

GW - 94

**GENERAL
CORRESPONDENCE**

YEAR(S):
1991 - 2004



Chemical Services

RECEIVED

JUN 24 2004

OIL CONSERVATION
DIVISION

June 21, 2004

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

RE: BJ Chemical Services GW-094

Dear Jack:

As per our agreement, we have completed the concrete and asphalt curbing around our Hobbs facility at 707 N. Leech. Therefore, our facility is now "contained" as per our Discharge Plan with New Mexico OCD.

As always, you are welcome to visit our facility at any time.

Sincerely,

BJ CHEMICAL SERVICES

Jim Britton
Director of Manufacturing & HSE

cc: Larry Johnson, Hobbs NMOCD
Jeff Day
Shane Stroh
Pam Moose

JB/ew



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

December 26, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Jim Britton
BJ Unichem Chemical Services
P.O. Box 1499
Hobbs, New Mexico 88240

**RE: PROPOSED CONSTRUCTION ACTIVITIES
HOBBS SERVICE FACILITY, GW-094**

Dear Mr. Britton:

The New Mexico Oil Conservation Division (OCD) has reviewed BJ Unichem Chemical Services's December 22, 2003 work plan for the design of storm water catchment activities at the Hobbs Service Facility, GW-094. The work plan specified the procedures and design for containment of storm water runoff at the above referenced facility. The above referenced work plan is **herewith approved**. The **proposed completion date is herewith approved**.

The OCD Hobbs District Office shall be notified at the conclusion of the proposed construction. Please be advised that OCD approval does not relieve BJ Unichem Chemical Services of liability should the work plan fail to adequately eliminate soil and/or ground water contamination related to BJ Unichem Chemical Services activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve BJ Unichem Chemical Services of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please call me at (505) 476-3489.

Sincerely,

W. Jack Ford, C.P.G.
OCD Environmental Bureau

xc: OCD Hobbs District Office



**BJ Unichem
Chemical Services**

December 22, 2003

Mr. Jack Ford
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Dear Jack:

As per our agreement, BJ Unichem Chemical Services would like to submit the following proposal for your consideration.

1. After a careful and thorough evaluation, we have decided to curb our entire facility located at 707 N. Leech, Hobbs, NM. A proposal from Ramirez and Sons along with a sketch is enclosed for your review.
2. Because this is considered a Capital Expense by our company, it will require several levels of approval from our corporate office in Houston.
3. In order to obtain a quality curbing job, it will be necessary to wait for warmer weather. Therefore, we will complete this work no later than July 1, 2004.

Please let me know as soon as possible if the above proposal is satisfactory so that I can proceed with appropriate approvals.

I will await your response.

Sincerely,

BJ UNICHEM CHEMICAL SERVICES

Jim Britton
Director of Manufacturing

cc: Jeff Day
Shane Stroh

Enclosures

JB/ew

PROPOSAL

**RAMIREZ
AND SONS**

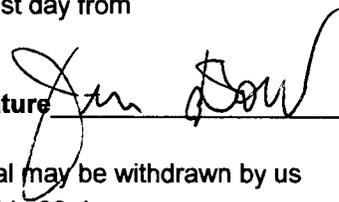
123 W. ADAMS,
LOVINGTON, NM 88260
505-396-3259 BUSINESS
505-396-4107 FAX

PAVING AND GENERAL DIRTWORK

3212 ENTERPRISE DR
HOBBS, NM 88240
505-492-0480 BUSINESS
505-492-0479 FAX

PROPOSAL SUBMITTED TO: <i>UNICHEM INTERNATIONAL</i>			JOB NAME: <i>CONCRETE AND ASPHALT BERM</i>		
ADDRESS: <i>707 N LEECH</i>			JOB LOCATION: <i>707 N LEECH</i>		
CITY, STATE, AND ZIP CODE: <i>HOBBS, NM 88240</i>			ARCHITECT OR ENGINEER:		
PHONE:	DATE OF PLANS:	PROPOSAL DATE: <i>10-Dec-03</i>	OUR CONTACT: <i>JIM DOW</i>	OUR PHONE: <i>505-492-0480</i>	FAX PHONE: <i>505 492 0479</i>
WE HEREBY SUBMIT SPECIFICATIONS AND ESTIMATES FOR:					
APPROX 760 LF OF 6" X 6" CONCRETE BARRIER CURB AND APPROX. 400 LF OF 3' X 3" SLOPED SPEED ASPHALT SPEED BUMP					\$5,800.00
Proposal does not include applicable taxes.					
We cannot be held responsible for any pavement settlement over utility ditches, trenches, foundations or any other work that has been constructed by others					
WE PROPOSE HEREBY TO FURNISH MATERIAL AND LABOR-COMplete IN ACCORDANCE WITH ABOVE SPECIFICATIONS, FOR THE SUM OF:					
Payment to be made as follows: Net amount due upon completion. Interest starts the 31st day from invoice date at the rate of 1.5% per month.					
All material is guaranteed to be as specified. All work to be completed in a workman like manner according to standard practices. Any alteration or deviation from above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delay beyond our control. Owner to carry fire, tornado and other necessary insurance. Our workers are fully covered by Workman's Compensation Insurance.					
Acceptance of Proposal - The above prices, specifications, terms and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.					
Date of acceptance _____			Signature _____		

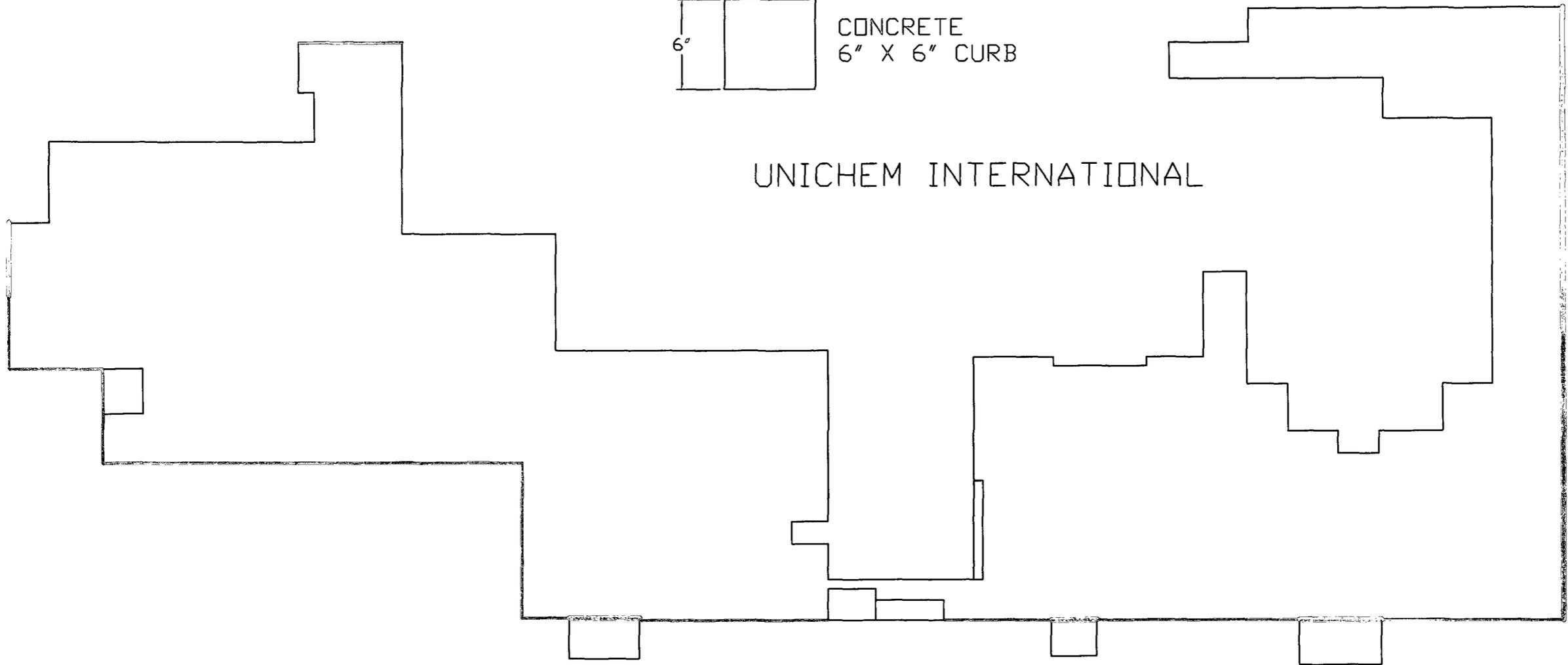
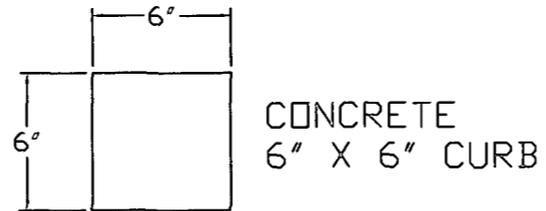
Authorized Signature



Note: This proposal may be withdrawn by us if not accepted within 30 days.

Signature _____

Signature _____



UNICHEM INTERNATIONAL

LEECH STREET

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 10/9/02,
or cash received on _____ in the amount of \$ 1,700.00

from BJ Services Unichem

for Hobbs Service Facility GW-094

Submitted by: [Signature] Date: 11-5-02

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal

Modification _____ Other _____
(optional)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

 BJ SERVICES COMPANY BJ Services Company U.S.A. P.O. BOX 4442 HOUSTON, TX 77210 713/462-4239	The Chase Manhattan Bank, N.A. Syracuse, New York	VENDOR NO. 157889	CHECK NO. [REDACTED]
			50-837 213
		CHECK DATE	CHECK AMOUNT
		10/09/02	*****1,700.00
PAY ONE THOUSAND SEVEN HUNDRED AND 00/100 *****			
NEW MEXICO ENVIRONMENTAL DEPT WATER QUALITY MANAGEMENT FUND 1220 SOUTH ST FRANCIS DR SANTA FE NM 87505		 VOID AFTER 90 DAYS AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.	



**BJ SERVICES COMPANY**

BJ Services Company U.S.A.

P.O. BOX 4442

HOUSTON, TX 77210

PLOPEZ

Stub 1 of 1

Check Date - 10/09/02

Check No. - [REDACTED]

Vendor No. - 157889

INVOICE NO.	DATE	DESCRIPTION	GROSS	DEDUCTIONS	AMOUNT PAID
GW094	092302	UNICHEM/ROBERT BARR/	1,700.00		1,700.00
			<u>1,700.00</u>		<u>1,700.00</u>



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

August 29, 2002

Lori Wrotenbery
Director
Oil Conservation Division

Ms. Cheryal Wilks
2033 Gary Lane
Hobbs, New Mexico 88240

**RE: Letter of Inquiry
BJ Unichem Chemicals Hobbs Facility and Duke Energy Field Services
Hobbs Booster Station**

Dear Ms. Wilks,

The New Mexico Oil Conservation Division is in receipt of your letter, dated August 23, 2002, regarding your concerns of potential groundwater impact from the two above captioned facilities. The Director has asked me to respond to your inquiry.

Based upon public information available from the New Mexico State Engineer's files your domestic well is located in an up-gradient (higher) position in relationship to the captioned facilities. In the event of a spill and/or leak occurring at the above captioned facilities an impact from these facilities to your domestic water supply is unlikely. The Oil Conservation Division is aware that oil field operations have in the past created impacts to the ground water in the Hobbs area and are working diligently to address those conditions.

I trust this response will alleviate your concerns regarding operation of these two facilities. As the person responsible for overseeing that the operations of the subject facilities comply with all Oil Conservation Division rules and regulations I would be pleased to attempt to answer any questions you may have. I may be contacted at this address or by telephone at (505) 476-3489. My e-mail address is: jwford@state.nm.us

Sincerely,

W. Jack Ford, C.P.G.
Environmental Engineer
Oil Conservation Division

cc: OCD Hobbs District Office

August 23, 2002

**Director of Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505**

To Whom It May Concern:

I noticed the Notice of Publication in the Hobbs News-Sun today regarding clean-up of two locations in the Hobbs, New Mexico area.

The first is (GW-094) for B J Unichem Chemicals located in NW4 NW4, Sec 34, T18S R38E, Lea County New Mexico. The second is (GW-044) for Duke Energy located in NW4, Section 4 T19S R38E, Lea County New Mexico.

My question is, since I live in NE 4 – NE 4 -Sec 30 T18S R38E, what is the probability of this clean-up and run off affecting my water well. We are constantly battling the effects of the ground water contamination from various oil companies in the area already, do we need another headache. We don't have an option in this area of Lea County, as the City is unsupportive of installing city water to our area. Directly across the street from my residence is a Retirement Home and they depend also on the water from their well. My mother and several of the neighbors have had to have their wells re-drilled and taken to deeper depths due to contamination. I feel this is not fair to the general working public.

I would just like to have information concerning the side affects of their actions. I am a widow and do not have the resources to pay for another water well due to some companies indiscretion over the years.

Your response to this matter would be greatly appreciated.

**Thanks,
Cheryal Wilks
2033 Gary Lane
Hobbs, NM 88240**

THE SANTA FE
NEW MEXICAN

Founded 1849

NM OIL CONSERVATION DIVISION
1220 S. ST. FRANCIS DR.
SANTA FE, NM 87505
ATTN: ED MARTIN

AD NUMBER: 277192 ACCOUNT: 56689
LEGAL NO: 72027 P.O.#: 03199000050
187 LINES 1 time(s) at \$ 82.43
AFFIDAVITS: 5.25
TAX: 5.48
TOTAL: 93.16

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS
AND
NATURAL RESOURCES
DEPARTMENT OIL
CONSERVATION
DIVISION**

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-094) - BJ Unichem Chemical Services, Mr. Robert Barr, Manager, Environment, Health & Safety, 707 Leach,

Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Hobbs Service facility located in the NW4 NW/4, Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 ml/l is disposed of, after testing, to the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of 80 feet with a total dissolved solids concentration of 800 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing should be held.

A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL
LORI WROTENBERY, Director
Legal #72027
Pub. Aug. 23, 2002

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, K. Cookes being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #72027 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/23/2002 and 08/23/2002 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 23 day of August, 2002 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

K. Cookes
/s/

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
23 day of August A.D., 2002

Notary Laura R. Herbig

Commission Expires 11/30/03

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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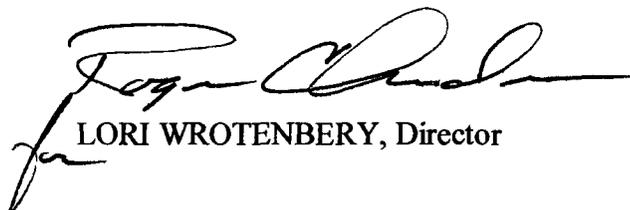
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


LORI WROTENBERY, Director

SEAL

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1 weeks.

Beginning with the issue dated

August 23 2002

and ending with the issue dated

August 23 2002

Kathi Bearden
Publisher

Sworn and subscribed to before me this 23rd day of

August 2002

Jodi Benson
Notary Public.

My Commission expires
October 18, 2004
(Seal)

is newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1977, and payment of fees for publication has been made.

LEGAL NOTICE
August 23, 2002
NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES
DEPARTMENT OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
(seal)
#19184

01100060000 02558413
State of New Mexico Oil &
1220 S. St. Francis
Santa Fe, NM 87505

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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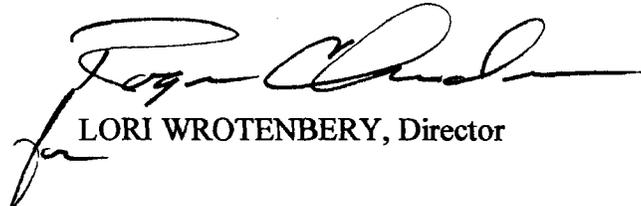
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


LORI WROTENBERY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 7/25/02
or cash received on _____ in the amount of \$ 100.00

from BJ Services/Unicem

for Hobbs Facility 610-094

Submitted by: [Signature] Date: 8/8/02

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

 BJ SERVICES COMPANY BJ Services Company U.S.A. P.O. BOX 4442 HOUSTON, TX 77210 713/462-4239	<small>The Chase Manhattan Bank, N.A. Syracuse, New York</small>	VENDOR NO 142197	CHECK NO [redacted]
		CHECK DATE 07/25/02	CHECK AMOUNT *****100.00
PAY ONE HUNDRED AND 00/100 *****		 VOID AFTER 90 DAYS AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.	
NMED-WATER QUALITY MGMT. ENERGY, MINERALS & NATURAL RESOURCES DEPT. OIL CONSERVATION DIV. 2040 S. PACHECO SANTA FE NM 87505			



**BJ SERVICES COMPANY**

BJ Services Company U.S.

P.O. BOX 4442

HOUSTON, TX 77210

PLOPEZ

Stub 1 of 1

Check Date - 07/25/02

Check No. - [REDACTED]

Vendor No. - 142197

INVOICE NO.	DATE	DESCRIPTION	GROSS	DEDUCTIONS	AMOUNT PAID
72402	072402	UNICHEM/GW094 FILING FEE	100.00		100.00
			<u>100.00</u>		<u>100.00</u>

RECEIVED

AUG 08 2002

**Environmental Bureau
Oil Conservation Division**

**BJ UNICHEM CHEMICAL SERVICES
707 NORTH LEECH STREET
HOBBS, NM 88240
505-393-7751**

**DISCHARGE PLAN
RENEWAL AND MODIFICATIONS
TO THE PLAN SUBMITTED JULY 22, 1992**

AUGUST 1, 2002

August 1, 2002

Mr. Roger Anderson
New Mexico Energy, Minerals, and
Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: Discharge Plan Renewal
BJ Unichem Chemical Services
Hobbs, NM Blending Plant
707 N. Leech, Hobbs, NM 88240

Dear Roger:

Enclosed are the modifications (two copies) to the BJ Unichem Hobbs blending plant discharge plan as indicated on the renewal submission dated August 1, 2002. Also attached is our \$100 filing fee.

Please call me at 281-631-8468 if you have any questions or require further information.

Best regards,

BJ UNICHEM CHEMICAL SERVICES



Robert Barr
Manager - Environment, Health & Safety

Enclosures

RB/ew

cc: Jim Britton

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised January 24, 2001

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS,
REFINERIES, COMPRESSOR, GEOTHERMAL FACILITIES
AND CRUDE OIL PUMP STATIONS**

(Refer to the OCD Guidelines for assistance in completing the application)

New Renewal Modification

1. Type: BJ Unichem Chemical Services is an oilfield and industrial specialty chemical blending facility.
2. Operator: BJ Unichem Chemical Services
Address: 707 N. Leech, Hobbs, NM 88240
Contact Person: Robert Barr Phone: 281/631-8468
Jim Britton - local Phone: 505/393/7751
3. Location: NW /4 NW /4 Section 34 Township 18S Range 38E
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
No change
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
Figure 2 - Site Plan, Revised 7-24-02
6. Attach a description of all materials stored or used at the facility.
As originally submitted.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
As originally submitted.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
As originally submitted.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
As originally submitted.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
Inspection Form - Revised 10-01-00
11. Attach a contingency plan for reporting and clean-up of spills or releases.
Appendix E - Revised 7-24-02
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
As originally submitted.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
No change from submission on 9-1-97; Copy of 2001 revision of New Mexico Spill Reporting
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Robert Barr

Title: Manager, Environmental, Health and Safety

Signature: Robert Barr

Date: 8-1-02

FIGURE 2

SITE PLAN

TEXAS AND NEW MEXICO RAILROAD

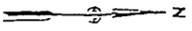
SPUR

Maintenance Building

Smoking Area

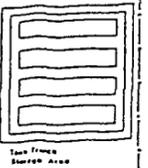
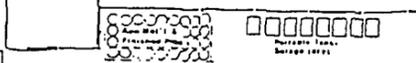
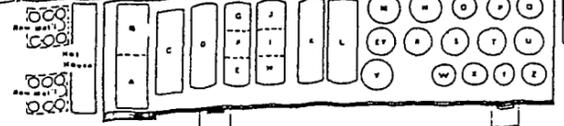
Water Wash Tank

Drum Storage

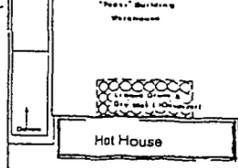
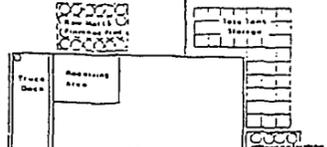


WEST CLINTON STREET

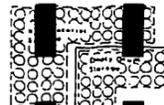
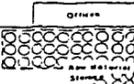
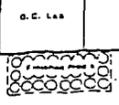
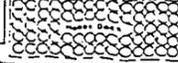
Empty Drum Storage Area
I.P.A. & Warehouse



PLANT BUILDING



Formulation Lab



Raw Mat. Drum Storage

ADMINISTRATION BUILDING

Steamer

Rinsate Tank



NORTH LEECH STREET

RAW MATERIAL & FINISHED PRODUCT DRUM STORAGE

UNICHEM
A Division Of *BJ SERVICES*
707 North Leech Street
Hobbs, New Mexico



APPENDIX E

**HAZARDOUS WASTE CONTINGENCY PLAN
&
SPILL AND RELEASE REPORTING PROCEDURES**

**BJ UNICHEM CHEMICAL SERVICES
HOBBS BLENDING PLANT**

**HAZARDOUS WASTE
CONTINGENCY PLAN**

**BJ UNICHEM CHEMICAL SERVICES
P.O. BOX 1499
707 NORTH LEECH
HOBBS, NEW MEXICO 88240
505/393-7751**

Revised 7-24-02

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HAZARDOUS WASTE CONTINGENCY PLAN

Hobbs, New Mexico
EPA ID# NM000333559

PURPOSE

This contingency plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

The provisions of this plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

EMERGENCY COORDINATOR RESPONSIBILITIES

The Emergency Coordinators for the Hobbs, NM facility are:

<u>NAME</u>	<u>TELEPHONE NO.</u>	<u>ADDRESS</u>
Jeff Day	505/393-7751 wk 505/392-6378 hm	1527 Camino Del Arco Hobbs, NM 88240
Shane Stroh	505/393-7751 wk 505/393-0254 hm	2208 N. Adobe Hobbs, NM 88240
Henry Pena	505/393-7751 wk 505/392-3726 hm	1105 W. Coal Hobbs, NM 88240
Jim Britton	505/393-7751 wk 505/393-5395 hm	919 Eagle Dr. P.O. Box 285 Hobbs, NM 88240
<i>Safety Representatives</i>		
Robert Barr	281/631-8468 wk 281/391-6465 hm 281/734-9510 cell 800/443-7243 pin #002416 pager	818 Aster Dr. Katy, TX 77493
Pam Moose	505/393-7751 wk 505/393-6281 hm 505/390-2803 cell 877/209-4827 pager	2106 N. Rojo Hobbs, NM 88240

One of these employees will be at the facility or on call (within a few minutes) at all times. This list of coordinators and their phone numbers along with phone numbers for emergency response agencies (fire, ambulance) and a drawing showing the location of spill response equipment and fire extinguishers must be posted near all phones within the facility.

The Emergency Coordinators are responsible for coordinating all emergency response measures. All of the coordinators are thoroughly familiar with all aspects of this plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out this plan.

GENERAL EMERGENCY PROCEDURES

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator must immediately:

1. Use or direct the use of the public address system to notify facility personnel of the emergency situation.
2. Alert all employees to shut down all equipment, electrical and mechanical, and report to the main gate northeast of the office on Leech Street (or if wind conditions prohibit meeting at that location, report to the railroad tracks at Clinton Street) for further directions.
3. Identify the character, exact source, amount, and extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.
4. Concurrently assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, explosion (i.e., the effects of any toxic, irritating, or asphyxiation gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat induced explosions).
5. Notify the appropriate state or local agencies if their help is needed. These agencies and their telephone numbers are as follows:

<u>Agency</u>	<u>Telephone</u>
Emergency	911
Ambulance	911
Hobbs Fire Dept.	911
Hobbs Police Dept.	911
Colombia Lea Regional Hospital	392-6581
If busy	392-2561
Covenant Medical Center	492-2000
Lea County Sheriff's Sub Station	393-2515
If busy	397-1217
New Mexico State Police	911

6. If the Emergency Coordinator determines that the facility has a release, fire, or explosion which could threaten health or the environment outside the facility he must report his findings as follows:
 - a) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate authorities. He must be

available to help appropriate officials decide whether local areas should be evacuated; and

- b) He must immediately notify the National Response Center (1-800-424-8802).

The report must include:

- ❖ Name and phone number of the reporter;
 - ❖ Name and address of the facility;
 - ❖ Time and type of incident (release, fire, explosion);
 - ❖ Name and quantity of material(s) involved, to the extent known;
 - ❖ The extent of any injuries, if any; and
 - ❖ The possible hazards to human health, or the environment, outside the facility.
7. During the emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping operations, collecting and containing released waste, and removing or isolating containers.
8. Immediately after an emergency, the Emergency Coordinator must provide for storing and disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
9. The Emergency Coordinator must ensure that, in the affected area(s) of the facility:
- a) No waste that may be incompatible with the released material is treated, stored, or disposed of until clean-up procedures are completed; and
 - b) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
10. The Emergency Coordinator must report to the Safety Department for the purpose of notification to the Regional Administrator of the EPA, Region VI in Dallas, Texas (214/655-6444), and appropriate State (NM-EID 505/827-9326) and local (Lea County LEPC – David Hooten 505/397-3636) authorities, that the facility is in compliance with paragraph (8) before operations are resumed in the affected area(s) of the facility.

11. The Emergency Coordinator must document the time, date, and details of any incident that required implementing the contingency plan. Within 15 days after the incident, the Safety Department must submit a written report on the incident to the EPA Regional Administrator, Region VI, 1201 Elm Street, Dallas, Texas 75270 and the New Mexico Environmental Improvement Division, Hazardous Waste Bureau, 1190 St. Francis Drive, P.O. Box 968, Santa Fe, NM 87504-0968 (505/827-9326). The report must include:

- a) Name, address, and telephone number of the owner or operator;
- b) Name, address, and telephone number of the facility;
- c) Date, time, and type of incident (e.g. fire, explosion, release);
- d) Name and quantity of material(s) involved;
- e) The extent of any injuries, if any;
- f) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g) Estimated quantity and disposition of recovered material that resulted from the incident.

TRAINING

Training contents and direction of the program shall be done by Robert Barr, Manager of Environmental Health & Safety. Safety meetings, on-the-job training, and familiarization will be provided by Jeff Day, Shane Stroh, Henry Pena or Abraham Harper. All facility personnel who handle or manage hazardous waste at this facility must be trained in the following areas:

1. Classroom training in RCRA general requirements with a discussion of emergency response actions appropriate to the hazardous waste handled at the facility.
2. Classroom and on-the-job training on procedures for inspecting, repairing, replacing and using spill control equipment.
3. Hands-on training in the proper use of fire extinguishing equipment.
4. Hands-on training for the decontamination of spill control equipment.
5. Classroom and on-the-job training on the appropriate personal protective equipment to be used in a response to a spill or fire.

6. Classroom training in the emergency response plan and procedures.
7. Drill in the shutdown and evacuation of the plant and office following execution of the alarm.
8. Additionally, monthly safety meetings will be held and attended by all facility personnel to discuss various subjects relevant to safe operations.

With the exception of #8 above, all training is repeated annually (and with three months of employment for newly employed personnel). Employees without training in the above items must work under direct supervision when handling waste until they have received the specified training.

Documents must be developed that include:

1. A job title for each position related to hazardous waste management and the name of each employee filling each job,
2. Written job descriptions that include skill, education, or other qualifications and duties,
3. Written descriptions of the type and amount of introductory and continuing training to be given, and
4. Documentation that the training has been provided.

Training records on current employees must be kept until closure. Former employee records must be kept at least three years.

COORDINATION WITH LOCAL AUTHORITIES

A copy of this contingency plan has been filed with local authorities (see Attachment #6). In the case of a fire that cannot be controlled by facility personnel, the local fire department will be called to aid in extinguishing the fire. In the event of a release of hazardous waste that that cannot be immediately absorbed, neutralized or otherwise controlled by BJ Unichem employees or presents physical or health hazards beyond the normal operating working hazards, the Emergency Coordinator shall contact appropriate response agencies. Employees will be instructed to maintain a safe distance from the fire or release.

ATTACHMENT #1

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>	
Fire Extinguisher	(1) 5# dry chemical stored	#14 QC lab, W. Wall.	
	(3) 10# dry chemical stored pressure for ABC fires	#7 N. end wash rack	
	(3) 5# dry chemical spread	Formulation Lab	
	(2) 20# dry chemical stored pressure for ABC fires	#6 S. end wash rack #19 N.E. beam Pepsi bldg.	
	(4) 20# dry chemical stored pressure for ABC fires	#3 Plant, N. of S. equip. door #13 Plant, center pole #10 S.W. beam Pepsi bldg. #15 Oil Side Tank Farm	
	(7) 30# dry chemical stored pressure for ABC fires	#1 Plant, S. door #2 S.E. door #5 S.E. door (radio tower) #8 N.E. chemical storage #4 W. door oil blending #9 S.E. door dry room #11 S.E. door dry room	
	(1) CO ₂ for ABC fires	#20 Water Side Tank Farm	
	(3) 150# Mobile ABC Dry Chemical Stored Pressure	#21 West of plant	
	Respirators	(8) MSA Half-Mask Cartridge Respirator with Organic Vapor/ Acid Gas & formaldehyde Cartridges, ammonia & amine cartridges	Spill Kit
		(3) SCBA, Survive-Air 30 minute escape	Next to Trans. Mgr. office
(1) SCBA, MSA sling 5 minute escape		Plant Spill Kit	
Absorbent Socks	Oil & Water absorbents	Plant Spill Kit, Pepsi bldg. Spill Kit	
Tyvek Coveralls	Full body protection against Hazardous materials contact	Plant Spill Kit, Pepsi bldg. Spill Kit	

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>
Rubber Slicker Suit	(4) medium-2, large-2; full body protection against hazardous material contact (impervious)	Plant Spill Kit
Rubber Gloves	Hand protection against chemical exposure	Plant Spill Kit
Goggles	(5) for eye protection	Plant Spill Kit
Salvage Drums	(10) 80 gallon DOT spec. containers for overpacking. 55 gallon drums for waste collection & transportation	Ubiquitous
Spark Proof Shovels	(4) For removing flammable material	South side of spill kit
Face Shields	(6) For eye and face protection	Plant Spill Kit
Shoe Covers	(50) For covering the boot or shoe (not impervious)	Plant spill kit; Pepsi bldg. spill kit
Air Driven Pump	(2) Mobile, can be used to clean up liquid spills, or to transfer liquid	E. wall under steps plant
Black Plastic Rools	For protection uncontaminated material and containment	W. Pepsi bldg.
Surgical Gloves	For handling small beakers & test tubes filled with hazardous waste and chemicals	QC lab; Pepsi bldg. spill kit
Emergency Showers	(3) Full body; (3) Drench hose; (5) Eye washes for decontamination	South of oil blending; North of drum filling; N. of dry mixing area; QC lab; West wall Pepsi bldg; Water side tank farm
Monitors	Sensidyne air pump 600 & Detector tubes for direct reading of air contaminates	QC lab
Satellite Drums		Center of plant blending area
Satellite Gaylord Boxes	(2) 250# Gaylord boxes	Center of plant blending area

Attachment #2

JOB TITLE/DESCRIPTIONS

Job Title: Maintenance and Driver

Job Description:

1. Responsible for delivery of chemical, bulk, and/or drums to lease locations for customers.
2. Responsible for loading truck for deliveries.
3. Responsible for unloading chemical at lease locations.
4. Driver is responsible for proper maintenance on vehicle.

Skills:

1. To be a safe driver.
2. Able to follow instructions.
3. To perform job in a timely manner.

Education: High School Diploma

Initial Training: Road Test, DOT Hazardous Material Transportation, Motor Carrier Safety, Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Forklift Operations Safety Program.

Subsequent Training: Handle Hazardous Waste, Respiratory Protection, Hydrogen Sulfide, Fire Extinguishers.

Attachment #2

Job Title: Long Haul Driver

Job Description:

1. Driving vehicle cross country.
2. Driver is responsible for loading on vehicle.
3. Responsible for unloading at BJ Unichem facilities.
4. Driver pumps chemical into a holding tank on vehicle and off into a holding tank.

Skills:

1. Able to handle vehicle in a safe manner.
2. Handle chemical safely.

Education: High School Diploma

Initial Training: DOT Hazardous Material Transportation, Motor Carrier Safety, Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Fork Lift Operations, Safety Program.

Subsequent Training: Respiratory Protection, Hydrogen Sulfide, Fire Extinguishers, Handling Hazardous Waste.

Attachment #2

Job Title: Quality Control Manager

Job Description:

1. Assuring the quality of all products coming in and going out of the plant.
2. Responsible for checking blended finished products for proper specifications.
3. Responsible for checking raw materials for proper specifications.
4. Responsible for checking and determine disposition of all products returned to plant.
5. Blending off obsolete products or off spec materials.
6. Running formulas for products to be blended.
7. Prints out labels for drums and tanks from the computer.
8. Assist in various plant operations.
9. Make changes to inventory on computer for variance on formulas.
10. Fills out reports on unanticipated release of chemical.

Skills:

1. Proficient in lab procedures.
2. Knowledge of basic chemistry.

Education: High School Diploma, 2 years of college with some chemistry desirable.

Initial Training: Hazard Communication, Contingency Plan, Personal Protective Equipment, Respiratory Protection, Computer Procedures, Q.C. Procedures, Inventory Procedures.

Subsequent Training: Fire Extinguishers, Fire Prevention

Attachment #2

Job Title: Drummer

Job Description:

1. Responsible for packaging finished or raw material from vats or tanks into drums or pails.
2. Assist in preparing drums; i.e., labeling, stenciling, sealing.
3. Assist in unloading trucks; i.e., drums, pallets of powder, and stacking drums.
4. Responsible for housekeeping in his work area.
5. Assist in inventory.
6. Respond to unanticipated spills when requested by supervisor.

Skills:

1. Must have the ability to learn procedures easily.

Education: High School Diploma

Initial Training: Forklift Operations, Use of Drumming Machine, Labeling Procedures, Inventory Procedures, DOT Hazardous Material Transportation, Hazard Communication, Contingency Plan, Personal Protective Equipment, Respiratory Protection.

Subsequent Training: Fire Extinguishers, Fire Prevention, Handling Hazardous Waste, Empty Drum Handling.

Attachment #2

Job Title: Blender

Job Description:

1. Responsible for blending raw materials to produce finished products.
2. Assist in unloading and loading trucks, cargo trucks, rail cars, and tankers of raw materials.
3. Assist in various duties in the plant operation when needed.
4. Responsible for housekeeping and paperwork in work area.
5. Respond to unanticipated spills when requested by supervisor.

Skills:

1. Ability to learn procedures.

Initial Training: Forklift Operations, Labeling Procedures, Inventory Procedures, Hazard Communication, Contingency Plan, Personal Protective Equipment, Safety Program, Respiratory Protection, Fire Extinguishers, Fire Prevention.

Subsequent Training: Empty Drum Handling, Handling Hazardous Waste.

Attachment #2

Job Title: Warehouseman

Job Description:

1. Responsible for blending raw materials to produce finished products.
2. Assist in unloading and loading trucks, cargo trucks, rail cars, and tankers of raw materials.
3. Assist in various duties in the plant operation when needed.
4. Responsible for housekeeping and paperwork in work area.
5. Respond to unanticipated spills when requested by supervisor.
6. Responsible for the overall departmental blending functions.

Skills:

1. Supervisory skills.

Education: High School Diploma

Initial Training: Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Forklift Operations, Labeling Procedures, DOT Hazardous Material Transportation, Contingency Plan, Empty Drum Handling, Inventory Procedures, Safety Program, Respiratory Protection.

Subsequent Training: Handling Hazardous Waste, Fire Extinguishers, Fire Prevention.

Attachment #2

Job Title: Plant Manager

Job Description:

1. Responsible for all aspects of the plant operations.
2. Responsible for logging and disposition of Hazardous Waste.
3. Orders equipment and supplies.
4. Updates Material Safety Data Sheet books for plant.
5. Respond to unanticipated spills.

Skills:

1. Ability for organization.
2. Supervisory and management skills.

Education: High School Diploma, 2 years college with chemistry desirable.

Initial Training: DOT Hazardous Material Transportation, Hazard Communication, Contingency Plan, Personal Protective Equipment, Hazardous Waste Management, Empty Drum Handling, Forklift Operations, Safety Training, Respiratory Protection.

