chemical drums and totes)
Date Inspected:	07/24/10

Sump Information	
Volume:	147.2 ft ³
Drained Products	none
Flow Estimation:	none

1101.1 gal

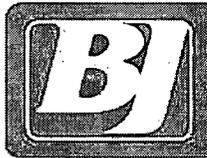
Instructions: Drain the sump and perform the specified inspection and maintenance task. Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in excellent condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was 1/2" of sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Not done. Sump is normally dry.

*Note: See Images attached.

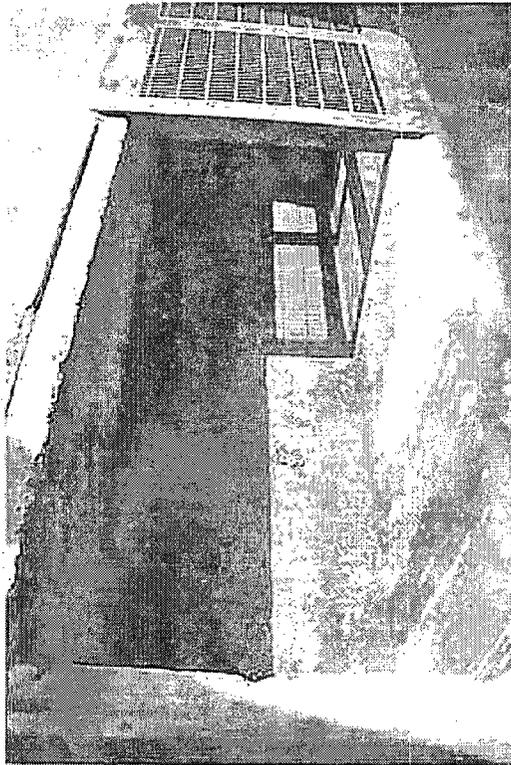
1/2

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1/21

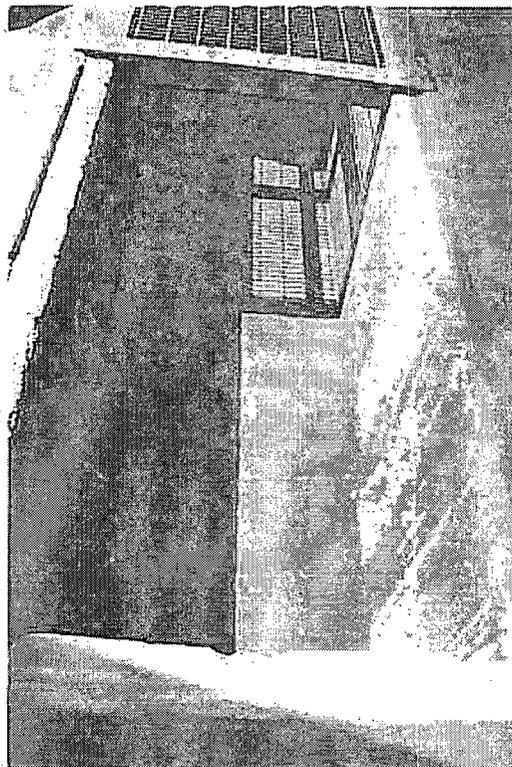


Chemical Services

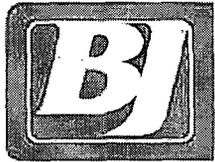
Before Inspection:



After Inspection:



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06/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump located in Pepsi Building. (Warehouse)
Date Inspected:	07/24/10

Sump Information	
Volume:	123 ft ³
Drained Products	none
Flow Estimation:	none

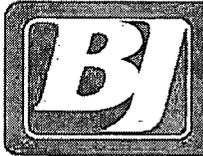
920.1991

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	No cracks or breaks. In good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was 2.5" of sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Not done. Sump is normally dry.

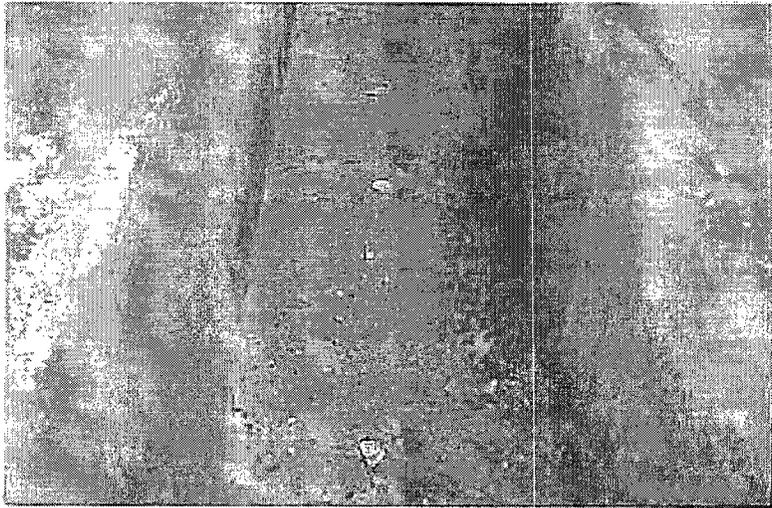
*Note: See Images attached.

14
10/21

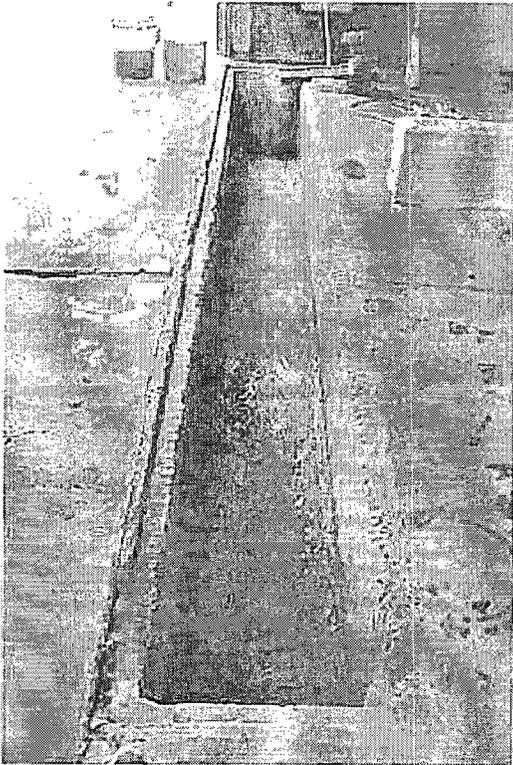


Chemical Services

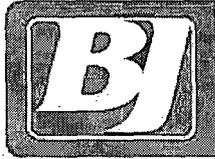
Before Inspection:



After Inspection:



15
07/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump located in plant warehouse.(Blending Area)
Date Inspected:	07/24/10

Sump Information	
Volume:	23.75 ft ³
Drained Products	Water from vats cooling system. Flush Water.
Flow Estimation:	In a normal operation day the estimate flow is around 5000 gallon/day.

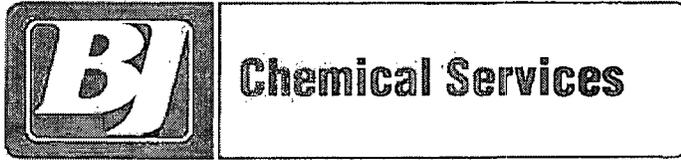
177.7 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task. Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Cracks in concrete around sump, but not in sump walls. Concrete in good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was about 5". Dirt, trash and sand.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

*Note: See Images attached.

