

NM1 - ____10 B____

**BIOPILE/
SOIL
REUSE
APPROVAL**

____April 16, 2021____

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Friday, April 16, 2021 9:17 AM
To: Marcella Marquez
Subject: RE: Request to Reuse Treated Soils
Attachments: 2021 0413 Reuse for stabilization request approval for biopiles 1200, 1203, 1215, and 1222 signed.pdf

Marcella,

Please see the attached approval letter. A hardcopy will not be placed in the mail. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Brad

Brad A. Jones • Environmental Scientist Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
1220 S. Saint Francis Drive | Santa Fe, New Mexico 87505
(505) 469-7486 | brad.a.jones@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>

From: Marcella Marquez <marcella@industrialecosystems.com>
Sent: Monday, April 12, 2021 10:37 AM
To: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>
Subject: [EXT] Request to Reuse Treated Soils

Brad:

Attached please find my request to reuse treated soils along with the corresponding analytical report.

Thanks,
Marcella Marquez
Regulatory/Compliance/HR Manager



State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Secretary

Adrienne Sandoval, Division Director
Oil Conservation Division



April 13, 2021

Ms. Marcella Marquez
JFJ Landfarm, L.L.C.
Industrial Ecosystems Inc.
P.O. Box 1202
Flora Vista, New Mexico 87415

RE: Request for Approval to Reuse Remediated Biopile Soils for the Stabilization/Solidification of Drilling Mud, Tank Bottoms, and Sludge
JFJ Landfarm, LLC - Industrial Ecosystems Inc.
JFJ Landfarm – Permit # NM1-010-B
Location: NW/4 SE/4 of Section 2, Township 29 North, Range 12 West, NMPM,
San Juan County, New Mexico

Dear Ms. Marquez:

The Oil Conservation Division (OCD) has reviewed JFJ Landfarm, LLC's (JFJ) request, emailed to OCD on April 12, 2021 and associated analytical results to reuse the remediated soils for the stabilization and/or solidification of incoming drilling mud, tank bottoms, and sludge from following biopile(s): **1200, 1203, 1215, and 1222.**

Based upon the information provided in the request, the above-referenced biopiles are hereby approved for the stabilization and/or solidification of incoming drilling mud and tank bottoms and sludge.

Please be advised that approval of this request does not relieve JFJ of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve JFJ of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 469-7486 or brad.a.jones@state.nm.us.

Respectfully,

Brad Jones
Environmental Engineer

BAJ



Main Address: 49 Road 3150 * Aztec, NM 87410
Remit to Address: P.O. Box 1202 * Flora Vista, NM 87415
P.O. Box: P.O. Box 2043 * Farmington, NM 87499
Phone: (505) 632-1782
Fax: (505) 632-1876 or (505) 334-1003

April 12, 2021

Brad Jones
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Use of reclaimed soil

Dear Brad:

Recent analytical results show that the following biopiles(s) have reached acceptable levels as required by our NMOCD permit.

Pile #

1203 DRO, GRO, BTEX & Chlorides Passed 04/08/21
1222 DRO, GRO, BTEX & Chlorides Passed 04/08/21
1200 DRO, GRO, BTEX & Chlorides Passed 04/08/21
1215 DRO, GRO, BTEX & Chlorides Passed 04/08/21

We are seeking NMOCD approval to recycle this soil by using it to mix/solidify incoming liquid waste.

Respectfully Submitted,

Marcella Marquez
Regulatory/Compliance/HR

Attachments/Enclosure – Analytical Reports

Analytical Results For:

INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410

Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876

Reported:
08-Apr-21 14:11

PILE # 1203
H210838-01 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories

Inorganic Compounds

Chloride	<16.0	16.0	mg/kg	4	1040713	GM	08-Apr-21	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	mg/kg	50	1040614	ms	06-Apr-21	8021B
Toluene*	<0.050	0.050	mg/kg	50	1040614	ms	06-Apr-21	8021B
Ethylbenzene*	<0.050	0.050	mg/kg	50	1040614	ms	06-Apr-21	8021B
Total Xylenes*	<0.150	0.150	mg/kg	50	1040614	ms	06-Apr-21	8021B
Total BTEX	<0.300	0.300	mg/kg	50	1040614	ms	06-Apr-21	8021B

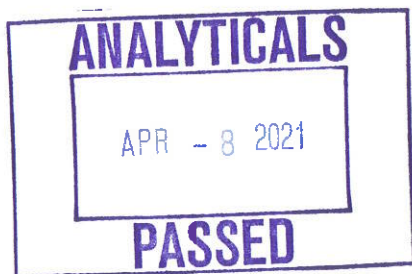
Surrogate: 4-Bromofluorobenzene (PID) 108 % 73.3-129 1040614 ms 06-Apr-21 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B
DRO >C10-C28*	12.4	10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B