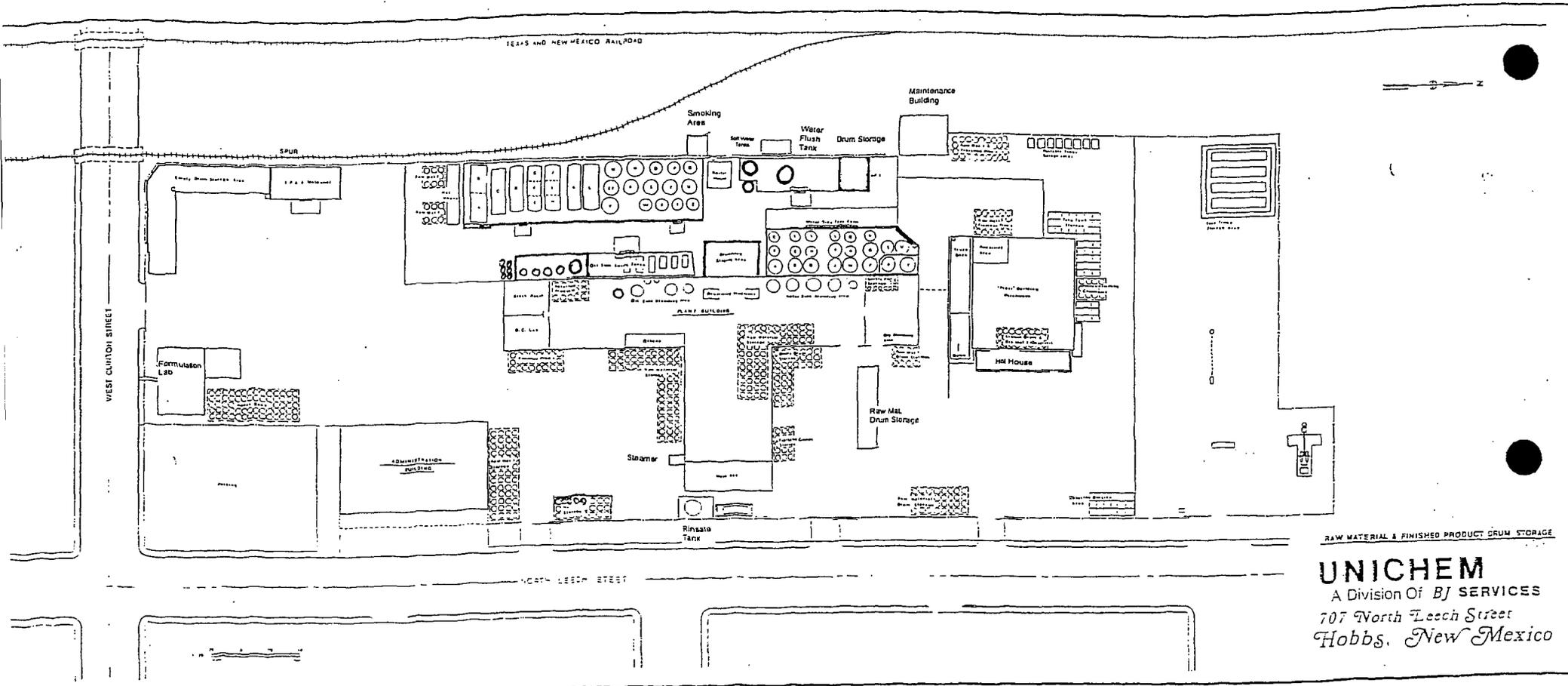
Subsequent Training: OSHA, SARA, and RCRA, Hydrogen Sulfide, Fire Extinguishers, Fire Prevention.

Attachment #3

PROPERTIES OF HAZARDOUS WASTE AND ASSOCIATED HAZARDS

The basic hazards presented in the hazardous waste generated at the BJ Unichem Hobbs blending facility is that of the raw materials used in the blending process. As a general rule, both raw materials and finished products are complex blends of petrochemical and aqueous solutions and few are found on site as a pure commodity substance. The hazards of these products may be discussed within three general groups of physical and health hazards.

1. **Flammability** – Many of the products used at the Hobbs blending facility pose a moderate risk of fire. This is due to the organic solvents and alcohols present. While most of the flash points represented fall in the range of 73 degrees F to 200 degrees F, the large volume on site presents an ever-present hazard. In addition, if involved in a fire, these materials can produce toxic products of combustion such as COx, SOx, and NOx.
2. **Corrosivity** – There are a relatively large population of raw materials present that pose a threat of chemical burns to the eyes and skin. These are best represented by caustics, organic amines, and weak acids. If not immediately flushed from the skin and eyes, severe burns could result. Many of these products are used in pH adjustment and the resulting finished products often contain a lesser degree of corrosivity.
3. **Toxicity** – This hazard can range from slight irritants to substances that could damage the lungs, liver, kidneys, blood, and central nervous system if breathed in high concentrations for extended periods of time. Some carcinogens or reproductive hazards exist in trace quantities. Some of the organic solvents (naphthas, xylene, methanol, isopropyl alcohol) can be absorbed through the skin. Industrial hygiene surveys have demonstrated that under normal working conditions, exposures above the permissible exposure level are not encountered. Contact with the skin can cause defatting and dermatitis.



RAW MATERIAL & FINISHED PRODUCT DRUM STORAGE

UNICHEM
 A Division Of BJ SERVICES
 707 North Leech Street
 Hobbs, New Mexico

Attachment #5

REQUIREMENTS REGARDING HAZARDOUS WASTE STORAGE,
CONTINGENCY PLANS, EMERGENCY PROCEDURES,
AND PERSONNEL TRAINING

I. (262.34) Hazardous Waste Accumulation Time

- A. Storage of hazardous waste for 90 days or less is acceptable without a permit provided that:
1. Hazardous waste is to be placed in containers complying with Subpart I, Part 265 [Use and Management of Containers] or placed in tanks complying with Subpart J, Part 265 [Tank Systems] except 265.197 (c) & 265.200. The generator is exempt from all requirements in Subpart G & H of Part 265 except 265.11 [Identification Numbers] & 265.114 [Disposal or Decontamination of Equipment, Structures, and Soils].
 2. The date of accumulation is marked and visible for inspection on each container.
 3. Containers and tanks are labeled "Hazardous Waste".
 4. The facility complies with requirements for owners and operators in Subpart C [Preparedness and Prevention] & D [Contingency Plan and Emergency Procedures] of 265 and 265.16 [Personnel Training].
- B. Storage of hazardous waste for 90 days or more requires a permit unless excepted.
- C. Satellite accumulation may occur provided that:
1. accumulated waste in containers does not exceed 55 gallons at the point where the waste is generated, and
 - a. the facility complies with 265.171 [Condition of Containers], 265.172 [Compatibility of Waste and Containers], & 265.173(a) [Containers Closed During Storage],
 - b. the containers are marked "Hazardous Waste" or with other words that identify the contents of the containers.

Attachment #5

2. Whenever accumulation exceeds 55 gallons, compliance with paragraph I.A must occur within three days.
- D. Generators with greater than 100kg but less than 1000kg of waste accumulation per month may store waste for 180 days or less without a permit provided:
1. the quantity never exceeds 6000 kg,
 2. compliance with Subpart I, Part 265 [Use and Management of Containers] except 265.176 [Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line],
 3. compliance with 265.201 of Part 265 in Subpart J [Special Requirements for Generators of Between 100 and 1,000 kg/mo That Accumulate Hazardous Waste in Tanks],
 4. compliance with Subpart C 265 [Preparedness and Prevention] and paragraphs 1.A.2 and 1.A.3 above,
 5. the facility has:
 - a. an Emergency Coordinator present or on-call to comply with I.D.5.d. below,
 - b. posted next to telephones the:
 - (1) name and phone number of Emergency Coordinators,
 - (2) location of fire extinguishers and spill control material and, if present, the fire alarms,
 - (3) phone number of fire department, unless connected by direct alarm;
 - c. ensured that all employees are made thoroughly familiar with proper waste handling procedures relevant to their responsibilities during normal operations and emergencies,
 - d. designated the Emergency Coordinator to respond to any emergency that arises.

Attachment #5

- (1) In the event of a fire, the Emergency Coordinator will notify the fire department or attempt to extinguish the fire with fire extinguishers.
 - (2) In the event of a spill, explosion, or release which could threaten human health outside the facility, or if the spill has reached surface water, the Emergency Coordinator shall notify the National Response Center (800/424-8802) with :
 - (a) the name, address, USEPA ID# of the facility,
 - (b) the date, time, and type of incident,
 - (c) the quantity and type of hazardous waste involved,
 - (d) the extent of any injuries, and
 - (e) the estimated quantities and disposition of recovered materials.
- E. Generators of greater than 100kg and less than 1000kg who offer waste to disposal facilities further than 200 miles may accumulate 270 days if facility complies with I.D. above.
- F. Facilities of Small Quantity Generators (>100kg & <1000kg per month) who accumulate more than 6000kg or who accumulate waste for more than 180 days (or 270 days if more than 200 miles from disposal) will constitute a storage facility subject to Parts 264 & 265 & permit requirements of Part 270 unless an extension has been granted.
- II. (265.16) Personnel Training**
- A. Personnel training must include:
1. classroom instruction or on-the-job training that teaches employees to perform the duties to ensure facility compliance (program must include all elements of II.D.3 below),
 2. the program is directed by a person trained in hazardous waste management procedures and includes instruction which teaches personnel hazardous waste management procedures (including the contingency plan) relevant to their positions, and

Attachment #5

3. the training program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:
 - a. procedures using, inspecting, repairing, and replacing emergency & monitoring equipment,
 - b. key parameters for automatic waste-feed cut-off systems,
 - c. communications or alarm systems,
 - d. response to fires or explosions,
 - e. response to ground-water contamination incidents, and
 - f. shutdown of operations.
- B. Personnel must complete training within six months of employment at the facility. Employees without training must work with supervision until they have received training.
- C. Employees must receive an annual review of training described in (II.A.) above.
- D. Documents must be developed and maintained at the facility that include:
 1. a job title for each position related to hazardous waste management and the name of each employee filling each job,
 2. written job descriptions that include skill, education, or other qualifications and duties,
 3. written descriptions of the type and amount of introductory and continuing training to be given, and
 4. documentation that the training has been provided.
- E. Training records on current employees must be kept until closure. Former employee records must be kept at least three years.

Attachment #5

III. (Part 265 Subpart C) Preparedness and Prevention

- A. Required equipment on site must include:**
 - 1. an internal communications or alarm system,
 - 2. telephones to summon assistance from local fire and police departments, or state or local emergency response teams,
 - 3. portable fire extinguishers, fire control equipment, special extinguishing equipment (foam, inert gas, dry chemical), spill control equipment, and decontamination equipment, and
 - 4. water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray equipment.

- B. All of the above equipment must be tested and maintained.**

- C. There must be access available to the communication or alarm systems.**

- D. There must be sufficient aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the waste storage area.**

- E. Arrangements with local authorities shall include:**
 - 1. arrangements to familiarize police, fire, and emergency response teams with the layout of the facility, the properties of the hazardous waste, places where personnel will be working, entrances to roads outside the facility, and possible evacuation routes.
 - 2. agreements concerning additional support, where more than one police or fire department might respond, describing primary response actions and responsibility,
 - 3. agreements with state emergency response teams, emergency response contractors, and equipment suppliers, and
 - 4. arrangements to familiarize local hospitals with properties of waste and type of injuries or illnesses that could result from fires, explosions, or releases.

Attachment #5

- F. Where state or local authorities decline to enter into arrangements, their refusal shall be documented.

IV. Subpart D, Part 265 Contingency Plan & Emergency Procedures

- A. The purpose and implementation of the contingency plan shall include:

1. design to minimize hazards to human health or environment from fires, explosions, or unplanned sudden releases or non-sudden releases of hazardous waste or constituents to air, soil, or surface water, and
2. provisions that the plan must be carried out immediately.

- B. Contents of the contingency plan must include:

1. a description of the actions facility personnel must take to comply with 265.51 [Purpose and Implementation of the Contingency Plan] and 265.56 [Emergency Procedures].
2. if any other contingency plan has been developed, it must be amended to comply with this Part,
3. a description of arrangements agreed to by local police, fire, hospitals, contractors, and state and local emergency response teams to coordinate emergency services pursuant to 265.37 [Arrangements with Local Authorities (III.E)].
4. A list of names, addresses, and phone numbers (office & home) of all Emergency Coordinators. (This list must be kept up-to-date. There must be more than one primary Emergency Coordinator with others listed as alternates listed in order of contact),
5. A list of all emergency equipment (fire extinguishing equipment, spill control equipment, communications, alarms (internal and external), decontamination equipment, and where such equipment is required (This list must be kept up-to-date and include the location and physical description of each item on the list with a brief outline of its capabilities), and
6. An evacuation plan of facility personnel describing signals to be used, routes and alternate routes to be taken.

Attachment #5

- C. Copies of the contingency plan:
1. must be maintained at the facility, and
 2. submitted to local fire and police departments, hospitals, and state and local emergency response teams.
- D. The contingency plan must be reviewed and immediately amended whenever:
1. regulations are revised,
 2. the plan fails in an emergency,
 3. the facility changes in design, construction, operation, maintenance, or other circumstances in such a way that materially increases potential for fires, explosions, or releases or changes the response necessary in an emergency.
 4. the list of Emergency Coordinators changes, or
 5. the list of emergency equipment changes.
- E. Emergency Coordinators must at all times be present or on-call (to respond in a short period of time) and be responsible for coordinating all emergency response measures. The Emergency Coordinator must be thoroughly familiar with all aspects of the contingency plan, all operations and activities of the facility, locations and characteristics of the waste handled, the location of all records in the facility, and the facility layout. The Emergency Coordinator must have authority to commit the resources needed.
- F. Emergency procedures shall be developed.
1. The Emergency Coordinator must immediately:
 - a. activate internal facility alarms or communications system to notify all personnel, and
 - b. notify state or local agencies with designated response roles if help is needed.

Attachment #5

2. The Emergency Coordinator must identify the characteristics, the exact source amount, and real extent of released materials by observation, review of records, or chemical analysis.
 3. The Emergency Coordinator must assess possible hazards to human health or environment (direct and indirect effects such as toxic, irritating, or asphyxiating gases generated or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire or heat induced explosions).
- G. Reports of findings must be made:
1. Evacuations of local areas may be advisable. The Emergency Coordinator must notify local authorities and be available to help decide whether local areas are to be evacuated.
 2. Report to the National Response Center (800/424-8802):
 - a. The name and phone number of the reporting person,
 - b. the name and address of the facility,
 - c. the time and type incident,
 - d. the name and quantity of materials involved,
 - e. the extent of any injuries, and
 - f. possible hazards to human health or environment outside the facility.
 3. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste. This includes stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
 4. If the facility operations stop during the response, the Emergency Coordinator must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes or other equipment.

Attachment #5

5. Immediately after the emergency, the Emergency Coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil, or surface water, or any other material that results from a release, fire, or explosion.
6. The Emergency Coordinator must ensure that in affected areas of the facility that:
 - a. no waste that may be incompatible with released material is treated, stored, or disposed until clean-up is completed, and
 - b. all emergency equipment is cleaned and fit for its intended use before operations resume.
7. The owner or operator must notify the Regional Administrator of the EPA and appropriate state and local authorities that the facility is in compliance with III.G.6. above before operations are resumed in the affected area of the facility.
8. The owner or operator must note in the operations log the time, date, and details that required implementation of the contingency plan. Within 15 days, he must submit a report to the Regional Administrator of the EPA that includes:
 - a. the name, address, and phone number of the owner/operator,
 - b. the name, address, and phone number of the facility,
 - c. the date, time, and type of incident,
 - d. the name and quantity of materials involved,
 - e. the extent of injuries,
 - f. an assessment of actual or potential hazards to human health or environment, and
 - g. the estimated quantity and disposition of recovered materials that resulted from the incident.

Attachment #6

DISTRIBUTION

NAME OF AGENCY	DATE MAILED
Hobbs Fire Department	8-1-02
Hobbs Police Department	8-1-02
Columbia Lea Regional Hospital	8-1-02
Covenant Medical Center	8-1-02
Lea County Sheriff's Sub Station	8-1-02
New Mexico Police Department	8-1-02
Lea County Local Emergency Planning Committee	8-1-02

US Inspection - 2002
Base/District HSE Inspection Report



Region: Unichem
 District/Base: Hobbs
 Reviewer: Pam Moose/UNIHOBBS/BJS/BJSERVICES
 Date of Inspection:
 Inspection Status:
 Facility Score = / X 100 = %

Key N/A - Not Applicable (Default Value)
 0 - Needs Immediate Attention
 1 - Needs Attention
 2 - Okay

1. GENERAL FACILITIES CONDITIONS	AREA REQUIRED	RATING
1. Current mandatory safety legislation posters	Office, shops	N/A
2. Local legislative accident log (e.g. OSHA 200 or equivalent)	Office	N/A
3. Emergency evacuation assembly point (posted, visible, unobstructed)	All areas	N/A
4. Emergency plans for fire, injury or chemical spill (posted, current)	All areas, All telephones	N/A
5. Emergency phone numbers posted (fire, ambulance, police, doctor, chemical spills, injuries)	All areas, All telephones	N/A
6. Fire alarm call point (in working order/visible)	All areas	N/A
7. Fire extinguishers - (operable, inspected, proper location, proper type)	All areas	N/A
8. Personal protective equipment (used as required)	All areas (except office)	N/A
9. PPE available for visitors or vendors	All areas (except office)	N/A
10. First aid kit (adequate number of, adequately stocked, highly visible)	Offices, shops	N/A
11. Trained first aiders at facility (sufficient number, identified, posted)	Facility	N/A
12. Safety signs and notices (sufficient number, all hazards, current)	All areas	N/A
13. Safety bulletin board (current)	Facility	N/A
14. Employer liability insurance certificate (current, displayed) UK only	Public areas	N/A
15. Entryway/gateway (signed, unobstructed)	Facility	N/A
16. Parking (sufficient, unobstructed, signed)	Facility	N/A
17. Road surfaces (safe, maintained)	Facility	N/A
18. Lighting (sufficient, working, assess both internal and external)	All areas	N/A
19. Heating and cooling system (radiators free/clear, system checked annually, adequate records)	All areas	N/A
20. Electrical panels and wiring (labeled, secure, maintained)	All areas	N/A
21. Landscape (presentable, maintained)	Facility	N/A
22. BJ Services company signs (visible, maintained)	Facility	N/A
23. Prohibited articles/substances sign (visible, maintained)	Facility	N/A
24. Safety signs for LTI free days (up to date, visible)	Facility	N/A
25. Notice to visitors and vendors (where to go, posted)	Facility	N/A
26. Speed limit signs (posted, visible, adhered to)	Facility	N/A
27. Security fence (sufficient, maintained)	Facility	N/A
28. Fixed stairs, ladders, walkways, handrails, gates and doors (maintained, clear, safe)	Facility	N/A
29. Emergency exits/routes (signed, unobstructed, site plan of)	All areas	N/A
30. Hazardous chemicals inventory (held locally, current)	Facility	N/A
31. Material safety data sheets (accessible locally, current) Dispatch?	All areas	N/A
32. Spills or leaks visible	All areas	N/A
33. Spill control material (available, appropriate, utilized)	All areas	N/A
34. Knowledge of environmental and safety (HSE) manuals	Facility	N/A
35. Knowledge of emergency response plans (fire, injury, spillage)	Facility	N/A
36. Surface-water/storm-water drains & discharge points free of oil, debris, etc	All areas	N/A

37. Site isolation valves marked/signed, access to, maintained (electricity, gas, water, drains)	Facility	N/A
38. Drains (surface/foul) emergency cut-off valves - where installed (work properly)	Facility	N/A
39. No open containers outside collecting water	All areas	N/A
40. Environmental Records present and in order	All areas	N/A
TOTAL		0

2. SHOPS(S): **RATING**

1. Hand tools (condition, noise, sufficient number, proper storage)	N/A	
2. Grinding equipment (signs/visibility, tool rests, wheels inspected/maintained)	N/A	
3. Welding and cutting equipment (stored properly, flash back arrestors, welding screens)	N/A	
4. Cranes, hoists and jacks (capacity signed, periodic inspection, tested, records)	N/A	
5. Lubrication area (clean, labeled, spill controls)	N/A	
6. Parts storage (secure, labeled, clean, records)	N/A	
7. Overhead storage area (posted for capacity, heavy items below, undamaged, secured to hazard points on floor)	N/A	
8. Material safety data sheets (accessible locally, current) - Shop materials involved	N/A	
9. Battery charging and storage area (separate, clean, ventilated)	N/A	
10. Shop sumps clean & routinely maintained	N/A	
11. Painting and paint storage area (contained, labeled, appropriate)	N/A	
12. Cleaning agents and solvents area (storage, ventilated or enclosed, hazard signage, MSDS available)	N/A	
13. Work benches (clean, tidy, vice condition)	N/A	
14. Oily rag containers (enclosed, metal, labeled)	N/A	
15. Lockout/tagout procedures (adhered, monitored, effective, understood)	N/A	
16. Ladders (checked periodically and tagged, not painted)	N/A	
17. Machine tools (pillar drill, lathe, etc.) (maintained, guarded, PPE available, signage, tested)	N/A	
18. Used oil and filters being properly handled	N/A	
19. Used anti-freeze being properly handled	N/A	
20. Air compressors (belts guarded, auto start signage, PRV's checked annually/tagged)	N/A	
21. Overhead doors (height marked, good working order)	N/A	
TOTAL		0

3. LOCKER ROOM(S), WASHROOM(S), BREAK AREA(S) **RATING**

1. Ventilation (adequate)	N/A	
2. Showers and sinks (adequate, clean, maintained)	N/A	
3. Toilets (adequate, clean, maintained)	N/A	
4. Lockers (sufficient size/number, accessible, lockable)	N/A	
5. Drinking water (available)	N/A	
6. Sufficient personal storage and changing space (clean, maintained, adequate)	N/A	
7. Any required regulations/posters	N/A	
TOTAL		0

4. CANTEEN/KITCHEN **RATING**

1. Food storage (refrigerated, contained, labeled, dry, ventilated)	N/A
2. Food segregation (meats, hot/cold, dairy isolated)	N/A
3. Cleanliness (floors, surfaces, preparation areas)	N/A
4. Waste disposal/storage (appropriate, labeled, managed)	N/A
5. Food hygiene signage (posted, appropriate)	N/A
6. Healthy living signage (posted, appropriate)	N/A

7. Washing equipment (adequate, clean maintained)	N/A
8. Cooking equipment (adequate, clean, maintained)	N/A
9. Ventilation (adequate, maintained)	N/A
10. Refrigeration/freezer (maintained)	N/A
11. Vermin (controlled)	N/A
12. Tables and chairs (sufficient, clean, structurally sound)	N/A
13. Utensils (sufficient number, clean, stored)	N/A
TOTAL	0

5. LABORATORY	RATING
1. Chemical containers (labeled, secure)	N/A
2. Only required chemicals on hand (labeled, secure)	N/A
3. Local extraction ventilation (installed, operable, maintained, records)	N/A
4. Gas bottle storage (secured, external where possible, regulators checked, labeled)	N/A
5. Safety shower and eyewash (maintained, tested)	N/A
6. Material safety data sheets (accessible locally, current)	N/A
7. Waste chemicals (correct storage, correct and regular disposal)	N/A
TOTAL	0

6. YARD/EXTERNAL EQUIPMENT STORAGE AREAS	RATING
1. Containers (appropriate, stacked, labeled)	N/A
2. Safe storage of waste (correctly segregated, labeled)	N/A
3. Pallets (adequate, maintained, safe)	N/A
4. Noise levels (signage, measured)	N/A
5. Flammable gas (caged, signed, segregated)	N/A
6. Road traffic signage (speed limits posted, warning signage for pedestrians)	N/A
7. Segregation of pedestrians/vehicles (walkways marked, railings)	N/A
8. PPE (signage, appropriate to risk assessed)	N/A
9. Racking (capacity signed, inspections, records, property utilized)	N/A
10. Washbay sump(s) clean (routinely maintained and emptied)	N/A
TOTAL	0

7. FORKLIFT	RATING
1. Forks (condition, maintained, appropriate)	N/A
2. Pre-use check sheets (available, utilized)	N/A
3. Area FLT warning signage (visible)	N/A
4. Rated capacity shown on FLT	N/A
5. Backup alarm and/or flashing light (audible, working)	N/A
6. FLT Operators (trained, licensed, nominated)	N/A
7. Controls (operate properly, maintained)	N/A
8. Brakes (operate properly, maintained)	N/A
9. Horn (operates properly, maintained)	N/A
10. Seat condition (maintained, comfortable)	N/A
11. Headlights (sufficient, working)	N/A
12. Rollover protection fitted	N/A

TOTAL 0

8. CEMENT WAREHOUSE & BULK PLANT	RATING
1. Material safety data sheets (accessible locally, current)	N/A
2. Gates, walkways, railings and ladders (maintained, clear, safe)	N/A
3. Climbing safety devices, harness (inspected, records, sufficient, available, utilized)	N/A
4. Dust collector (working properly, maintained, inspected)	N/A
5. Silo pressure relief valves (periodic inspection/ test /calibration, records)	N/A
6. Air compressors (belts guarded, auto start signage, PRV's checked annually/tagged)	N/A
7. Partial bags properly stored	N/A
TOTAL	0

9. CO2 / NITROGEN STORAGE	RATING
1. Warning signs (asphyxiation, cold burns)	N/A
2. Relief valve (checked annually/tagged)	N/A
3. Pumps and packing (operable, maintained)	N/A
4. Condition of equipment (hoses, stowed appropriately, gauges clean, operable)	N/A
TOTAL	0

10. ACID STORAGE	RATING
1. Gates, walkways, railings and ladders (maintained, clear, safe)	N/A
2. Pump, fittings, valves, piping and hoses (condition, maintained)	N/A
3. Tank contents identified and measured (type, capacity, labeled)	N/A
4. Scrubber (maintained, inspected)	N/A
5. Acid loading area clean and free of spills	N/A
6. Acid tank containment viable (walls and bottom)	N/A
7. UN specification buckets being used for hazardous material	N/A
8. Safety shower and eyewash (maintained, tested)	N/A
9. Spill kit (shovel, neutralizer)	N/A
TOTAL	0

11. PRESSURE TEST BAY	RATING
1. Enclosure secure (locks)	N/A
2. Access controlled	N/A
3. Walls/fittings protected	N/A
4. Windows protected	N/A
5. Warning lights (working, sufficient)	N/A
6. Warning signs (local, relevant, sufficient)	N/A
7. Controls and valves (secure area, inspected, tested, records)	N/A
8. Instruments (enter test, calibration date) :	N/A
9. Relief valves (enter test, calibration date) :	N/A
10. Maximum acceptable working pressure of testing system indicated	N/A
11. Risk assessment (available, read, understood, utilized)	N/A
12. Pressure testing procedure (available, read, understood)	N/A
TOTAL	0

12. HEAD RACK/IRON REBUILD

1. Heads, manifolds, swages stored safely	N/A
2. Thread protectors	N/A
3. Baker vise or better	N/A
4. Hoist Adequate	N/A
5. Lifting chains safe	N/A
6. Adequate pipe wrenches	N/A
7. Pinpullers to standard	N/A
TOTAL	0

13. CHEMICAL WAREHOUSE**RATING**

1. All chemicals (identified, labeled)	N/A
2. Proper stacking (drums and bag pallets no more than three [3] high)	N/A
3. Safety shower and eyewash (maintained, tested)	N/A
4. Hoses, piping and valves (clear, operable, stowed appropriately)	N/A
5. Tanks vented to outside	N/A
6. Proper chemical segregation (types, aisles, labeled)	N/A
7. Used spill material container (available, empty, clean, isolated)	N/A
8. Floors (flat, clean, impermeable)	N/A
9. Sump (empty, clean, isolated)	N/A
10. Racking (capacity signed, inspections)	N/A
11. Material safety data sheets (accessible locally, current)	N/A
12. Waste/surplus chemicals (routinely identified, correct storage, correct and regular disposal)	N/A
TOTAL	0

14. FUEL ISLAND**RATING**

1. Pumps (barriered off)	N/A
2. Fuel storage (barriered off)	N/A
3. Hoses and pumps (condition, clean, proper type, date, stowed appropriately)	N/A
4. Waste container (metal, lidded, labeled)	N/A
5. Drip trays (drain to interceptor)	N/A
6. Fuel and oil tanks in secondary containment and free of spills	N/A
7. Fuel island area clean and free of spills	N/A
8. Fuel and oil tanks property labeled	N/A
9. Proper containment (double wall tanks, bunds)	N/A
10. Filling nozzles (good working condition, locked off at night)	N/A
TOTAL	0

15. SAND STORAGE AREA**RATING**

1. Electrical safe and clearly marked	N/A
2. Railing, walkways, ladders and stairs safe	N/A
3. Climbing safety devices	N/A
4. All drives guarded	N/A
5. Lighting	N/A
TOTAL	0

16. RADIATION STORAGE AREA**RATING**

1. Current copy of RA licenses on display	N/A
2. Copy of RA "Notice to Employees" on display	N/A
3. BJ Services Radiation Protection Manual available	N/A
4. Country/State NRC regulations available	N/A
5. Storage area posted "Caution - Radioactive Material"	N/A
6. Are sources properly labeled ?	N/A
7. Storage area secure (lock working properly)	N/A

8. Utilization log available and current	<u>N/A</u>
9. Bill of Lading being used	<u>N/A</u>
TOTAL	0

17. Housekeeping

Things to look for:

- Cluttered and poorly arranged areas
- Untidy and dangerous piling of materials
- Items that are excess, obsolete or no longer needed
- Blocked aiseways
- Trip hazards (cables, boxes, hoses, loose items)
- Material stuffed in corners, on overcrowded shelves, in overflowing bins and containers
- Tools and equipment left in work areas instead of being returned to tool rooms, racks, cribs or chests
- Broken containers and damaged material
- Materials gathering dirt and rust from disuse
- Waste, scrap and excess materials that congest work areas
- Spills, leaks and hazardous materials creating safety and health hazards

Key
 Select only the scores listed below.

N/A - Note Applicable (Default Value)
 0 - Needs Immediate Attention
 1 - Poor
 2 - Needs some attention
 4 - Good - Meets standards

17. HOUSEKEEPING	RATING
A. PREMISES (incl YARD)	N/A
B. SHOP(S)	N/A
C. OFFICE(S)	N/A
D. LOCKER ROOM(S), WASHROOM(S), BREAK AREA(S), MESS ROOMS, CANTEEN(S)	N/A
E. LABORATORY	N/A
F. STORES & EQUIPMENT STORAGE AREAS	N/A
G. CEMENT WAREHOUSE & BULK PLANT	N/A
H. CO2 / NITROGEN STORAGE	N/A
I. ACID STORAGE	N/A
J. PRESSURE TEST BAY	N/A
K. HEAD RACK/IRON REBUILD	N/A
L. CHEMICAL WAREHOUSE	N/A
M. FUEL ISLAND	N/A
N. SAND STORAGE	N/A
O. RADIATION STORAGE	N/A
TOTAL	0

ADDITIONAL COMMENTS

Attachments

Total Points 0

Chapter 43

New Mexico

KeyCite®: Cases and other legal materials listed in KeyCite Scope can be researched through West Group's KeyCite service on Westlaw®. Use KeyCite to check citations for form, parallel references, prior and later history, and comprehensive citator information, including citations to other decisions and secondary materials.

- § 43:1 Summary of reporting procedures
- § 43:2 Step-by-step guide to determining when notification is required—General spill reporting
- § 43:3 State website directory
- Appendix NM-1 Excerpts from New Mexico water quality control commission regulations
- Appendix NM-2 New Mexico air quality management regulations
- Appendix NM-3 Underground storage tanks

The notification and reporting requirements listed in this Chapter are imposed by the laws and regulations of New Mexico. You should also determine whether any reporting is required under applicable federal law, including the Clean Air Act. Also, review all of the facility's permits, including RCRA, NPDES, and sewer permits, to determine any additional reporting requirements. Also, review the notification provisions of each contingency plan or emergency response plan to see if they have been triggered. A master notification list may be assembled from these materials for easier reference.

The laws and regulations of New Mexico require reporting of (1) discharges of oil or water contaminants, (2) operation of process equipment or air pollution control equipment in a manner inconsistent with the Air Quality Control regulations, or (3) releases, suspected releases, spills or overfills of regulated substances at underground storage tanks (UST).

§ 43:1 Summary of reporting procedures

A. *Notify by Telephone*

1. Environmental Protection Division
New Mexico Health and Environment Department
24-hour Emergency Response Number
(505) 827-9329
2. For UST releases
Underground Storage Tank Bureau
New Mexico Environment Department
(505) 827-0188
3. Any affected local emergency planning committee.

B. *Notify in Writing*

1. Environmental Protection Division

Any unauthorized release during oil or gas drilling or production is also reportable to the Environmental Bureau Chief and the Division District Office of the Energy, Minerals and Natural Resources Department. See 19 NMAC 15 § 116.

B. Operation of Process Equipment or Air Pollution Control Equipment Inconsistently with Air Quality Management Regulations

1. The New Mexico Air Quality Management Regulations (relevant portions attached hereto as Appendix NM-2) require the owner or operator of a facility experiencing a malfunction, startup or shutdown that is causing process equipment or air pollution control equipment operation inconsistent with the Air Quality Management Regulations to notify the Division by telephone and then submit a written report as described above.

The terms "malfunction," "startup," "shutdown," and "air pollution control equipment" are defined in the regulations. Consult Appendix NM-2 for those definitions.

2. In the case of scheduled maintenance, the owner or operator of a facility must notify:
 - a. The Division verbally no later than 24 hours *prior* to the initial occurrence of the excess emission; and
 - b. The Division in writing within 10 days after the start of the next regular business day.

The regulations do not define the term "scheduled maintenance."

3. Facilities operating under Title V Air Permits should follow the specific reporting instructions in their permit. See 20 NMAC 2.70 § 302.

C. Releases, Suspected Releases, Spills or Overfills of Regulated Substances at Underground Storage Tanks

The New Mexico Underground Storage Tank Regulations require that, in the event of a suspected release, confirmed release and spills or overfills from an underground storage tank (UST), the owners and operators must provide telephone notification to the Department within 24 hours followed in seven days by a written report. See Appendix NM-3.

USTs covered under the regulations include any one or combination of tanks (including connected underground pipes) that is used to contain an accumulation of regulated substances and the volume of which (including the volume of underground pipes) is 10 percent or more beneath the ground. "Regulated substance" is defined to include petroleum and CERCLA hazardous substances (*not RCRA hazardous waste*). See Appendix 4 in Part I of this Handbook for the definition of CERCLA hazardous substances. Certain USTs are exempt from these regulations. See Appendix NM-3 (Sections 101).

D. Releases Triggering Reporting Requirements

Three types of releases trigger the notification requirements: suspected releases, confirmed releases, and spills or overfills. A "release" is defined as any spilling, leaking, emitting, discharging, escaping, leaching, or disposing from an underground storage tank into the groundwater, surface water or subsurface soils.

1. A "suspected release" requires reporting by the owner and operator of the underground storage tank to the Department upon the occurrence of any of the following conditions:
 - a. Discovery of released regulated substances at tank site or surrounding area;
 - b. Unusual operating conditions observed by owners and operators (unless system equipment is found to be defective but not leaking and is immediately repaired or replaced); or
 - c. Monitoring results from release detection method that indicate a release may have occurred (unless the monitoring device is found to be defective and is immediately repaired, recalibrated or replaced and additional monitoring does not confirm the initial result or a second month of inventory control data does not confirm the initial result).

A suspected release must be investigated and confirmed within seven days. The owner or operator must conduct a tightness test to determine the location of the leak and measure for the presence of the release at the tank site. Upon confirmation of a release, the owner or operator shall report the release to the Department.

2. The owner or operator must contain and notify the Department within 24 hours of a spill or overfill from an UST. Reporting is required upon the occurrence of any of the following conditions:
 - a. Spill or overfill of petroleum that results in the release of 25 gallons;
 - b. Spill or overfill of a hazardous substance that results in a release that equals or exceeds the reportable quantity under CERCLA (see Table A in Part I of this Handbook for a list of reportable quantities); or
 - c. Spill or overfill of petroleum under 25 gallons or hazardous substance below its reportable quantity if spill or overfill cannot be contained within 24 hours (immediate notification is required for this situation).

New Mexico has received final approval from the EPA of its UST program.

§ 43:3 State website directory

The State of New Mexico has useful information regarding releases and response at the following World Wide Web addresses:

- New Mexico Home Page: <http://www.state.nm.us>
- Natural Resources: <http://www.emnrd.state.nm.us>
- Oil Conservation: <http://www.emnrd.state.nm.us/ocd>
- Environment Department: <http://www.nmenv.state.nm.us>



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

July 8, 2002

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 8980

Ms. Pam Moose
Unichem International
P.O. Box 1499
Hobbs, New Mexico 88240

RE: Discharge Plan Renewal Notice for the Unichem International Facility

Dear Ms. Moose:

Unichem International has the following discharge plan, which expires during the current calendar year.

GW-094 expires 12/01/2002 – Hobbs Service Facility

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00. Renewal discharge plans require a flat fee equal to \$1,700.00 for oil field service facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114. The \$100.00 filing fee is to be submitted with each discharge plan renewal application and is nonrefundable.

Ms. Pam Moose
February 12, 2001
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on NMED's website at www.nmenv.state.nm.us).

If any of the above-sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If Unichem International has any questions, please do not hesitate to contact Mr. Jack Ford at (505) 476-3489.

Sincerely,



Roger C. Anderson
Oil Conservation Division

RCA/wjf

cc: OCD Hobbs District Office

UNICHEM

A Division of BJ Services Company

June 1, 1999

Mr. Jack Ford
New Mexico Environmental Dept.
Water Quality Management Fund
2040 South Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Ford:

Enclosed please find a check in the amount of \$690.00 for the Discharge Plan renewal flat fee.