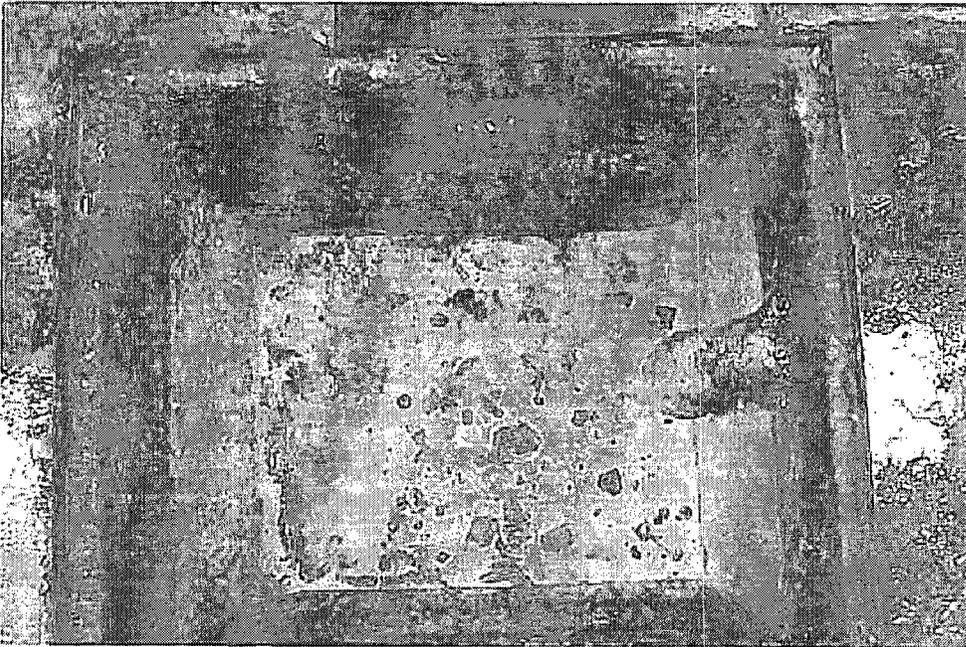
108/21



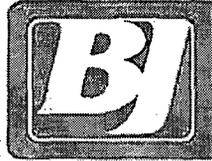
Before Inspection:



After Inspection:



1/21



Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Sump located in Wash Bay
Date Inspected:	07/24/10

Sump Information	
Volume:	25.5 ft ³
Drained Products	Water and dirt
Flow Estimation:	The flow varies depending on the use of the wash bay (# of tankers, totes, etc). In a normal operation day the flow estimation is around 2600 gallons/day.

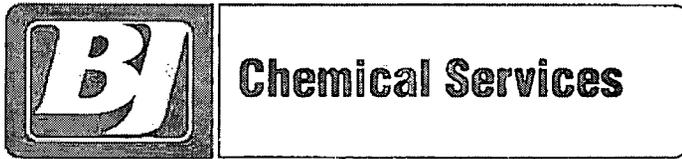
190.75 gal

Instructions: Drain the sump and perform the specified inspection and maintenance task. Make any comments, which are pertinent to the future maintenance needs.

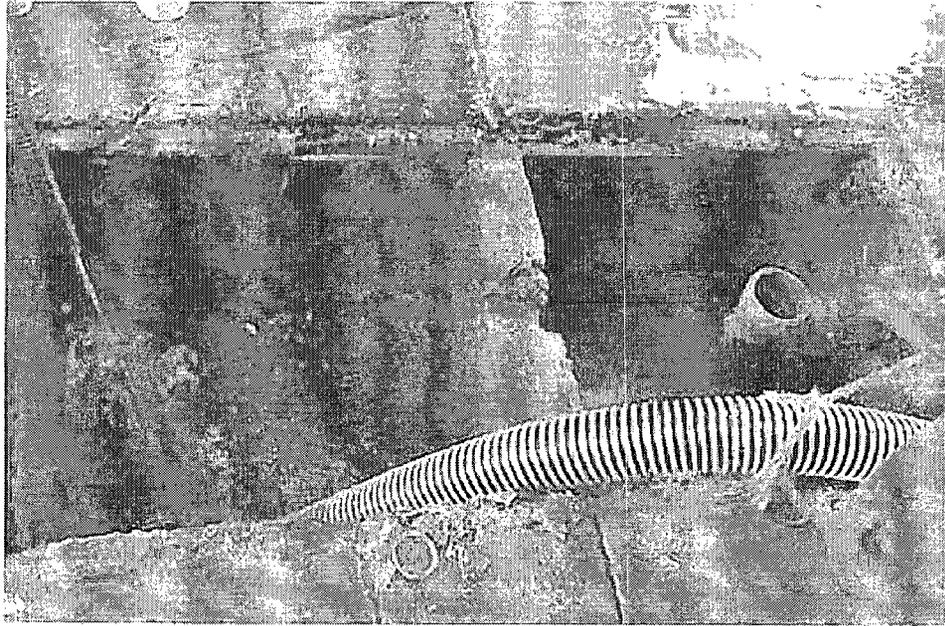
Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Cracks around sump area.
Check Sediment depth and remove manually or by vacuum truck.	Sediment at 4" thick. Mud and trash.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

***Note:** See Images attached.

18
18/21

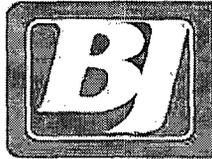


Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente – Plant Engineer
Designation and Location of Item Inspected:	Oil/Water separator that discharges to POTW
Date Inspected:	07/24/10

Sump Information	
Volume:	595.5 ft³
Drained Products	*Rain Water *Water that meets the specifications of Hobbs NM Water Department.
Flow Estimation:	The flow estimation is around 174,000 gallons/month plus the monthly rain average.

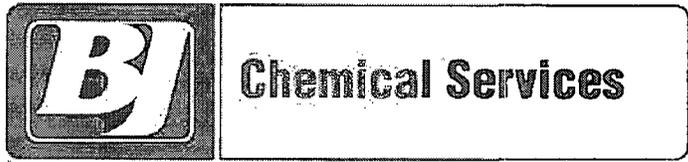
4454.79^{gal}

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

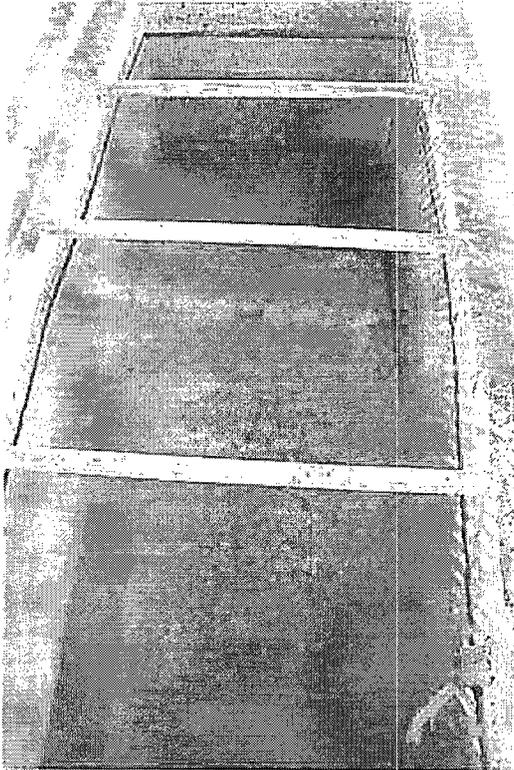
Item to be inspected	Comments
Check steel structure for rust, corrosion, leakage, scale, damaged protective coating, and damage.	In good condition. No corrosion, scale or leakage. Protective coating still in good condition.
Check concrete for cracks, breaks, exposed reinforcing: settlement.	No cracks or breaks.
Check painted surfaces for blistering, cracking, scaling, wrinkling, peeling, rust, corrosion, absence of paint or any damage.	Coating in good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment at 4" thick. Mostly dirt and sand. All sediments were removed by vacuum truck.
Inspect piping for corrosion, open joints, cracked or crushed sections, and any obstructions.	Piping in good condition.
Check secondary containment curbing for cracks, breaks, settlement.	In good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