Surrogate: 1-Chlorooctane 70.0 % 44.3-144 1040707 MS 07-Apr-21 8015B

Surrogate: 1-Chlorooctadecane 70.0 % 42.2-156 1040707 MS 07-Apr-21 8015B



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*=Accredited Analyte

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410

Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876

Reported:
08-Apr-21 14:11

PILE # 1222
H210838-02 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories

Inorganic Compounds

Chloride	<16.0	16.0	mg/kg	4	1040713	GM	08-Apr-21	4500-Cl-B		
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B		
Toluene*	<0.050	0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B		
Ethylbenzene*	<0.050	0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B		
Total Xylenes*	<0.150	0.150	mg/kg	50	1040614	ms	07-Apr-21	8021B		
Total BTEX	<0.300	0.300	mg/kg	50	1040614	ms	07-Apr-21	8021B		

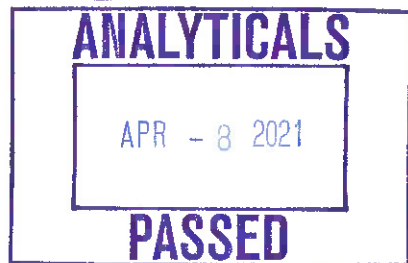
Surrogate: 4-Bromofluorobenzene (PID)	111 %	73.3-129	1040614	ms	07-Apr-21	8021B				
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B		
DRO >C10-C28*	28.2	10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B		

Surrogate: 1-Chlorooctane	70.7 %	44.3-144	1040707	MS	07-Apr-21	8015B				
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Surrogate: 1-Chlorooctadecane	67.5 %	42.2-156	1040707	MS	07-Apr-21	8015B				
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*=Accredited Analyte

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

Analytical Results For:INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876Reported:
08-Apr-21 14:11PILE # 1200
H210838-03 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	48.0		16.0	mg/kg	4	1040713	GM	08-Apr-21	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B	
Toluene*	<0.050		0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	1040614	ms	07-Apr-21	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	1040614	ms	07-Apr-21	8021B	

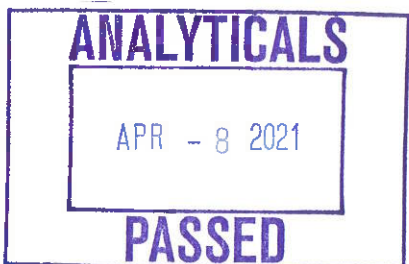
Surrogate: 4-Bromofluorobenzene (PID)			109 %	73.3-129		1040614	ms	07-Apr-21	8021B	
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B	
DRO >C10-C28*	19.3		10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B	

Surrogate: 1-Chlorooctane			77.3 %	44.3-144		1040707	MS	07-Apr-21	8015B	
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Surrogate: 1-Chlorooctadecane			79.2 %	42.2-156		1040707	MS	07-Apr-21	8015B	
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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410

Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876

Reported:
08-Apr-21 14:11

PILE # 1215
H210838-04 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories

Inorganic Compounds

Chloride	32.0	16.0	mg/kg	4	1040713	GM	08-Apr-21	4500-Cl-B
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B
Toluene*	<0.050	0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B
Ethylbenzene*	<0.050	0.050	mg/kg	50	1040614	ms	07-Apr-21	8021B
Total Xylenes*	<0.150	0.150	mg/kg	50	1040614	ms	07-Apr-21	8021B
Total BTEX	<0.300	0.300	mg/kg	50	1040614	ms	07-Apr-21	8021B

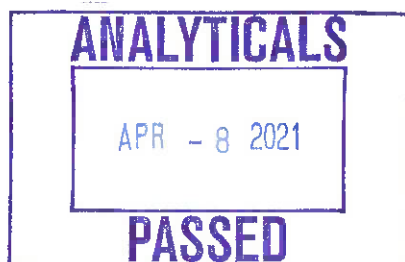
Surrogate: 4-Bromofluorobenzene (PID) 109 % 73.3-129 1040614 ms 07-Apr-21 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B
DRO >C10-C28*	<10.0	10.0	mg/kg	1	1040707	MS	07-Apr-21	8015B

Surrogate: 1-Chlorooctane 78.1 % 44.3-144 1040707 MS 07-Apr-21 8015B

Surrogate: 1-Chlorooctadecane 80.7 % 42.2-156 1040707 MS 07-Apr-21 8015B



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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410

Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876

Reported:
08-Apr-21 14:11

Inorganic Compounds - Quality Control

Cardinal Laboratories

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1040713 - 1:4 DI Water										
Blank (1040713-BLK1)										
Chloride	ND	16.0	mg/kg							Prepared & Analyzed: 07-Apr-21
LCS (1040713-BS1)										
Chloride	416	16.0	mg/kg	400		104	80-120			Prepared & Analyzed: 07-Apr-21
LCS Dup (1040713-BSD1)										
Chloride	416	16.0	mg/kg	400		104	80-120	0.00	20	