If anything else is required, please let me know. Thank you.

Sincerely,

UNICHEM, A DIVISION OF BJ SERVICES



Pam Moose
Safety & Regulatory Compliance Coordinator

Enclosure

cc: Charlie Root
Jim Britton

PM/ew

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 5/26/99,
or cash received on _____ in the amount of \$ 690.00
from BJ Services

for Hobbs Services GW-094

Submitted by: [Signature] Date: 6-7-99

Submitted to ASD by: [Signature] Date: 6-7-99

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 99

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

 BJ SERVICES COMPANY P.O. BOX 4442 HOUSTON, TX 77210 713/462-4239	The Chase Manhattan Bank, N.A. Syracuse, New York	VENDOR NO. 157889	CHECK NO. [redacted]
		CHECK DATE 05/26/99	CHECK AMOUNT *****690.00
PAY SIX HUNDRED NINETY AND 00/100 *****			

NEW MEXICO ENVIRONMENTAL DEPT
WATER QUALITY MANAGEMENT FUND
2040 SOUTH PACHECO
SANTA FE, NM 87505

[Signature]
VOID AFTER 90 DAYS
AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.



**BJ SERVICES COMPANY**P.O. BOX 4442
HOUSTON, TX 77210
713/462-4239

PLOPEZ

Stub 1 of 1

Check Date - 05/26/99

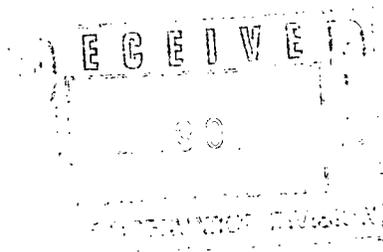
Check No. - [REDACTED]

Vendor No. - 157889

INVOICE NO.	DATE	DESCRIPTION	GROSS	DEDUCTIONS	AMOUNT PAID
051499	05/25	FEE	690.00		690.00

UNICHEM

A Division of BJ Services Company



January 22, 1998

Roger Anderson
New Mexico Oil Conservation Division
Energy, Minerals & Natural Resources Department
2040 S. Pacheco
Santa Fe, New Mexico 87505

**RE: Discharge Plan GW-094 Renewal
Hobbs Service Facility
Lea County, New Mexico**

Dear Roger:

Attached is a signed copy of the Discharge Plan Approval Conditions. Notify me of the amount of the flat fee accessed.

Call if you need anything further.

Best Regards,

Unichem, a Division of BJ Services Co., USA

Charles N. Root
Manager, Environmental, Health & Safety

Attachment: Discharge Plan Approval Conditions

The Santa Fe New Mexican

Since 1849. We Read You.

NM OCD
ATTN: SALLY MARTINEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 703331

ACCOUNT: 56689

LEGAL NO: 62459

P.O. #: 98-199-000257

218 LINES ONCE at \$ 87.20
Affidavits: 5.25
Tax: 5.78
Total: \$ 98.23

RECEIVED

OCT 9 1997

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

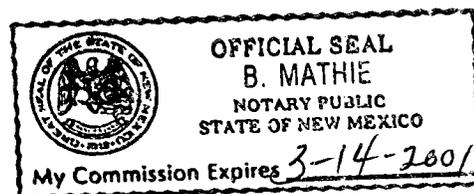
I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a News-paper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 62459 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 7 day of OCTOBER 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
7 day of OCTOBER A.D., 1997

Notary B. Mathie
Commission Expires 3-14-2001



NOTICE OF PUBLICATION

STATE OF NEW MEXICO

**ENERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT**

**OIL CONSERVATION
DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(GW-94) - UNICHEM, Charles Root, (281) 631-8468, 14505 Torrey Chase Blvd., Suite 201, Houston, Texas 77014-1024, has submitted a discharge application for renewal of its previously approved discharge plan for the Hobbs blending Plant located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top receptacles prior to off-site disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-287) - Williams Field Services, Ingrid DeKlaur, (801) 584-6543, 295 Chipeta Way, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a discharge application for the Snowshoe Straddle Compressor Station located in the S/2 NW/4 of Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling

at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 28 feet with a total dissolved solids concentration of approximately 6,225 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan applications, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plans based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plans based on the information in the discharge plan renewal application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 29th day of September 1997.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
Legal #62459
Pub. October 7, 1997

NOTICE OF PUBLICATION

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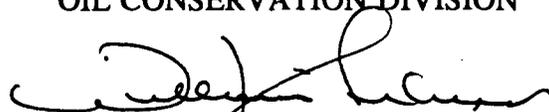
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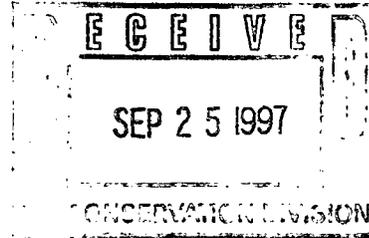
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

SEAL

UNICHEM

A Division of BJ Services Company



September 22, 1997

Mr. Roger Anderson
New Mexico Energy, Minerals
and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Subject: Discharge Plan Renewal
Unichem Hobbs, NM Blending Plant
707 N. Leech, Hobbs, NM 88240

Dear Roger:

Attached are the modifications (two copies) to the Unichem Hobbs blending plant discharge plan as indicated on the renewal submission dated August 29, 1997. Also attached is our \$50 filing fee.

Please call me at 281-631-8468 if you have any questions or require further information.

Best Regards,

A handwritten signature in cursive script that reads "Charles N. Root".

Charles N. Root
Manager, Environmental, Health & Safety

cc: Jim Britton

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/12/97

or cash received on _____ in the amount of \$ 50.00

from B.J. Services

for Unichem - Hobbs GW-094

Submitted by: _____ Date: _____

Submitted to ASD by: R. Chubb Date: 10/20/97

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.
Full Payment _____ or Annual Increment _____



BJ SERVICES COMPANY
P.O. BOX 4442
HOUSTON, TX 77210
713/462-4239

The Chase Manhattan Bank, N.A.
Syracuse, New York

VENDOR NO.
142197

CHECK NO. [REDACTED] 50-937
213

CHECK DATE	CHECK AMOUNT
09/12/97	*****50.00

PAY FIFTY AND 00/100 *****

NMED-WATER QUALITY MGMT.
ENERGY, MINERALS & NATURAL
RESOURCES DEPT.
OIL CONSERVATION DIV.
2040 S. PACHECO
SANTA FE, NM 87505

VOID AFTER 90 DAYS
AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.



**BJ SERVICES COMPANY**P.O. BOX 4442
HOUSTON, TX 77210
713/462-4239

PLOPEZ

Stub 1 of 1

Check Date - 09/12/97

Check No. - [REDACTED]

Vendor No. - 142197

INVOICE NO.	DATE	DESCRIPTION	GROSS	DEDUCTIONS	AMOUNT PAID
090897	09/11	FILING FEE	50.00		50.00

GW-94

UNICHEM
A DIVISION OF BJ SERVICES COMPANY, USA
707 NORTH LEECH STREET
HOBBS, NM 88240
505-393-7751

DISCHARGE PLAN
RENEWAL AND MODIFICATIONS
TO THE PLAN SUBMITTED JULY 22, 1992

SEPTEMBER 1, 1997

Volume I

UNICHEM

A Division of BJ Services Company

September 22, 1997

Mr. Roger Anderson
New Mexico Energy, Minerals
and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

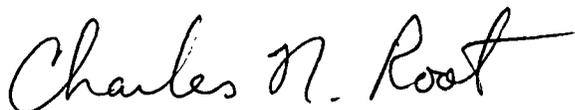
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707 N. Leech, Hobbs, NM 88240

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Best Regards,



Charles N. Root
Manager, Environmental, Health & Safety

cc: Jim Britton

FIGURE 2

SITE PLAN

APPENDIX E

**HAZARDOUS WASTE CONTINGENCY PLAN
&
SPILL AND RELEASE REPORTING PROCEDURES**

**UNICHEM
HOBBS BLENDING PLANT**

**HAZARDOUS WASTE
CONTINGENCY PLAN**

**Unichem
a Division of BJ Services Company, USA
P.O. Box 1499
707 North Leech
Hobbs, New Mexico 88240
505/393-7751**

revised 9-19-97

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JOB TITLES/DESCRIPTIONS	Attachment #2
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FACILITY DRAWING.....	Attachment #4
REGULATORY SUMMARY.....	Attachment #5
ARRANGEMENTS WITH LOCAL AUTHORITIES	Attachment #6

HAZARDOUS WASTE CONTINGENCY PLAN

Hobbs, New Mexico
EPA ID# NMD000333559

PURPOSE

This contingency plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.

The provisions of this plan must be carried out immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

EMERGENCY COORDINATOR RESPONSIBILITIES

The Emergency Coordinators for the Hobbs, NM facility are:

<u>NAME</u>	<u>TELEPHONE NO.</u>	<u>ADDRESS</u>
Jeff Day	505/393-7751 wk 505/392-6378 hm	6010 Casa Verde Hobbs, NM 88240
Wes Johnston	505/393-7751 wk 505/392-5707 hm	217 Commanche Dr. Hobbs, NM 88240
Henry Pena	505/393-7751 wk 505/392-3726 hm	1105 W. Coal Hobbs, NM 88240
Jim Britton	505/393-7751 wk 505/393-5395 hm	919 Eagle Dr. P.O. Box 285 Hobbs, NM 88240
<i>Safety Representatives</i>		
Jay Miller	505/393-7751 wk 915/758-3216 hm 800/596-0423 pager 505/390-7480 mobile	208 SW 22 nd Seminole, TX 79360
Charles Root	281-631-8468 wk 281-298-9755 hm 800/718-0459 pager	12000 Sawmill Rd. #2910 The Woodlands, TX 77380

Pam Moose

505/393-7751 wk
505/393-6281 hm
800/495-4369 pager
369-4880 mobile

2106 N. Rojo
Hobbs, NM 88240

One of these employees will be at the facility or on call (within a few minutes) at all times. This list of coordinators and their phone numbers along with phone numbers for emergency response agencies (fire, ambulance) and a drawing showing the location of spill response equipment and fire extinguishers must be posted near all phones within the facility.

The Emergency Coordinators are responsible for coordinating all emergency response measures. All of the coordinators are thoroughly familiar with all aspects of this plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out this plan.

GENERAL EMERGENCY PROCEDURES

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator must immediately:

1. Use or direct the use of the public address system to notify facility personnel of the emergency situation.
2. Alert all employees to shut down all equipment, electrical and mechanical and report to the main gate northeast of the office on Leech Street (or if wind conditions prohibit meeting at that location, report to the railroad tracks at Clinton Street) for further directions.
3. Identify the character, exact source, amount, and extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.
4. Concurrently assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, explosion (i.e., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat induced explosions).
5. Notify the appropriate state or local agencies if their help is needed. These agencies and their telephone numbers are as follows:

<u>Agency</u>	<u>Telephone</u>
Emergency	911
Ambulance	911
Hobbs Fire Dept.	911
Hobbs Police Dept.	911
Colombia Lea Regional Hospital	392-6581
if busy	392-2561
St. Mary Medical Center	392-5571
Lea County Sheriff's Sub Station	393-2515
if busy	397-1217
New Mexico State Police	911

6. If the Emergency Coordinator determines that the facility has a release, fire, or explosion which could threaten health or the environment, outside the facility, he must report his findings as follows:
 - a) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and
 - b) He must immediately notify the National Response Center (1-800-424-8802)

The report must include:

- * Name and phone number of the reporter;
- * Name and address of the facility;
- * Time and type of incident (release, fire, explosion);
- * Name and quantity of material(s) involved, to the extent known;
- * The extent of any injuries, if any; and
- * The possible hazards to human health, or the environment, outside the facility.

7. During the emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping operations, collecting and containing released waste, and removing or isolating containers.
8. Immediately after an emergency, the Emergency Coordinator must provide for storing and disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
9. The Emergency Coordinator must ensure that, in the affected area(s) of the facility:
 - a) No waste that may be incompatible with the released material is treated, stored, or disposed of until clean-up procedures are completed; and
 - b) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
10. The Emergency Coordinator must report to the Safety Department for the purpose of notification to the Regional Administrator of the EPA, Region VI in Dallas, Texas (214/655-6444), and appropriate State (NM-EID 505/827-9326) and local (Lea County LEPC - David Hooten 505/397-3636) authorities, that the facility is in compliance with paragraph (8) before operations are resumed in the affected area(s) of the facility.
11. The Emergency Coordinator must document the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the Safety Department must submit a written report on the incident to the EPA Regional Administrator, Region VI, 1201 Elm Street, Dallas, Texas 75270 and the New Mexico Environmental Improvement Division, Hazardous Waste Bureau, 1190 St. Francis Drive, P.O. Box 968, Santa Fe, NM, 87504-0968 (505/827-9326). The report must include:
 - a) Name, address, and telephone number of the owner or operator;

- b) Name, address and telephone number of the facility;
- c) Date, time and type of incident (e.g. fire, explosion, release);
- d) Name and quantity of material(s) involved;
- e) The extent of any injuries, if any;
- f) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g) Estimated quantity and disposition of recovered material that resulted from the incident.

TRAINING

Training contents and direction of the program shall be done by Jay Miller, Safety Manager, and Charles N. Root, Manager of Environmental Health & Safety. Safety meetings, on-the-job training, and familiarization will be provided by Jeff Day, Wes Johnston, Henry Pena or Xavier Pena. All facility personnel who handle or manage hazardous waste at this facility must be trained in the following areas:

1. Classroom training in RCRA general requirements with a discussion of emergency response actions appropriate to the hazardous waste handled at the facility.
2. Classroom and on-the-job training on procedures for inspecting, repairing, replacing and using spill control equipment.
3. Hands-on training in the proper use of fire extinguishing equipment.
4. Hands-on training for the decontamination of spill control equipment.
5. Classroom and on-the-job training on the appropriate personal protective equipment to be used in a response to a spill or fire.
6. Classroom training in the emergency response plan and procedures.
7. Drill in the shutdown and evacuation of the plant and office following execution of the alarm.
8. Additionally, monthly safety meetings will be held and attended by all facility personnel to discuss various subjects relevant to safe operations.

With the exception of #8 above, all training is repeated annually (and within six months of employment for newly employed personnel). Employees without training in the above items must work under direct supervision when handling waste until they have received the specified training.

Documents must be developed that include:

1. A job title for each position related to hazardous waste management and the name of each employee filling each job,
2. Written job descriptions that include skill, education or other qualifications and duties,
3. Written descriptions of the type and amount of introductory and continuing training to be given, and
4. Documentation that the training has been provided.

Training records on current employees must be kept until closure. Former employee records must be kept at least three years.

COORDINATION WITH LOCAL AUTHORITIES

A copy of this contingency plan has been filed with local authorities (see attachment #6). In the case of a fire that cannot be controlled by facility personnel, the local fire department will be called to aid in extinguishing the fire. In the event of a release of hazardous waste that cannot be immediately absorbed, neutralized or otherwise controlled by Unichem employees or presents physical or health hazards beyond the normal operating working hazards, the Emergency Coordinator shall contact appropriate response agencies. Employees will be instructed to maintain a safe distance from the fire or release.

ATTACHMENT #1

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>
Fire Extinguisher	(1) 5# dry chemical stored	#14 QC lab, W. Wall
	(3) 10# dry chemical stored pressure for ABC fires	#7 N. end wash rack
	(2) 20# dry chemical stored pressure for ABC fires	#6 S. end wash rack #19 N.E. beam Pepsi bldg.
	(4) 20# dry chemical stored pressure for ABC fires	#3 Plant, N. of S. equip. door #13 Plant, center pole #10 S.W. beam Pepsi bldg. #15 Oil side tank farm
	(7) 30# dry chemical stored pressure for ABC fires	#1 Plant, S. door #2 S.E. door #5 S.E. door (radio tower) #8 N.E. chemical storage #4 W. door oil blending #9 S.E. door dry rm. #11 S.E. door dry rm.
	(1) CO ₂ for ABC fires	#20 Waterside tank farm
	(1) 150# Mobile ABC Dry Chemical Stored Pressure	#21 West of plant
Respirators	(8) MSA Half-Mask Cartridge respirator with Organic Vapor/Acid Gas & formaldehyde cartridges, ammonia & amine cartridges	Spill kit
	(1) SCBA, Survive-Air 30 minute escape	Next to Trans. Mgr. ofc.
	(1) SCBA, MSA sling 5 minute escape	Plant spill kit
Absorbent Socks	Oil & Water absorbents	Plant spill kit Pepsi bldg. spill kit
Tyvek Coveralls	Full body protection against hazardous materials contact	Plant spill kit Pepsi bldg. spill kit

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>
Fire Extinguishers	(1) 5# dry chemical stored	#14 QC lab, W. Wall
Rubber Slicker Suit	(4) medium-2, large-2; full body protection against hazardous material contact (impervious)	Plant spill kit
Rubber Gloves	Hand protection against chemical exposure	Plant spill kit
Goggles	(5) for eye protection	Plant spill kit, Pepsi bldg spill kit
Salvage Drums	(47) 80 gallon DOT spec. containers for overpacking. 55 gallon drums for waste collection & transportation	Ubiquitous
Spark Proof Shovels	(4) For removing flammable material	South side of spill kit
Face Shields	(6) For eye and face protection.	Plant spill kit
Shoe Covers	(50) For covering the boot or shoe (not impervious)	Plant spill kit; Pepsi bldg. spill kit
Air Driven Pump	(2) Mobile, can be used to clean up liquid spills, or to transfer liquid.	E. wall under steps plant
Black Plastic Rools	For protection uncontaminated material and containment	W. Pepsi bldg.
Surgical Gloves	For handling small beakers & test tubes filled with hazardous waste and chemicals.	QC lab Pepsi bldg. spill kit
Emergency Showers	(3) Full body & (5) Eye washes for decontamination.	South of oil blending North of drum filling North of dry mixing area QC lab (eye wash only) West wall Pepsi bldg.
Monitors	Sensidyne air pump 600 & detector tubes for direct reading of air contaminates	QC Lab

Type of Equipment

Description of Capabilities

Location

Fire Extinguishers

(1) 5# dry chemical stored

#14 QC lab, W. Wall

Satellite Drums

(18) 55 gallon drums located throughout the plant and outside on the plant grounds. For disposal of hazardous waste.

#2 Empty drum dock
#3 Oil tank farm
#4 Oil tank farm
#5 Oil tank farm
#6 Oil tank farm
#7 South end of plant
#8 South end of plant
#9 Oil blending area
#10 Oil blending area
#12 Water blending area
#13 Dry chemical blending area
#14 Dry chemical blending area
#15 Pepsi building
#16 Pepsi building
#17 Water tank farm
#18 West water tank farm
#19 Wash bay

Attachment #2

JOB TITLES/DESCRIPTIONS

Job Title: Maintenance and Driver

Job Description:

1. Responsible for delivery of chemical, bulk, and/or drums to lease locations for customers.
2. Responsible for loading truck for deliveries.
3. Responsible for unloading chemical at lease locations.
4. Driver is responsible for proper maintenance on vehicle.

Skills:

1. To be a safe driver.
2. Able to follow instructions.
3. To perform job in a timely manner.

Education: High School diploma.

Initial Training: Road Test, DOT Hazardous Material Transportation, Motor Carrier Safety, Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Forklift Operations Safety Program.

Subsequent Training: Handle Hazardous Waste, Respiratory Protection, Hydrogen Sulfide, Fire Extinguishers.

Attachment #2

Job Title: Long Haul Driver

Job Description:

1. Driving vehicle cross country.
2. Driver is responsible for loading on vehicle.
3. Responsible for unloading at Unichem facilities.
4. Driver pumps chemical into a holding tank on vehicle and off into a holding tank.

Skills:

1. Able to handle vehicle in a safe manner.
2. Handle chemical safely.

Education: High School diploma.

Initial Training: DOT Hazardous Material Transportation, Motor Carrier Safety, Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Fork Lift Operations, Safety Program.

Subsequent Training: Respiratory Protection, Hydrogen Sulfide, Fire Extinguishers, Handling Hazardous Waste.

Attachment #2

Job Title: Blending Foreman

Job Description:

1. Logging all tickets (chemical order) that come into the plant and determine if product is in stock or must be blended.
2. Complete paperwork (tickets, bill of lading, etc.) on all incoming trucks.
3. Supervises blending operations.
4. Assist in unloading and loading trucks with forklift.
5. Responsible for housekeeping.
6. Responsible for preparing and verifying inventory.
7. Assist in the blending operations when needed.
8. Responsible for ordering 55, 30, etc. gallon drums on a weekly basis.
9. Respond to unanticipated spills when requested by the supervisor.

Skills:

1. Proficient in mathematics.
2. Organization and ability to learn procedures easily.

Education: High School Diploma, 2 years of college desirable.

Initial Training: Safety Program, Forklift Operations, Hazard Communication, Contingency Plan, DOT Hazardous Material Transportation, Personal Protective Equipment, Empty Drum Handling, Spill Response Training, Drum Machine, Inventory Procedures, Paperwork.

Subsequent Training: Respiratory Protection, Hydrogen Sulfide, Handling Hazardous Waste, Fire Extinguishers, Fire Prevention, OSHA, SARA, and RCRA.

Attachment #2

Job Title: Quality Control Manager

Job Description:

1. Assuring the quality of all products coming in and going out of the plant.
2. Responsible for checking blended finished products for proper specifications.
3. Responsible for checking raw materials for proper specifications.
4. Responsible for checking and determine disposition of all products returned to plant.
5. Blending off obsolete products or off spec materials.
6. Running formulas for products to be blended.
7. Prints out labels for drums and tanks from the computer.
8. Assist in various plant operations.
9. Make changes to inventory on computer for variance on formulas.
10. Fills out reports on unanticipated release of chemical.

Skills:

1. Proficient in lab procedures.
2. Knowledge of basic chemistry.

Education: High School Diploma, 2 years of college with some chemistry desirable.

Initial Training: Hazard Communication, Contingency Plan, Personal Protective Equipment, Respiratory Protection, Computer Procedures, Q.C. Procedures, Inventory Procedures.

Subsequent Training: Fire Extinguishers, Fire Prevention

Attachment #2

Job Title: Drummer

Job Description:

1. Responsible for packaging finished or raw material from vats or tanks into drums or pails.
2. Assist in preparing drums; i.e., labeling, stenciling, sealing.
3. Assist in unloading trucks; i.e., drums, pallets of powder, and stacking drums.
4. Responsible for housekeeping in his work area.
5. Assist in inventory.
6. Respond to unanticipated spills when requested by supervisor.

Skills:

1. Must have the ability to learn procedures easily.

Education: High School Diploma

Initial Training: Forklift Operations, Use of Drumming Machine, Labeling Procedures, Inventory Procedures, DOT Hazardous Material Transportation, Hazard Communication, Contingency Plan, Personal Protective Equipment, Respiratory Protection.

Subsequent Training: Fire Extinguishers, Fire Prevention, Handling Hazardous Waste, Empty Drum Handling.

Attachment #2

Job Title: Blender

Job Description:

1. Responsible for blending raw materials to produce finished products.
2. Assist in unloading and loading trucks, cargo trucks, rail cars, and tankers of raw materials.
3. Assist in various duties in the plant operation when needed.
4. Responsible for housekeeping and paperwork in work area.
5. Respond to unanticipated spills when requested by supervisor.

Skills:

1. Ability to learn procedures.

Education: High School Diploma.

Initial Training: Forklift Operations, Labeling Procedures, Inventory Procedures, Hazard Communication, Contingency Plan, Personal Protective Equipment, Safety Program, Respiratory Protection, Fire Extinguishers, Fire Prevention.

Subsequent Training: Empty Drum Handling, Handling Hazardous Waste.

Attachment #2

Job Title: Blending Supervisor

Job Description:

1. Responsible for blending raw materials to produce finished products.
2. Assist in unloading and loading trucks, cargo trucks, rail cars and tankers of raw materials.
3. Assist in various duties in the plant operation when needed.
4. Responsible for housekeeping and paperwork in work area.
5. Respond to unanticipated spills when requested by supervisor.
6. Responsible for the overall departmental blending functions.

Skills:

1. Supervisory skills.

Education: High School Diploma

Initial Training: Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Forklift Operations, Labeling Procedures, DOT Hazardous Material Transportation, Contingency Plan, Empty Drum Handling, Inventory Procedures, Safety Program, Respiratory Protection.

Subsequent Training: Handling Hazardous Waste, Fire Extinguishers, Fire Prevention.

Attachment #2

Job Title: Plant Manager

Job Description:

1. Responsible for all aspects of the plant operations and quality control.
2. Responsible for logging and disposition of Hazardous Waste.
3. Orders equipment and supplies.
4. Updates Material Safety Data Sheet books for plant.
5. Respond to unanticipated spills.

Skills:

1. Ability for organization.
2. Supervisory and management skills.

Education: High School Diploma, 2 years college with chemistry desirable.

Initial Training: DOT Hazardous Material Transportation, Hazard Communication, Contingency Plan, Personal Protective Equipment, Hazardous Waste Management, Empty Drum Handling, Forklift Operations, Safety Training, Respiratory Protection.

Subsequent Training: OSHA, SARA, and RCRA, Hydrogen Sulfide, Fire Extinguishers, Fire Prevention.

Attachment #3

PROPERTIES OF HAZARDOUS WASTE AND ASSOCIATED HAZARDS

The basic hazards presented in the hazardous waste generated at the Unichem Hobbs blending facility is that of the raw materials used in the blending process. As a general rule, both raw materials and finished products are complex blends of petrochemical and aqueous solutions and few are found on site as a pure commodity substance. The hazards of these products may be discussed within three general groups of physical and health hazards.

1. Flammability – Many of the products used at the Hobbs blending facility pose a moderate risk of fire. This is due to the organic solvents and alcohols present. While most of the flash points represented fall in the range of 73 degrees F to 200 degrees F, the large volume on site presents an ever-present hazard. In addition, if involved in a fire, these materials can produce toxic products of combustion such as CO_x, SO_x and NO_x.
2. Corrosivity – There are a relatively large population of raw materials present that pose a threat of chemical burns to the eyes and skin. These are best represented by caustics, organic amines and weak acids. If not immediately flushed from the skin and eyes, severe burns could result. Many of these products are used in pH adjustment and the resulting finished products often contain a lesser degree of corrosivity.
3. Toxicity – This hazard can range from slight irritants to substances that could damage the lungs, liver, kidneys, blood and central nervous system if breathed in high concentrations for extended periods of time. Some carcinogens or reproductive hazards exist in trace quantities. Some of the organic solvents (naphthas, xylene, methanol, isopropyl alcohol) can be absorbed through the skin. Industrial hygiene surveys have demonstrated that under normal working conditions, exposures above the permissible exposure levels are not encountered. Contact with the skin can cause defatting and dermatitis.

SECONDARY
EVALUATION
SITE

UNICHEM, A DIVISION OF B.J. SERVICES, CO., USA
707 NORTH LEECH ST., P.O. BOX 1499
HOBBS, NEW MEXICO 88240
(505) 393-7751

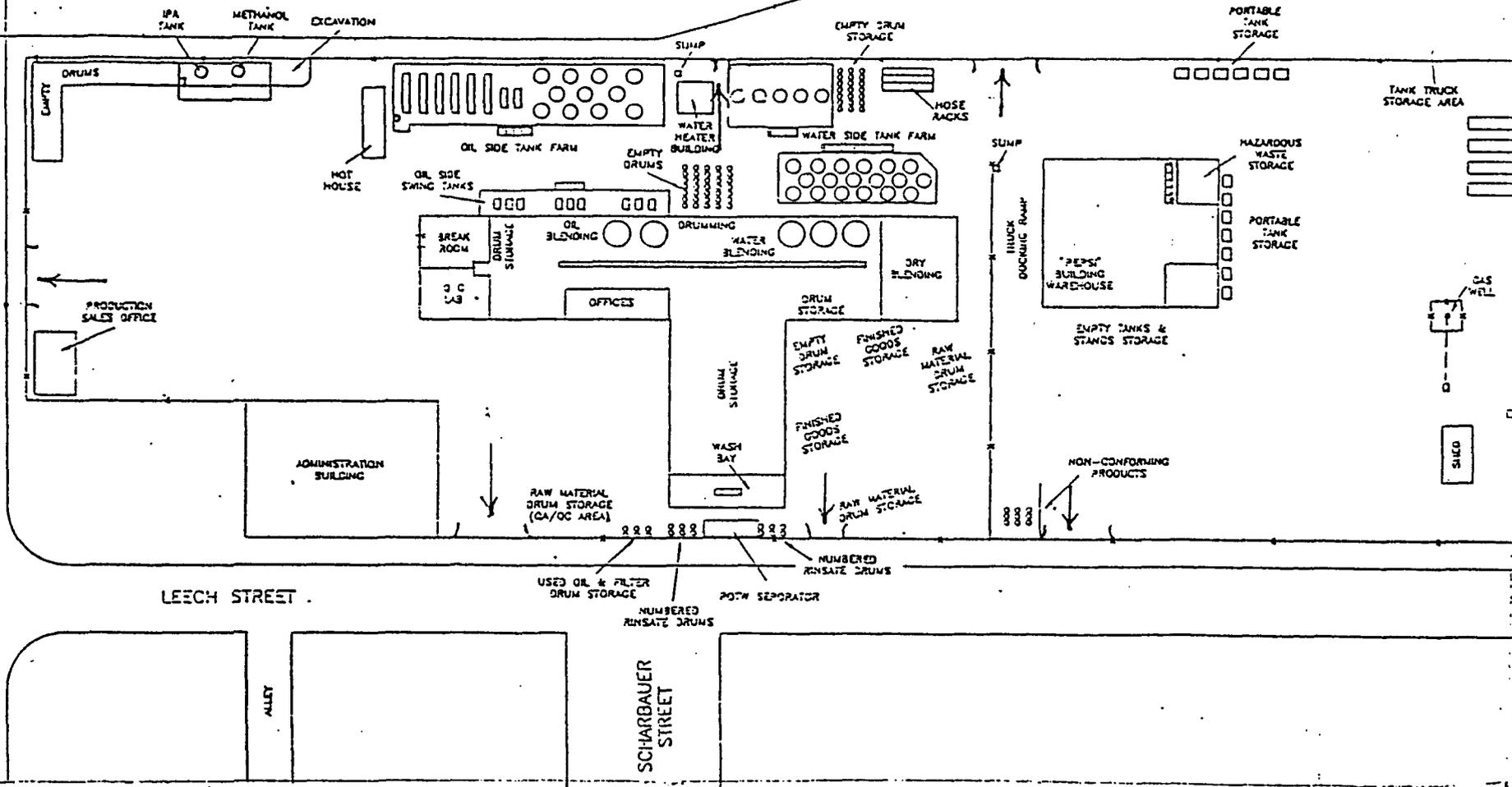
Red arrows
indicate
evacuation
routes

CLINTON STREET

PRIMARY
EVACUATION
SITE

LEECH STREET

SCHARBAUER
STREET



Attachment #5

REQUIREMENTS REGARDING HAZARDOUS WASTE STORAGE,
CONTINGENCY PLANS, EMERGENCY PROCEDURES,
AND PERSONNEL TRAINING

- I. **(262.34) Hazardous Waste Accumulation Time**
 - A. Storage of hazardous waste for 90 days or less is acceptable without a permit provided that:
 1. hazardous waste is to be placed in containers complying with Subpart I, Part 265 [Use and Management of Containers] or placed in tanks complying with Subpart J, Part 265 [Tank Systems] except 265.197(c) & 265.200. The generator is exempt from all requirements in Subpart G & H of Part 265 except 265.11 [Identification Numbers] & 265.114 [Disposal or Decontamination of Equipment, Structures and Soils].
 2. the date of accumulation is marked and visible for inspection on each container.
 3. containers and tanks are labeled "Hazardous Waste".
 4. the facility complies with requirements for owners and operators in Subpart C [Preparedness and Prevention] & D [Contingency Plan and Emergency Procedures] of 265 and 265.16 [Personnel Training].
 - B. Storage of hazardous waste for 90 days or more requires a permit unless excepted.
 - C. Satellite accumulation may occur provided that:
 1. accumulated waste in containers does not exceed 55 gallons at the point where the waste is generated, and:
 - a. the facility complies with 265.171 [Condition of Containers], 265.172 [Compatibility of Waste and Containers], & 265.173(a) [Containers Closed During Storage], and
 - b. the containers are marked "Hazardous Waste" or with other words that identify the contents of the containers.
 2. Whenever accumulation exceeds 55 gals., compliance with paragraph I.A must occur within three days.

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- D. Generators with greater than 100kg but less than 1000kg of waste accumulation per month may store waste for 180 days or less without a permit provided:
1. the quantity never exceeds 6000 kg,
 2. compliance with Subpart I, Part 265 [Use and Management of Containers] except 265.176 [Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line],
 3. compliance with 265.201 of Part 265 in Subpart J [Special Requirements for Generators of Between 100 and 1,000 kg/mo That Accumulate Hazardous Waste in Tanks],
 4. compliance with Subpart C 265 [Preparedness and Prevention] and paragraphs I.A.2. and I.A.3. above.
 5. the facility has:
 - a. an Emergency Coordinator present or on-call to comply with I.D.5.d. below,
 - b. posted next to telephones the:
 - (1) name and phone number of Emergency Coordinators,
 - (2) location of fire extinguishers and spill control material and, if present, the fire alarms,
 - (3) phone number of fire department, unless connected by direct alarm;
 - c. ensured that all employees are made thoroughly familiar with proper waste handling procedures relevant to their responsibilities during normal operations and emergencies,
 - d. designated the Emergency Coordinator to respond to any emergency that arises:
 - (1) In the event of a fire, the Emergency Coordinator will notify the fire department or attempt to extinguish the fire with fire extinguishers.

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- (2) In the event of a spill, the Emergency Coordinator will contain the flow to the extent possible and as soon as possible, clean up hazardous waste and any contaminated soil and materials,
- (3) In the event of a fire, explosion, or release which could threaten human health outside the facility, or if the spill has reached surface water, the Emergency Coordinator shall notify the National Response Center (800/424-8802) with:
 - (a) the name, address, USEPA ID# of the facility,
 - (b) the date, time, and type of incident.
 - (c) the quantity and type of hazardous waste involved,
 - (d) the extent of any injuries, and
 - (e) the estimated quantities and disposition of recovered materials.
- E. Generators of greater than 100kg and less than 1000kg who offer waste to disposal facilities further than 200 miles may accumulate 270 days if facility complies with I.D. above.
- F. Facilities of Small Quantity Generators (>100kg & <1000kg per month) who accumulate more than 6000kg or who accumulate waste for more than 180 days (or 270 days if more than 200 miles from disposal) will constitute a storage facility subject to Parts 264 & 265 & permit requirements of Part 270 unless an extension has been granted.

II. (265.16) Personnel Training

- A. Personnel training must include:
 - 1. classroom instruction or on-the-job training that teaches employees to perform the duties to ensure facility compliance (program must include all elements of II.D.3. below),
 - 2. the program is directed by a person trained in hazardous waste management procedures and includes instruction which teaches personnel hazardous waste management

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procedures (including the contingency plan) relevant to their positions, and

3. the training program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including:
 - a. procedures for using, inspecting, repairing, and replacing emergency & monitoring equipment,
 - b. key parameters for automatic waste-feed cut-off systems,
 - c. communications or alarm systems,
 - d. response to fires or explosions,
 - e. response to ground-water contamination incidents, and
 - f. shutdown of operations.
- B. Personnel must complete training within six months of employment at the facility. Employees without training must work with supervision until they have received training.
- C. Employees must receive an annual review of training described in (II.A.) above.
- D. Documents must be developed and maintained at the facility that include:
 1. a job title for each position related to hazardous waste management and the name of each employee filling each job,
 2. written job descriptions that include skill, education, or other qualifications and duties,
 3. written descriptions of the type and amount of introductory and continuing training to be given, and
 4. documentation that the training has been provided.
- E. Training records on current employees must be kept until closure. Former employee records must be kept at least three years.

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III. (Part 265 Subpart C) Preparedness and Prevention

- A. Required equipment on site must include:
 - 1. an internal communications or alarm system,
 - 2. telephones to summon assistance from local fire and police departments, or state or local emergency response teams,
 - 3. portable fire extinguishers, fire control equipment, special extinguishing equipment (foam, inert gas, dry chemical), spill control equipment, and decontamination equipment, and
 - 4. water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray equipment.
- B. All of the above equipment must be tested and maintained.
- C. There must be access available to the communication or alarm systems.
- D. There must be sufficient aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the waste storage area.
- E. Arrangements with local authorities shall include:
 - a. arrangements to familiarize police, fire, and emergency response teams with the layout of the facility, the properties of the hazardous waste, places where personnel will be working, entrances to roads outside the facility, and possible evacuation routes,
 - b. agreements concerning additional support, where more than one police or fire department might respond, describing primary response actions and responsibility,
 - c. agreements with state emergency response teams, emergency response contractors, and equipment suppliers, and
 - d. arrangements to familiarize local hospitals with properties of waste and type of injuries or illnesses that could result from fires, explosions, or releases.

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2. Where state or local authorities decline to enter into arrangements, their refusal shall be documented.