***Note:** See Images attached.

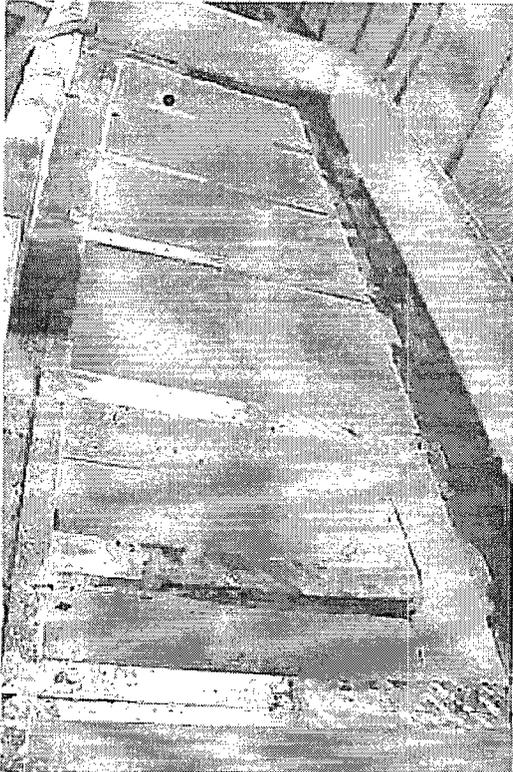
20/21



Before Inspection:



After Inspection:



2/21



Chemical Services

Tuesday, July 28, 2009

Leonard Lowe
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

**Subject: New Mexico Oil and Conservation Division (NM OCD) - 2009
Sump Inspections- BJ Chemical Services- Discharge permit
GW-094.**

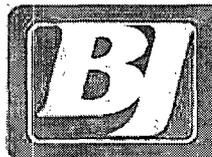
Dear Mr. Lowe:

Attached are the forms for the 2009 Sump Inspection in our facility.
Please let me know if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Otoniel Puente'.

Otoniel Puente
Plant Engineer



Chemical Services

Sump Inspection

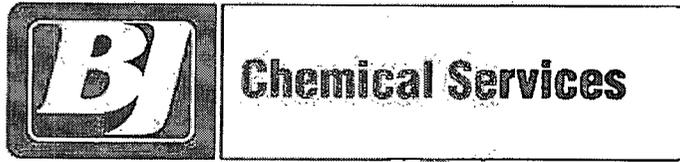
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente
Designation and Location of Item Inspected:	Sump located in Area 1 (Alcohols tank farm)
Date Inspected:	07/07/09

Sump Information	
Volume:	9.4 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs Yearly Average

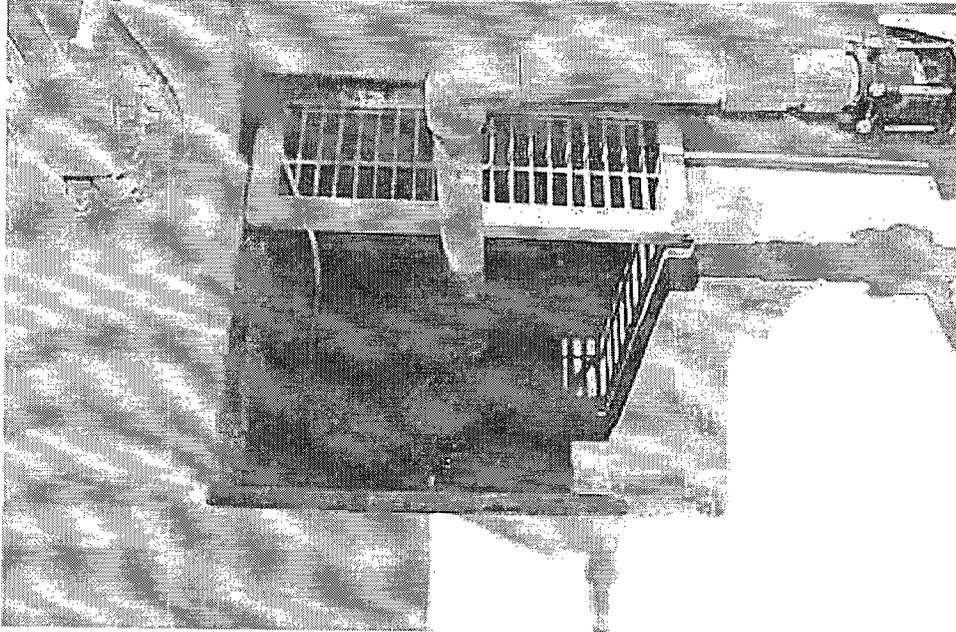
Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth 2" of dirt and sand
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than ½ inch.	Hydrostatic test passed.

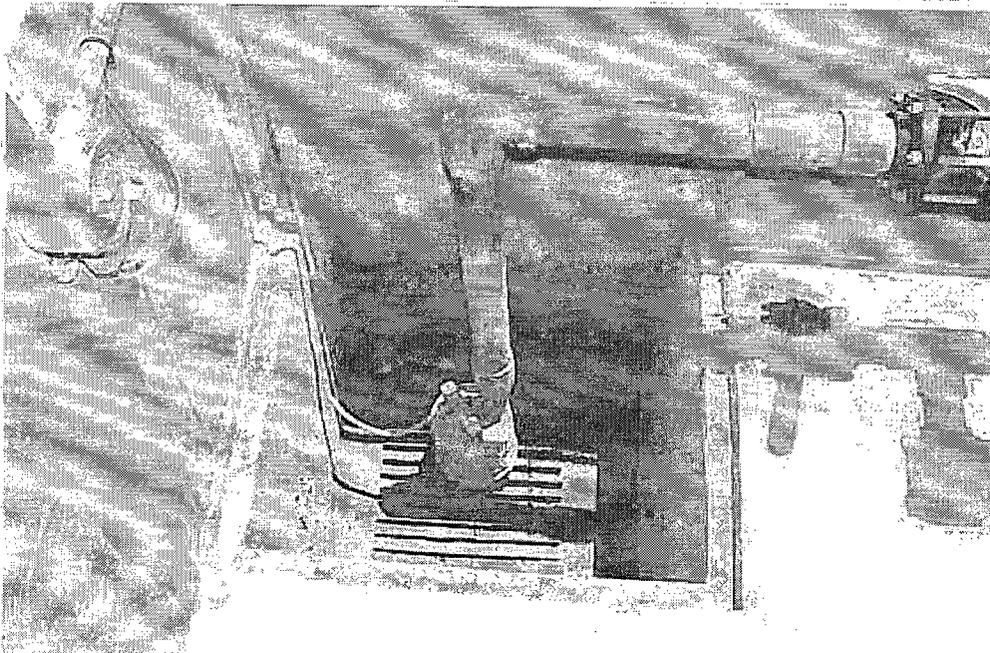
***Note:** See Images attached.



Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

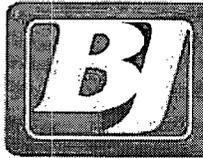
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente
Designation and Location of Item Inspected:	Area 2 (Oil Tank Farm)
Date Inspected:	7/7/09

Sump Information	
Volume:	88.3 ft³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs Yearly Average

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

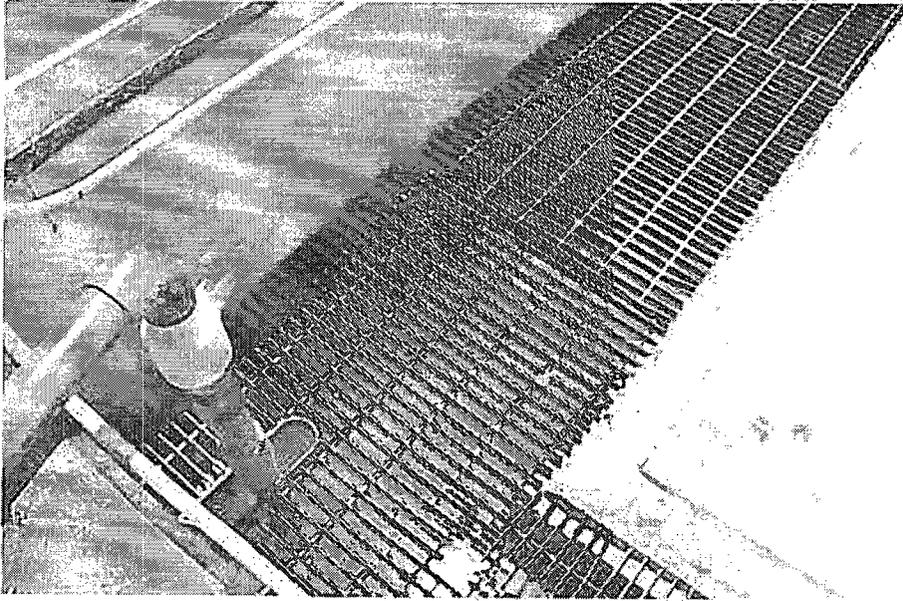
Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good Condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was 2" of mud.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

***Note:** See Images attached.

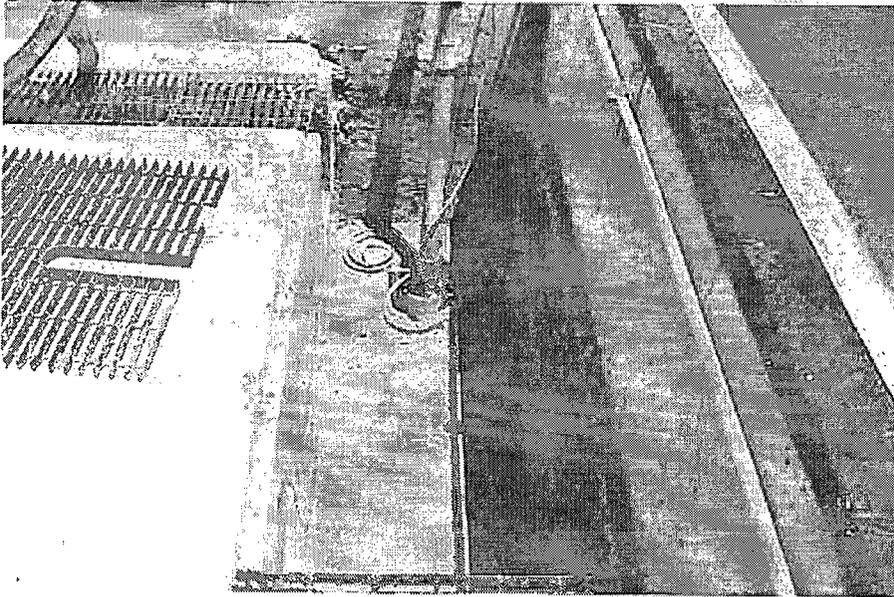


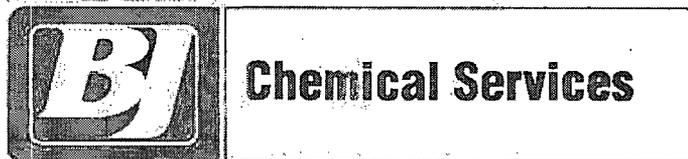
Chemical Services

Before inspection:



After Inspection:





Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Punte
Designation and Location of Item Inspected:	Sump located in Area 3 (Soft Water Tank Farm)
Date Inspected:	07/07/09

Sump Information	
Volume:	208.9 ft³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs Yearly Average

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment was .5 " sand and dirt
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping
Perform Hydrostatic Test <ol style="list-style-type: none"> 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch. 	Hydrostatic test passed.

***Note:** See Images attached.

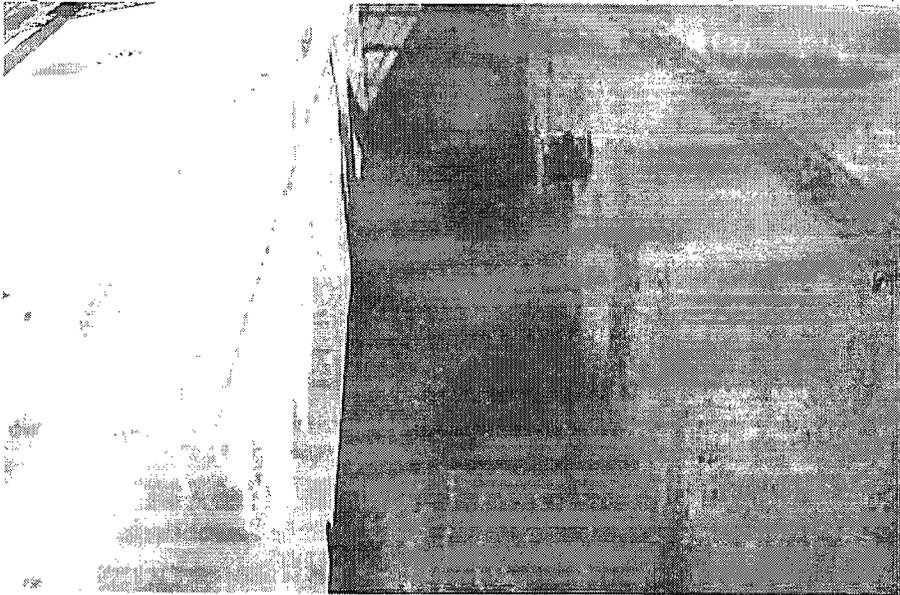


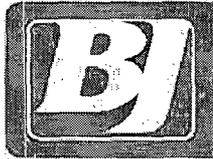
Chemical Services

Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

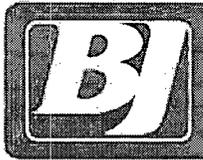
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puento
Designation and Location of Item Inspected:	Sump located in Area 4 (Water soluble Tank Farm)
Date Inspected:	07/13/09

Sump Information	
Volume:	406.6 ft³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs Yearly Average