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Analytical Results For:INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876Reported:
08-Apr-21 14:11**Volatile Organic Compounds by EPA Method 8021 - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
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Batch 1040614 - Volatiles**Blank (1040614-BLK1)**

Prepared & Analyzed: 06-Apr-21

Benzene	ND	0.050	mg/kg						
Toluene	ND	0.050	mg/kg						
Ethylbenzene	ND	0.050	mg/kg						
Total Xylenes	ND	0.150	mg/kg						
Total BTEX	ND	0.300	mg/kg						
Surrogate: 4-Bromofluorobenzene (PID)	0.0564		mg/kg	0.0500		113	73.3-129		

LCS (1040614-BS1)

Prepared & Analyzed: 06-Apr-21

Benzene	1.97	0.050	mg/kg	2.00		98.4	72.2-131		
Toluene	2.07	0.050	mg/kg	2.00		104	71.7-126		
Ethylbenzene	2.05	0.050	mg/kg	2.00		103	68.9-126		
Total Xylenes	6.36	0.150	mg/kg	6.00		106	71.4-125		
Surrogate: 4-Bromofluorobenzene (PID)	0.0535		mg/kg	0.0500		107	73.3-129		

LCS Dup (1040614-BSD1)

Prepared & Analyzed: 06-Apr-21

Benzene	2.12	0.050	mg/kg	2.00		106	72.2-131	7.41	14.6
Toluene	2.20	0.050	mg/kg	2.00		110	71.7-126	5.97	17.4
Ethylbenzene	2.19	0.050	mg/kg	2.00		109	68.9-126	6.47	18.9
Total Xylenes	6.80	0.150	mg/kg	6.00		113	71.4-125	6.73	18.5
Surrogate: 4-Bromofluorobenzene (PID)	0.0535		mg/kg	0.0500		107	73.3-129		

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:INDUSTRIAL ECOSYSTEMS
49 CR 3150
AZTEC NM, 87410Project: JFJ
Project Number: 8377
Project Manager: MARCELLA MARQUEZ
Fax To: (505) 632-1876Reported:
08-Apr-21 14:11**Petroleum Hydrocarbons by GC FID - Quality Control****Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1040707 - General Prep - Organics**Blank (1040707-BLK1)**

Prepared & Analyzed: 07-Apr-21

GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	44.3		mg/kg	50.0		88.6	44.3-144			
Surrogate: 1-Chlorooctadecane	47.0		mg/kg	50.0		94.0	42.2-156			

LCS (1040707-BS1)

Prepared & Analyzed: 07-Apr-21

GRO C6-C10	226	10.0	mg/kg	200		113	83.7-135			
DRO >C10-C28	228	10.0	mg/kg	200		114	80.4-133			
Surrogate: 1-Chlorooctane	49.3		mg/kg	50.0		98.6	44.3-144			
Surrogate: 1-Chlorooctadecane	50.9		mg/kg	50.0		102	42.2-156			

LCS Dup (1040707-BSD1)

Prepared & Analyzed: 07-Apr-21

GRO C6-C10	215	10.0	mg/kg	200		107	83.7-135	5.20	13.8	
DRO >C10-C28	215	10.0	mg/kg	200		108	80.4-133	5.60	22.1	
Surrogate: 1-Chlorooctane	49.4		mg/kg	50.0		98.9	44.3-144			
Surrogate: 1-Chlorooctadecane	51.2		mg/kg	50.0		102	42.2-156			

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Industrial Ecosystems, Inc.

(970) 247-4220
Fax: (970) 247-4227

service@greenanalytical.com or dzufelt@greenanalytical.com
75 Suttle St Durango, CO 81303

Project Manager:

Address: 49 Road 3150

City: Aztec

State: NM Zip: 87410

Phone #: 505-632-1782

Email: marcella@industrialecosystems.com

Additional Report To:

Project Name: JFJ

Project Number:

Sample Name (Print): Marcella Marqued

FOR LAB USE ONLY

Lab I.D.

#A10838

Sample Name or Location

PILE # 1203

PILE # 1202

PILE # 1202

PILE # 1215

PILE #

PILE #

PILE #

PILE #

PILE #

Date	Time	Collected
3/31/21	5:20	
	10:00	
	10:27	
	2:00	

GROUNDWATER
SURFACEWATER
WASTEWATER
PRODUCEDWATER
SOIL
OTHER :

No preservation (general)
HNO₃
HCl
H₂SO₄
Other:
Other:

Matrix (check one)

of containers

ANALYSIS REQUEST

DRO (8015B)
GRO (8015B)
BTEX (8021B)
CHLORIDE (300.)

PLEASE NOTE: GAL's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by GAL, within 30 days after completion. In no event shall GAL be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder.

Relinquished By:

Day: 3/31/21

Received By:

ADDITIONAL REMARKS:

Report to State? (Circle)

Yes No

Relinquished By:

Day: 4/5/21

Received By:

ADDITIONAL REMARKS:

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Day: 4/4/21

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