IV. Subpart D, Part 265 Contingency Plan & Emergency Procedures

- A. The purpose and implementation of the contingency plan shall include:
 1. design to minimize hazards to human health or environment from fires, explosions, or unplanned sudden releases or non-sudden releases of hazardous waste or constituents to air, soil, or surface water, and
 2. provisions that the plan must be carried out immediately.
- B. Contents of the contingency plan must include:
 1. a description of the actions facility personnel must take to comply with 265.51 [Purpose and Implementation of the Contingency Plan] and 265.56 [Emergency Procedures],
 2. if any other contingency plan has been developed, it must be amended to comply with this Part,
 3. a description of arrangements agreed to by local police, fire, hospitals, contractors, and state and local emergency response teams to coordinate emergency services pursuant to 265.37 [Arrangements with Local Authorities (III.E.)],
 4. a list of names, addresses, and phone numbers (office & home) of all Emergency Coordinators. (This list must be kept up to date. There must be more than one primary Emergency Coordinator with others listed as alternates listed in order of contact),
 5. a list of all emergency equipment (fire extinguishing equipment, spill control equipment, communications, alarms (internal and external), decontamination equipment, and where such equipment is required. (This list must be kept up to date and include the location and physical description of each item on the list with a brief outline of its capabilities), and
 6. an evacuation plan for facility personnel describing signals to be used, routes and alternate routes to be taken.
- C. Copies of the contingency plan:

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1. must be maintained at the facility, and
 2. submitted to local fire and police departments, hospitals, and state and local emergency response teams.
- D. The contingency plan must be reviewed and immediately amended whenever:
1. regulations are revised,
 2. the plan fails in an emergency,
 3. the facility changes in design, construction, operation, maintenance, or other circumstances in such a way that materially increases potential for fires, explosions or releases or changes the response necessary in an emergency,
 4. the list of Emergency Coordinators changes, or
 5. the list of emergency equipment changes.
- E. Emergency Coordinators must at all times be present or on-call (to respond in a short period of time) and be responsible for coordinating all emergency response measures. The Emergency Coordinator must be thoroughly familiar with all aspects of the contingency plan, all operations and activities of the facility, locations and characteristics of the waste handled, the location of all records in the facility and the facility layout. The Emergency Coordinator must have authority to commit the resources needed.
- F. Emergency procedures shall be developed.
1. The Emergency Coordinator must immediately:
 - a. activate internal facility alarms or communications system to notify all personnel, and
 - b. notify state or local agencies with designated response roles if help is needed.
 2. The Emergency Coordinator must identify the characteristics, the exact source, amount, and real extent of released materials by observation, review of records, or chemical analysis.

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3. The Emergency Coordinator must assess possible hazards to human health or environment (direct and indirect effects such as toxic, irritating, or asphyxiating gases generated or the effects of any hazardous surface water run-offs from water or chemical agents use to control fire or heat induced explosions).
- G. Reports of findings must be made:
1. Evacuations of local areas may be advisable. The Emergency Coordinator must notify local authorities and be available to help decide whether local areas are to be evacuated.
 2. Report to the National Response Center (800/424-8802):
 - a. the name and phone number of the reporting person,
 - b. the name and address of the facility,
 - c. the time and type incident,
 - d. the name and quantity of materials involved,
 - e. the extent of any injuries, and
 - f. possible hazards to human health or environment outside the facility.
 3. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste. This includes stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
 4. If the facility operations stop during the response, the Emergency Coordinator must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes or other equipment.
 5. Immediately after the emergency, the Emergency Coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil, or surface water, or any other material that results from a release, fire, or explosion.

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6. The Emergency Coordinator must ensure that in affected areas of the facility that:
 - a. no waste that may incompatible with released material is treated, stored, or disposed until clean-up is completed, and
 - b. all emergency equipment is cleaned and fit for its intended use before operations resume.

7. The owner or operator must notify the Regional Administrator of the EPA and appropriate state and local authorities that the facility is in compliance with III.G.6. above before operations are resumed in the affected area of the facility.

8. The owner or operator must note in the operations log the time, date, and details that required implementation of the contingency plan. Within fifteen days, he must submit a report to the Regional Administrator of the EPA that includes:
 - a. the name, address, and phone number of the owner/operator.
 - b. the name, address, and phone number of the facility,
 - c. the date, time, and type of incident,
 - d. the name and quantity of materials involved,
 - e. the extent of injuries,
 - f. an assessment of actual or potential hazards to human health or environment, and
 - g. the estimated quantity and disposition of recovered materials that resulted from the incident.

Attachment #6

DISTRIBUTION

NAME OF AGENCY	DATE MAILED
Hobbs Fire Department	9-25-97
Hobbs Police Department	9-25-97
Columbia Lea Regional Hospital	9-25-97
St. Mary Medical Center	9-25-97
Lea County Sheriff's Sub Station	9-25-97
New Mexico Police Department	9-25-97
Lea County Local Emergency Planning Committee	9-25-97

Oil:

Report any discharge from any facility of oil or other water contaminant whose quantity may, with reasonable probability, injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, as soon as possible after learning of such a discharge, but in no event more than 24 hours thereafter to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Ground Water Bureau
(8 to 5) (505) 827-2917
(505) 827-0188 (UST Section)
(24-hour) (505) 827-9329 (Alternate)

Notes:

1. Verbal reports shall include the following items:
 - a. The name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility.
 - b. The name and address of the facility.
 - c. The date, time, location, and duration of the discharge.
 - d. The source and cause of discharge.
 - e. A description of the discharge, including its chemical composition.
 - f. The estimated volume of the discharge.
 - g. Any actions taken to mitigate immediate damage from the discharge.
2. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification verifying the prior oral notification as to each of the items in Note 1, providing any appropriate additions or corrections to:

New Mexico Health and Environment Department
Environmental Improvement Division
Chief, Ground Water Bureau
Harold Runnels Building
1100 St. Francis Drive
Santa Fe, NM 87503

3. Any facility which is subject to the notification and reporting requirements of the Oil Conservation Division is not required to comply with these environmental improvement notification and reporting requirements.

Report any fire, break, leak, spill, or blowout at any injection or disposal facility or at any oil and gas drilling, producing, transporting, or processing facility to:

New Mexico Energy, Minerals and Natural Resources Department, Santa Fe
Oil Conservation Division
(8 to 5) (505) 827-5800

In addition, make "immediate" and/or "subsequent" notifications for any fire, break, leak, spill, or blowout to the appropriate district office (refer to notes for details and map for nearest district offices):

<u>District</u>	<u>City</u>	<u>Numbers</u>	<u>After Hours</u>
I	Hobbs	(505) 393-6161	(505) 393-6161
II	Artesia	(505) 748-1283	(505) 748-1283
III	Aztec	(505) 334-6178	(505) 334-6178
IV	Santa Fe	(505) 827-5810	(505) 471-1068

Notes:

1. "Immediate notification" shall be as soon as possible after discovery in person or by telephone to the appropriate district office or, if after business hours, to the district supervisor. Immediate notification to be followed by subsequent notification.
2. "Subsequent notification" shall be a complete written report of the incident in duplicate to the appropriate district office within 10 days after discovery of the incident.
3. Verbal or written reports shall include:
 - a. Location of the incident by quarter-quarter, section, township, and range.
 - b. Location by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground.
 - c. Nature and quantity of the loss.
 - d. General conditions prevailing in the area to include precipitation, temperature, and soil conditions.
 - e. Measures that have been taken and are being taken to remedy the situation.
4. Notifications shall be in accordance with the following:
 - a. Well blowout—immediate notification.
 - b. Major and minor breaks, spills or leaks; gas leaks and line breaks; tank fires; drilling pits, slush pits, storage pits and ponds:

<u>Material</u>	<u>Quantity (bbls unless otherwise noted)</u>	<u>Water- course¹</u>	<u>Notification</u>
Crude Oil or Condensate	≥25	No	Immediate
	5<25	No	Subsequent
(Tank Fires)	≥1	Yes	Immediate
	≥25	—	Immediate
(Tank Fires)	5<25	—	Subsequent
(Endanger Life or Property)	Any Quantity	—	Immediate

<u>Material</u>	<u>Quantity (bbls unless otherwise noted)</u>	<u>Water- course¹</u>	<u>Notification</u>
Salt Water	≥100	No	Immediate
	≥25	Yes	Immediate
	25<100	No	Subsequent
(Endanger Life or Property)	Any Quantity	—	Immediate
<hr/>			
Gas			
(Endanger Life or Property)	Any Quantity	—	Immediate
(No Danger)	≥1000 MCF	—	Subsequent
<hr/>			
Related Materials ²			
(Endanger Life or Property)	Any Quantity	—	Immediate
—Drilling pits, slush pits, storage pits and ponds			
(Endanger Life or Prop- erty)	Any Quantity	—	Immediate
(No Danger)	Any Quantity	—	Subsequent

¹Water course is defined as any lake bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

²Related materials include hydrocarbons, hydrocarbon waste or residue, strong caustics, strong acids or other deleterious chemicals or harmful contaminants.

5. The following notification form shall be submitted in duplicate to the appropriate district office within 10 days after discovery of the incident. This applies to both Immediate and Subsequent Notifications. Refer to the map for addresses.
6. If the discharge of oil or other water contaminant is in such quantity so that it may injure or be detrimental to humans, animal, or plant life, or property, or interfere with public welfare or property, any person in charge of the discharging facility shall immediately take appropriate and necessary steps to contain and remove or mitigate the damage caused by the discharge.

Report leaks from natural gas and other gas pipelines within 2 hours of discovery to:

New Mexico State Corporation Commission, Santa Fe
Pipeline Division

<u>Office Numbers (8 to 5)</u>	<u>Home Numbers</u>
(505) 827-4581 or 4497	(505) 983-1810 (Rey S. Medina)
(505) 827-4521 (Alternate)	(505) 473-1923 (Albino O. Zuniga)
(505) 827-4009 (Alternate)	(505) 473-0717 (Ray Elliott)
(505) 827-4494 (Alternate)	(505) 892-2274 (Joe Johnson)

NM-3

Hazardous Substances:

Same as Oil.

Hazardous Wastes:

Report spills to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Hazardous Waste Bureau
(8 to 5) (505) 827-2929
(24-hour) (505) 827-9329

Hazardous Materials:

Same as Oil.

Excess Air Emissions:

Report excess emissions within 24 hours or no later than the next working day to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Air Quality Bureau
(8 to 5) (505) 827-0062

Wastewater Excursions:

Same as Oil.

Underground Tank Leaks:

Report any known or suspected release from a UST system, any spill, or any other emergency situation within 24 hours to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Underground Storage Tank Bureau
(8 to 5) (505) 827-0173
(24-hour) (800) 827-9329 (Alternate)

Notes:

1. Verbal report shall include:
 - a. The name, address, and telephone number of the agent in charge of the site at which the UST system is located, as well as of the owner and the operator of the system.
 - b. The name and address of the site at which the UST system is located and the location of the UST system on that site.
 - c. The date, time, location, and duration of the spill, release, or suspected release.
 - d. The source and cause of the spill, release, or suspected release.
 - e. A description of the spill, release, or suspected release, including its chemical composition.
 - f. The estimated volume of the spill, release, or suspected release.

- g. Action taken to mitigate immediate damage from the spill, release, or suspected release.
2. Written notice describing the spill, release, or suspected release and any investigation or follow-up action taken or to be taken must be mailed or delivered within seven (7) days of the incident. The written notice shall verify the prior oral notification as to each of the items of information listed above and provide any appropriate additions or corrections to the information contained in the prior oral notification. The written notice must be submitted to:

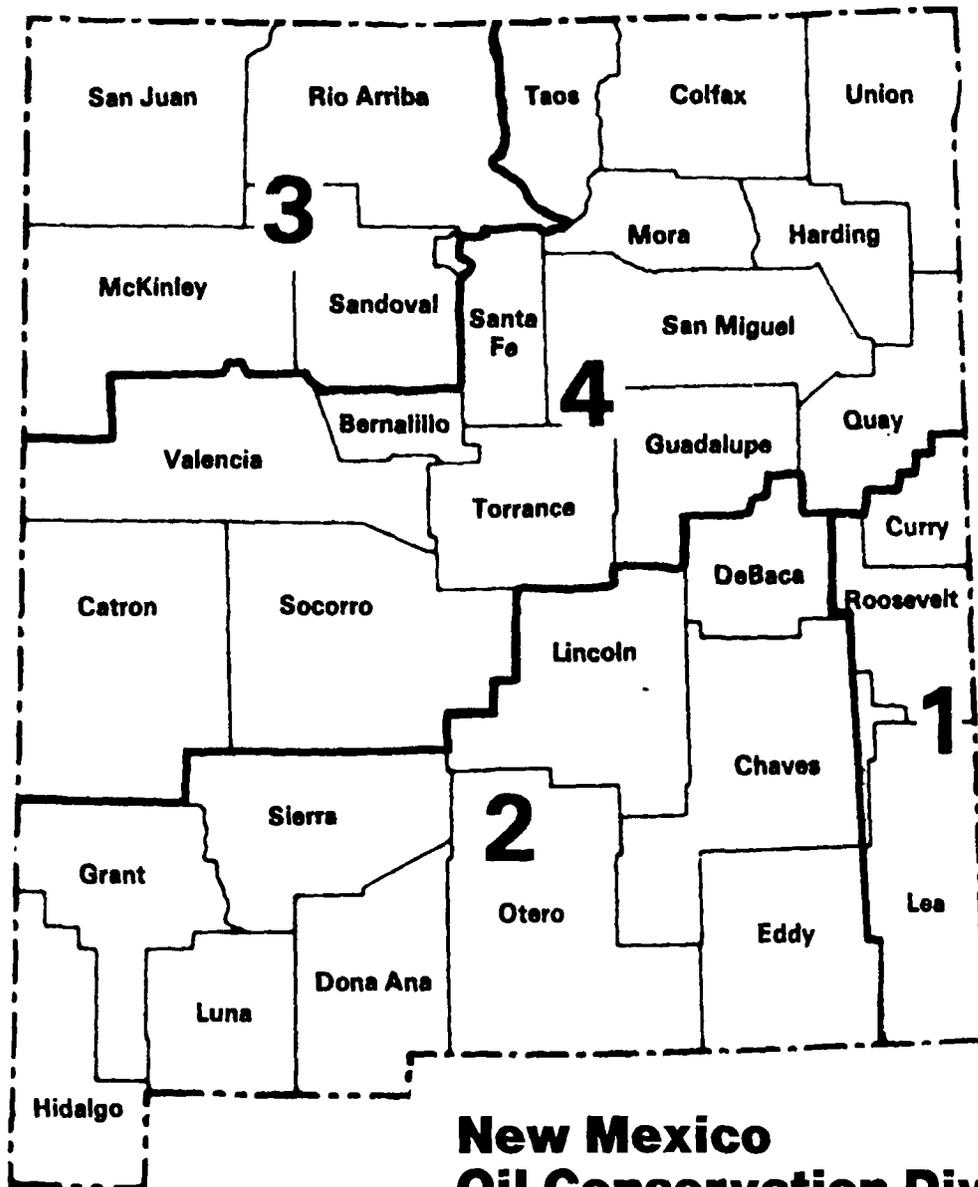
Marcig Leavitt, Manager, Remedial Action Program
New Mexico Environmental Improvement Division
Runnels Building
1190 St. Francis Drive
Santa Fe, NM 87503

SARA Title III:

Report releases and submit written follow-up emergency notice(s) to:

New Mexico Emergency Response Commission
Department of Public Safety
Title III Bureau
P.O. Box 1628
Santa Fe, NM 87504-1628
(505) 827-9222

NM-5



New Mexico Oil Conservation Division District Offices

District	City	Numbers	Addresses
1	Hobbs	(505) 393-6161	1000 W. Broadway, 88240
2	Artesia	(505) 748-1283	811 South First, 88210
3	Aztec	(505) 334-6178	1000 Rio Brazo, 87410
4	Santa Fe	(505) 827-5810	P.O. Box 2088, 87504

State of New Mexico
Energy and Minerals Department

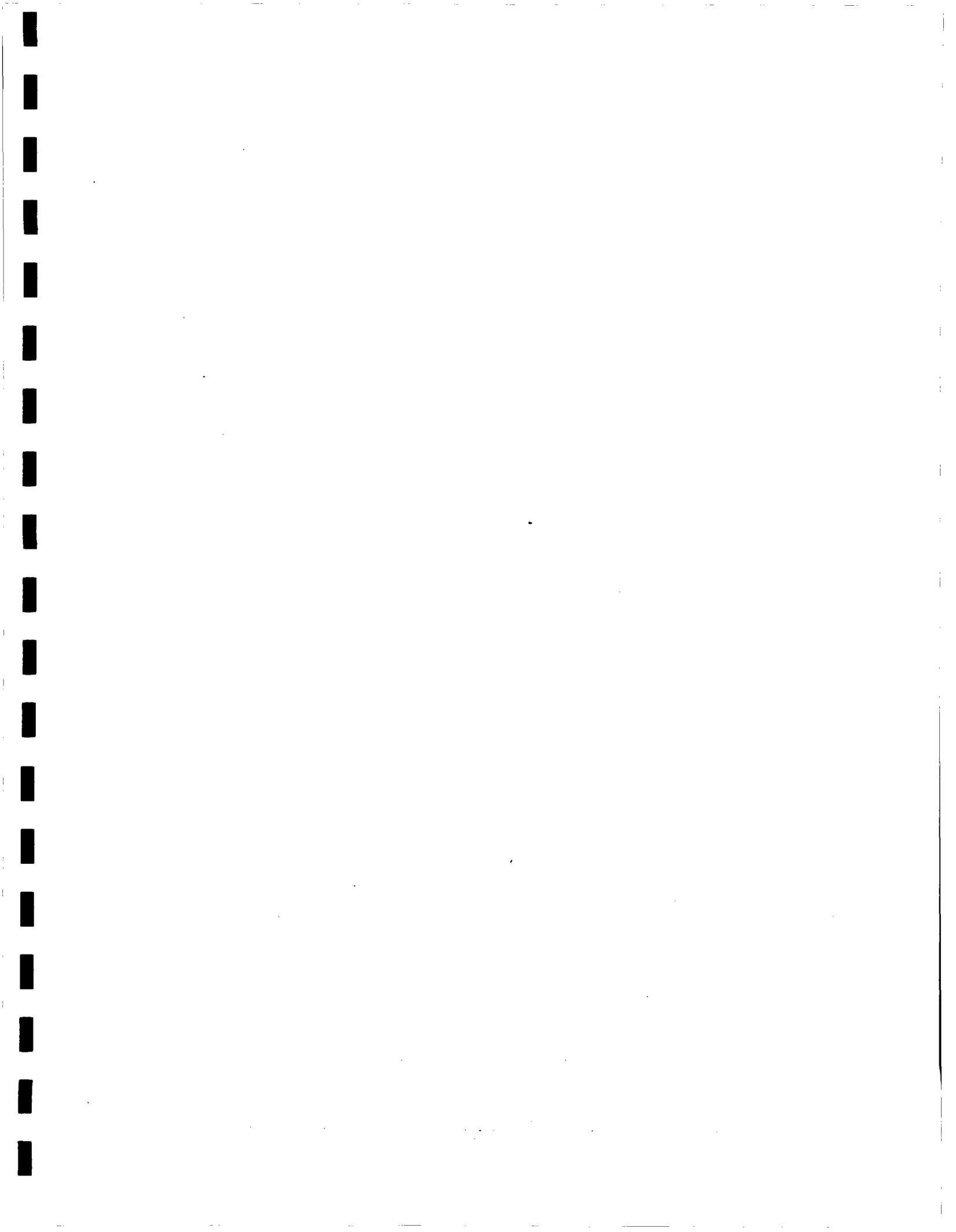
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

Name of Operator				Address			
Report of	Fire	Break	Spill	Leak	Blowout	Other*	
Type of Facility	Drlg Well	Prod Well	Tank Btty	Pipe Line	Gasol Pint	Oil Rfy	Other*
Name of Facility							
Location of Facility (Quarter/Quarter Section or Footage Description)				Sec.	Twp.	Rge.	County
Distance and Direction From Nearest Town or Prominent Landmark							
Date and Hour of Occurrence				Date and Hour of Discovery			
Was Immediate Notice Given?	Yes	No	Not Required	If Yes, To Whom			
By Whom				Date and Hour			
Type of Fluid Lost				Quantity of Loss-	_____ BO _____ BW	Volume Recovered	_____ BO _____ BW
Did Any Fluids Reach a Watercourse?	Yes	No	Quantity				
If Yes, Describe Fully**							
Describe Cause of Problem and Remedial Action Taken**							
Describe Area Affected and Cleanup Action Taken**							
Description of Area	Farming	Grazing	Urban	Other*			
Surface Conditions	Sandy	Sandy Loam	Clay	Rocky	Wet	Dry	Snow
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)**							
I Hereby Certify That the Information Above Is True and Complete to the Best of My Knowledge and Belief							
Signed		Title			Date		

*Specify

**Attach Additional Sheets if Necessary



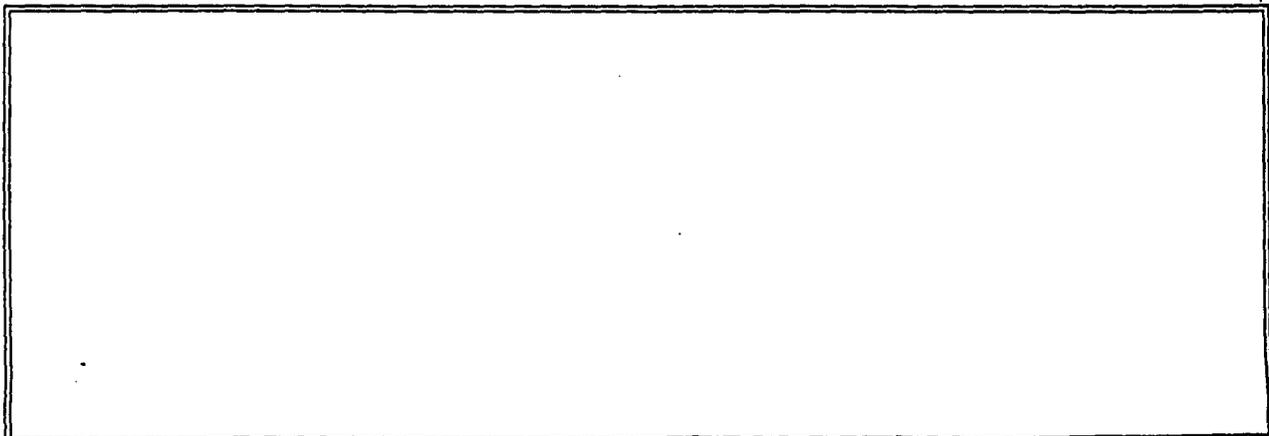
Directions: Any spill of a chemical substance in a quantity greater than one pound or one pint must be reported immediately to your supervisor and the Safety Department. The term spill refers to any contact between a chemical substance and soil, pavement, concrete, or water, whether inside or outside of the workplace. A spill may also involve the evaporation of a volatile chemical substance into the air which may require a report. All spills must be properly contained and disposed of. The proper personal protective equipment (goggles, rubber gloves, respirator, coveralls, rubber boots, etc.) must be worn at all times.

In the event of a spill, follow these steps:

1. Determine the nature of the chemical substance. Visually estimate the quantity spilled.
2. Prevent others from entering the area and report to your supervisor or the Safety Department.
3. Wear the appropriate personal protective equipment as determined by the MSDS, consultations with your supervisor, and/or consultations with the Safety Department.
4. Eliminate all sources of ignition. It may be necessary to shut off nearby electrical circuits.
5. Contain the substance by appropriate methods. Check the MSDS and consult with your supervisor or the Safety Department. Measure the amount spilled.
6. Place all material and, if applicable, all soil, sand, gravel, etc. in a clean or undamaged previously used container (open top drum, five gallon-pail or bucket, etc.) and seal tightly. Place all disposable clean-up items (rags, towels, absorbent pigs, coveralls, gloves, etc.) in an appropriate container and seal.
7. Mark the top and side of the containers with the spill report number provided by the Safety Department. Do not move containers off-site unless the spill occurred at a location not owned by Unichem. If necessary, move the containers to the nearest Unichem owned facility. Call the Safety Department for permission.
8. Complete the Report Form on the opposite side and also draw a diagram of the spill to the best of your ability in the space below. Complete all blanks. If an answer is not applicable or unknown, then write "N/A" or "UNK". Be very specific and detailed in writing the descriptions. Describe the physical state as liquid, solid, vapor, or gas. Describe the container from which the spill occurred, ie. 55 gal. steel unlined drum, Tank #, XYZ Storage Tank Valve. Be sure to sign the report in the space provided.
9. Send the original spill report to the Safety Department.

DIAGRAM

N
↑



Attach separate sheets, if needed.

CLOSURE PLAN

13. **Prior to cessation of operations at the Unichem blending facility located at 707 North Leech, Hobbs, NM, the following will be performed:**
 - A. **All tanks, equipment and chemicals will be removed.**
 - B. **All sumps will be thoroughly cleaned.**
 - C. **All solid wastes will be disposed of properly in an OCD approved manner.**
 - D. **Any below grade lines that handle non-domestic wastes will be cleaned and pressure tested to 3 psig over the normal operating pressure of the line.**
 - E. **The OCD will be contacted so that arrangements can be made to inspect the final closure of the facility.**
 - F. **Unichem will submit a final closure report to the Santa Fe office with a copy sent to the Hobbs OCD District office.**

BJ SERVICES COMPANY

P.O. BOX 4442
HOUSTON, TX 77210
713/462-4239

The Chase Manhattan Bank, N.A.
Syracuse, New York

VENDOR NO.
142197

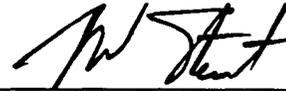
CHECK NO. [REDACTED]

50-937
213

CHECK DATE	CHECK AMOUNT
09/12/97	*****50.00

PAY FIFTY AND 00/100 *****

NMED-WATER QUALITY MGMT.
ENERGY, MINERALS & NATURAL
RESOURCES DEPT.
OIL CONSERVATION DIV.
2040 S. PACHECO
SANTA FE, NM 87505



VOID AFTER 90 DAYS
AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.



BJ SERVICES COMPANY

P.O. BOX 4442
HOUSTON, TX 77210
713/462-4239

PLOPEZ

Stub 1 of 1

Check Date - 09/12/97

Check No. - [REDACTED]

Vendor No. - 142197

INVOICE NO.	DATE	DESCRIPTION	GROSS	DEDUCTIONS	AMOUNT PAID
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090897	09/11	FILING FEE	50.00		50.00
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UNICHEM

A Division of BJ Services Company

August 29, 1997

New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Attn: Roger Anderson

Subject: Discharge Plan Renewal
Unichem – Hobbs Facility

Dear Roger:

Enclosed is the Discharge Plan Application for Service Companies. Most items on the application renewal are the same as originally submitted. There have been several minor modifications made to our facility during the past five years. Each of these modifications has been reported to the OCD, but this application form *indicating a modification to the plan was not submitted.*

We will endeavor to formalize these modifications along with a contingency plan for reporting releases and a closure plan by September 22, 1997.

Thank you for your assistance and cooperation.

Sincerely,



Charles N. Root
Manager, Environmental, Health & Safety

Attachment: Discharge Plan for Service Companies – Renewal

cc: NMOCD District I
P.O. Box 1980
Hobbs, NM 88241-1980

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Revised 12/1/95

Submit Original
Plus 1 Copies
to Santa Fe
1 Copy to appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES.
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS.
(Refer to the OCD Guidelines for assistance in completing the application)

New

Renewal

Modification

1. Type: Unichem is an oilfield and industrial specialty chemical blending facility.
2. Operator: Unichem, a Division of Bj Services Company, USA
Address: 707 N. Leech, Hobbs NM 88240
Charles N. Root 281-631-8468
Contact Person: local - Jim Britton Phone: 505-393-7751
3. Location: NW /4 NW /4 Section 34 Township 18S Range 38E
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
BJ Services Co., 5500 Northwest Central Dr., Houston, TX 77092
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. As originally submitted with minor modifications as reported to the NMOCD over the past five years.
6. Attach a description of all materials stored or used at the facility.
As originally submitted.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. As originally submitted.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
As originally submitted.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
As originally submitted.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
As originally submitted.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
To be submitted prior to September 22, 1997.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
As originally submitted.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
To be submitted prior to September 22, 1997.
14. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: Charles N. Root Title: Manager, Environmental, Health & Safety

Signature: Charles N. Root Date: August 29, 1997



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 827-7131

June 11, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-404

Mr. James H. Britton
UNICHEM
P.O. Box 1499
Hobbs, NM 88240

RE: Discharge Plan GW-094
UNICHEM
Hobbs facility
Lea County, New Mexico

Dear Mr. Britton:

On December 1, 1992, the groundwater discharge plan, GW-094, for the Hobbs Facility located in the W/2 NW/4, Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was renewed for a period of five years. The approval will expire on December 1, 1997.

If the facility continues to have potential or actual effluent or leachate discharges and UNICHEM wishes to continue operation, the discharge plan must be renewed. Pursuant to WQCC Section 3106.F, if an application for renewal is submitted at least 120 days before the discharge plan expires (on or before September 1, 1997), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether UNICHEM has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the Hobbs Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 and a flat fee of \$690 for service companies. The \$50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. James H. Britton
Unichem, GW-094
6 Month Notice
June 11, 1997
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A copy of the WQCC regulations, discharge plan application form, and guidelines are enclosed. (If you require additional copies of these items notify the OCD at (505)-827-7152. A complete copy of the regulations is also available on OCD's website at www.emnrd.state.nm.us/ocd.htm.)

If Unichem no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If Unichem has any questions, please do not hesitate to contact Pat Sanchez at (505) 827-7156.

Sincerely,

RCA for Roger Anderson

Roger C. Anderson
Environmental Bureau Chief

RCA/pws

c: OCD Hobbs District

P 410 432 404

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street Address	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 9:15AM	Date 1-8-97
---	-----------------------------------	-------------	-------------

<u>Originating Party</u>	<u>Other Parties</u>
Pat Sanchez - OCD.	Jim Britton - UNICHEM

Subject Hobbs facility "Hot House" Sump installation letter dated 1-2-97 from UNICHEM.

Discussion Mr. Britton indicated that they had contacted Roger Anderson sometime during the week of Christmas 1996 to discuss the above subject. The "sump" is really a catchment basin - indoors (inside the hot house) that will provide a means of collecting spilled chemicals in the event of a spill - It would be emptied within 24 hours - not used for continuous fluid storage. They therefore want to forgo the installation of 2ndry containment w/leak detection.

Conclusions or Agreements

① I told Mr. Britton I could not approve because Roger had not discussed this with me - also no documentation regarding their (UNICHEM'S) discussion w/ Roger - I will therefore wait until 1-21-97 to discuss w/ Roger.

Distribution FILE, WAYNE PRICE

Signed

Robert W. [Signature]

UNICHEM

A Division of BJ Services Company

RECEIVED
1997 JAN 8 52

RECEIVED

JAN - 8 1997

Oil Conservation Division

January 2, 1997

New Mexico Oil Conservation Division
Attn: Pat Sanchez
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

Dear Pat:

We recently described the installation of a Hot House at our facility in Hobbs to include a sump.

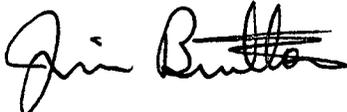
This sump is actually a containment to be utilized only in the event of a spill. The containment will be kept clean and dry at all times. Should a spill occur, the contents will be pumped from the containment area within a few hours.

Therefore, we are requesting that this containment area not fall under the requirements of a leak detection system.

If further information is requested, please let us know. We await your comments.

Sincerely,

UNICHEM, A DIVISION OF BJ SERVICES CO USA



Jim Britton
Director of Manufacturing

cc: Roger Anderson, Santa Fe
Wayne Price, Hobbs
Wes Johnston, Unichem

JB/eb



FAX COVER SHEET

Date: 12/11/96

Page 1 of 3

<p>FROM: <i>Jim Bitten</i></p> <p>COMPANY NAME: Unichem--Hobbs,NM A DIVISION OF B.J. SERVICES COMPANY U.S.A. 707 N. LEECH, P.O. BOX 1499 HOBBS, NEW MEXICO 88240</p> <p>PHONE NUMBER: 505/393-7751</p> <p>FAX NUMBER: 505/393-6754</p>	<p>TO: <i>Roger Anderson</i></p> <p>COMPANY NAME: <i>NMOCS</i> <i>Santa Fe</i></p> <p>PHONE NUMBER:</p> <p>FAX NUMBER: <i>827-7152</i> 505-473-7540 <i>827-8177</i></p>
--	--

COMMENTS:

~~827-8177~~

If transmission is not complete or if material is illegible, please notify me immediately at the number listed above. To response via facsimile, call 505/393-6754 (automatic unit).

UNICHEM

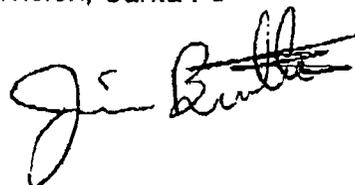
A Division of EJ Services Company

December 11, 1996

TO: Roger Anderson, New Mexico Oil Conservation Division, Santa Fe
Fax #505-473-7542

FROM: Jim Britton, Unichem, Hobbs, Fax #505-393-6754

RE: UNICHEM NEW CONSTRUCTION



Unichem intends to build two new structures at its existing plant facility at 707 N. Leech, Hobbs, NM.

Structure #1: An enclosed new empty drum storage shed designed to keep drums out of the weather (12' x 24' x 42).

Structure #2: A hot house designed for the storage of products with a high freeze point. This 16' x 32' x 68' building will be maintained at 100° to 120° F. It will contain a 4" high curb and a small sump to contain any accidental spills/leaks.

Unichem does not believe either of these new structures to significantly alter our current NMOCD approved discharge plan and therefore we are not amending that plan at this time.

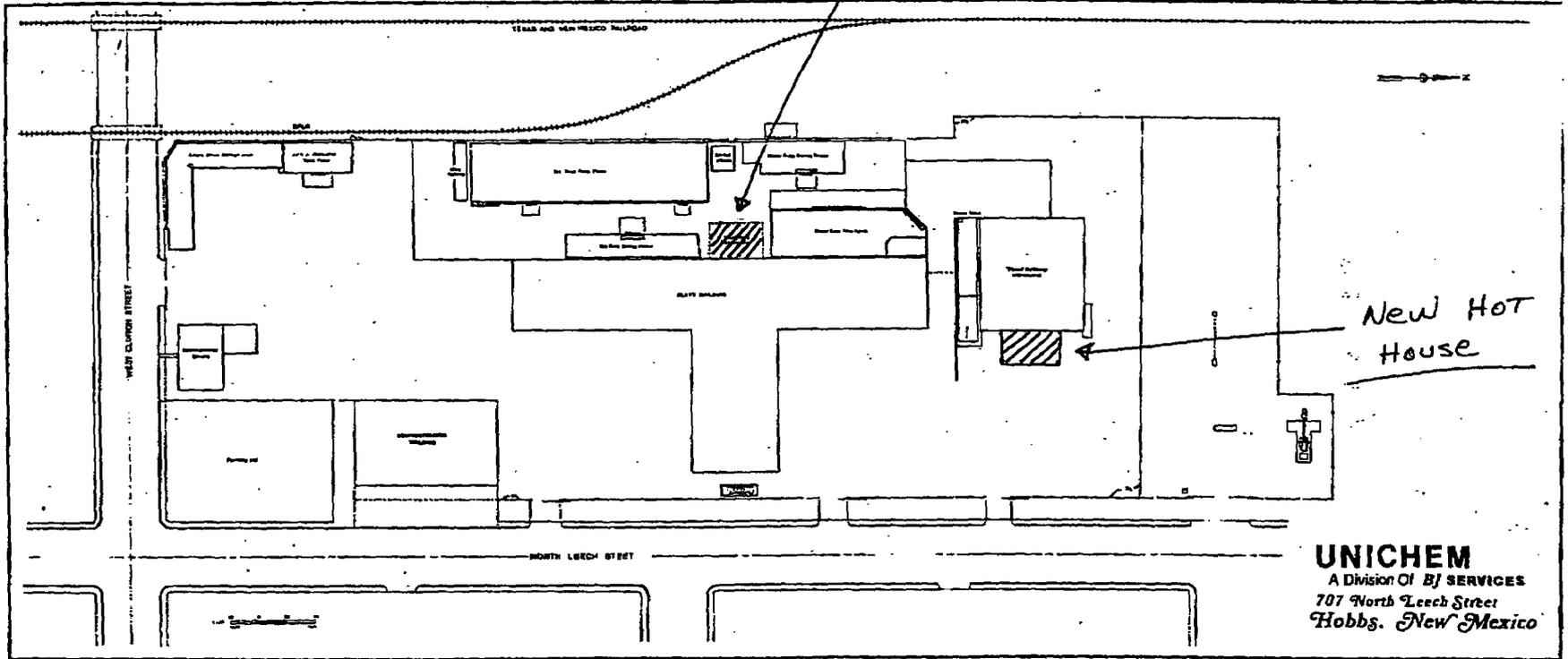
Please let me know if you have any questions.