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment .25" inches in depth. Sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

***Note:** See Images attached.

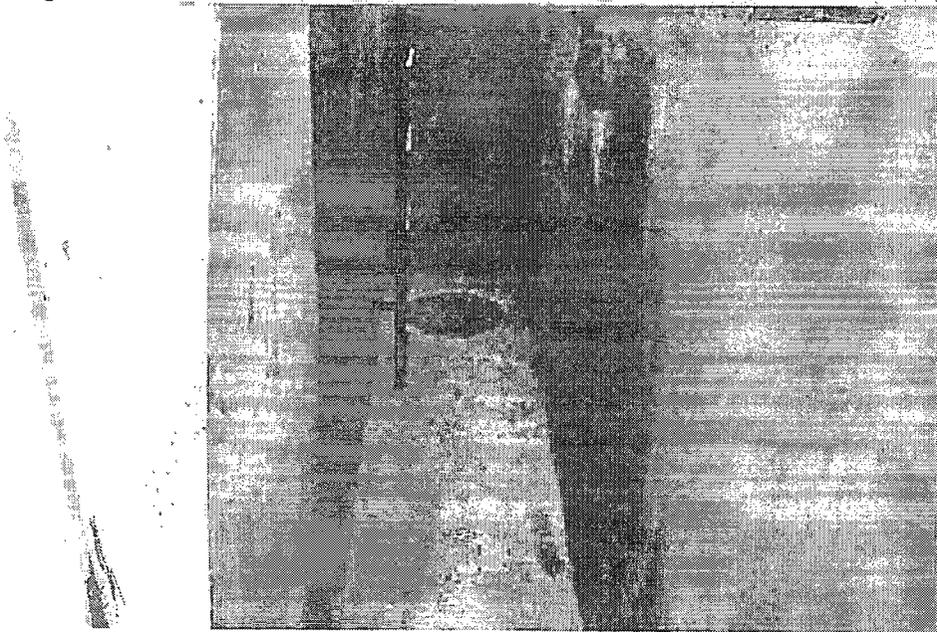


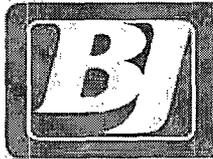
Chemical Services

Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente
Designation and Location of Item Inspected:	Sump Located in Area 5 (Oil Tank Farm)
Date Inspected:	07/13/09

Sump Information	
Volume:	152.7 ft ³
Drained Products	Rain Water
Flow Estimation:	Rain Water- Hobbs Yearly Average

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in good condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was .25" sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed

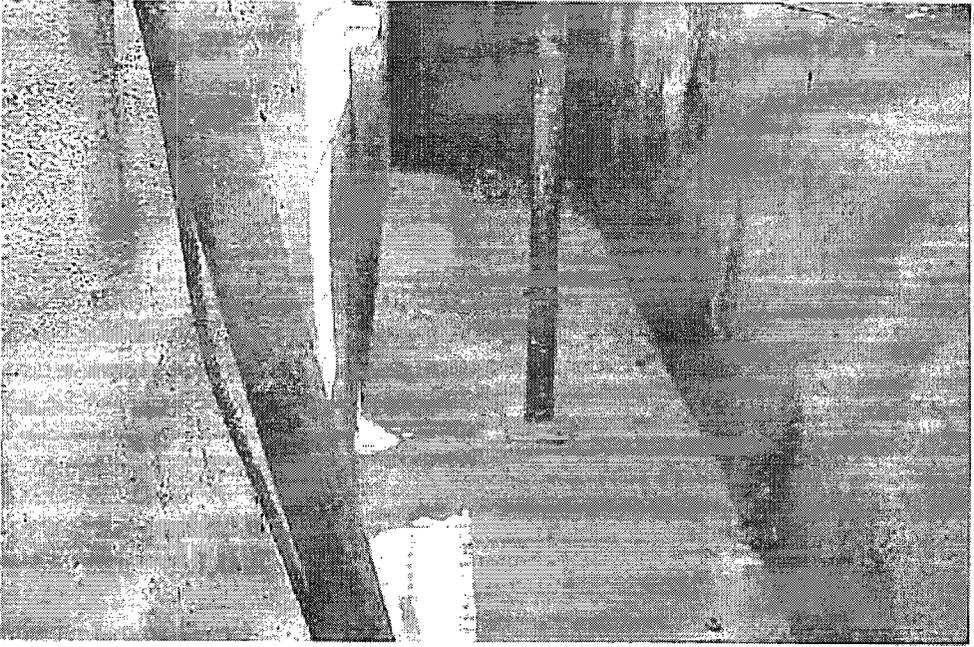
***Note:** See Images attached.

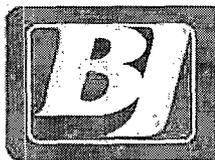


Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

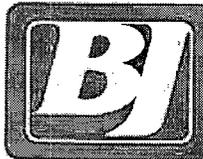
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente
Designation and Location of Item Inspected:	Sump located in Hot House (Storage of Chemical drums and totes)
Date Inspected:	07/14/09

Sump Information	
Volume:	147.2 ft ³
Drained Products	none
Flow Estimation:	none

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

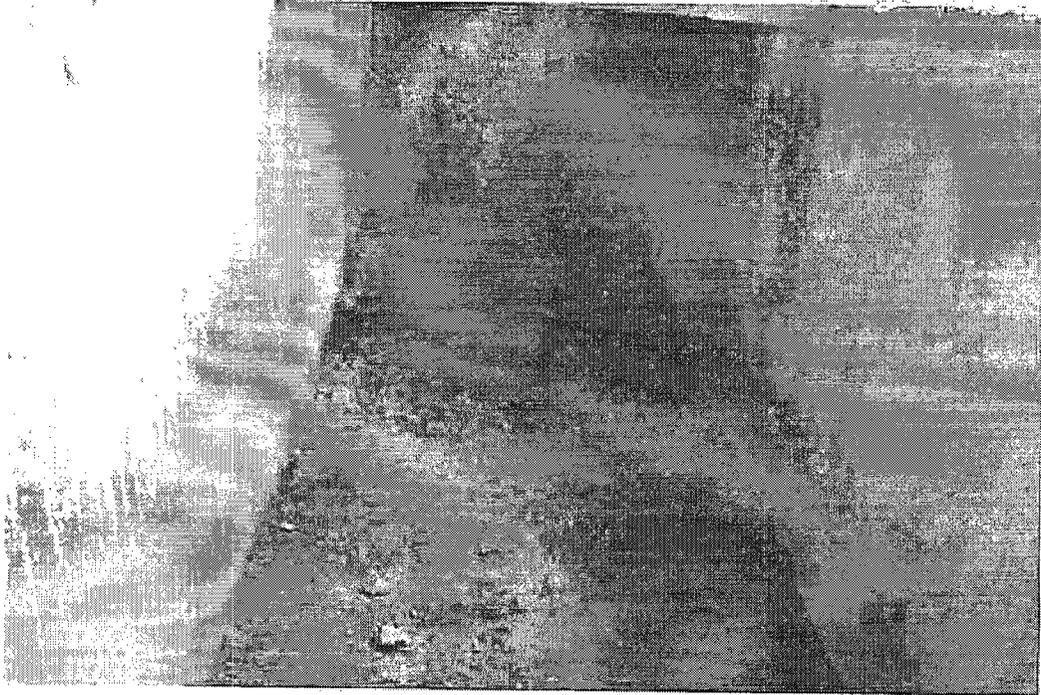
Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Concrete in excellent condition
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was .25" of sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Not done. Sump is normally dry.

*Note: See Images attached.

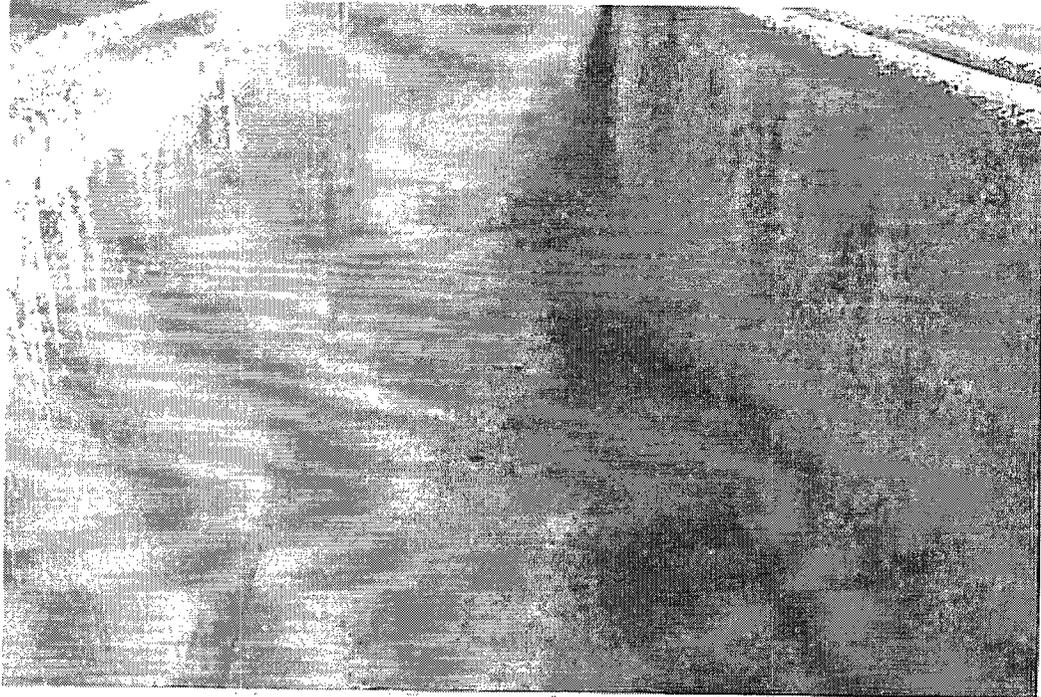


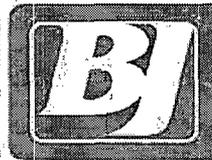
Chemical Services

Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

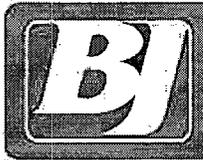
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente
Designation and Location of Item Inspected:	Sump located in Pepsi Building. (Warehouse)
Date Inspected:	07/15/09

Sump Information	
Volume:	123 ft³
Drained Products	none
Flow Estimation:	none

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	No cracks or breaks. In good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was 1" of sand and dirt.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	No piping.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Not done. Sump is normally dry.

***Note:** See Images attached.

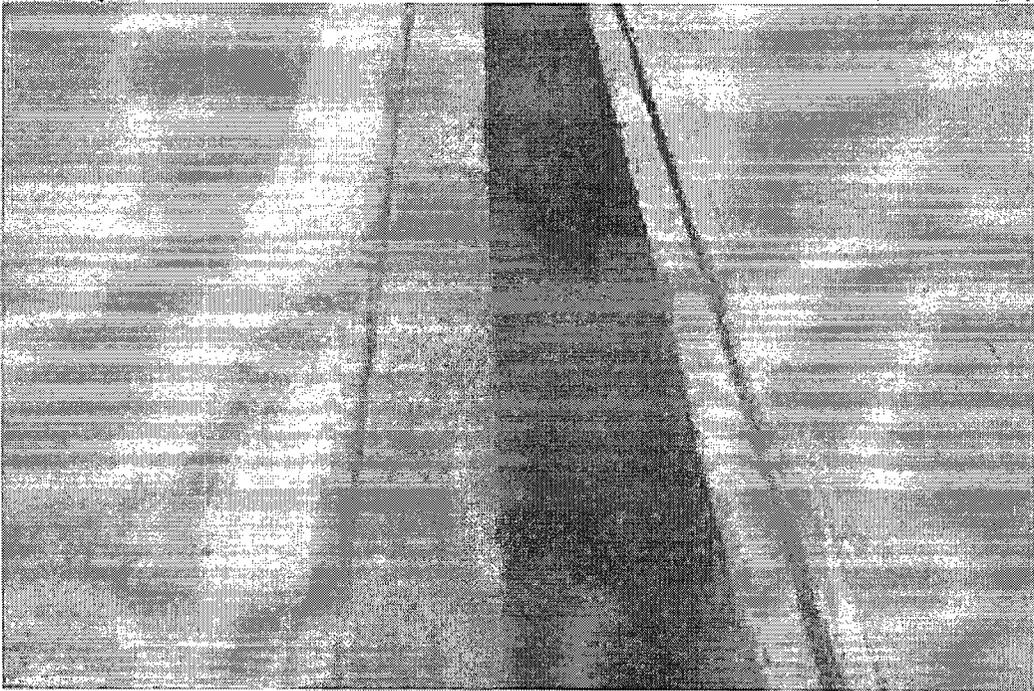


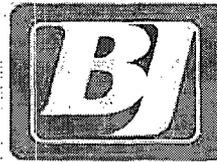
Chemical Services

Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

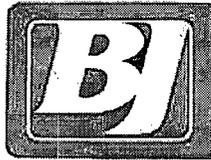
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puente
Designation and Location of Item Inspected:	Sump located in plant warehouse.(Blending Area)
Date Inspected:	07/15/09

Sump Information	
Volume:	23.75 ft ³
Drained Products	*Water from vats cooling system. *Flush Water.
Flow Estimation:	In a normal operation day the estimate flow is around 5000 gallon/day.

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Cracks in concrete around sump, but not in sump walls.
Check Sediment depth and remove manually or by vacuum truck.	Sediment depth was about 8". Dirt, trash and sand.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than ½ inch.	Hydrostatic test passed.

*Note: See Images attached.

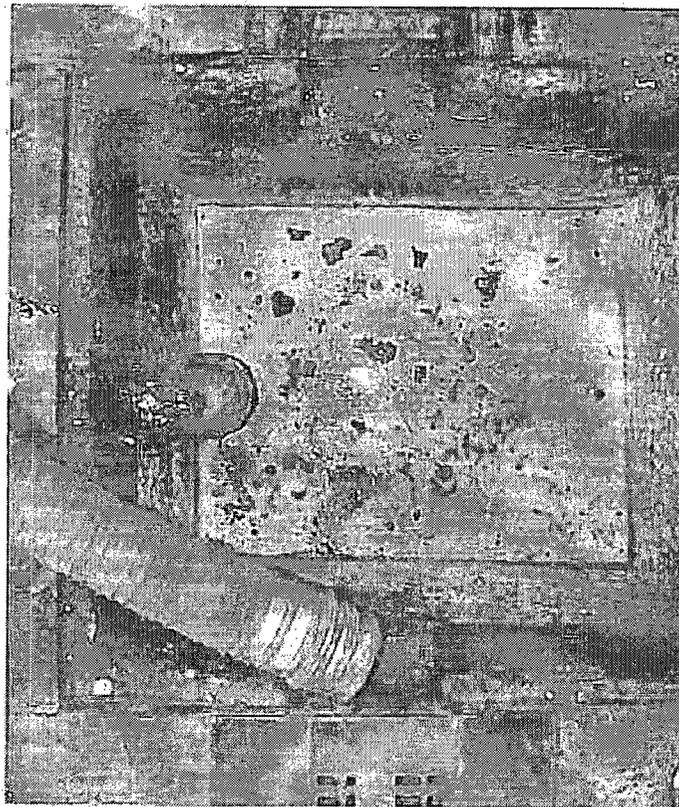


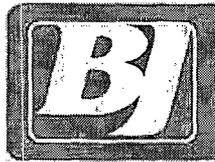
Chemical Services

Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

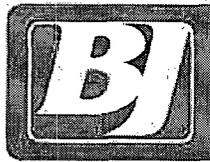
Discharge Permit	GW-094
Inspector's Name:	Otoniel Punte
Designation and Location of Item Inspected:	Sump located in Wash Bay
Date Inspected:	07/16/09

Sump Information	
Volume:	25.5 ft³
Drained Products	Water and dirt
Flow Estimation:	The flow varies depending on the use of the wash bay (# of tankers, totes, etc). In a normal operation day the flow estimation is around 2600 gallons/day.

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

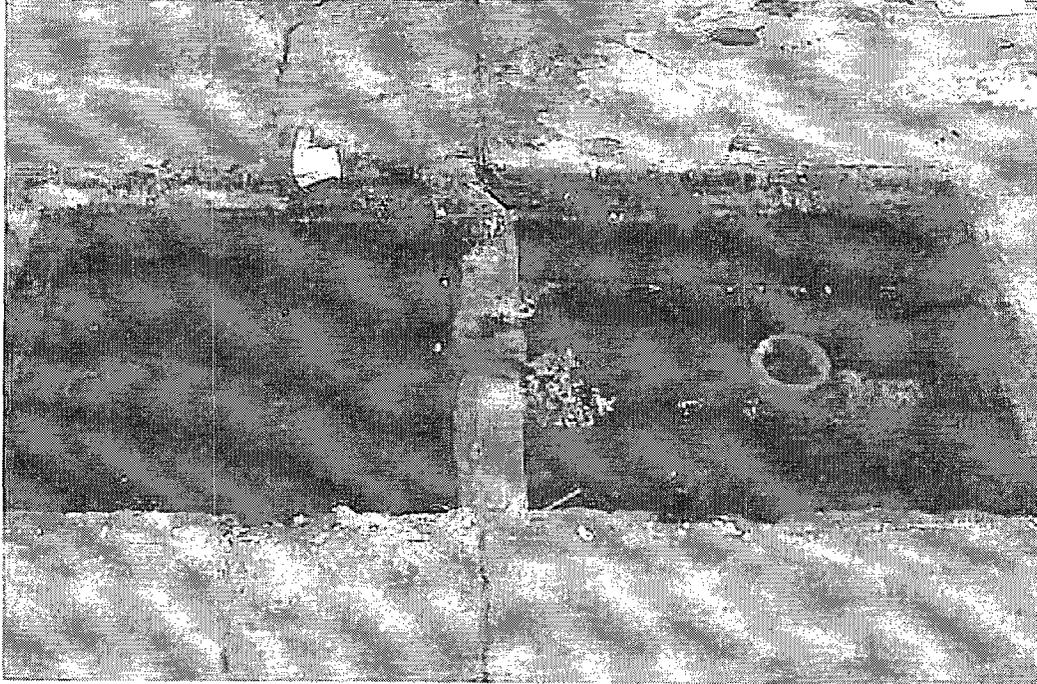
Item to be inspected	Comments
Check concrete for cracks, breaks, exposed reinforcing and settlement.	Slight cracks around sump area.
Check Sediment depth and remove manually or by vacuum truck.	Sediment at 7" thick. Dirt, sand and trash.
Inspect piping for corrosion, open joints, cracked or crushed sections, and obstructions.	Piping in good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

*Note: See Images attached.

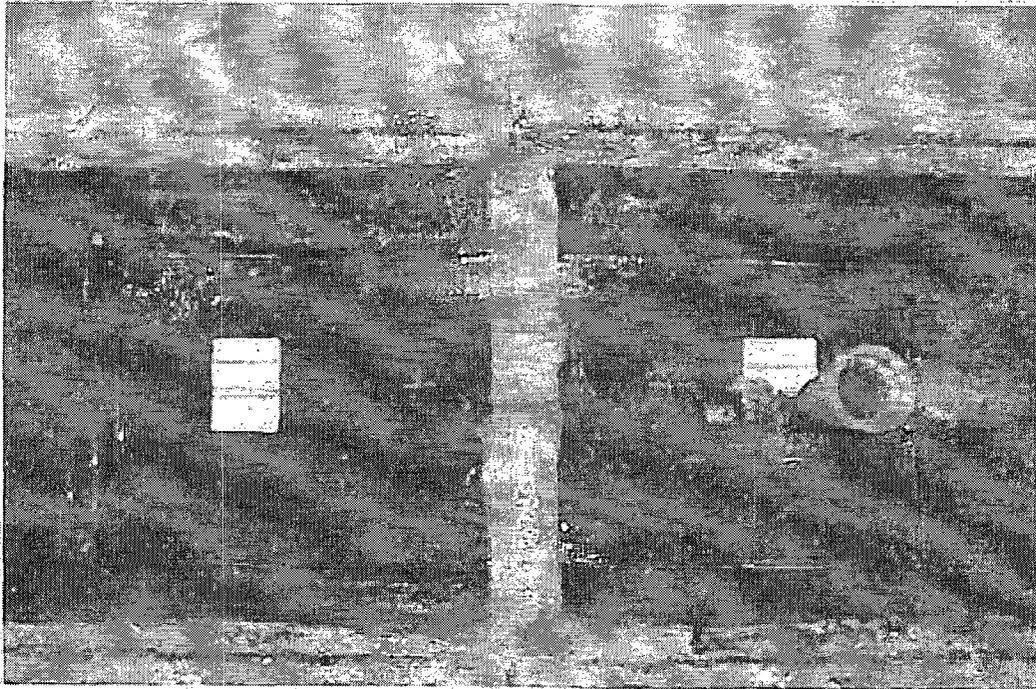


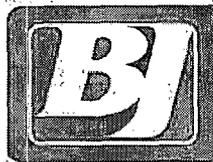
Chemical Services

Before Inspection:



After Inspection:





Chemical Services

Sump Inspection

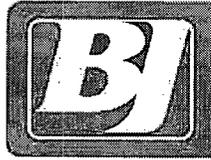
Discharge Permit	GW-094
Inspector's Name:	Otoniel Puento
Designation and Location of Item Inspected:	Oil/Water separator that discharges to POTW
Date Inspected:	07/24/09

Sump Information	
Volume:	595.5 ft ³
Drained Products	*Rain Water *Water that meets the specifications of Hobbs NM Water Department.
Flow Estimation:	The flow estimation is around 174,000 gallons/month plus the monthly rain average.

Instructions: Drain the sump and perform the specified inspection and maintenance task.
Make any comments, which are pertinent to the future maintenance needs.

Item to be inspected	Comments
Check steel structure for rust, corrosion, leakage, scale, damaged protective coating, and damage.	Everything in good condition. No corrosion, scale leakage and protective coating still in good condition.
Check concrete for cracks, breaks, exposed reinforcing: settlement.	No cracks or breaks.
Check painted surfaces for blistering, cracking, scaling, wrinkling, peeling, rust, corrosion, absence of paint or any damage.	Coating in good condition.
Check Sediment depth and remove manually or by vacuum truck.	Sediment at 3" thick. Mostly dirt and sand. All sediments were removed by vacuum truck.
Inspect piping for corrosion, open joints, cracked or crushed sections, and any obstructions.	Piping in good condition.
Check secondary containment curbing for cracks, breaks, settlement.	In good condition.
Perform Hydrostatic Test 1. Isolate the sump by shutting incoming and exiting valves. 2. Fill the sump to operational level with fresh water and note the level. 3. Monitor the level for a minimum of 4 hrs. Investigate seepage or leakage if liquids levels vary by more than 1/2 inch.	Hydrostatic test passed.

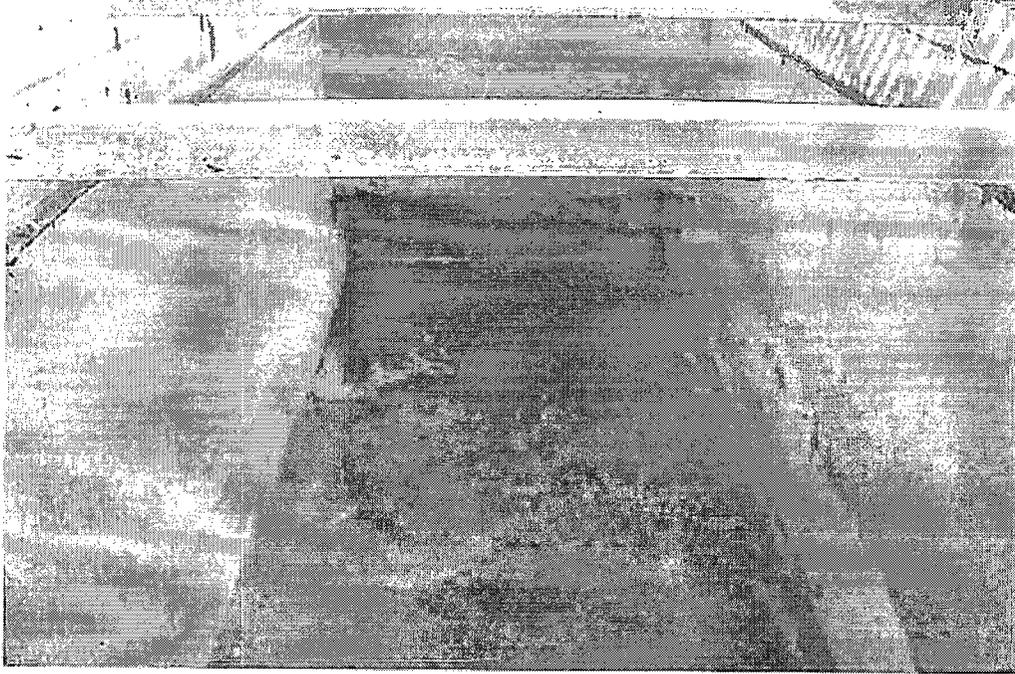
*Note: See Images attached.



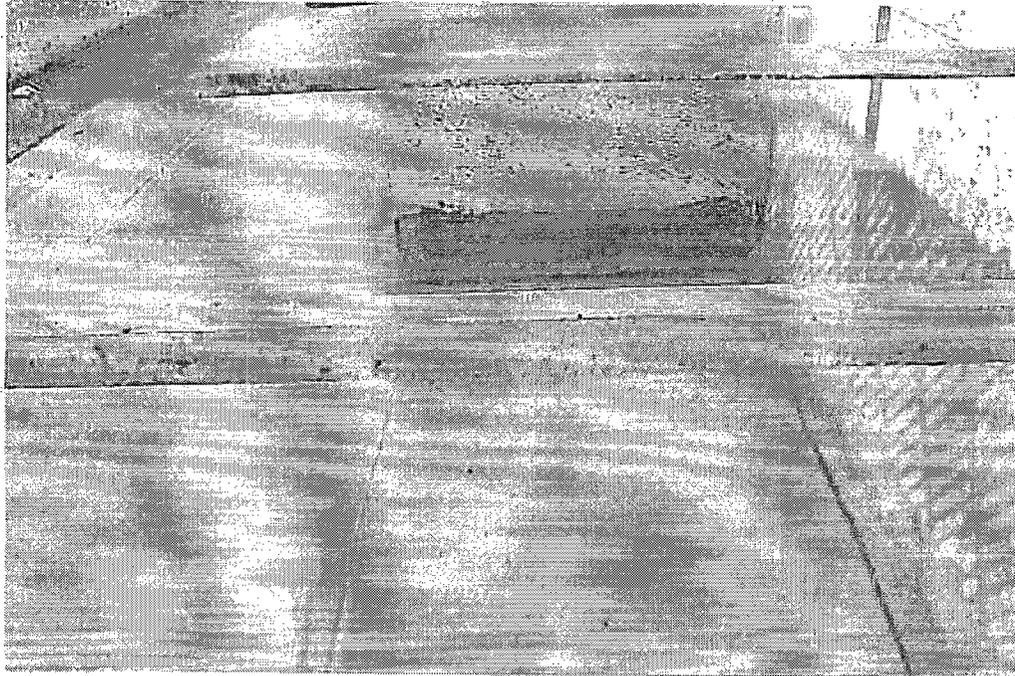
Chemical Services

***Note: See Images attached.**

Before Inspection:



After Inspection:



Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, August 04, 2009 1:03 PM
To: 'Otoniel.Puente@bjservices.com'
Subject: RE: BJ Chemical Services-Sump Inspection

Mr. Puente,

The OCD has reviewed your sump inspection results submitted for GW-094, Hobbs BJ Services.

The OCD acknowledges the successful results of tests.

It was noted in the report one of the sumps, "Oil/Water separator that discharges to POTW" has a working volume of 595.5 FT3 (3740.3 gallons). OCD requires that any sump that is

Greater than 500 gallons

OR

Has fluids contained within its capacity (<500 gallons)

To be re-engineered to meet Condition 11.A of GW-094.

GW-095's permit expires on December 1, 2012.

Please submit designs to my attention for review prior to installation as noted within Condition 11.A.

Thank you,

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Leonard Lowe

Environmental Engineer
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From: Otoniel.Puente@bjservices.com [mailto:Otoniel.Puente@bjservices.com]
Sent: Friday, July 31, 2009 12:46 PM
To: Lowe, Leonard, EMNRD
Subject: BJ Chemical Services-Sump Inspection
Importance: High

Good Morning Mr. Lowe,
I am sorry that I missed your call but it seems that I been having problems with my cell phone.
I have finished the sump inspection in the plant and I have ready the PDF file with the results. Please see attached file.

Please review the document and if you have any questions or concerns don't hesitate to contact me.

Could you please send me a confirmation of receipt and also a statement of your approval of this year inspection report?
Thank you.

Best Regards,

Otoniel "Tony " Puente
Plant Engineer

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