

GW - __014__

**FIRE WATER
PONDS**

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, May 27, 2011 4:40 PM
To: 'Moore, Darrell'; Lackey, Johnny; 'Hilliard, Jessie'; 'Hernandez, Eloy'; 'Welch, Bill'
Cc: Michael Leighton; Hill, Larry, EMNRD; VonGonten, Glenn, EMNRD
Subject: Navajo Refining Company- Lea/Lovington Refinery "Minor Modification" Firewater Pond (GW-014)

Darrell, et al.:

The New Mexico Oil Conservation Division (OCD) has reviewed the most recent May 26, 2011 communique from Navajo Refining Company with attached "2 Million Gal Firepond Layout" (Drawing Number: 60-120-D) dated 5/13/11 by RDJ and Aerial Photograph Depicting the "New Proposed Location" for the pond (200' x 115').

The OCD hereby approves the proposed "Firewater Pond" with the following conditions:

- 1) The OCD May 11, 2011, communique with the referenced applicable permit conditions shall apply.
- 2) Drawing Number: 60-120D exhibits a only a partial liner keyed into the berm in "plan view", but the liner shall be omnipresent throughout the storage and containment area and constructed in accordance with provision 3 below.
- 3) The pond construction shall meet the technical construction requirements of 20.6.2.17 NMAC and/or 20.6.2.36 NMAC to ensure that the pond does not leak or adversely affect the contaminant hydrogeology beneath the facility and the monitor well network, i.e., mounding affect that disperses contaminants in multiple or artificial directions beneath the facility. Also, consideration of the cone(s) of depression(s) from any water well used to supply fresh water to the firewater pond. The pond water must not contain floating product, sheen or exhibit exceedances above WQCC Regulations. If there is a likelihood this condition could occur, the pond shall be constructed with double liner, leak detection system, etc.
- 4) The operator shall work with the City of Lovington to outline an agreeable water conservation management strategy or approach in the City of Lovington's Well Head Protection Area (WHPA) or any other issues that may arise from the ponds construction.

Please contact me if you have questions. Thank you.

Please be advised that OCD approval of the pond does not relieve Navajo Refining Company of responsibility should their operations fail to adequately investigate and remediate contamination that poses a threat to surface water and/or ground water, human health or the environment. In addition, OCD approval does not relieve Navajo Refining Company of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us

Website: <http://www.emnrd.state.nm.us/ocd/index.htm>

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From: Moore, Darrell [mailto:Darrell.Moore@hollycorp.com]
Sent: Thursday, May 12, 2011 7:39 AM
To: Chavez, Carl J, EMNRD

Cc: Michael Leighton
Subject: RE: Map

Carl

When the drawings are finalized, we will send OCD a copy with details such as liner specifications, etc. The pond is a fire water pond that will be filled with fresh water so the secondary containment, leak detection, monitoring, etc should not apply.

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Wednesday, May 11, 2011 3:16 PM
To: Moore, Darrell
Cc: Michael Leighton
Subject: RE: Map

Darrell:

Denied.

Please comply with the terms and conditions of the OCD Discharge Permit (GW-014).

11. Below-Grade Tanks/Sumps and Pits/Ponds.

B. Where pits or ponds are to be constructed, including modifications and retrofits, they shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, 30-mil LLDPE reinforced or other OCD approved liner with dual thermal seam (seamless liners preferred), and secondary containment with leak detection, monitoring and closure plans with the exception of storm water ponds. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/ operator shall retrofit all existing systems without secondary containment and Leak detection before discharge permit renewal or within a schedule submitted and approved within 6 months of permit issuance. A list of all pits and ponds including detention ponds down gradient from the facility with schedule for completion shall be included in the submittal.

D. The owner/operator shall maintain the results of all tests and inspections at the facility covered by this discharge permit and made available for OCD inspection upon request. The owner/operator shall report the discovery of any system which is found to be Leaking or has lost integrity to the OCD within 72 hours of discovery. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD and the City of Lovington at Least 72 hours prior to all testing.

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From: Moore, Darrell [mailto:Darrell.Moore@hollycorp.com]
Sent: Wednesday, May 11, 2011 2:50 PM
To: Chavez, Carl J, EMNRD
Subject: FW: Map

Carl

Attached is a site diagram that shows the location of a new fire water pond at our Lovington facility. We plan on starting construction in the next three weeks. Thank you for your attention to this matter.

From: Hernandez, Carrie
Sent: Wednesday, May 11, 2011 1:39 PM
To: Moore, Darrell
Subject: Map

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Chavez, Carl J, EMNRD

From: Moore, Darrell [Darrell.Moore@hollycorp.com]
Sent: Thursday, May 26, 2011 8:54 AM
To: Chavez, Carl J, EMNRD
Cc: Michael Leighton; Lackey, Johnny; Hilliard, Jessie; Hernandez, Eloy; Welch, Bill
Subject: New Fire Water Pond
Attachments: New Proposed Location for Approval Map.pdf; Lovington Refining 2 Million Gal Firepond Layout.pdf

Carl

Attached, please find the plot plan and engineered drawings for the new fire water pond at our Lovington facility. We are planning on constructing this pond in the next month or two pending OCD approval.

Darrell Moore
Environmental Manager for Water and Waste
Navajo Refining Company, LLC
Phone Number 575-746-5281
Cell Number 575-703-5058
Fax Number 575-746-5451

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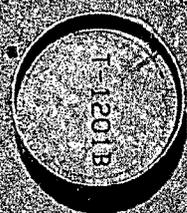
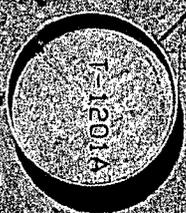
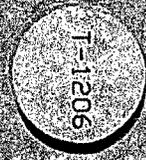


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NEW PROPOSED
LOCATION
FOR APPROVAL



Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, May 12, 2011 8:21 AM
To: 'Moore, Darrell'
Cc: Michael Leighton
Subject: RE: Lovington Refineryt (GW-014) Map

Darrell:

See Page 38 for the Fire Water Pond approved for the Artesia Refinery (GW-028) at http://ocdimage.emnrd.state.nm.us/Imaging/FileStore/SantaFeAdmin/AO/84404/pENV000GW00029_197_AO.tif

This is what the agencies expect for the Fire Water Pond at the Lovington Refinery (GW-014).

Thanks.

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NEW PROPOSED
LOCATION
FOR APPONAL

200' x 115'

T-1202

T-1203

T-1204

T-1214

T-1206

T-1215

T-1209

T-1207

T-1205

T-1208

T-1201A

T-1201B

T-1201C

T-1201D

ISSUED FOR
MAY 06 2011
REVIEW & COMMENTS