We await your approval before proceeding.

cc: Wayne Price, NMOCD-Hobbs, Fax #393-0720
Charlie Root, Fax #281-363-7566
Jay Miller
Jeff Day
Wes Johnston

Attachment

JB/eb



UNICHEM
A Division Of BJ SERVICES
707 North Leech Street
Hobbs, New Mexico

Pat Sanchez

From: Wayne Price
Sent: Tuesday, December 10, 1996 2:03 PM
To: Pat Sanchez; Roger Anderson
Cc: Jerry Sexton
Subject: Unichem-Hobbs GW-094
Importance: High

Jim Britton VP of Unichem called and informed me they have plans on building a new hot house for chemical storage.

I informed him to notify you in writing for approval and cc district.

RECEIVED
MAY 1 1996
MAY 8 52

CC: JERRY SEYTON
CHRIS EUSTICE



April 29, 1996

Mr. Wayne Price
New Mexico Oil Conservation Division
P.O. Box 1980
Hobbs, New Mexico 88240

Dear Wayne:

The dirt pile on the west side of our property at 707 N. Leech has now been totally removed by Gandy Marley, Inc. and disposed at their disposal site west of Tatum.

If any further information is required, please let me know.

Sincerely,

UNICHEM, A DIVISION OF BJ SERVICES CO USA

Jim Britton
Director of Manufacturing

- cc: Bill Clements
- Charlie Root
- Jay Miller
- Pam Moose.
- Wes Johnston

JB/eb

RECEIVED
MAY 06 1996
OIL FIELD
OFFICE

RECEIVED
MARCH 22 1976
93 170 8 52

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time ≈ 8:37 AM	Date 3/21/76
---	-----------------------------------	-------------------	-----------------

<u>Originating Party</u> JIM BRITTON - (BUCKLEMAN)	<u>Other Parties</u>
---	----------------------

Subject DIRT PILE REMOVAL PROJECT

Discussion PROGRESS REPORT - HAVE MOVED ≈ 485 YARDS OFF-SITE

Conclusions or Agreements
WILL COVER REMAINING DIRT + WASTE FOR BUDGET APPROVAL - WILL SEND LETTER TO CONFIRM FUTURE ACTIONS FOR REMAINING MATERIAL

Distribution CC: JERRY SEXTON / JIM BRITTON / CHRIS EUSTICE Signed [Signature]

RECEIVED

FEB 18 1996

TO: JERRY SEYTON
CC: CHRIS EUSTICE - NMCA SF - UPA 6W-094
GARY WINK - HOBBS
LINDA GARDNER - UNICHEM

OIL CONSERVATION DIVISION
RECEIVED

MILE

UIC: _____
OTHER: _____

OIL CONSERVATION DIVISION
COMPLAINT FORM 8 52

Environmental Bureau
Oil Conservation Division

PERSON COMPLAINING:

INFORMATION TAKEN BY:

NAME: ANONYMOUS GROUP
ADDRESS: MAVERICK TRAILER PARK
SANGER & LETCH ST - HOBBS NM

TAKEN BY: WAYNE PRICE
DATE: 3/15/96 TIME: 10:20 AM
IN PERSON: _____ BY PHONE: ✓

PHONE: N.A.

COMPLAINT: DIRT PILE AT UNICHEM'S YARD - LOCATED BETWEEN
RAILROAD TRACKS & PLANT

COMMENTS: BLOWING DIRT INTO TRAILER PARK, EXPOSING CHILDREN
& KIDS TO CONTAMINATED SOILS

- INVESTIGATION -

INVESTIGATOR: WAYNE PRICE
DATE: 3/15/96
TIME: 10:20 AM

DESCRIBE INVESTIGATION AND FINDINGS: CALL UNICHEM'S PLANT
MGR. (LINDA GARDNER) SHE WILL CHECK INTO &
CALL BACK!

≈ 11:00 AM 3/15/96 - NCS SUTTON DELIVERED ANALYTICAL
RESULTS FOR DIRT PILE! HE IS GOING
TO CONTACT GMI FOR POSSIBLE DISPOSAL
SUBJECT TO HUN' Mgr's APPROVAL!

- FOLLOW-UP -

DATE: _____
TIME: _____
ACTION TAKEN: _____

*ATTACH ADDITIONAL SHEETS, IF NECESSARY

TO: JERRY SEXTON
cc: CHAS EUSTICE - NMCA SF - DPA 6W-094
GARY WINK - HOBBS
LINDA GARDNER - UNICHEM

MILEAGE: _____

UIC: _____
OTHER: _____

OIL CONSERVATION DIVISION
COMPLAINT FORM

PERSON COMPLAINING:

NAME: ANONYMOUS GROUP
ADDRESS: MAVERICK TRAILER PARK
SANGER & LETCH ST - HOBBS NM

INFORMATION TAKEN BY:

TAKEN BY: WAYNE PRICE
DATE: 3/15/96 TIME: 10:20 AM
IN PERSON: _____ BY PHONE: ✓

PHONE: N.A.

COMPLAINT: DIRT PILE AT UNICHEM'S YARD - LOCATED BETWEEN
RAILROAD TRACKS & PLANT

COMMENTS: BLOWING DIRT INTO TRAILER PARK, EXPOSING CHILDREN
& KIDS TO CONTAMINATED SOILS

- INVESTIGATION -

INVESTIGATOR: WAYNE PRICE
DATE: 3/15/96
TIME: 10:20 AM

DESCRIBE INVESTIGATION AND FINDINGS: CALL UNICHEM'S PLANT
MR. (LINDA GARDNER) SHE WILL CHECK INTO +
CALL BACK!

- FOLLOW-UP -

DATE: _____
TIME: _____

ACTION TAKEN: _____

*ATTACH ADDITIONAL SHEETS, IF NECESSARY



**The Western Company
of North America**

OIL CONSERVATION DIVISION
RECEIVED
95 MAR 21 PM 8 52

PHILLIP BOX REM
Manager, Real Estate & Environmental Compliance
Tel. 713/629-2861
Fax 713/629-2885

March 10, 1995

Mr William J LeMay Director
State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
P O Box 2088
Santa Fe NM 87504

RE: NOTIFICATION OF COMPANY SALE

Dear Mr LeMay:

This letter is to notify you of the pending sale of The Western Company of North America. BJ Services Company, USA is purchasing the assets of The Western Company of North America with the sale being final on or about April 13, 1995.

The name of records would then be BJ Services Company, USA for **Discharge Plan GW-72 for the Hobbs District facility.**

If additional information is required or if you have any questions, please call me.

Sincerely,

Phillip Box
THE WESTERN COMPANY OF NORTH AMERICA

pc: COO file
ERF



UNICHEM

707 N. Leech, P.O. Box 1499/Hobbs, NM 88240/Ph. 505/393-7751, Fax 505/393-6754

OIL CONSERVATION DIVISION
RECEIVED

'94 APR 2 10 8 49

March 31, 1994

Mr. William J. LeMay - Director
State of New Mexico
Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504

Dear Bill:

As stated in the Unichem International groundwater Discharge Plan (GW-94), submitted July 22, 1992, Unichem has abandoned the 12 underground chemical transfer lines and filled the underground lines with concrete.

In addition, Unichem International Inc. was recently (February 11, 1994) sold to The Western Company of North America and is now known as Western Unichem, a division of The Western Company of North America.

If any further information is required please let me know.

Sincerely,

WESTERN UNICHEM

Jim Britton
Vice President - Operations

JHB:jd

cc: Roger Anderson - NMOCD, Santa Fe
Jerry Sexton - NMOCD, Hobbs
Wayne Price - NMOCD, Hobbs
Charles Root - Western Unichem
B. Clements - Western Unichem

WESTERN UNICHEM



707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

OIL CONSERVATION DIVISION
RECEIVED
'93 MAR 30 AM 9 18

April 28, 1993

Mr. William J. LeMay
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

**SUBJECT: DISCHARGE PLAN GW-94 ADDENDUM #1
HOBBS SERVICE FACILITY
LEA COUNTY, NEW MEXICO**

Dear Mr. LeMay:

In reference to your letter dated March 2, 1993, the US EPA ID# is incorrect. Please change your records to reflect the correct US EPA ID#, NMD000333559.

If you have any questions, don't hesitate to call.

Sincerely,

UNICHEM INTERNATIONAL INC.

A handwritten signature in black ink that reads 'Wayne Price' followed by a stylized flourish.

Wayne Price
Staff Engineer

:pm

cc: Kathy Brown

UNICHEM INTERNATIONAL INC.



STATE OF NEW MEXICO OIL CONSERVATION DIVISION
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

APR 7 1993 8 49 AM

BRUCE KING
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

April 5, 1993

Unichem International
P.O. Box 1499
Hobbs, NM 88240

Attn: Wayne Price

RE: APPROVAL FOR DISPOSAL OF WASTE

Dear Mr. Price:

In reference to your letter dated April 1, 1993, we hereby give you authorization to dispose the 2 to 4 barrels of exempt waste, (produced water/crude oil), at your Parabo oilfield facility.

Very truly yours,

JERRY SEXTON
District I Supervisor

/sad

cc: Roger Anderson - Santa Fe





STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

March 30, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-956

Mr. Wayne Price, Staff Engineer
Unichem International Inc.
707 N. Leech
Hobbs, New Mexico 88240

**RE: BIO-REMEDIATION PROJECT
HOBBS SERVICE FACILITY (GW-94)
LEA COUNTY, NEW MEXICO**

Dear Mr. Price:

The New Mexico Oil Conservation Division (OCD) has received your March 9, 1993 request to place the soil from your bio-remediation area at the Hobbs Service Facility (discharge plan GW-94) back into the excavated area near the methanol-IPA tank farm. The soils will be placed back into the area where they were excavated from.

Based on the information in the March 9, 1993 request and the bottom hole sample analyses in the May 2, 1991 "Site Investigation", the OCD hereby approves Unichem Inc. to place the above referenced soils back into the excavated area.

Please be advised approval of this operation does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

xc: Jerry Sexton, OCD Hobbs Office

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/12/93,
or cash received on 3/23/93 in the amount of \$ 50.00
from Unichem International Inc.

for Hobbs Service Company GW-94
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 3/23/93

Received in ASD by: Sherry Gonzales Date: 3/23/93

Filing Fee ^{modification} New Facility _____ Renewal _____
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.
Full Payment _____ or Annual Increment _____

	UNICHEM INTERNATIONAL INC. P.O. BOX 1499 (505) 393-7751 HOBBS, NEW MEXICO 88240	FIFTH THIRD BANK OF MIAMI VALLEY P.O. BOX 1117 PIQUA, OHIO 45356-1117	56-219 422	CONTROL NUMBER [redacted]
			CHECK DATE CHECK NO.	3/12/93 [redacted]
			CHECK AMOUNT	
			*****50.00	

FIFTY AND 00/100*****

VOID AFTER 180 DAYS FROM DATE

PAY TO THE ORDER OF
 NMED-WATER QUALITY MGMT
 P.O. BOX 2088
 STATE LAND OFFICE BLDG
 SANTA FE 87504 NM

[redacted] AUTHORIZED SIGNATURE

[redacted]



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

February 18, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-945

Mr. Wayne Price, Staff Engineer
Unichem International Inc.
707 N. Leech
Hobbs, New Mexico 88240

**RE: DISCHARGE PLAN GW-94
HOBBS SERVICE FACILITY
LEA COUNTY; NEW MEXICO**

Dear Mr. Price:

The New Mexico Oil Conservation Division (OCD) has received your February 3, 1993 request to incorporate the following materials into your Hobbs Service Facility discharge plan GW-94. The request is to clarify the approved method of drum storage and to incorporate copies of WQCC Rule 1-203 and OCD Rule 116 into the discharge plan which was previously approved by the Director of the Division on December 1, 1992.

Based on the information in the above referenced correspondence, the OCD hereby approves the requested changes/additions to discharge plan GW-94 for the Hobbs Service Facility. In addition, based on the OCD facility inspection on January 13, 1993, the OCD acknowledges that Unichem International Inc. is in compliance with the approved discharge plan GW-94.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

xc: Jerry Sexton, OCD Hobbs Office

OIL CONSERVATION DIVISION
RECEIVED

'93 FEB 24 AM 8 59

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: <i>Mr. Chris Justice NMCO P.O. Box 2088 Santa Fe, NM 87504-2088</i>	4. Article Number <i>P-661-764-445</i>
Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>[Signature]</i>	
7. Date of Delivery	

SANTA FE, NM
DEC 7 1993
USPS

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

Re-Certified # P-661-764-511
Mailed 2/19/93.



707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

OIL CONSERVATION DIVISION
RECEIVED

'93 FEB 3 AM 9 02

February 3, 1993

Ms. Kathy Brown
Environmental Geologist
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Dear Ms. Brown:

**GW-94 - Unichem International
Hobbs Service Facility**

During your recent inspection of our facility on Wednesday, January 13, 1993, it is our understanding that we are in compliance with our existing approved permit GW-94 issued to us on December 1, 1992. This approval had certain conditions attached and are enclosed to this letter for reference.

Unichem agrees to Items 2, 3, and 4 listed in the attachment. At the time of your visit we understand that Item 1 Drum Storage will now read as follows:

- #1. All drums will be stored on concrete, asphalt, or any suitable place that will provide a barrier for the product if spilled, leaked, or otherwise would be released so as to prevent this material from entering, directly or indirectly into surface water, and or ground water.

Unichem International comments to and hereby agrees to the above change.

We are also enclosing copies of WQCC Rule 1-203 and OCD Rule 116 and will make these rules part of the discharge plan as discussed.

At this time we would also request written approval of this matter and also the Discharge Plan addendum #1 submitted to Mr. Chris Eustice on December 2, 1992. This addendum was verbally approved on November 24, 1992.

UNICHEM INTERNATIONAL INC.

Ms. Kathy Brown
Page 2
February 3, 1993

Thank you very much , your time in this matter is greatly appreciated. If you have any further questions please do not hesitate to call or write.

Sincerely,

UNICHEM INTERNATIONAL INC.



Wayne Price
Staff Engineer

LWP:jd

cc: Bill Clements
Jim Britton
Linda Gardner
Charlie Root
Harold McCullough

ATTACHMENT TO DISCHARGE PLAN GW-94 APPROVAL
UNICHEM INTERNATIONAL HOBBS SERVICE FACILITY
DISCHARGE PLAN REQUIREMENTS
(December 1, 1992)

1. Drum Storage: All drums will be stored on pad and curb type containment.
2. Sump Inspection: All sumps at this facility will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will be approved by the OCD prior to installation and will incorporate secondary containment with leak detection in their designs.
3. Tank Berming: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain one and one third times the capacity of the tank.
4. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

RULE 116. NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS, AND BLOWOUTS

The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

"Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

1. Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

2. "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrel or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

3. "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

4. Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

5. Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in

substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

6. Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.

IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in duplicate to the appropriate district office of the Division within ten days after discovery of the incident.

SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

WATERCOURSE. For the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

RULE 117. WELL LOG, COMPLETION AND WORKOVER REPORTS

Within 20 days after the completion of a well drilled for oil or gas, or the recompletion of a well into a different common source of supply, a completion report shall be filed with the Division on Form C-105. For the purpose of this rule, any hole drilled or cored below fresh water or which penetrates oil or gas-bearing formations or which is drilled by an "owner" as defined herein shall be presumed to be a well drilled for oil or gas.

RULE 118. HYDROGEN SULFIDE GAS - PUBLIC SAFETY

A. The intent of this rule is to provide for the protection of the public's safety in areas where hydrogen sulfide (H_2S) gas in concentrations greater than 100 parts per million (PPM) may be encountered.

C. Plans and specifications required to be filed under this section must be filed prior to the commencement of construction.

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required:

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of the discharge;
and

g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau,

Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification/and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agent, in an effort to determine the division's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days.

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified

D. Notification of discharge received pursuant to this regulation or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.

1-210. VARIANCE PETITIONS.

A. Any person seeking a variance from a regulation of the commission pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall:

1. state the petitioner's name and address;
2. state the date of the petition;
3. describe the facility or activity for which the variance is sought;
4. state the address or description of the property upon which the facility is located;
5. describe the water body or watercourse affected by the discharge;
6. identify the regulation of the commission from which the variance is sought;
7. state in detail the extent to which the petitioner wishes to vary from the regulation;
8. state why the petitioner believes that compliance with the regulation will impose an unreasonable burden upon his activity; and
9. state the period of time for which the variance is desired.

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 12/22/92, or cash received on 12/29/92 in the amount of \$ 1,380 from Unichem International for Hobbs Sewer Facility GW-94

Submitted by: _____ Date: _____ Submitted to ASD by: Kathy Brown Date: 12/29/92 Received in ASD by: Sherry Gonzales Date: 12/29/92

Filing Fee _____ New Facility X Renewal _____ Modification _____ Other _____ (specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund. Full Payment X or Annual Increment _____



UNICHEM INTERNATIONAL INC. P.O. BOX 1499 HOBBS, NEW MEXICO 88240 (505) 393-7751

FIFTH THIRD BANK OF MIAMI VALLEY P.O. BOX 1117 PIQUA, OHIO 45356-1117

56-219 422

CONTROL NUMBER [redacted]

CHECK DATE CHECK NO.

12/22/92 [redacted] CHECK AMOUNT

*****1,380.00

ONE THOUSAND THREE HUNDRED EIGHTY AND 00/100*****

VOID AFTER 180 DAYS FROM DATE

PAY TO THE ORDER OF NMED-WATER QUALITY MGMT P.O. BOX 2088 STATE LAND OFFICE BLDG SANTA FE 87504

NM

[Signature] AUTHORIZED SIGNATURE





ADVISORY
DIVISION
AUG 8 59

**UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107**

Roger

September 10, 1992

Mr. William J. Lemay, Director
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on August 27, 1992, regarding the Oil Conservation Division (OCD) discharge permits GW-127 and GW-94 on fish, shellfish, and wildlife resources in New Mexico.

The Service has determined there are no wetlands or other environmentally sensitive habitats, plants, or animals that will be adversely affected by the following discharge.

GW-94 - UNICHEM International in Hobbs, located in Section 34, T18S, R38E, NMPM, Lea County, New Mexico. Approximately 3,600 gallons per day of waste water will be discharged through three main underground stormwater drains to an oil separator; then after testing will be disposed of at the City of Hobbs Publicly Owned Treatment Works.

Regarding GW-127, Centennial Natural Gas Company, Burton Flats Gas Processing Plant, the Service has the following comments on the issuance of a permit to allow 275 gallons per day of waste water to be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The facility is located in Section 9, T20S, R29E, NMPM, Eddy County, New Mexico. It was not disclosed in the permit whether the tank was a closed tank or not. The Service is concerned an open tank would create a potential risk to Department of the Interior Trust Resources. If this is the case, the Service recommends screening or netting be implemented to exclude migratory birds.

Migratory birds are protected under the Migratory Bird Treaty Act (MBTA). If migratory birds become exposed to or accumulate harmful levels of contaminants, this constitutes "take" under the MBTA. The MBTA makes it unlawful for anyone at anytime or in any manner to capture, transport, or kill any migratory birds unless permitted by regulations promulgated under it. The courts have stated the MBTA can be constitutionally applied to impose penalties to persons, associations, partnerships, or corporations which did not intend to "kill" migratory birds and that the MBTA includes poisoning by

Mr. William J. Lemay, Director

2

any means. The MBTA holds that the unlawful killing of even one migratory birds is an offense.

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Fowler-Probst", written in a cursive style.

Jennifer Fowler-Probst
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, N.M. 87501

**DISCHARGE PLAN APPLICATION FOR
UNICHEM INTERNATIONAL INC.
HOBBS PLANT**

PREPARED BY:

WAYNE PRICE
STAFF ENGINEER

July 22, 1992

RECEIVED

JUL 21 1992

**OIL CONSERVATION DIV.
SANTA FE**

DISCHARGE PLAN

I. Facility Type:

N.M.O.C.D. Facility Category: Oil and Gas Service Company

Description: Chemical Manufacturing and Blending Plant Producing Water and Oil Formulations and Powder Blends. For further description, see Appendix A - Unichem International "Solutions" Brochures.

SIC Codes: 2899

5169

II. Operator:

Unichem International Inc. - Hobbs Manufacturing/Blend Plant

707 N. Leech

Hobbs, New Mexico 88240

Telephone: 505/393-7751

Contact Persons:

Jim Britton - Vice President of Operations

Wayne Price - Staff Engineer

Linda Gardner - Plant Manager

Max Zachary - Trucking/Purchasing

Charles Root - Environmental Compliance Manager

Jay Miller - Manager of Safety and Risk Management

III. Location:

The facility is located in the West Half of the Northwest Quarter of Section 34, Township 18 South, Range 38 East, N.M.P.M., Lea County, New Mexico, which is also within the corporate boundary of Hobbs, New Mexico. The facility is located at the northwest corner of Clinton and Leech Streets and east of the Texas-New Mexico Rail line, which runs north and south in that area. A drawing entitled Unichem Hobbs Blending Plant Topo Map is included as Figure 1 with the facility location highlighted.

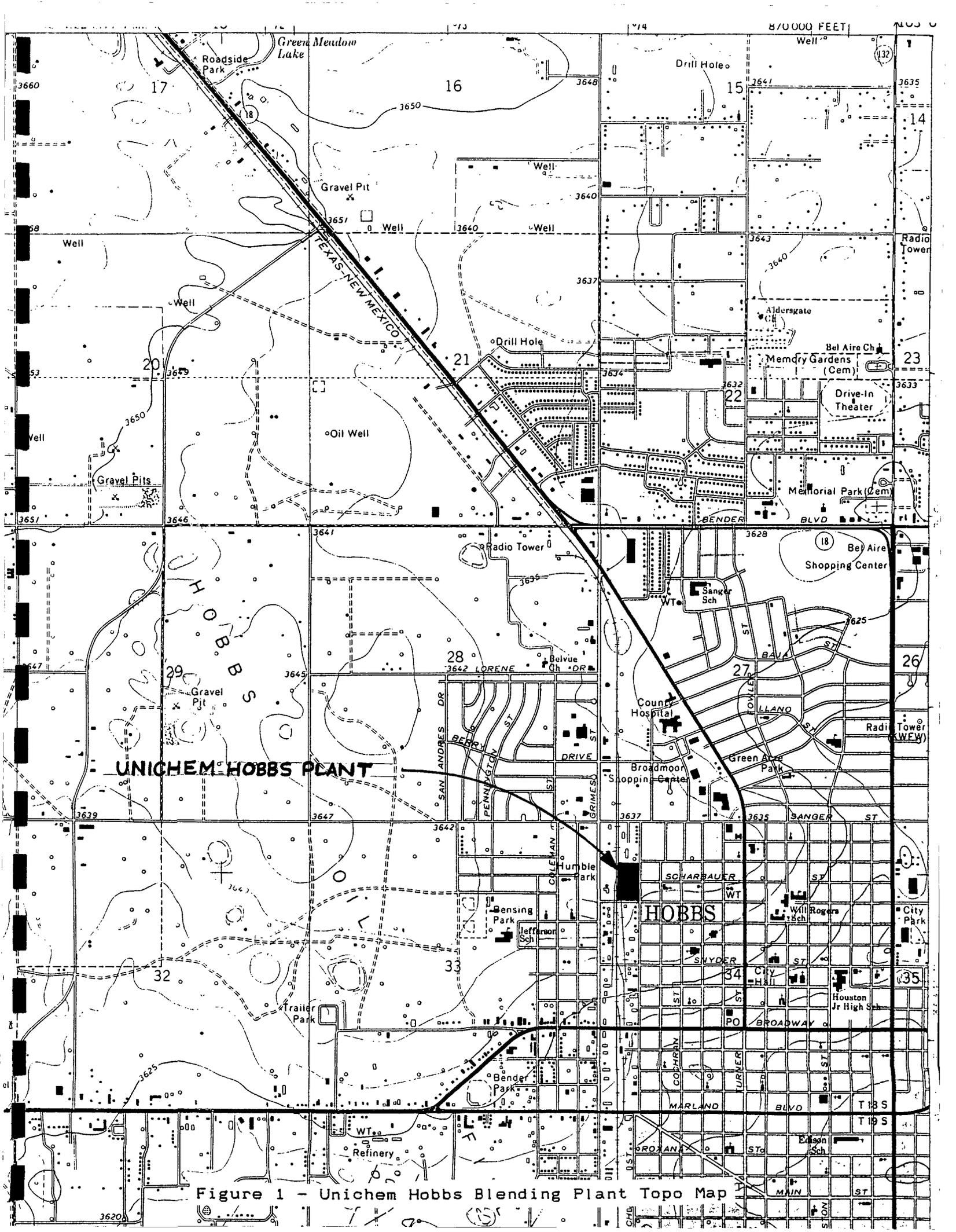


Figure 1 - Unichem Hobbs Blending Plant Topo Map

IV. Attach the name and address of the landowner of the facility site:

Unichem International Inc.
707 N. Leech
Hobbs, New Mexico 88240

V. Attach a description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility:

The Unichem Hobbs plant is situated on approximately 4.5 acres in west-central Hobbs, New Mexico. The plant purchases chemical raw materials in solid and liquid form and prepares oil and water based chemical formulations and powder blends primarily for use within the oil and gas industry. A diagram of the facility is shown as Figure 2 - Site Plan, which describes the locations of discharges, storage facilities, disposal facilities, processing facilities and other relevant areas including drum storage.

VI. Attach a description of all materials stored or used at the facility:

Due to the number and complexity of chemical formulations produced by Unichem at the Hobbs plant, practicality demands that the information requested for Section VI be presented in a different form in Supplement - Materials Stored and Used at the Site.

In this Supplement, the following information is presented:

1. A map, Raw Material Storage Locations, is included that shows the location of all materials stored in bulk storage tanks (as liquids) or in powder form (as solids). All materials not listed on this map are in liquid form and are stored in drums in the drum storage areas indicated. Please note that some materials, primarily solvents, are brought in by rail and are stored in rail cars which remain on the rail siding until used.
2. A Master Chemical List is included that shows all raw materials and finish products used or prepared by Unichem at the Hobbs plant. This list indicates the raw material or product name; the product density in pounds per gallon (a density of 1.00 indicating a powder form); item type ("4" indicating that it is a raw material and "1" indicating that it is a finished product); the unit of measure for the material and, finally, the on-hand quantity of that material at the time of the last inventory. An on-hand quantity which is less than or equal to zero indicates that the material is immediately blended into another

product or packaged and sent off-site.

3. Product Bulletins and Material Safety Data sheets for all raw materials and for representative finished products, as applicable, are included to address the general composition of all materials used or stored at the site. Representative product formulations are used since many finished products listed as separate names are simply a dilution of the base product formulation. Unichem prepares literally hundreds of such derivations of base product formulations which, for the purposes of this plan, are identical in terms of chemical characteristics.
4. For completeness, a copy of Form VI is included that lists all eight (8) applicable categories of materials mentioned for Oilfield Service Facilities. This list is keyed to the proprietary product names used by Unichem and mentioned in the Master Chemical List, the Product Bulletins and the Material Safety Data Sheets, which are included in the Supplement.

VII. Attach a description of present sources and quantities of effluent and waste solids:

The sources and quantities of effluent and waste solids are summarized in Form VII, which is included below:

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VII. Form

Sources and Quantities of Effluent and Waste Solids Generated at the Facility - For each source include types of effluents (e.g. salt water, hydrocarbons, sewage, etc.), estimated quantities in barrels or gallons per month, and types and volumes of major additives (e.g. acids, biocides, detergents, degreasers, etc.).

Waste Type	General Composition and Source	Volume per Month	Major Additives
1. Truck Wastes	Not applicable.		
2. Truck, Tank and Drum Washing	Ignitable oil/water emulsion from cleaning cargo truck tanks, blending vats, containers and ventilation equipment	23 gal/month (est. annual average)	None

3. Steam Cleaning of Parts, Equipment, Tanks	Not applicable.		
4. Solvent/De-greaser use	Not applicable.		
5. Spent Acids, Caustics, or Completion Fluids	Not applicable.		
6. Waste Slop Oil	Not applicable.		
7. Waste Lubrication and Motor Oils	Used motor oils from company vehicles.	55 gal/month (est. annual average)	None
8. Oil Filters	Used oil filters from company vehicles.	14 gal/month (est. annual average)	None
9. Solids and Sludges from Tanks	EP Toxic solids from sump clean-out in tank farm.	0.1 bbl/month (est. annual average from one time event of 1200 lbs. of material.)	None
10. Painting Wastes	Not applicable.		
11. Sewage	Stormwater from inside the tank farm area, external truck wash materials, and de minimis drips of chemicals washed to sumps in blending area	108,000 gal/month (est. annual average)	Constituents of POTW wastewater stream are listed in the sampling data attached as Appendix D.

12 (a). Other Waste Liquids	Ignitable off-spec/obsolete finished products and raw materials (magnesium oxide in kerosene)	14 gal/month (est. annual average from one-time event of 165 gallons.)	None
(b). Other Waste Liquids	EP toxic water/oil emulsion generated from skimming hydrocarbon at plant oil/water separators and from cleaning plant drains.	16 gal/month (est. annual average)	None
12 (c). Other Waste Liquids	Ignitable and toxic product, raw material and reagent sample waste.	20 gal/month (est. annual average)	None
12 (d). Other Waste Liquids	Corrosive, ignitable and toxic liquid wastes associated with the disposal of obsolete and off-spec product and raw material.	< 90 gal/month (est. annual average)	None
12 (e). Other Waste Liquids	Ignitable/EP Toxic liquid wastes associated with laboratory operations, including a mixture of wastes from laboratory wastes including excess samples from field, waste reagents and product samples and wastewater.	133 gal/month (est. annual average)	None
12 (f). Other Waste Liquids.	Laboratory waste waters and oils generated from sample excess of oil and gas exploration and production produced water and crude oil samples for analytical purposes, mixed with other residual lab chemicals used in analysis. Residual lab chemicals include, but are not limited to, xylene, heavy aromatic solvents, acetone, alcohols and halogens.	27.5 gal/month (est. annual average)	None

13 (a). Other Waste Solids.	EP Toxic spill cleanup solids generated from clean-up activities. Chemicals which could be found in the solids include, but are not limited to, hydrocarbons, alcohols, amines, polymers, surfactants, and chromium.	1040 lb/month (est. annual average)	None
13 (b). Other Waste Solids.	EP Toxic soils generated from spill clean-up operations	75 lb/month (est. annual average)	None
13 (c). Other Waste Solids.	EP Toxic solids generated from disposal of glassware, containers, and hoses.	32 lb/month (est. annual average)	None
13 (d). Other Waste Solids.	Chromium containing solids generated from disposal of obsolete or off-spec product and raw materials. This includes precipitated and/or crystallized product, acrylic copolymers and organic amines.	21 lb/month (est. annual average based on one time event of 500 lbs.)	None
13 (e). Other Waste Solids.	Used metal drums and pails from blending plant operations. (Non-hazardous)	1600 drums per month (est. annual average)	None
13 (f). Other Waste Solids	Municipal solid waste from plant and office facilities, including empty aerosol cans, plastic pails, empty powder chemical sacks, paper towels, office trash, lab glass, etc. (Non-hazardous)	2,200 loose cu.ft./ month (est. annual average)	None
13 (g). Other Waste Solids	Construction debris (Non-hazardous)	Depends upon level of construction activity.	None

13 (h). Other Waste Solids	Oily soils at bioremediation site. (Non-hazardous)	Depends upon depth and extent of spills to be remediated.	None
13 (i). Other Waste Solids	Other contaminated soils. (Non-hazardous)	Depends upon depth and extent of spill in question.	None
13 (j). Other Waste Solids	Scrap metal. (Non-hazardous)	Depends upon demolition activity undertaken.	None
13 (k). Other Waste Solids	Used batteries from fleet vehicles	1 per month (est. annual average)	None

VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures:

Current liquid and solid waste collection, treatment and disposal procedures are addressed in Form VIII, which is included below, and are further described by the Solid Waste Flow Diagram attached as Appendix B:

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VIII. Form

Summary Description of Existing Liquid and Solids Waste Collection and Disposal -

For each waste type listed in Part VII, Provide summary information about onsite collection and disposal systems. Information on basic construction features, specific descriptions, and wastewater schematics should be provided as required in the Guidelines. The use of this form is optional, but the summary information requested must be provided.

Note: Unichem does not own or operate on-site injection wells or leach fields of any type at the Hobbs plant, so those items are left out of the following table.

Waste Type	General Composition and Source	Tank (T) or Drum (D)	Floor Drain (F) or Sump (S)	Pits Lined (L) or Un-lined (U)	Off-site Disposal
1. Truck Wastes	Not applicable				
2. Truck Tank and Drum Washing	Ignitable oil/water emulsion from cleaning cargo truck tanks, blending vats, containers and ventilation equipment	D	N/A	N/A	None. Rinsate is used as feedstock in blending of compatible products.
3. Steam Cleaning of Parts, Equip., Tanks	Not applicable				
4. Solvent/ Degreaserus	Not applicable				
5. Spent Acids, Caustics, or Comple-tion Fluids	Not applicable				
6. Waste Slop Oil	Not applicable				
7. Waste Lubrica-tion and Motor Oils	Used motor oils from company vehicles	D	N/A	N/A	Manifested off-site to a used motor oil collector.

8. Oil Filters	Used oil filters from company vehicles	D	N/A	N/A	Manifested off-site to a used motor oil collector.
9. Solids and Sludges from Tanks	EP Toxic solids from sump clean-out in tank farm.	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
10. Painting Wastes	Not applicable				
11. Sewage	Stormwater from inside the tank farm area, external truck wash materials, and de minimis drips of chemicals washed to sumps in blending area.	N/A	F	N/A	Outfall to POTW.
12 (a). Other Waste Liquids	Ignitable off-spec/obsolete finished products and raw materials (magnesium oxide in kerosene)	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
12 (b). Other Waste Liquids	EP toxic water/oil emulsion generated from skimming hydro- carbon at plant oil/water separators and from cleaning plant drains.	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
12 (c). Other Waste Liquids	Ignitable and toxic product, raw material and reagent sample waste.	D	N/A	N/A	Manifested off-site to a RCRA TSDF.

12 (d). Other Waste Liquids	Corrosive, ignitable and toxic liquid wastes associated with the disposal of obsolete and off-spec product and raw material.	D	N/A	N/A	Manifested off-site to a RCRA TSDf.
12 (e). Other Waste Liquids	Ignitable/EP Toxic liquid wastes associated with laboratory operations, including a mixture of wastes from laboratory wastes including excess samples from field, waste reagents and product samples and wastewater.	D	N/A	N/A	Manifested off-site to a RCRA TSDf.
12 (f). Other Waste Liquids.	Laboratory waste waters and oils generated from sample excess of oil and gas exploration and production produced water and crude oil samples for analytical purposes, mixed with other residual lab chemicals used in analysis. Residual lab chemicals include, but are not limited to, xylene, heavy aromatic solvents, acetone, alcohols and halogens.	D	N/A	N/A	Manifested off-site to a RCRA TSDf.

13 (a). Other Waste Solids.	EP Toxic spill cleanup solids generated from clean-up activities. Chemicals which could be found in the solids include, but are not limited to, hydrocarbons, alcohols, amines, polymers, surfactants, and chromium.	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
13 (b). Other Waste Solids.	EP Toxic soils generated from spill clean-up operations	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
13 (c). Other Waste Solids.	EP Toxic solids generated from disposal of glassware, containers, and hoses.	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
13 (d). Other Waste Solids.	Chromium containing solids generated from disposal of obsolete or off-spec product and raw materials. This includes precipitated and/or crystal-lized product, acrylic copolymers and organic amines.	D	N/A	N/A	Manifested off-site to a RCRA TSDF.
13 (e). Other Waste Solids.	Used metal drums and pails from blending plant operations. (Non-hazardous)	N/A	N/A	L-Lined concrete berm	Offsite to a drum recycler.

13 (f). Other Waste Solids	Municipal solid waste from plant and office facilities, including empty aerosol cans, plastic pails, empty powder chemical sacks, paper towels, office trash, lab glass, etc. (Non-hazardous)	N/A	N/A	N/A	Stored in a waste bin for delivery off-site to a municipal landfill.
13 (g). Other Waste Solids	Construction debris (Non-hazardous)	N/A	N/A	U	Off-site to municipal and/or industrial landfill.
13 (h). Other Waste Solids	Oily soils at bioremediation site. (Non-hazardous)	N/A	N/A	L	Bioremediated per NMOCDC cleanup levels and disposed of on-site or off-site to industrial landfill.
13 (i). Other Waste Solids	Other contaminated soils. (Non-hazardous)	N/A	N/A	L	Off-site to industrial landfill.
13 (j). Other Waste Solids	Scrap metal. (Non-hazardous)	N/A	N/A	U	Off-site to scrap metal buyer.
13 (k). Other Waste Solids	Used batteries from fleet vehicles	N/A	N/A	N/A	Not stored - Immediate trade-in for new battery.
13 (l). Other Waste Solids	Non-Hazardous solid waste from outlying field operations located in New Mexico. This solid stream is generated from routine operations, such items include; soil, dirt, hoses, plastic buckets, gloves, paper towels, rags, absorbent material and pigs which are contaminated with chemicals.	D	N/A	N/A	Manifested off-site to a RCRA TSDF

A concrete-lined floor drain/sump system, interconnected by 3" Schedule 80 CPVC underground lines, drains all areas likely to come into contact with chemicals from spills, leaks or drips. This system is shown on Figure 4 - Underground Utilities Site Plan, which is included in this report as a part of Section XI. This system is returned to a dry condition within 24 hours of any rainfall event, by company policy, so the system is never under more than minimal pressure and leak potential is minimized.

13 (f). Other Waste Solids	Municipal solid waste from plant and office facilities, including empty aerosol cans, plastic pails, empty powder chemical sacks, paper towels, office trash, lab glass, etc. (Non-hazardous)	2,200 loose cu.ft./ month (est. annual average)	None
13 (g). Other Waste Solids	Construction debris (Non-hazardous)	Depends upon level of construction activity.	None
13 (h). Other Waste Solids	Oily soils at bioremediation site. (Non-hazardous)	Depends upon depth and extent of spills to be remediated.	None
13 (i). Other Waste Solids	Other contaminated soils. (Non-hazardous)	Depends upon depth and extent of spill in question.	None
13 (j). Other Waste Solids	Scrap metal. (Non-hazardous)	Depends upon demolition activity undertaken.	None
13 (k). Other Waste Solids	Used batteries from fleet vehicles	1 per month (est. annual average)	None
13 (l). Other Waste Solids	Non-Hazardous solid waste from outlying field operations located in New Mexico. This solid stream is generated from routine operations, such items include: soil, dirt, hoses, plastic buckets, gloves, paper towels, rags, absorbent material and pigs which are contaminated with chemicals.	Estimated volume 1-10 drums/month	None

VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures:

Current liquid and solid waste collection, treatment and disposal procedures are addressed in Form VIII, which is included below, and are further described by the Solid Waste Flow Diagram attached as Appendix B:

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VIII. Form

Summary Description of Existing Liquid and Solids Waste Collection and Disposal - For each waste type listed in Part VII, Provide summary information about onsite collection and disposal systems. Information on basic construction features, specific descriptions, and wastewater schematics should be provided as required in the Guidelines. The use of this form is optional, but the summary information requested must be provided.

Note: Unichem does not own or operate on-site injection wells or leach fields of any type at the Hobbs plant, so those items are left out of the following table.

13 (f). Other Waste Solids	Municipal solid waste from plant and office facilities, including empty aerosol cans, plastic pails, empty powder chemical sacks, paper towels, office trash, lab glass, etc. (Non-hazardous)	N/A	N/A	N/A	Stored in a waste bin for delivery off-site to a municipal landfill.
13 (g). Other Waste Solids	Construction debris (Non-hazardous)	N/A	N/A	U	Off-site to municipal and/or industrial landfill.
13 (h). Other Waste Solids	Oily soils at bioremediation site. (Non-hazardous)	N/A	N/A	L	Bioremediated per NMOCDC cleanup levels and disposed of on-site or off-site to industrial landfill.
13 (i). Other Waste Solids	Other contaminated soils. (Non-hazardous)	N/A	N/A	L	Off-site to industrial landfill.
13 (j). Other Waste Solids	Scrap metal. (Non-hazardous)	N/A	N/A	U	Off-site to scrap metal buyer.
13 (k). Other Waste Solids	Used batteries from fleet vehicles	N/A	N/A	N/A	Not stored - Immediate trade-in for new battery.

A concrete-lined floor drain/sump system, interconnected by 3" Schedule 80 CPVC underground lines, drains all areas likely to come into contact with chemicals from spills, leaks or drips. This system is shown on Figure 4 - Underground Utilities Site Plan, which is included in this report as a part of Section XI. This system is returned to a dry condition within 24 hours of any rainfall event, by company policy, so the system is never under more than minimal pressure and leak potential is minimized.

Tankage areas holding bulk chemical are all surrounded by concrete containments as described in the containment matrix included in Section X. These containments all are capable of containing far more capacity than any individual tank capacity. All drummed chemical storage areas are on either asphalt or concrete surfaces which will allow leakage of individual chemicals to be managed by the spill detection and response team in virtually all cases without allowing offsite discharge.

As mentioned in Section XI, only twelve underground process lines remain, all of which transmit raw materials from the tank farms to the blending areas. These subsurface lines are due to be replaced above ground in the fall of 1992. These lines are all 2" Schedule 40 carbon steel lines.

- IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems:

Modifications of Unichem's Hobbs plant have been ongoing for several years, with particular attention to construction of properly engineered spill containment structures, chemically resistant storage structures and elimination of underground tanks and piping. Further modifications to Unichem's Hobbs plant collection/treatment/disposal systems are anticipated, subject to the availability of construction funds.

- X. Attach a routine inspection, maintenance plan and reporting to ensure permit compliance.

The Unichem Hobbs plant does not have any on-site surface impoundments or any disposal units. Therefore, sections A and B of the discharge plan preparation guidelines are not applicable.

Unichem International maintains and uses a Quality Process Management Manual which addresses inspection, maintenance, manufacturing, packaging, sampling, spill control, waste minimization, personnel training and quality control, among other items. Portions of this document have been included in this discharge plan as applicable. Enclosed as Appendix C is the Table of Contents for this manual, which indicates the subject matter discussed therein. The manual has not been included in this discharge plan due to its length. A copy of the manual is available for review upon request.

The Unichem Blending plant process and storage areas are listed in the table on the following page, which indicates the containment system in place for each. By virtue of the containment systems described therein, supplemented by the efforts of the Unichem spill detection and response team, discharges of more than de minimis amounts of chemicals are avoided. Spills, leaks and drips are handled by first removing useable quantities of chemicals for reuse as feedstock for compatible products and then by through removal of residual amounts of chemical through use of approved spill removal procedures. Only de minimis amounts of chemical

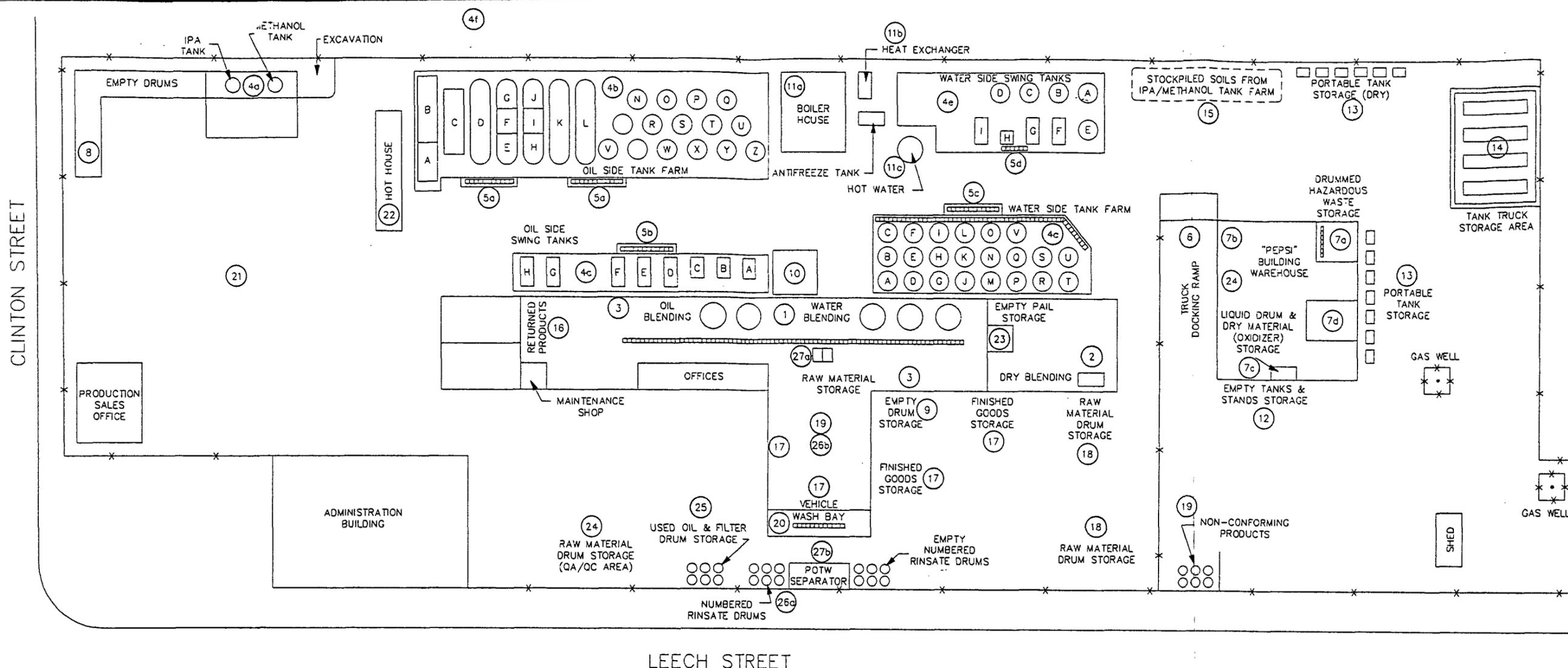
PROCESS AND STORAGE AREA CONTAINMENT SYSTEMS

This matrix lists the characteristics of the containment system which handles each of the process and/or storage areas listed. The location of each of these process and/or storage areas is shown in Figure 3 - Unichem Hobbs Plant Storage/Process Areas.

DRAWING SYMBOL	PROCESS OR STORAGE AREA	DESCRIPTION	LOCATION	Containment Characteristics												
				INSIDE OR OUTSIDE	BERMED CONTAINMENT	CONCRETE BERM	SUMP OR FLOOR DRAIN	CONTAINMENT VOLUME	WATER STOP	CONCRETE SURFACE	ASHPHALT SURFACE	DIRT SURFACE	SYNTHETIC LINER	RUNON/RUNOFF PROTECTION	STORMWATER TESTED	
1	Blending Vats and Finished Product Drumming Area		Inside blending plant	I			●				●					●
2	Chemical Powder Storage Area		Inside dry blending area	I							●					●
1..	Drum (55-gallon) Raw Material Storage Area		Inside blending plant	I			●				●					●
4(a)	Finished and Raw Product Bulk Storage Areas	Methanol/IPA Tank Farm	Outside	○	●	●	●	●	●	●	●				●	●
4(b)	"	Oil Side Tank Farm	Outside	○	●	●	●	●	●	●	●				●	●
4(c)	"	Oil Side Swing Tank Farm	Outside	○	●	●	●	●	●	●	●				●	●
4(d)	"	Water Side Tank Farm	Outside	○	●	●	●	●	●	●	●				●	●
4(e)	"	Water Side Swing Tank Farm	Outside	○	●	●	●	●	●	●	●				●	●
4(f)	"	Railroad Unloading Spur	Outside	○				●					●			
5(a)	Chemical Loading and Unloading Areas	South and North Side Oil Tank Farm Load/Unload Containment Areas	Outside	○	●	●	●									
5(b)	"	Oil Side Swing Tank Farm Load/Unload Containment Areas	Outside	○	●	●	●				●				●	●

DRAWING SYMBOL	PROCESS OR STORAGE AREA	DESCRIPTION	LOCATION	Containment Characteristics											
				INSIDE OR OUTSIDE	BERMED CONTAINMENT	CONCRETE BERM	SUMF OR FLOOR DRAIN	CONTAINMENT VOLUME	WATER STOP	CONCRETE SURFACE	ASHPHALT SURFACE	DIRT SURFACE	SYNTHETIC LINER	RUNON/RUNOFF PROTECTION	STORHWATER TESTED
11(a)	Process Heating System	Heaters, Air Conditioning Controls	Inside the Blending Plant Building	I	●	●	●				●			●	●
11(b)	"	Heat Exchanger	Outside	○							●			●	
11(c)	"	Process Water Tank	Outside	○							●			●	
12	Empty Tank and Stand Storage		Outside	○									●		
13	Portable Tank Storage		Outside	○									●		
14	Tank Truck Storage Areas		Outside	○	●			●					●	●	●
15	Bioremediation Area		Outside	○	●			●					●	●	●
16	Returned Product Drum Storage		Inside Blending Plant Building	I			●	●		●				●	
17	Finished Goods Drum Storage		Outside	○									●		
18	Raw Material Drum Storage		Outside	○									●		
19	Non-Conforming Products Drum Storage		Outside	○							●				
20	Truck Wash Bay		East End of Blending Plant Building	I	●	●	●			●				●	
21	Truck Parking Area		Outside	○									●		
22	Hot Chemical Storage Area		Separate Storage Area	I	●		●	●	●	●				●	●

DRAWING SYMBOL	PROCESS OR STORAGE AREA	DESCRIPTION	LOCATION	Containment Characteristics											
				INSIDE OR OUTSIDE	BENNEU CONTAINMENT	CONCRETE BENE	SUMP OR FLOOR DRAIN	CONTAINMENT VOLUME	WATER STOP	CONCRETE SURFACE	ASPHALT SURFACE	DIRT SURFACE	SYNTHETIC LINER	RUNON/RUNOFF PROTECTION	STORM WATER TESTED
23	Used Empty Plastic Pail Storage		Inside Blending Plant Building	I						●					●
24	Raw Material QA/QC Drum Storage Area		Inside Blending Plant Building	I			●	●		●					●
25	Used Oil and Filter Drum Storage Area		Outside	○							●				
26(a)	Rinsate Drums from Truck Washout		Outside	○							●				
26(b)	Rinsate Drums from Blending Vat Washout		Inside Blending Plant Building	I			●			●					●
27(a)	Oil/Water/Solid Separator	Blending Area	Inside Blending Plant Building	I			●			●					
27(b)	"	At POTW Outfall	East of Blending Plant Building	○	●	●	●			●					



NUMBER	DESCRIPTION	NUMBER	DESCRIPTION
1	BLENDED VAT & FINISHED PRODUCT DRUMMING	11c	PROCESS WATER TANK
2	CHEMICAL POWDER STORAGE AREA	12	EMPTY TANK & STAND STORAGE
3	DRUM (55 GAL) RAW MATERIAL STORAGE AREA	13	PORTABLE TANK STORAGE
4a	METHANOL/IPA TANK FARM	14	TANK TRUCK STORAGE AREA
4b	OIL SIDE TANK FARM	15	BIOREMEDIATION AREA
4c	OIL SIDE SWING TANK FARM	16	RETURNED PRODUCT DRUM STORAGE
4d	WATER SIDE TANK FARM	17	FINISHED GOODS DRUM STORAGE
4e	WATER SIDE SWING TANK FARM	18	RAW MATERIAL DRUM STORAGE
4f	RAILROAD UNLOADING SPUR	19	NON-CONFORMING PRODUCTS DRUM STORAGE
5a	SOUTH & NORTH SIDE OIL TANK FARM LOAD/UNLOAD CONT. AREA	20	TRUCK WASH BAY
5b	OIL SIDE SWING TANK FARM LOAD/UNLOAD CONT. AREA	21	TRUCK PARKING AREA
5c	WATER SIDE TANK FARM LOAD/UNLOAD CONT. AREA	22	HOT CHEMICAL STORAGE AREA
5d	WATER SIDE SWING TANK FARM LOAD/UNLOAD CONT. AREA	23	USED EMPTY PLASTIC PAIL STORAGE
6	DRUM TRUCK LOAD/UNLOAD DOCKING RAMP	24	RAW MATERIAL QA/QC DRUM STORAGE AREA
7a	HAZARDOUS WASTE DRUM STORAGE AREA	25	USED OIL AND FILTER DRUM STORAGE AREA
7b	SLOW-MOVING INVENTORY DRUM STORAGE	26a	RINSATE DRUMS FROM TRUCK WASHOUT
7c	OXIDIZER - SOLID & DRUMMED LIQUID STORAGE AREA	26b	RINSATE DRUMS FROM BLENDING VAT WASHOUT
7d	MAINTENANCE STORAGE AREA	27a	OIL/WATER/SOLID SEPERATOR
8	USED EMPTY DRUM STORAGE AREA	27b	OIL/WATER/SOLID SEPERATOR
9	NEW EMPTY DRUM STORAGE AREA		
10	NEW EMPTY DRUM RACK FEED FOR AUTO-DRUM MACHINE		
11a	HEATERS, AIR CONDITIONING CONTROLS		
11b	HEAT EXCHANGER		

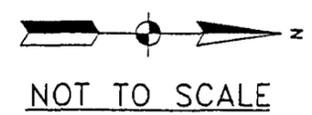


FIGURE 3 - UNICHEM HOBBS PLANT STORAGE/PROCESS AREAS

1/8" = 1'-0"
CAD FILE: 226-02.DWG

CARTER & BURGESS, INC.
ENGINEERS - PLANNERS - SURVEYORS
505 NORTH BIG SPRING/SUITE 600/MIDLAND, TEXAS 79701/(915) 687-2425

DWG. TITLE: UNICHEM INTERNATIONAL, INC.
HOBBS PLANT
**HOBBS PLANT
STORAGE/PROCESS AREAS**

DESIGN:	DRAWN: MC	JOB NO. 9226
DATE: 7-7-92	AFE NO.	SHEET 1 of 1
SCALE: NONE	DWG. NO. B-9226-02	

not removable from the plant, loading or storage area surface by ordinary methods enter the plant drain system which discharges to POTW.

Stormwater which falls in blending and/or storage areas (where chemical would most likely be able to come into contact with the stormwater) is held and tested by visual, olfactory and Ph determination for the presence of residual chemicals before release to the plant drain system and subsequently to POTW. The release of stormwater to POTW in the manner done by Unichem is expressly permitted by ordinance of the City of Hobbs, which is the POTW governing authority. For your information, we have included water quality analyses for January through June of 1992 for the waters discharged to the POTW, as well as, daily visual and Ph determinations from August 21, 1991 to present. These are included herein as Appendix D.

In an extremely large rainfall event where stormwater from these areas cannot reasonably be released to POTW, the stormwater is tested as described above, and, if tests are negative for the presence of residual chemicals, the stormwater is released to surface outfall to the City of Hobbs stormwater collection system.

In one emergency case, stormwater was released from these areas to surface outfall with only visual inspection. In all other cases, the previously listed procedures were used and no further release of stormwater without testing is anticipated.

Please note that reporting of stormwater discharge is not currently required by law. In the event that regulations require stormwater discharge reporting, Unichem agrees to provide all required report documentation.

XI. Attach a description of proposed modifications to existing collection/treatment/disposal systems:

The Unichem Hobbs plant presently has in place a comprehensive Hazardous Waste Contingency Plan. This plan is being submitted and attached (as Appendix E) hereto and will become part of this discharge plan as required by this section (see attachments). This plan has an emergency preparedness and prevention section that will anticipate and adequately provide any required equipment, trained personnel, notification, coordination with local authorities, site maps, properties of hazardous waste, hazardous materials and associated hazards.

This contingency plan is designed to minimize hazards to human health or the environment from fires, explosions or any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituent or constituents to the air, soil, ground water or surface water.

To fulfil certain New Mexico notification and reporting requirements, Unichem is providing a Supplement to the Hazardous Waste Contingency Plan attached herein

(see Appendix F) and hereby commits to abide by such plan.

The Unichem Hobbs plant also has in place a spill detection and spill response team for handling all chemical spills. Please refer to Appendix G for attachments called POTW Waste Minimization Program, Procedures for Handling Spills, Unichem Spill Report Form, and Directions for any Spilled Chemicals.

These documents are included in this report to fulfil certain requirements for this discharge plan and commits to using these procedures as part of the discharge plan. Unichem also agrees to abide by N.M.O.C.D. guidance on all mitigation of such spills to ensure that the State of New Mexico's ground water and/or surface water is protected. Unichem also agrees to abide by N.M.O.C.D. guidance on the proper disposal of waste that is generated during the course of its operations.

All chemicals stored onsite have containment systems in place. Unichem commits to keeping these systems in proper working order and maintained. A matrix called "Process and Storage Area Containment Systems" has been included in Section X of this plan which shows the containment systems in place for the various facilities in the Hobbs plant.

There are no UST's onsite and all AST's are triple contained within concreted dike containments designed per NFPA 30 guidelines and local fire department review and approval.

Besides the usual assortment of underground utilities, such as water, municipal sewer and natural gas services, Unichem has 12 chemical transfer lines that presently are underground and has plans to remove those lines and replace them aboveground. This project is proposed for the fall of 1992. All tanks, valves, piping, concrete containments and pumps are visually checked on a daily basis. All systems are designed so that leak detection can be performed visually.

Stormwater is handled through three (3) main underground lines which transmit only stormwater that falls within the tank farm containments. These lines originate in the tank farm and blending plant sumps and, after passing through an oil/water/solids separator, outfall to the publicly owned treatment works. (See Underground Utilities Site Plan, Figure 4, for locations of sumps and lines.) Before release to the oil/water/solids separator, stormwater is subjected to visual, olfactory and Ph testing to determine if chemicals (from de minimis leaks, drips or spills within the containment area or blending plant) are present in the stormwater.

Unichem policy states that all stormwater sumps and lines will be drained or pumped dry within 24 hours of any rainfall event, therefore, these lines cannot routinely be inspected for leakage.

XII. Attach geological/hydrological evidence demonstrating that disposal of oil field

wastes will not adversely impact fresh water:

The Unichem Blending plant is located in southeastern Lea County in the Llano Estacado part of the High Plains section (Nicholson and Clebsh, 1961). Mescalero Ridge, located south of Hobbs, marks the edge of the Llano Estacado. The Llano Estacado is a depositional surface of low relief that slopes uniformly southeastward. The land surface is characterized as a flat to gently sloping, treeless plain covered with short prairie grass. Shallow depressions and small sand dunes are the only significant relief features. There is no integrated drainage in southern Lea County; hence, there is no through-going drainage to the Pecos River, which is west and south of the area. All stream courses are ephemeral. Most of the rainfall runoff collects in shallow depressions where it remains until it seeps into the ground or evaporates.

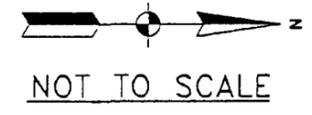
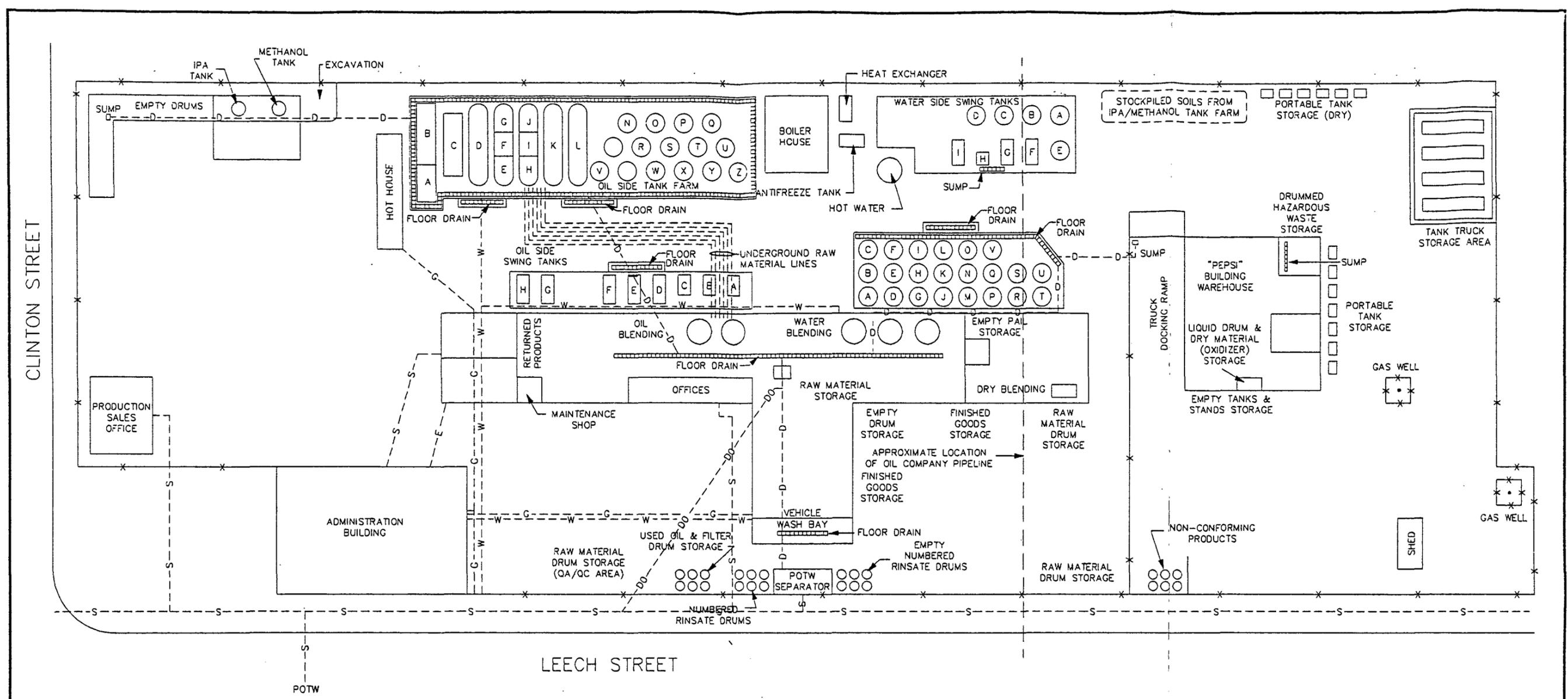
There are no bodies of water, streams, other watercourses or groundwater discharge sites within one mile of the Unichem Blending plant, other than the existing street and storm sewer systems surrounding the area.

There are records at the New Mexico State Engineer's Office of nine (9) water wells within one-half mile of the site. Water analyses to indicate total dissolved solids or other quality data are not available on these wells. Drilling records were available from the State Engineer's Office and these are included as Appendix H. These nine (9) wells are:

WELL OWNER	YEAR INSTALLED	DEPTH (FT.)	DISTANCE AND DIRECTION FROM SITE
T.V. Marks	1955	150	E - 1500'
R. Murdock	1953	136	ENE - 2500'
J.D. Hill	1952	102	SE - 1750'
B. Florence	1951	110	ENE - 2000'
C.B. Medlin	1955	80	W - 1000'
D. Wilson	1953	105	W - 1000'
Gulf Oil Co.	1952	95	WNW - 2400'
D. McClellan	1957	Unknown	WSW - 2500'
T. Schnaubert	1966	130	N - 1500'

Flood protection for the Unichem Blending plant is provided by means of grading

1/8" = 1'-0"
 CAD FILE: 226-03.DWG



LEGEND

---D---D---	DRAIN LINE
---DO---DO---	DRAIN LINE (NOT USED)
---E---E---	ELECTRICAL LINE
---G---G---	GAS LINE
---S---S---	SEWER LINE
---W---W---	WATER LINE

CARTER & BURGESS, INC.
 ENGINEERS - PLANNERS - SURVEYORS
 505 NORTH BIG SPRING/SUITE 600/MIDLAND, TEXAS 79701/(915) 687-2425

DWG. TITLE: UNICHEM INTERNATIONAL, INC.
 HOBBS PLANT

**UNDERGROUND UTILITIES
 SITE PLAN**

DESIGN:	DRAWN: MC	JOB NO. 9226
DATE: 7-7-92	AFE NO.	SHEET 1 of 1
SCALE: NONE	DWG. NO. B-9226-03	

FIGURE 4 - UNDERGROUND UTILITIES SITE PLAN

of the yard away from the blending plant, loading/unloading and storage areas, supplemented by the construction of concrete containments for the four (4) bulk storage tank farms, the loading/unloading area and the used drum storage area. Each of these containments is served by a sump and/or floor drain system which allows containment of the stormwater for testing by visual, olfactory and Ph determination before release to POTW. As mentioned previously, there has been only one occasion since the construction of the tank farm containments that stormwater was released to surface discharge without testing. This event occurred during what has been widely reported to be at least a 100-year return period storm event on Friday, May 22, 1992, and is documented in the memo enclosed as Appendix I.

During all other rainfall events, stormwater is effectively contained in those areas where chemical contamination is most likely to occur until the aforementioned testing can be carried out.

- XIII. Attach other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders:

This section is not applicable.

XIV. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: James H. Britton
Title: Vice President of Operations

Signature: James H. Britton Date: 7-20-92

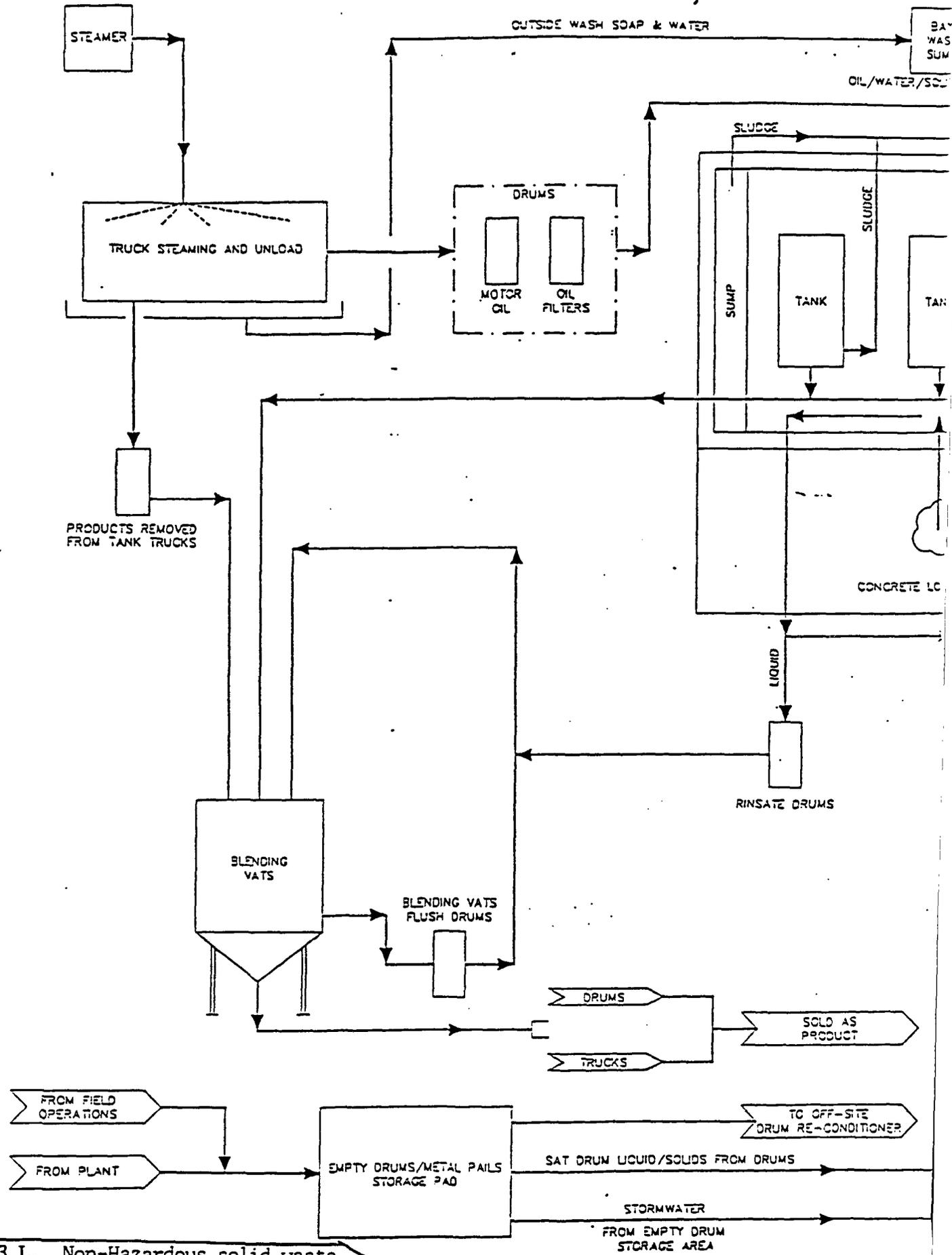
SUPPLEMENT TO SECTION VI

REFER TO BOOK 1 A THROUGH BOOK 1 I

APPENDIX A

UNICHEM INTERNATIONAL INC. "SOLUTIONS" BROCHURE

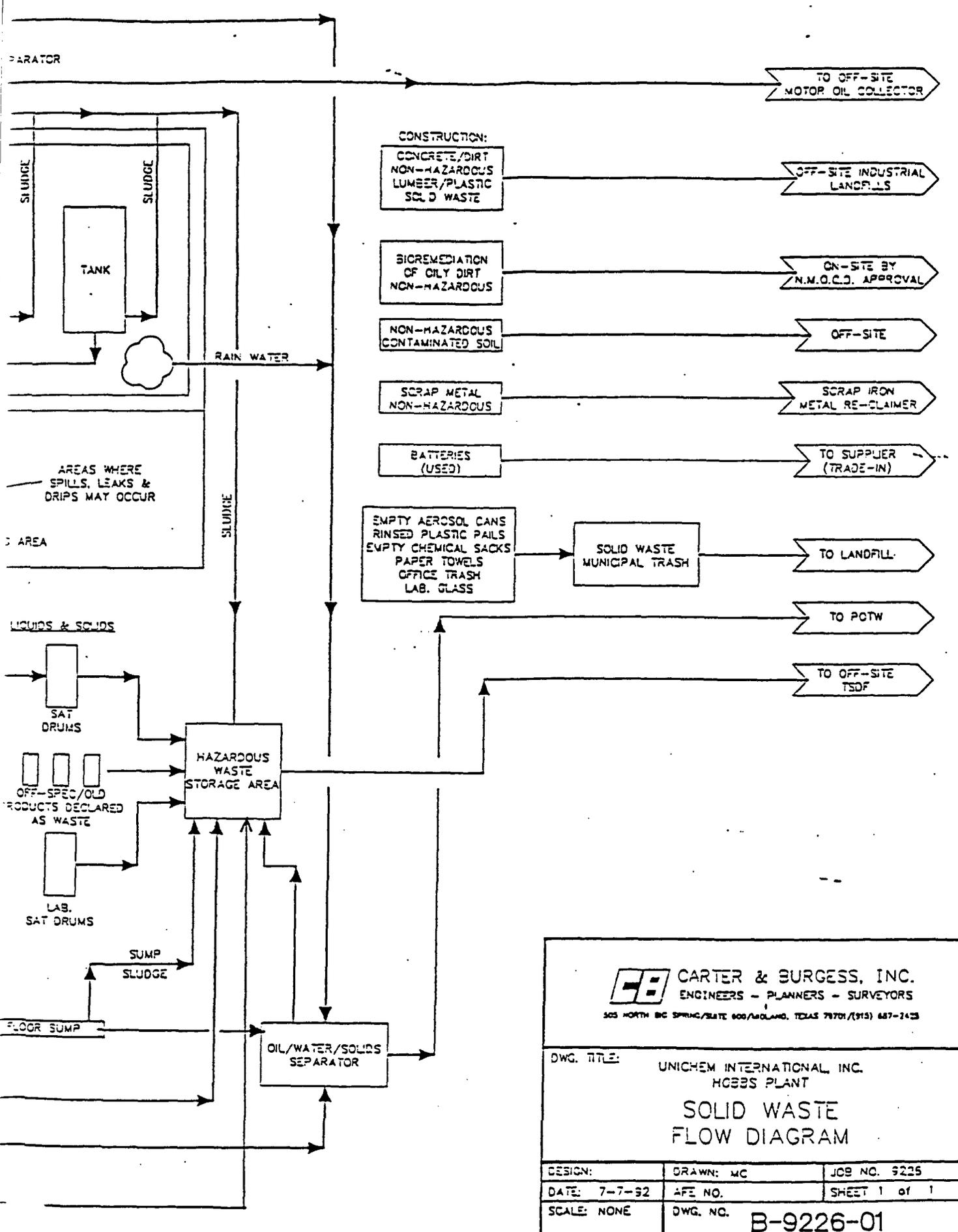
APPENDIX B
SOLID WASTE FLOW DIAGRAM



13 L. Non-Hazardous solid waste from outlying field operations located in New Mexico.

1/8" = 1'-0"
 CAD FILE: 226-01.DWG

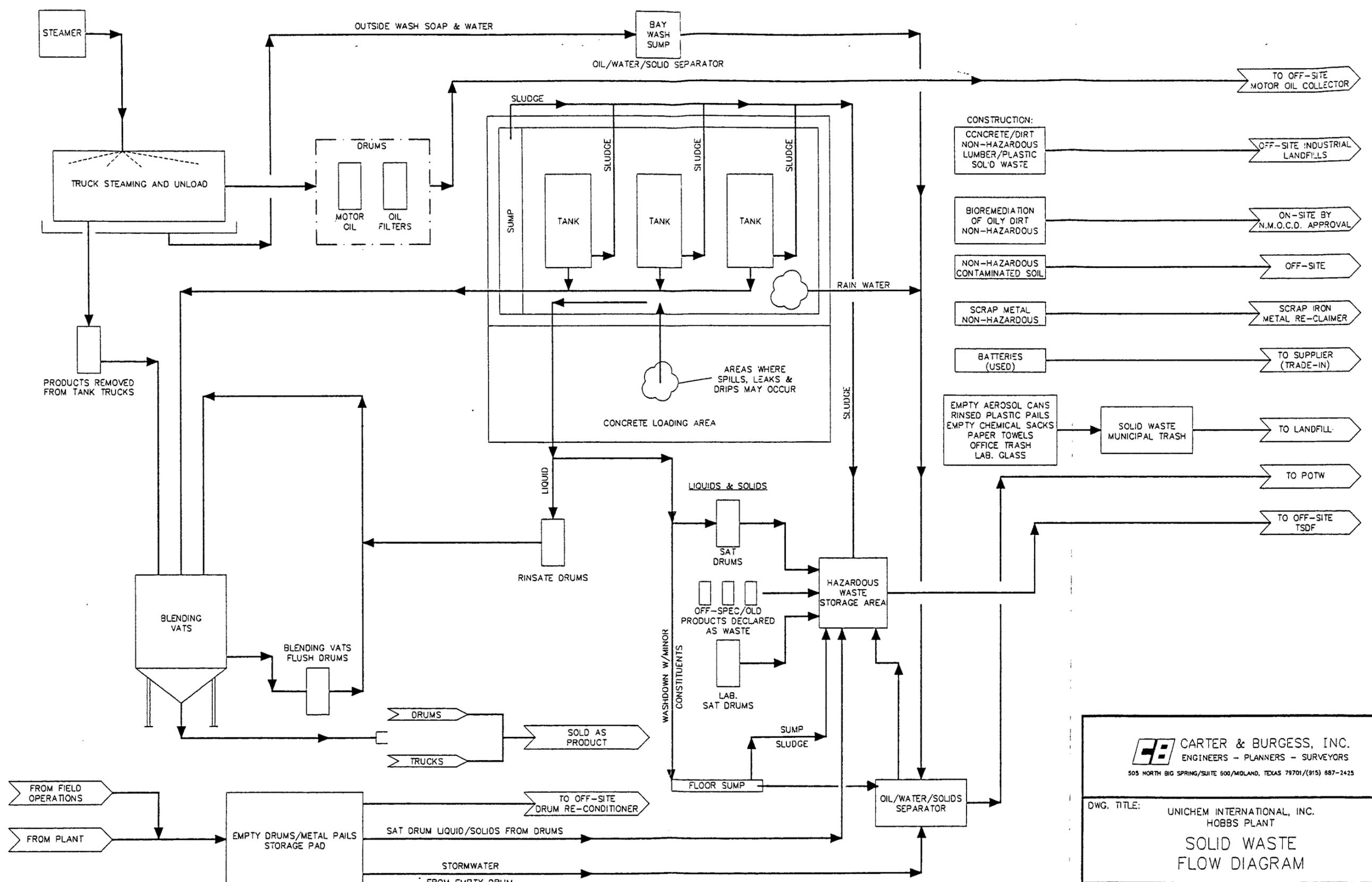
REVISED 12/2/92



CARTER & BURGESS, INC.
 ENGINEERS - PLANNERS - SURVEYORS
 505 NORTH BIC SPRING/SUITE 600/MOJAVE, TEXAS 76701/(817) 687-2425

DWG. TITLE: UNICHEM INTERNATIONAL, INC. HCBBS PLANT SOLID WASTE FLOW DIAGRAM		
DESIGN:	DRAWN: MC	JOB NO. 9225
DATE: 7-7-92	AFE NO.	SHEET 1 of 1
SCALE: NONE	DWG. NO.	B-9226-01

1/8" = 1'-0"
 CAD FILE: 226-01.DWG



CARTER & BURGESS, INC.
 ENGINEERS - PLANNERS - SURVEYORS
 505 NORTH BIG SPRING/SUITE 500/MIDLAND, TEXAS 79701/(915) 887-2425

DWG. TITLE: UNICHEM INTERNATIONAL, INC.
 HOBBS PLANT
SOLID WASTE FLOW DIAGRAM

DESIGN:	DRAWN: MC	JOB NO. 9226
DATE: 7-7-92	AFE NO.	SHEET 1 of 1
SCALE: NONE	DWG. NO. B-9226-01	

APPENDIX C

TABLE OF CONTENTS FOR QUALITY PROCESS MANAGEMENT MANUAL



TABLE OF CONTENTS

MISSION STATEMENT

QUALITY CIRCLE RECORDKEEPING ASSIGNMENTS

PRODUCT DEVELOPMENT

Product Development Flowchart
Approval of Product Formulations
Raw Material Purchasing Approval
Finished Product Formulation
Raw Material Purchasing Approval (Form)
Finished Product Formulation (Form)
Product Variation Approval (Form)

PURCHASING

Vendor Certification
Supplier Assessment

RECEIVING

Raw Material Acceptance Procedure- Bulk Loads
Raw Material Acceptance Procedure- Attachment #1-
 Incoming Bulk Tanker Shipment Check List
Raw Material Acceptance Procedure- Drums, Totes, Bags
Raw Material Acceptance Procedures- Non-Conforming Raw Materials
Raw Material Acceptance Procedures- Attachment #2-
 Non-Conformance Report
Contractor Safety Rules

Originated by: _____
Approved by: _____
Issued by: _____

Date: _____
Date: _____
Date: _____



MANUFACTURING

- Blending Flowchart
- Blending Paperwork Flowchart
- Manufacturing Procedures- Oil Department- General Blending Procedures
- Manufacturing Procedures- Water Side Blending
- Dry Blending Procedures
- Manufacturing Procedures For Five Gallon Blends- Oil and Water Department

SAMPLING

- Vat Sampling Procedure- Water Department
- Vat Sampling Procedure- Oil Department
- Sampling Procedures- Bulk Loading and Unloading

PACKAGING

- Packaging Operation- Loading Products Onto Tankers
- Packaging Operation- Procedure for Drumming Raw Materials From Tank to Drums- Water Department
- Packaging Operation- Procedure for Drumming Raw Materials From Tank to Drums- Oil Department- Using 15 Horse Pump
- Packaging Operation- Procedure For Drumming Raw Material From Tank- Oil Department- Free Flow Directly From Tank
- Packaging Operation- Procedure For Drumming Raw Materials From Tanker Compartments to Drums- Oil and Water Department
- Packaging Operation- Packaging Products Into Drums
- Packaging Operation- Packaging Products Into Swing Tanks- Oil Department
- Packaging Operation- Packing Products Into Tote Tank
- Procedure For Using Seals On All Unichem and Commercial Tankers

INSPECTIONS

- Inspection- Procedure for Bulk Tanks and Trailer Compartment
- Tank Inspection Check List (Form)
- Hose Inspection and Certification Program
- I.D. and Certification:
- Hose Inspection Sheet (Form)
- Care and Maintenance of Hose

Originated by: _____
Approved by: _____
Issued by: _____

Date: _____
Date: _____
Date: _____



LABELING

Labeling Procedures- For Drum, Holding Tanks, Tanker Compartments,
and Tote Tanks

MONITORING INVENTORY

Procedure for Monitoring Inventories
Attachment #1- Dock Numbers

EMPTY DRUMS

Procedure For Handling Empty Drums

MAP

Map of Unichem International

CALIBRATION

Plant Weight- Scales (Maintenance) Procedures
Weight Scale Run Chart (Form)
Certificate of Calibration (Examples)
Laboratory Scales Accuracy Testing Procedure
Lab Scales Accuracy Check Chart (Form)
Report of Test (Examples)
Weight Traceability Certificate (Examples)

SPILLS AND WASTE

POTW Waste Minimization Program
Leak and Spill Response

INTERNAL AUDITS

Customer Complaint Report (Form)
Customer Complaint Register (Form)

Originated by: _____
Approved by: _____
Issued by: _____

Date: _____
Date: _____
Date: _____



PERSONNEL TRAINING

- Employee Training Record Card (Form)
- Start Up Procedure For New Employees
- Drumming (Check List Form)
- Receiving Empty Drums at Hobbs Facility (Check List Form)
- Blender Training (Check List Form)

VERIFICATIONS (Scribe's Notebook Only)

- Verification of Receipts

FINISHED GOODS

- Manufacturing Procedure for ALPHA 133
- Manufacturing Procedures for TW447
- Manufacturing Procedures for TH793 and TH765
- Manufacturing Procedures for ALPHA 137 and ALPHA 139
- Key Quality Measures- Finished Goods- UNICHEM 1000
- Key Quality Measures- Finished Goods- UNICHEM 1200
- Key Quality Measures- Finished Goods- UNICHEM 1300
- Key Quality Measures- Finished Goods- UNICHEM 1600
- Key Quality Measures- Finished Goods- UNICHEM 1620
- Key Quality Measures- Finished Goods- UNICHEM 1700
- Key Quality Measures- Finished Goods- UNICHEM 1705
- Key Quality Measures- Finished Goods- UNICHEM 1710
- Key Quality Measures- Finished Goods- UNICHEM 2010
- Key Quality Measures- Finished Goods- UNICHEM 2015
- Key Quality Measures- Finished Goods- UNICHEM 2310
- Key Quality Measures- Finished Goods- UNICHEM 2315
- Key Quality Measures- Finished Goods- UNICHEM 2320
- Key Quality Measures- Finished Goods- UNICHEM 4000
- Key Quality Measures- Finished Goods- UNICHEM 4060
- Key Quality Measures- Finished Goods- UNICHEM 4100
- Key Quality Measures- Finished Goods- UNICHEM 7005
- Key Quality Measures- Finished Goods- UNICHEM 7025
- Key Quality Measures- Finished Goods- UNICHEM 7154

Originated by: _____
Approved by: _____
Issued by: _____

Date: _____
Date: _____
Date: _____



Key Quality Measures- Finished Goods- UNICHEM 7156
Key Quality Measures- Finished Goods- UNICHEM 7412
Key Quality Measures- Finished Goods- UNICHEM 9100

RAW MATERIALS

Key Quality Measures- Raw Materials- Benzotriazole
Key Quality Measures- Raw Materials- Borax
Key Quality Measures- Raw Materials- Caustic Potash 45%
Key Quality Measures- Raw Materials- Chemphos H
Key Quality Measures- Raw Materials- Dequest 2010
Key Quality Measures- Raw Materials- DMAD
Key Quality Measures- Raw Materials- duPont K/A
Key Quality Measures- Raw Materials- Mono Potassium Dihydrogen Phosphate
Key Quality Measures- Raw Materials- Sodium Bisulfite/Sodium Metabisulfite
Key Quality Measures- Raw Materials- Primene 81R
Key Quality Measures- Raw Materials- Sodium Hexametaphosphate
Key Quality Measures- Raw Materials- Sodium Nitrate
Key Quality Measures- Raw Materials- Sodium Nitrite
Key Quality Measures- Raw Materials- Sodium Sulfite
Key Quality Measures- Raw Materials- Sodium Tripolyphosphate
Key Quality Measures- Raw Materials- Tetra Potassium Pyrophosphate
Key Quality Measures- Raw Materials- Water
Key Quality Measures- Raw Materials- Witco 1247H

ANALYTICAL PROCEDURES

Analytical Procedures- Chloride Measurement
Analytical Procedures- Density Measurement
Analytical Procedures- Imidazoline to Amide Ratio Measurement
Analytical Procedures- pH Measurement
Analytical Procedures- Quaternary Ammonium Compound Measurement
Analytical Procedures- Sodium Nitrite Measurement
Analytical Procedures- Solids Bu Evaporation Measurement
Analytical Procedures- Total Acid Number Measurement
Analytical Procedures- Total Amine Value Measurement
Analytical Procedures- Total Phosphate Measurement
Analytical Procedures- Water Hardness Measurement

Originated by: _____
Approved by: _____
Issued by: _____

Date: _____
Date: _____
Date: _____

APPENDIX D

WATER QUALITY ANALYSES OF WATERS DISCHARGED TO POTW



Home Office-707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

February 20, 1992

Mr. Arkie Wheeler
Hobbs Utilities Manager
City of Hobbs
300 N. turner
Hobbs, NM 88240

Dear Mr. Wheeler:

**Industrial User Notification submitted pursuant
to 40 CFR 403.12 (h)**

Please consider this letter as a significant non-categorical industrial user six month notification submitted on behalf of Unichem International, Inc. ("Unichem") pursuant to Federal Regulation at 40 CFR 403.12 (h). This section requires that a significant non-categorical industrial user shall submit to the Control Authority, at least once every six months, a description of the nature, concentration and flow of the pollutants required to be reported by the Control Authority.

Attached are the Hobbs Plant wastewater analysis and log records in which we have kept records on a daily basis from August 21, 1991 to date. We estimate our flow to be approximately 5000 gallons per day.

Also enclosed are the conventional pollutants, metals, and significant organics taken during the months of January and February of 1992.

If you have any questions, please feel free to contact me at any time.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price
Staff Engineer

LWP:jd

Enc.

cc: J. Britton
C. Root
L. Gardner
Environmental File

INTERNATIONAL

DATE 1992

STATION MEXICO 88340

Outside Sump

- 1-27-92 - 7.30 - A.M. - water white clear
1-27-92 - 7.25 - P.M. - water white clear
1-28-92 - 7.27 - A.M. - slight haze, small trace of fallout.
1-28-92 - 7.36 - P.M. - slight haze, small trace of fallout
1-28-92 - 7.25 - A.M. - water white clear
1-27-92 - 7.04 - P.M. - slight haze, no fallout.
1-30-92 - 7.18 - A.M. - water white clear
1-30-92 - 6.71 - P.M. - slight haze, no fallout.
2-3-92 - 6.40 - A.M. - water white clear
2-3-92 - 6.49 - P.M. - slight haze, small trace of fallout.
2-4-92 - 6.79 - A.M. - slight haze, no fallout.
2-4-92 - 7.37 - P.M. - slight haze, small trace of fallout.
2-5-92 - 7.03 - A.M. - slight haze, no fallout.
2-5-92 - 6.76 - P.M. - slight haze
2-6-92 - 6.72 - A.M. - slight haze, small trace of fallout.
2-6-92 - 6.78 - P.M. - Hazy, small trace of fallout.
2-7-92 - 7.30 - A.M. - water white clear
2-7-92 - 7.15 - P.M. - Hazy, small trace of fallout
2-10-92 - 7.63 - A.M. - Hazy, white, no fallout, no sig
2-10-92 - 7.15 - P.M. - Hazy, white, small trace of fallout, no sig. of liquid
2-11-92 - 7.67 - A.M. - Hazy, white, small trace of fallout, no sig. of liquid
2-11-92 - 7.29 - P.M. - Hazy, 1% fallout
2-12-92 - 6.85 - A.M. - water white clear
2-12-92 - 6.94 - P.M. - water white clear
2-13-92 - 6.89 - A.M. - slight haze, no fallout
2-13-92 - 6.87 - P.M. - Hazy, no fallout, no sig
2-14-92 - 6.84 - A.M. - Hazy, small trace of fallout
2-14-92 - 6.60 - P.M. - slight haze, no fallout
2-17-92 - 6.71 - P.M. - slight haze, no fallout
2-18-92 - 6.77 - A.M. - very slight haze, no fallout
2-19-92 - 6.70 - ~~P.M.~~ - water white clear

Out side Sunp

- 12-27-91 - 7.07 - A.M. - slight haze, no fallout.
 12-27-91 - 7.09 - P.M. - Heavy mist - no fallout no fog
 12-30-91 - 7.39 - A.M. - Slight haze, no fallout
 12-30-91 - 7.42 - P.M. - Turbidity, 2% fallout, possibly dirt
 12-31-91 - 7.45 - A.M. - Very cloudy, 1 1/2 fallout
 12-31-91 - 7.23 - P.M. - Heavy no fallout
 1-1-92 7.35 - A.M. - heavy small trace of fallout
 1-2-92 - 7.29 - P.M. - water white clear
 1-3-92 - 8.15 - A.M. - slight haze, small trace of fallout
 1-3-92 - 8.06 - P.M. - slight haze, small trace of fallout
 1-6-92 - 6.90 - A.M. - heavy, small trace of fallout.
 1-6-92 - 7.17 - P.M. - heavy, small trace of fallout
 1-7-92 - 7.20 - A.M. - slight haze, small trace of fallout
 1-7-92 - 7.43 - P.M. - slight haze, no fallout
 1-8-92 - 7.40 - A.M. - slight haze, no fallout.
 1-8-92 - 7.48 - P.M. - slight haze, no fallout
 1-9-92 - 7.27 - A.M. - very slight haze, no fallout.
 1-10-92 - 7.21 - A.M. - water white clear - no fallout.
 1-10-92 - 7.01 - P.M. - slight haze, small trace of fallout.
 1-13-92 - 7.10 - A.M. - Very Heavy, 1 1/2 fallout
 1-13-92 - 6.64 - P.M. - Heavy, small trace of fallout
 1-14-92 - 6.74 - A.M. - slight haze, no fallout
 1-14-92 - 7.07 - P.M. - slight haze, no fallout
 1-15-92 - 7.10 - A.M. - slight haze, small trace of fallout.
 1-15-92 - 7.89 - P.M. - slight haze, small trace of fallout
 1-16-92 - 7.31 - A.M. - slight haze, no fallout
 1-16-92 - 6.98 - P.M. - Heavy, no fallout
 1-17-92 - 7.29 - 7.53 A.M. - slight haze, no fallout
 1-20-92 - 7.40 - P.M. - slight haze, no fallout
 1-21-92 - 7.01 - A.M. - water white clear
 1-21-92 - 6.86 - P.M. - water white clear
 1-22-92 - 7.31 - A.M. - water white clear
 1-22-92 - 7.21 - P.M. - very slight haze no fallout.
 1-27-92 - 7.49 - A.M. - water white clear
 1-23-92 - 6.91 - P.M. - slight haze, no fallout
 1-24-92 - 7.25 - A.M. - water white clear

Outside Camp

- 10-31-91 - 7.03 - P.M. - Hazy, small trace of fallout
- 10-31-91 - 7.12 - A.M. - Hazy, 0.1% fallout of a white substance
- 10-31-91 - 7.14 - P.M. - Slight haze, 0.2% fallout of a brown substance
- 11-1-91 - 7.15 - A.M. - very slight haze, small trace of fallout
- 11-1-91 - 7.07 - P.M. - slight haze, small trace of fallout
- 11-2-91 - 7.00 - A.M. - water white clear
- 11-4-91 - 7.26 - P.M. - water white clear
- 11-5-91 - 7.21 - A.M. - water white clear
- 11-5-91 - 7.07 - P.M. - water white clear
- 11-6-91 - 6.85 - A.M. - water white clear
- 11-6-91 - 6.67 - P.M. - Very slight haze, no fallout
- 11-7-91 - 6.80 - A.M. - water white clear
- 11-7-91 - 6.79 - P.M. - Hazy, a lot of dirt in the sample, 0% fallout
- 11-8-91 - 6.80 - A.M. - H₂O slight haze
- 11-8-91 - 6.85 - P.M. - H₂O clear
- 11-9-91 - 5.90 - A.M. - H₂O clear
- 11-11-91 - 5.90 - P.M. - H₂O clear
- 11-12-91 - 6.09 - A.M. - slight haze
- 11-12-91 - 6.22 - P.M. - slight haze
- 11-13-91 - 6.34 - A.M. - slight haze
- 11-13-91 - 6.29 - P.M. - slight haze
- 11-14-91 - 6.22 - A.M. - Turbidity, no fallout, no separation
- 11-14-91 - 6.57 - P.M. - Hazy, small trace of fallout
- 11-15-91 - 6.59 - A.M. - slight haze, no fallout
- 11-15-91 - 6.54 - P.M. - Hazy, small trace of fallout
- 11-16-91 - 6.65 - A.M. - very slight haze, no fallout
- 11-16-91 - 7.15 - P.M. - water white clear
- 11-19-91 - 6.98 - A.M. - water white clear
- 11-19-91 - 7.34 - P.M. - water white clear
- 11-20-91 - 7.16 - A.M. - slight haze, no fallout
- 11-20-91 - 7.30 - P.M. - Hazy, small trace of fallout, no separation
- 11-21-91 - 6.85 - A.M. - Hazy, very small trace of fallout, no sep. in liquid
- 11-21-91 - 6.87 - P.M. - Hazy, no fallout, no separation
- 11-22-91 - 7.01 - A.M. - Hazy, no fallout, no separation
- 11-23-91 - 7.07 - P.M. - slight haze, no fallout

Net size Sump

- 7-1-91 - 2.31 - A.M. - Slight haze, small trace of fallout
- 7-1-91 - 2.30 - P.M. - Slight haze, small trace of fallout.
- 7-7-91 - 7.10 - A.M. - water white clear.
- 7-7-91 - 6.56 - P.M. - Very slight haze, small trace of fallout.
- 7-8-91 - 7.06 - A.M. - Slight haze, small trace of fallout.
- 7-8-91 - 2.08 - P.M. - Slight haze, small trace of fallout.
- 7-9-91 - 6.97 - A.M. - Very slight haze, no fallout.
- 7-9-91 - 6.87 - P.M. - Slight haze, no fallout.
- 7-10-91 - 6.98 - A.M. - Very slight haze, no fallout.
- 7-10-91 - 7.35 - P.M. - water clear.
- 7-11-91 - 7.21 - A.M. - water clear, no fallout.
- 7-10-91 - 7.79 - P.M. - haze, small trace of fallout.
- 7-14-91 - 6.52 - A.M. - Very slight haze, no fallout.
- 7-14-91 - 7.58 - P.M. - water clear.
- 7-15-91 - 7.35 - A.M. - water clear.
- 7-15-91 - 6.98 - P.M. - water clear.
- 7-16-91 - 6.99 - A.M. - water clear.
- 7-16-91 - 7.10 - P.M. - water clear.
- 7-17-91 - 7.10 - A.M. - Very slight haze, no fallout.
- 7-17-91 - 7.37 - P.M. - haze, small trace of fallout.
- 7-18-91 - 7.23 - A.M. - water clear.
- 7-18-91 - 7.08 - P.M. - very slight haze, no fallout.
- 7-21-91 - 6.66 - A.M. - water white clear, no fallout.
- 7-21-91 - 6.47 - P.M. - Slight haze, no fallout.
- 7-22-91 - 6.30 - A.M. - very slight haze, small trace of fallout.
- 7-22-91 - 6.42 - P.M. - very slight haze, no fallout.
- 7-23-91 - 6.29 - A.M. - very slight haze, no fallout.
- 7-23-91 - 6.30 - P.M. - Slight haze, small trace of fallout.
- 7-24-91 - 7.0 - A.M. - Slight haze, small trace of fallout.
- 7-24-91 - 6.71 - P.M. - Slight haze, small trace of fallout.
- 7-25-91 - 6.97 - A.M. - Slight haze, small trace of fallout.
- 7-25-91 - 6.55 - P.M. - Hazy, small trace of fallout, no separation.
- 7-25-91 - 7.07 - A.M. - water white clear, no fallout.
- 7-25-91 - 6.54 - P.M. - Very slight haze, no fallout.
- 7-29-91 - 6.77 - A.M. - Water white clear, no fallout.
- 7-29-91 - 6.99 - P.M. - Slight haze, no fallout.
- 7-29-91 - 6.55 - A.M. - Very slight haze, no fallout.

Outside

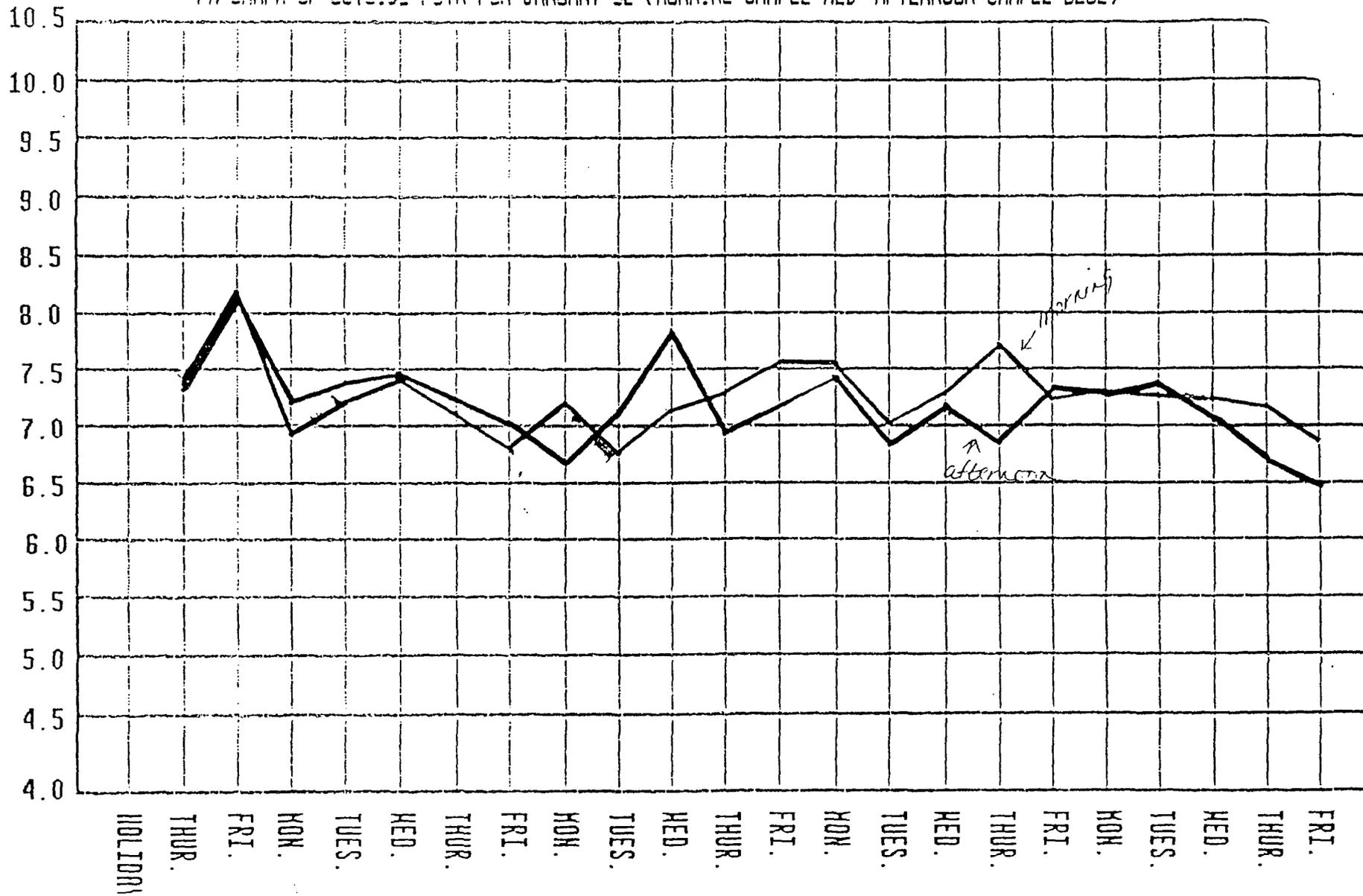
~~Inside~~

- 8-10-91 - 7:27 - A.M. - water-white clear
- 8-10-91 - 6:29 - P.M. - water-white
- 8-11-91 - 6:64 - A.M. - water-white clear
- 8-11-91 - 6:52 - P.M. - water-white clear
- 9-12-91 - 7:34 - A.M. - slight haze, small trace of fallout
- 9-12-91 - 7:07 - P.M. - hazy, 3% fallout of a white powdery substance
- 9-13-91 - 7:11 - water clear, no fallout
- 9-16-91 - 7:54 - ~~7:54~~ A.M. - water clear, no fallout
- 9-16-91 - 8:10 - slight haze, small trace of fallout
- 9-17-91 - 8:15 - A.M. - slight haze, no fallout
- 9-17-91 - 6:80 - P.M. - very slight haze, no fallout
- 9-18-91 - 6:91 - A.M. - water white clear, no fallout
- 9-18-91 - 6:67 - P.M. - water white clear
- 9-19-91 - 6:74 - A.M. - water white clear
- 9-19-91 - 6:95 - P.M. - water white clear
- 9-20-91 - 8:19 - A.M. - Hazy, 2% fallout
- 9-20-91 - 6:86 - P.M. - slight haze, no fallout
- 9-23-91 - 6:96 - A.M. - slight haze, small trace of fallout
- 9-27-91 - 6:50 - P.M. - water white clear
- 9-28-91 - 6:92 - A.M. - slight haze, small trace of fallout
- 9-24-91 - 6:72 - P.M. - light haze, 2% fallout of a brown substance
Presumably dirt.
- 9-25-91 - 6:55 - A.M. - slight haze, .005% fallout
- 9-25-91 - 7:13 - P.M. - slight haze, small trace of fallout
- 9-26-91 - 7:03 - A.M. - slight haze, small trace of fallout
- 9-26-91 - 6:79 - P.M. - Hazy, 10% fallout
- 9-27-91 - 6:72 - A.M. - slight haze, small trace of fallout
- 9-27-91 - 7:22 - P.M. - hazy, small trace of fallout
- 9-30-91 - 6:49 - A.M. - slight haze, small trace of fallout
- 10-1-91 - 7:32 - P.M. - slight haze, small trace of fallout
- 10-1-91 - 7:13 - A.M. - slight haze, small trace of fallout
- 10-2-91 - 7:01 - P.M. - water white clear
- 10-2-91 - 6:41 - A.M. - water white clear
- 10-2-91 - 7:25 - P.M. - slight haze, no fallout

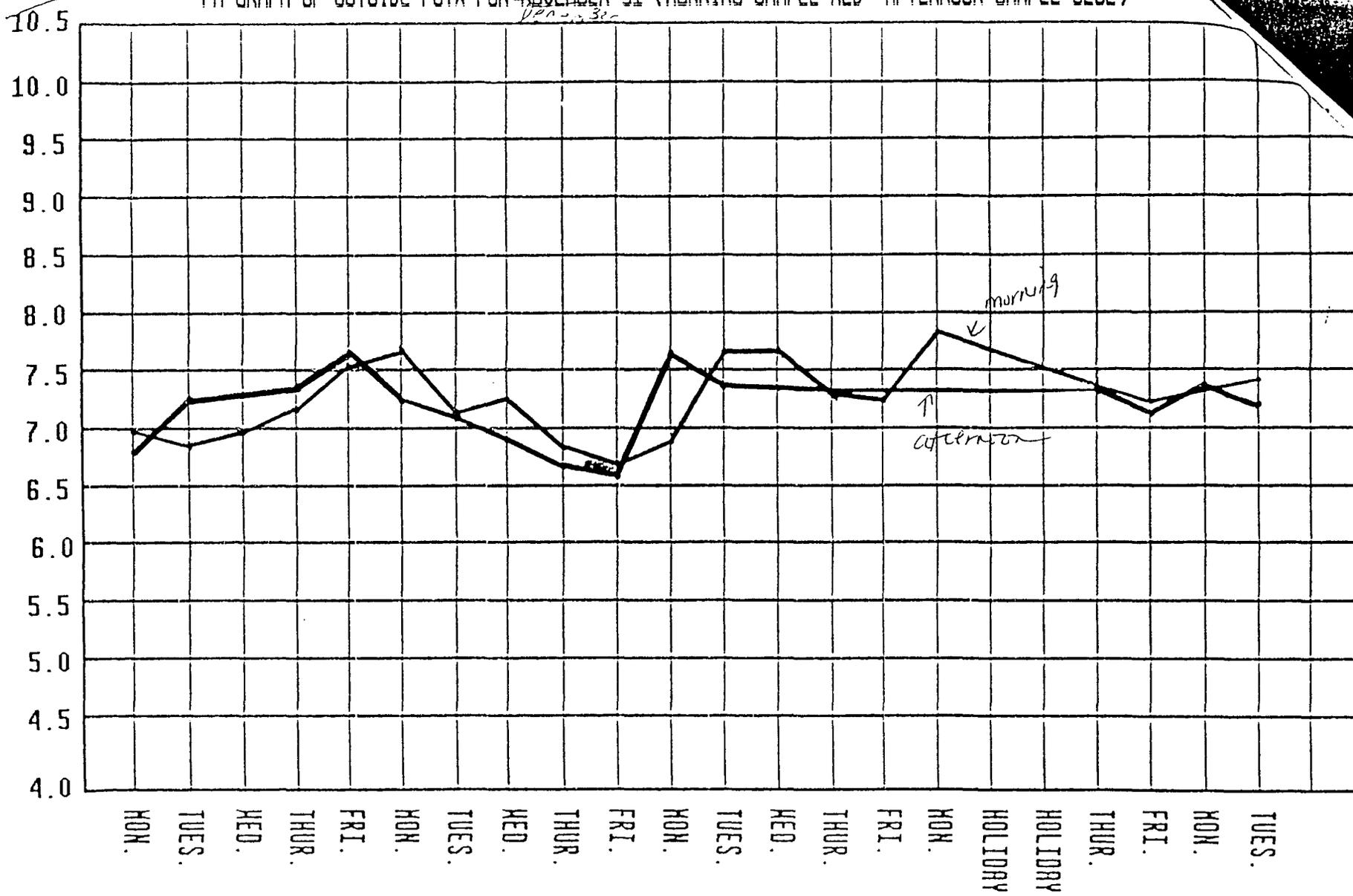
Outside Survey

- 8-14-91 - 6.57 - P.M. - slight haze, small trace of fallout
8-15-91 - 7.07 - A.M. - water white clear
8-16-91 - 7.31 - A.M. - very slight haze, no fallout
8-16-91 - 7.25 - P.M. - very slight haze, no fallout
8-19-91 - 7.15 - A.M. - water white clear
8-17-91 - 6.54 P.M. - Very turbid, no fallout, no separation of liquids
~~8-18-91 - 7.13~~ - Possible green polyene coats from soil bag
8-20-91 - 7.73 - A.M. - slight haze, small trace of fallout
8-20-91 - 7.74 - P.M. - haze, small trace of fallout
8-21-91 - 6.83 - A.M. - Hazy, small trace of fallout
8-21-91 - 7.30 - P.M. - Hazy, small trace of fallout
8-21-91 - 7.33 - A.M. - slight haze, no fallout
8-22-91 7.26 P.M. Slight haze, no fallout
8-23-91 7.28 A.M. slight haze, no fallout
8-23-91 6.53 P.M. slight haze, trace fallout
8-24-91 7.35 A.M. - water white clear
8-26-91 - 7.37 - P.M. - water white clear
8-27-91 - 7.51 - A.M. - water white clear
8-27-91 - 8.38 - P.M. - slight haze, no fallout
8-28-91 - 7.74 - A.M. - water white clear
8-28-91 - 7.91 - P.M. - slight haze, no fallout
8-28-91 - 7.87 - A.M. - slight haze, 2% fallout
8-29-91 - 7.40 - P.M. - slight haze, no fallout
8-29-91 - 7.53 A.M. - slight haze, small trace of fallout
8-30-91 - 7.70 - P.M. - slight haze, no fallout
9-2-91 - 7.09 - A.M. - water white clear
9-3-91 - 6.65 - P.M. - haze, small trace of fallout
9-4-91 - 6.31 - A.M. - very slight haze, no fallout
9-4-91 - 7.02 - P.M. - water white clear
9-5-91 - 7.17 - A.M. - water white clear
9-5-91 - 7.24 - P.M. - water white clear
9-6-91 - 7.20 - A.M. - slight haze, small trace of fallout
9-6-91 - 7.01 - P.M. - water clear, no fallout
9-9-91 - 7.11 - A.M. - water white clear
9-9-91 - 7.40 - P.M. - slight haze, no fallout. haze may be due to heavy
movement of water due to pumping at the site water

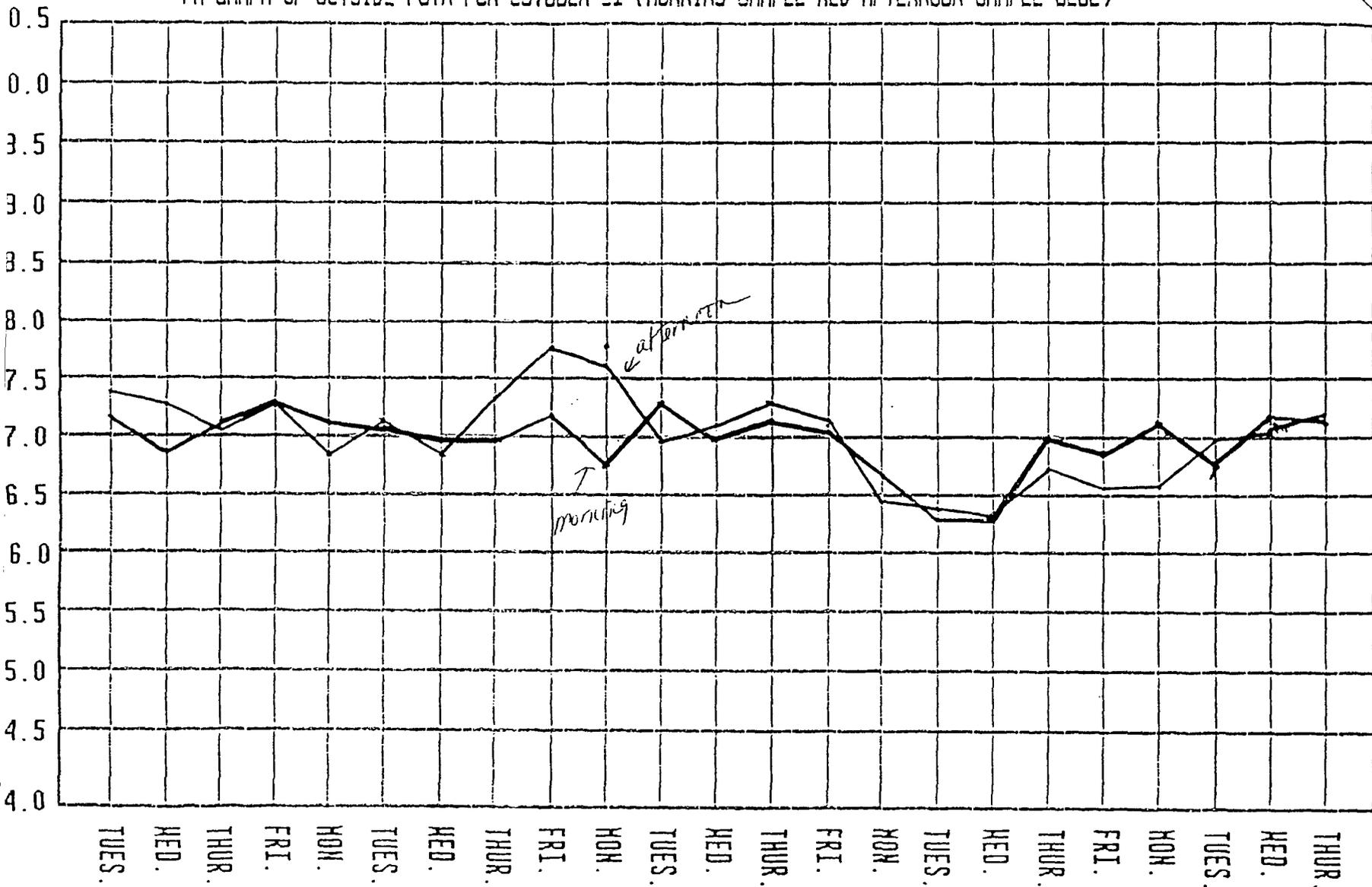
PH GRAPH OF OUTSIDE POTW FOR JANUARY 92 (MORNING SAMPLE-RED AFTERNOON SAMPLE-BLUE)



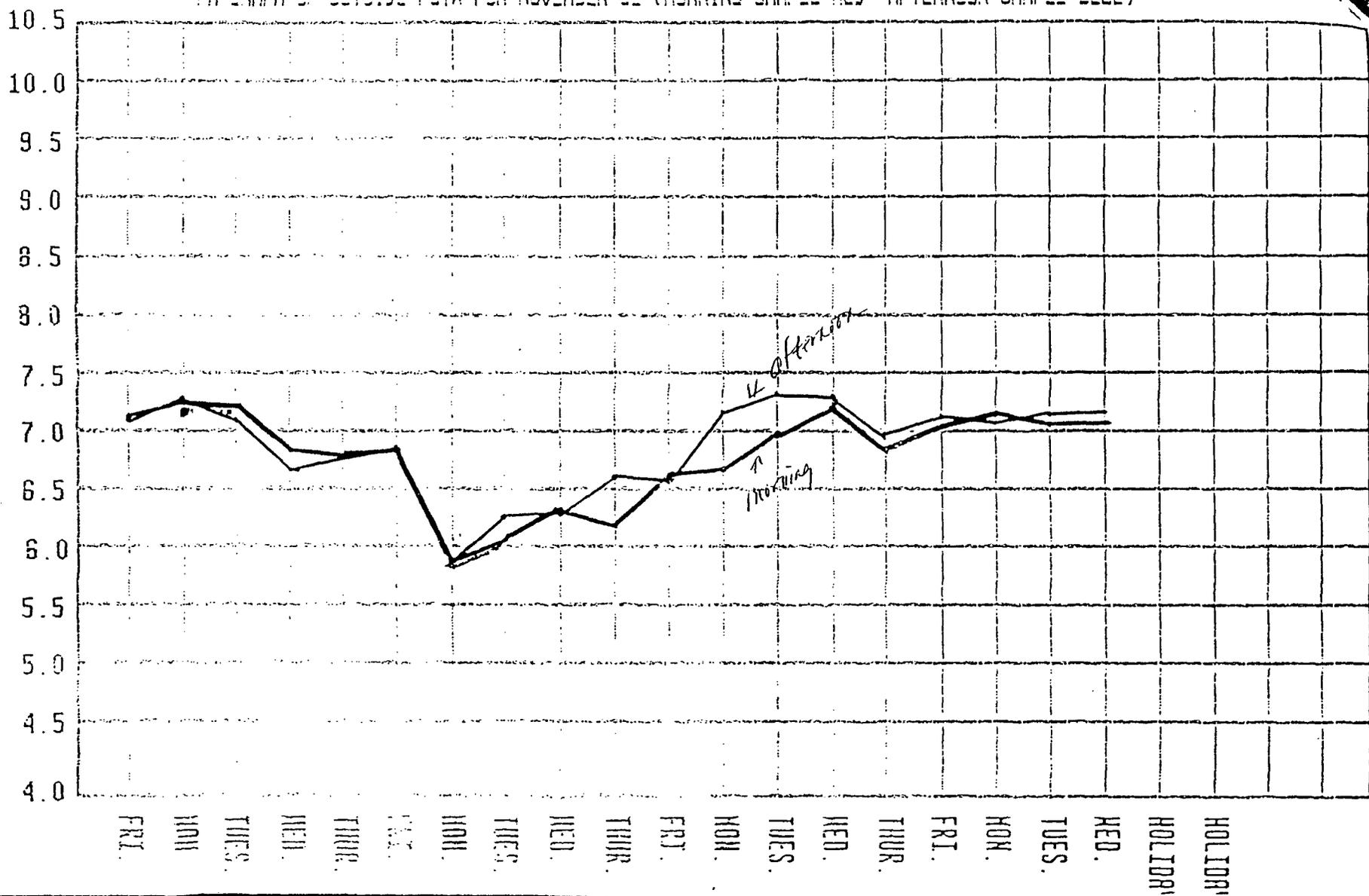
PH GRAPH OF OUTSIDE POTH FOR NOVEMBER 91 (MORNING SAMPLE-RED AFTERNOON SAMPLE-BLUE)



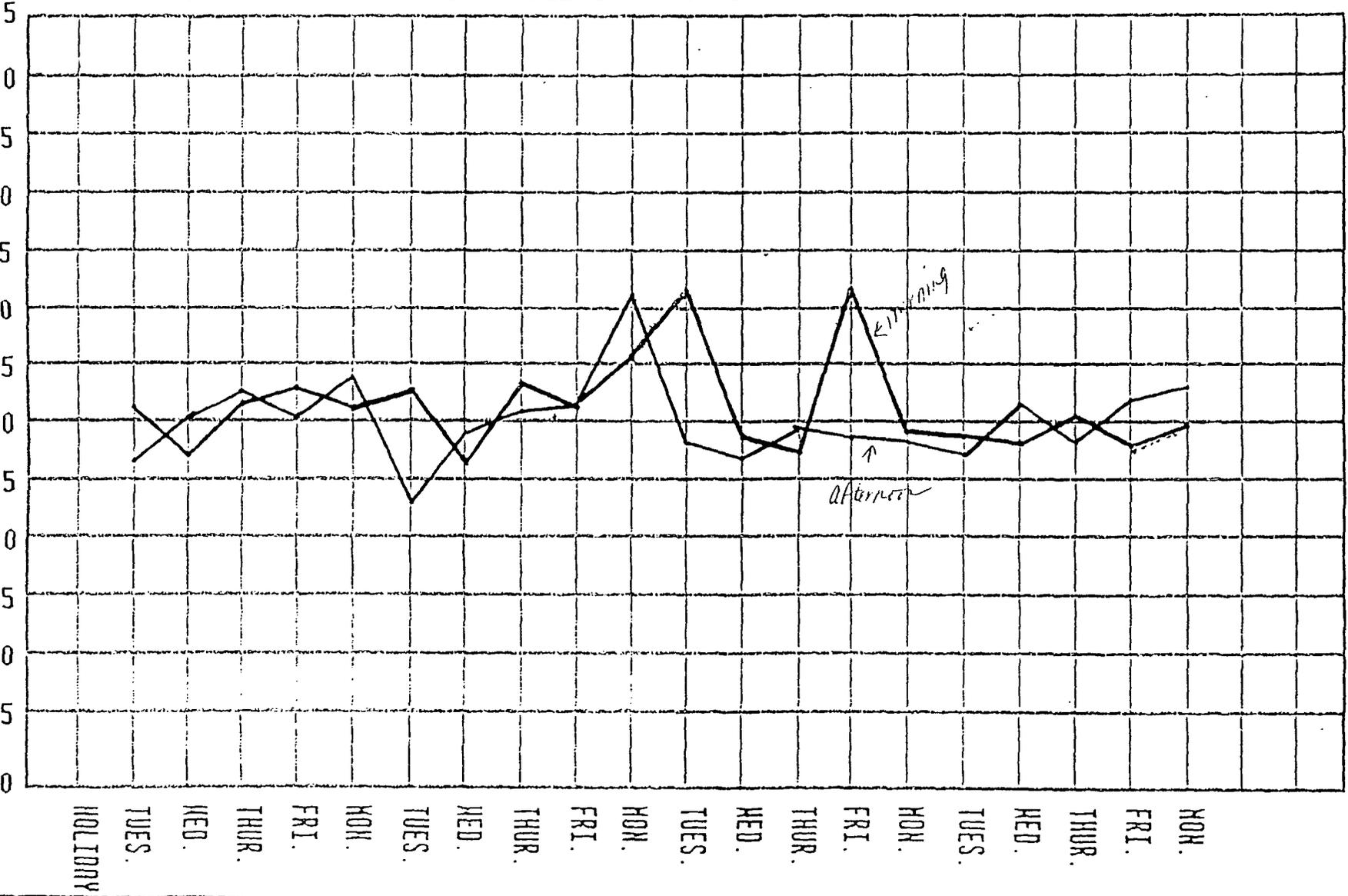
PH GRAPH OF OUTSIDE POTH FOR OCTOBER 91 (MORNING SAMPLE-RED AFTERNOON SAMPLE-BLUE)



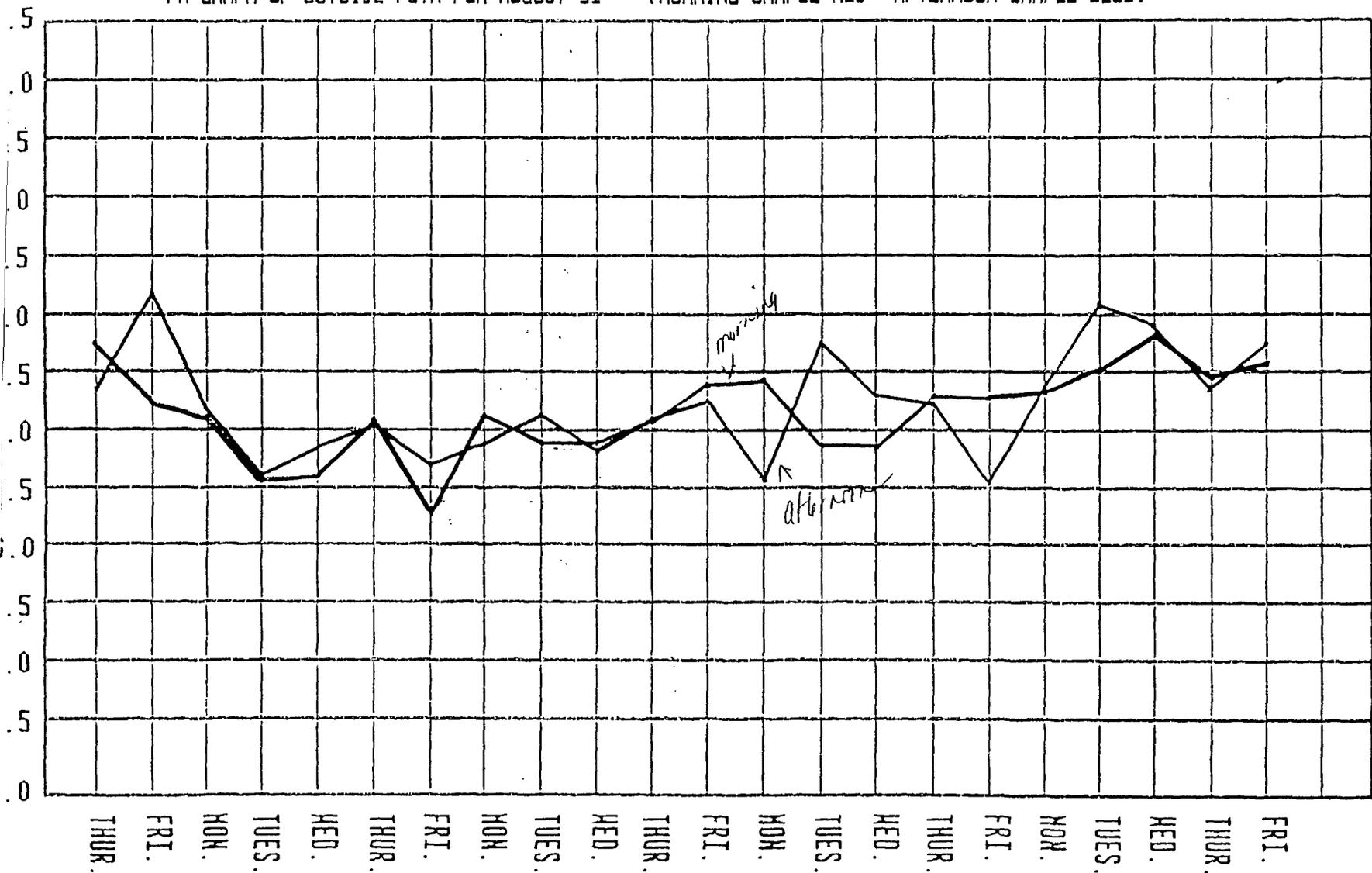
PH GRAPH OF OUTSIDE POTW FOR NOVEMBER 91 (MORNING SAMPLE-RED AFTERNOON SAMPLE-BLUE)



PH GRAPH OF OUTSIDE POTX FOR SEPTEMBER 91 (MORNING SAMPLE-RED AFTERNOON SAMPLE-BLUE)



PH GRAPH OF OUTSIDE POTW FOR AUGUST 91 (MORNING SAMPLE-RED AFTERNOON SAMPLE-BLUE)





Lubbock Christian University Institute of Water Research

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(806) 796-8900

ANALYTICAL RESULTS FOR
UNICHEM INTERNATIONAL, INC.
Attention: Wayne Price
P. O. Box 1499
Hobbs, NM 88240

January 23, 1992
Receiving Date: 1/14/92
Sample Type: Liquid
Project No: MI-HW-92-WW
Project Location: Hobbs Plant

Sampling Date: 1/13/92
Sample Condition: Intact & Cool
Sample Received by: YL
Project Name: Discharge Wastewater
to POTW

LCUIWR #	Field Code	pH (S.U.)	Oil & Grease (ppb)	TSS (mg/l)	BOD (mg/l)	COD (mg/l)	-----TOTAL METALS-----			
							Zinc (ppm)	Iron (ppm)	Pb (ppm)	Copper (ppm)
Y35358	Comp. of #1A, #1B, #1C, #1D, #1E	7.31	140,048	89	675	1,077	0.78	2.34	<0.1	<0.05
QC	Quality Control	7.06	83,034	---	---	605.4	0.97	4.80	4.90	0.98
% Precision		100	NR	94	98	95	94	94	100	94
% Extraction Accuracy		---	102	---	---	---	NR	NR	NR	NR
% Instrument Accuracy		100	100	---	114	101	97	96	98	98
				TOTAL XYLENES (ppb)			PHENOLS (ppm)			
Y35358	Comp. of #1A, #1B, #1C, #1D, #1E			1,949			<0.5			
QC	Quality Control			629			0.5			
% Precision				100			100			
% Extraction Accuracy				102			---			
% Instrument Accuracy				105			100			

METHODS: EPA 600/4-79-020.

QC: Blank Spiked with 5.00 ppm Pb, Fe; 1.00 ppm Zn, Cu; 600 mg/l COD; 0.5 mg/l PHENOLS;

Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

1-24-91

Date



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ANALYTICAL RESULTS FOR
UNICHEM INTERNATIONAL, INC.
Attention: Wayne Price
P. O. Box 1499
Hobbs, NM 88240

February 20, 1992
Receiving Date: 2/10/92
Sample Type: Liquid
Project No: UI-HW-92-WW
Project Location: Hobbs Plant

Sampling Date: 2/10/92
Sample Condition: Intact & Cool
Sample Received by: McD
Project Name: Discharge Wastewater
to POTW

LCUIWR #	Field Code	pH (s.u.)	Oil & Grease (ppb)	TSS (mg/l)	BOD (mg/l)	COD (mg/l)	-----TOTAL METALS-----			
							Zinc (ppm)	Iron (ppm)	Pb (ppm)	Copper (ppm)
Y36407	Discharge	6.65	28,205	778	Re-running	1,424	1.15	1.05	<0.1	<0.05
QC	Quality Control	7.03	83,083	---		624.8	1.04	1.00	4.9	1.00
% Precision		100	---	100		99	96	98	100	97
% Extraction Accuracy		---	106	---		---	---	---	---	---
% Instrument Accuracy		100	100	---		104	104	100	98	100

LCUIWR #	Field Code	TOTAL XYLENES (ppb)		PHENOLS (ppm)	
		Y36407	Discharge	1,949	<0.5
QC	Quality Control	593	0.5		
% Precision		100		100	
% Extraction Accuracy		96		---	
% Instrument Accuracy		99		100	

METHODS: EPA SW 846-3810 USING AUTOMATED HEAD SPACE; EPA SW 846-8020, 3020, 6010; EPA 600/4-79-020.
QC: Blank Spiked with 5.0 ppm Pb; 1.00 ppm Zn, Cu, Fe; 600 mg/l COD; 0.5 mg/l PHENOLS; 600 ppb XYLENES.



Director, Dr. Blair Leftwich
Asst. Dir., Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghighi-Podeh

2-20-92
Date



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ANALYTICAL RESULTS FOR
UNICHEM INTERNATIONAL
Attention: Linda Gardner
707 N. Leech
Hobbs, NM 38240

July 06, 1992
Receiving Date: 06/29/92
Sample Type: Liquid
Project No: 6-29-92
Project Location: Hobbs Plant

Analysis Date: 06/30/92
Sampling Date: 06/29/92
Sample Condition: Intact & Cool
Sample Received by: McD
Project Name: Hobbs Plant Discharge
Waste Water to POTW
Oil &

LCUIWR #	Field Code	TOTAL METALS (ppm)									
		Pb	Zn	Cu	COD (mg/l)	PHENOL (mg/l)	pH (s.u.)	BOD5 (mg/l)	TSS (mg/l)	Grease (ppb)	XYLENES (ppm)
Y42996	Composite of #1- #1E	<0.1	0.74	<0.1	464	<1.0	6.73	99	47	45.7	0.28
QC	Quality Control	5.24	0.98	1.03	413	1.05	7.02	---	---	34.4	0.595
% Precision		100	100	100	97	100	100	98	97	---	100
% Extraction Accuracy		104	---	---	---	---	---	---	---	105	98
% Instrument Accuracy		105	98	103	103	105	100	---	---	103	100

METHODS: EPA SW 846-3020, 6010, 8020; EPA 600/4-79-020; EPA 413.2.
QC: Blank Spiked with 5.00 ppm Pb, 1.00 ppm Cu, Zn; 400 mg/l COD; 1.00 mg/l PHENOL.


Director, Dr. Blair Leftwich
Asst. Dir., Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghghi-Podeh

7/6/92
Date

LUBBOCK CHRISTIAN UNIVERSITY INSTITUTE OF WATER RESEARCH
1 806 796 8900
TEL: 1-806-796-8900
JUL 05 1992 12:41 PM 029 F.01



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 5601 West 19th Street • Lubbock, Texas 79407
 (806) 796-8900

ANALYTICAL RESULTS FOR
 UNICHEM INTERNATIONAL
 Attention: Linda Gardner
 707 N. Leech
 Hobbs, NM 88240

May 12, 1992
 Receiving Date: 05/01/92
 Sample Type: Liquid
 Project No: NA
 Project Location: NA

Analysis Date: 05/04/92
 Sampling Date: 04/30/92
 Sample Condition: Intact & Cool
 Sample Received by: SY
 Project Name: Hobbs Plant Discharge
 Waste Water to POTW

LCUIWR #	Field Code	TOTAL METALS (ppm)				COD (mg/l)	PHENOL (mg/l)	pH (s.u.)	BOD5 (mg/l)	TSS (mg/l)	FOG (ppm)	XYLENE (ppm)
		Pb	Zn	Cu								
Y40550	Composite of #1A - #1E	<0.1	0.29	<0.1	321	<1	7.4	201	21	41.939	0.22	
QC	Quality Control	5.05	0.98	1.04	400	1.0	7.1	---	---	82.095	0.58	
% Precision		100	100	100	96	100	100	99	96	---	100	
% Extraction Accuracy		97	77	81	---	---	---	---	---	104	92	
% Instrument Accuracy		101	89	104	100	100	101	125	---	99	97	

METHODS: EPA SW 846-3020, 6010, 8020; EPA 600/4-79-020; EPA 413.2.

QC: Blank Spiked with 5.00 ppm Pb, 1.00 ppm Zn, Cu; 400 mg/l COD; 1.0 mg/l PHENOL.


 Director, Dr. Blair Leftwich
 Asst. Dir., Dr. Bruce McDonell
 Asst. Dir., Dr. Mohammad Haghighi-Podeh

5/12/92
 Date

1 806 796 8900

LCUI INST WATER RES

TEL: 1-806-796-8900

Apr 10 1992

14:06 No. 022 P



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ANALYTICAL RESULTS FOR
UNICHEM INTERNATIONAL, INC.
Attention: Wayne Price
P. O. Box 1499
Hobbs, NM 88240

April 10, 1992
Receiving Date: 04/01/92
Sample Type: Liquid
Project No: UI-HW-92-WW
Project Location: Hobbs Plant

Analysis Date: 04/01/92
Sampling Date: 03/31/92
Sample Condition: Intact & Cool
Sample Received by: DS
Project Name: Discharge WW TO POTW

LCUIWR #	FIELD CODE	M, P, O, XYLENE (ppb)
Y39007	#1E	448
QC	Quality Control	581

Air Blank	<1
% Precision	100
% Extraction Accuracy	95
% Instrument Accuracy	97

METHODS: EPA SW 846-3810 USING AUTOMATED HEAD SPACE; EPA SW-8020.

Director, Dr. Blair Leftwich
Asst. Dir., Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghghi-Podeh

4-10-92

Date



Lubbock Christian University Institute of Water Research

5601 West 19th Street - Lubbock, Texas 79407
(806) 796-8900

ANALYTICAL RESULTS FOR UNICHEM INTERNATIONAL INC

Attn: Wayne Price
P. O. Box 1499
Hobbs, NM 88240

Sampling Date: 3/31/92
Sample Condition: Intact & Cool.
Sample Received by: DS
Project Name: DISCH. WW TO POTW
Analysis Date: 04/01/92

April 10, 1992
Receiving Date: 04/01/92
Sample Type: Liquid.
Project No: UI-HW-92-WW
Project Location: Hobbs Plant

TOTAL METALS (ppm)

LCUIWR #	FIELD CODE	Zinc (ppm)	Iron (ppm)	Lead (ppm)	Copper (ppm)
Y39005	#1 (A, B, C)	<0.1	<0.1	<0.1	<0.1
QC	QUALITY CONTROL	0.99	0.98	1.10	0.97
% Precision		100	100	100	100
% Extraction Accuracy		77	80	81	81
% Instrument Accuracy		99	98	110	97

METHODS: EPA SW 846-3020, 6010.

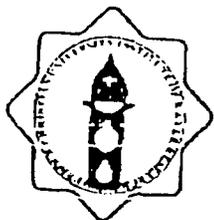
TOTAL METALS QC: Blank Spiked with 1.00 ppm ZINC, IRON, LEAD, COPPER.



Director, Dr. Blair Leftwich
Asst. Dir., Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghghi-Podeh

4-10-92
Date

LCUI INST WATER RES
1 806 796 8900
TEL: 1-806-796-8900
Apr 10 1992 14:05 No. 022



Lubbock Christian University Institute of Water Research

5601 West 19th Street - Lubbock, Texas 79407
(806) 796-8900

ANALYTICAL RESULTS FOR UNICHEM INTERNATIONAL INC

Attn: Wayne Price
P. O. Box 1499
Hobbs, NM 88240

Sampling Date: 3/31/92
Sample Condition: Intact & Cool
Sample Received by: DS
Project Name: DISCH. WW TO POT
Analysis Date: 04/01/92

April 10, 1992
Receiving Date: 04/01/92
Sample Type: Liquid
Project No: UI-HW-92-WW
Project Location: Hobbs Plant

LCUIWR #	FIELD CODE	pH (s.u.)	Oil & Grease (ppm)	TSS (mg/l)	BOD (mg/l)	COD (mg/l)	Phenols (mg/l)
Y39005	#1 (A,B,C)	7.81	101.53	30	180	1,422	1.21
QC	QUALITY CONTROL	7.01	82.95	--	--	601.9	0.99
% Precision		100	--	98	97	99	100
% Extraction Accuracy		--	104	--	--	--	--
% Instrument Accuracy		105	100	100	105	100	99

METHODS: EPA 600/4-79-020.
QC: Blank Spiked with 1.00 mg/l PHENOLS; 600.0 mg/l COD.

Director, Dr. Blair Leftwich
Asst. Dir., Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Heshghi

4-10-92
Date

14:05 No. 022 P. 01

Apr 10 1992

TEL: 1-806-796-8900

LUBBOCK CHRISTIAN UNIVERSITY WATER RES

APPENDIX E

HAZARDOUS WASTE CONTINGENCY PLAN

UNICHEM INTERNATIONAL INC.

707 NORTH LEECH
P.O. BOX 1499
HOBBS, NEW MEXICO 88240
505/393-7751

HAZARDOUS WASTE CONTINGENCY PLAN

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HAZARDOUS WASTE CONTINGENCY PLAN

Hobbs, New Mexico
EPA ID# NMD000333559

PURPOSE

This contingency plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

The provisions of this plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

EMERGENCY COORDINATOR RESPONSIBILITIES

The Emergency Coordinators for the Hobbs, NM facility are:

<u>Name</u>	<u>Telephone No.</u>	<u>Address</u>
Linda Gardner	505/393-7751 wk 505/392-2309 hm	300 Antelope Dr Hobbs, NM 88240
Max Zachary	505/393-7751 wk 505/397-2025 hm	1408 Rose Lane Hobbs, NM 88240
Wayne Price	505/393-7751 wk 505/392-4046 hm	1207 Brittany Hobbs, NM 88240
Wes Johnston	505/393-7751 wk 505/392-5707 hm	217 Commanche Drive Hobbs, NM 88240
Frank Collins	505/393-7751 wk 505/393-2634 hm	2526 Conner Road Hobbs, NM 88240

Safety
Representatives:

Jay Miller	505/393-7751 wk 505/392-7428 hm	1103 Nambe Hobbs, NM 88240
Charles Root	505/393-7751 wk 505/392-5666 hm	914 W. Coal Hobbs, NM 88240
Pam Matlock	505/393-7751 wk 505/392-8282 hm	2916 N. Selman Hobbs, NM 88240

One of these employees will be at the facility or on call (within a few minutes) at all times. This list of coordinators and their phone numbers along with phone numbers for emergency response agencies (fire, ambulance) and a drawing showing the location of spill response equipment and fire extinguishers must be posted near all phones within the facility.

The Emergency Coordinators are responsible for coordinating all emergency response measures. All of the coordinators are thoroughly familiar with all aspects of this plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, these coordinators have the authority to commit the resources needed to carry out this plan.

GENERAL EMERGENCY PROCEDURES

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator must immediately:

1. Use or direct the use of the public address system to notify facility personnel of the emergency situation.
2. Alert all employees to shut down all equipment, electrical and mechanical and report to the main gate northeast of the office on Leech Street (or if wind conditions prohibit meeting at that location, report to the railroad tracks at Clinton Street) for further directions.
3. Identify the character, exact source, amount, and extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.
4. Concurrently assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, explosion (i.e., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat induced explosions).
5. Notify the appropriate state or local agencies if their help is needed. These agencies and their telephone numbers are as follows:

<u>Agency</u>	<u>Telephone</u>
Emergency	911
Ambulance	911
Hobbs Fire Dept.	911
Hobbs Police Department	911
Lea Regional Hospital	392-6581
if busy	392-2561
Norte Vista Medical Center	392-5571
Lea County Sheriff's Sub Station	393-2515
if busy	397-1217
New Mexico State Police	911

6. If the Emergency Coordinator determines that the facility has a release, fire, or explosion which could threaten health or the environment, outside the facility, he must report his findings as follows:
 - a) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and
 - b) He must immediately notify the National Response Center (1-800/424-8802).

The report must include:

- * Name and phone number of the reporter;
 - * Name and address of the facility;
 - * Time and type of incident (release, fire, explosion)
 - * Name and quantity of material(s) involved, to the extent known;
 - * The extent of any injuries, if any; and
 - * The possible hazards to human health, or the environment, outside the facility.
7. During the emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping operations, collecting and containing released waste, and removing or isolating containers.
 8. Immediately after an emergency, the Emergency Coordinator must provide for storing and disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
 9. The Emergency Coordinator must ensure that, in the affected area(s) of the facility:
 - (a) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
 - (b) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

10. The Emergency Coordinator must report to the Safety Department for the purpose of notification to the Regional Administrator of the EPA, Region VI in Dallas, Texas (214/655-6444), and appropriate State (NM-EID Boyd Hamilton 505/827-2926) and local (Lea County LEPC - David Hooten 505/397-3636) authorities, that the facility is in compliance with paragraph (8) before operations are resumed in the affected area(s) of the facility.

11. The Emergency Coordinator must document the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the Safety Department must submit a written report on the incident to the EPA Regional Administrator, Region VI, 1201 Elm Street, Dallas, Texas, 75270 and the New Mexico Environmental Improvement Division, Hazardous Waste Bureau, 1190 St. Francis Drive, P. O. Box 968, Santa Fe, NM, 87504-0968 (505/827-2926). The report must include:
 - (a) Name, address, and telephone number of the owner or operator;
 - (b) Name, address, and telephone number of the facility;
 - (c) Date, time, and type of incident (e.g.. fire, explosion, release);
 - (d) Name and quantity of material(s) involved;
 - (e) The extent of any injuries, if any;
 - (f) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
 - (g) Estimated quantity and disposition of recovered material that resulted from the incident.

TRAINING

Training contents and direction of the program shall be done by Charles N. Root, Safety Manager and Jay Miller, Safety Director. Safety meetings, on-the-job training, and familiarization will be provided by Linda Gardner or Max Zachary. All facility personnel who handle or manage hazardous waste at this facility must be trained in the following areas:

1. Classroom training in RCRA general requirements with a discussion of emergency response actions appropriate to the hazardous waste handled at the facility.
2. Classroom and on-the-job training on procedures for inspecting, repairing, replacing and using spill control equipment.
3. Hands on training in the proper use of fire extinguishing equipment.
4. Hands on training for the decontamination of spill control equipment.
5. Classroom and on-the-job training on the appropriate personal protective equipment to be used in a response to a spill or fire.
6. Classroom training in the emergency response plan and procedures.
7. Drills in the shut-down and evacuation of the plant and office following execution of the alarm.
8. Additionally, monthly safety meetings will be held and attended by all facility personnel to discuss various subjects relevant to safe operations.

With the exception of #8 above, all training is repeated annually (and within six months of employment for newly employed personnel). Employees without training in the above items must work under direct supervision when handling waste until they have received the specified training.

Documents must be developed that include:

1. A job title for each position related to hazardous waste management and the name of each employee filling each job,
2. Written job descriptions that include skill, education or other qualifications and duties,
3. Written descriptions of the type and amount of introductory and continuing training to be given, and
4. Documentation that the training has been provided.

Training records on current employees must be kept until closure. Former employee records must be kept at least three years.

COORDINATION WITH LOCAL AUTHORITIES

A copy of this contingency plan has been filed and discussed with local authorities (see attachment #5). In case of a fire which cannot be controlled by facility personnel, the local fire department will be called to aid in extinguishing the fire. In the event of a release of hazardous waste which cannot be immediately absorbed, neutralized, or otherwise controlled by Unichem employees or presents physical or health hazards beyond the normal operating working hazards, the Emergency Coordinator shall contact appropriate response agencies. Employees will be instructed to maintain a safe distance from the fire or release.

EMERGENCY RESPONSE EQUIPMENT

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>
Fire Extinguishers	(1) 5# dry chemical stored pressure for ABC fires	#14 QC lab, W. Wall
	(3) 10# dry chemical stored pressure for ABC fires	#7 N. end wash rack S. end quonset N. end quonset
	(2) 20# dry chemical stored pressure for BC fires	# 6 S. end wash rack #19 N.E. beam Pepsi bldg.
	(4) 20# dry chemical stored pressure for ABC fires	# 3 Plant, N. of S. equip. door #13 Plant, center pole #10 S.W. beam Pepsi bldg. #15 Oil side tank farm
	(7) 30# dry chemical stored pressure for ABC fires	# 1 Plant, S. door # 2 S.E. door # 5 S.E. door (radio tower) # 8 N.E. chemical storage # 4 W. door oil blending # 9 S.E. door dry rm. #11 S.E. door dry rm.
	(1) CO ₂ for ABC fires	#20 Waterside tank farm
	(1) 150# Mobile ABC Dry Chemical Stored Pressure	#21 West of plant
Respirators	(8) Wilson Half-Mask Cartridge respirator with Organic Vapor/Acid Gas, ammonia & HEPA cartridges.	Spill kit, next to plant mgr. office
	(2) Wilson full-face respirators with organic vapor/acid gas, ammonia, and HEPA cartridges.	Spill kit

EMERGENCY RESPONSE EQUIPMENT

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>
Respirators (cont)	(1) SCBA, Survive-Air 30 minute escape.	Spill kit QC lab
	(1) SCBA, MSA sling 5 minute escape.	Plant spill kit
Absorbent Socks	Oil & Water adsorbents	Plant spill kit Pepsi bldg. spill kit
Tyvek Coveralls	Full body protection against hazardous materials contact P.E. Coated tyvek	Plant spill kit Pepsi bldg spill kit
Rubber Slicker Suit	(4) medium-2, large-2; full body protection against hazardous material contact (impervious)	Plant spill kit
Rubber Gloves	Hand protection against chemical exposure	Plant spill kit
Goggles	(5) for eye protection	Plant spill kit, Pepsi bldg. spill kit
Salvage Drums	(47) 80 gallon DOT spec. containers for overpacking. 55 gallon drums for waste collection & transportation.	Ubiquitous
Spark Proof Shovels	(4) For removing flammable material.	North side of spill kit
Face Shields	(6) For eye and .face protection.	Plant spill kit
Shoe Covers	(50) For covering the boot or shoe (not impervious)	Plant spill kit; Pepsi bldg. spill kit
Air Driven Pump	(2) Mobile, can be used to clean up liquid spills, or to transfer liquid.	E. wall under steps plant
Black Plastic Rolls	For protection uncontaminated material and containment.	W. pepsi bldg.
Surgical Gloves	For handling small beakers & test tubes filled with hazardous waste and chemicals.	QC lab Pepsi bldg. spill kit

EMERGENCY RESPONSE EQUIPMENT

<u>Type of Equipment</u>	<u>Description of Capabilities</u>	<u>Location</u>
Emergency Showers	(3) Full body & (5) Eye washes for decontamination.	South of oil blending North of drum filling North of dry mixing area QC lab(eye wash only) West wall pepsi bldg.
Monitors	Sensidyne air pump 600 & detector tubes for direct reading of air contaminates.	QC lab
	3M 3720 Formaldehyde with analysis	QC lab
Satellite Drums	(18) 55 gallon drums located throughout the plant and outside on the plant grounds. For disposal of hazardous waste.	# 1 Empty drum dock # 2 Empty drum dock # 3 Oil tank farm # 4 Oil tank farm # 5 Oil tank farm # 6 Oil tank farm # 7 South end of plant # 8 South end of plant # 9 Oil blending area #10 Oil blending area #11 Water blending area #12 Water blending area #13 Dry chemical blending area #14 Dry chemical blending area #15 Pepsi building #16 Pepsi building #17 Water tank farm #18 West water tank farm

JOB TITLES/DESCRIPTIONS

Job Title: Maintenance and Driver

Job Description:

1. Responsible for delivery of chemical, bulk and/or drums to lease locations for customers.
2. Responsible for loading truck for deliveries.
3. Responsible for unloading chemical at lease locations.
4. Driver is responsible for proper maintenance on vehicle.

Skills:

1. To be a safe driver.
2. Able to follow instructions.
3. To perform job in a timely manner.

Education: High School diploma.

Initial Training: Road Test, DOT Hazardous Material Transportation, Motor Carrier Safety, Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Fork Lift Operations, Safety Program.

Subsequent Training: Handle Hazardous Waste, Respiratory Protection, Hydrogen Sulfide, Fire Extinguishers, Hazwoper.

Job Title: Long Haul Driver

Job Description:

1. Driving vehicle cross county.
2. Driver is responsible for loading on vehicle.
3. Responsible for unloading at Unichem facilities.
4. Driver pumps chemical into a holding tank on vehicle and off into a holding tank.

Skills:

1. Able to handle vehicle in a safe manner.
2. Handle chemical safely.

Education: High School Diploma.

Initial Training: DOT Hazardous Material Transportation, Motor Carrier Safety, Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Fork Lift Operations, