

NM1 - ____63____

**ANNUAL
REPORT**

____2019____

Jones, Brad A., EMNRD

From: Timothy Shreve <tshreve@ndblandfill.com>
Sent: Monday, August 31, 2020 3:48 PM
To: Enviro, OCD, EMNRD
Cc: Jones, Brad A., EMNRD
Subject: [EXT] OWL Landfill Services Annual Report - 2019
Attachments: OWL Landfill Services Annual Report 2019.pdf

Good Afternoon,

As part of our Commercial Surface Waste Management Facility Permit NM1-63, located in Lea County, New Mexico, OWL Landfill Services, LLC is required to submit an annual report to the Oil Conservation Division (OCD) by September 1st of each year, providing information for the preceding year.

Still being under construction, non-operational with no waste accepted for the entire 2019 year, the attached document is intended to address the requirements of our operating permit, NM1-63.

If you have any further questions or feel this letter does not serve its intended purpose of reporting for the preceding year, please feel free to contact me at (281) 802-2038 or by e-mail at tshreve@ndblandfill.com.

Very Respectfully,

Tim Shreve
Director of Landfill Operations

Please note "NEW" e-mail address: tshreve@ndblandfill.com.



OWL Landfill Services, LLC
dba. Northern Delaware Basin Landfill
8201 Preston Rd., Suite 520
Dallas, Texas 75225
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OWL Landfill Services, LLC
(dba) Northern Delaware Basin Landfill
8201 Preston Rd. Suite 520
Dallas, Texas 75225
(214) 292-2011

Date: August 24, 2020

Mr. Brad Jones
EMNRD Oil Conservation Division
1220 S. Saint Francis Dr.
Santa Fe, NM 87505

RE: Annual Reporting
OWL Landfill Services, LLC, (dba) Northern Delaware Basin Landfill, Lea County, New Mexico
Commercial Surface Waste Management Facility Permit NM1-63. Section 23, Township 24 South, Range 33 East NMPM, Lea County, New Mexico dated 08/17/2017

Dear Mr. Jones:

As part of our Commercial Surface Waste Management Facility Permit NM1-63, located in Lea County, New Mexico, OWL Landfill Services, LLC is required to submit an annual report to the Oil Conservation Division (OCD) by September 1st of each year, providing information for the preceding year.

Section 2, General Facility Operations, Item D, specifically states:

Annual Report. The operator must submit an annual report to the OCD by September 1st of each year providing the following information for the preceding year: 1) all inspection forms including those for leak detection systems along with analytical results, 2) hydrogen sulfide monitoring results, 3) process piping integrity test results, 4) training records, 5) complaint logs and resolutions, and 6) a summary of the nature and amount of any reportable releases.

To address this requirement, I would like to offer the following as it pertains to Section 2, D of our Commercial Surface Waste Management Facility Permit:

- 1) All inspection forms including those for leak detection systems along with analytical results** – The facility was still under construction in 2019 and the leak detection systems were not completed. Accordingly, OWL cannot submit the inspection forms as required for the preceding year 2019 as the site was still under construction, non-operational and did not received waste; there is nothing to report.

- 2) **Hydrogen Sulfide monitoring results** – The Hydrogen Sulfide (H₂S) monitoring systems as detailed in the constructions plans around the disposal pit, evaporation pond(s), drying pad(s), liquids processing facility, were not installed in 2019 as the site was still under construction. Additionally, the site was to monitor loads of incoming wastes for the presence of H₂S. Accordingly, OWL cannot submit the H₂S monitoring information as required for the preceding year 2019 as the site was still under construction, non-operational and did not received waste; there is nothing to report.
- 3) **Process piping integrity test results** – Process piping as detailed in the construction plans were not complete in the preceding year 2019. Accordingly, OWL cannot submit the process piping integrity testing information as required for the preceding year 2019 as the site was under construction, non-operational and did not received waste; there is nothing to report.
- 4) **Training records** – There have not been any operations personnel hired, as the site was non-operational. Accordingly, OWL cannot submit the training records as required for the preceding year 2019 as the site was still under construction, non-operational and did not received waste; there is nothing to report.
- 5) **Complaint logs and resolutions** – Once the facility becomes operational, OWL will provide complaint logs and resolutions if any are reported. Accordingly, OWL cannot submit the complaint logs and resolutions as required for the preceding year 2019 as the site was still under construction, non-operational and did not received waste; there is nothing to report
- 6) **Summary of the nature and amount(s) of any reportable releases** – Once the facility becomes operational; OWL will provide a summary of the nature and amount(s) of any reportable releases if any occur. Accordingly, OWL cannot submit a summary of the nature and amount(s) of any reportable releases (if any) as required for the preceding year 2019 as the site was still under construction, non-operational and did not received waste; there is nothing to report. Additionally, there have not been any reportable spills associated with the construction of the facility.

OWL Landfill Services, LLC is committed to the safety of the general public, our employees, and the environment and will operate in a productive, responsible manner. The OWL Facility is designed in compliance with 19.15.36 NMAC, and will be constructed and operated in compliance with our Surface Waste Management Facility Permit NM1-63.

If you have any further questions or feel this letter does not serve its intended purpose of reporting for the preceding year, please feel free to contact me at (281) 802-2038 or by e-mail at tshreve@ndblandfill.com. On behalf of OWL Landfill Services, LLC, I wish to thank you in advance for your continued support of this facility.

Sincerely,



Timothy L
Shreve

Digitally signed by
Timothy L Shreve
Date: 2020.08.31
16:40:55 -05'00'

Tim Shreve
Director of Landfill Operations
OWL Landfill Services, LLC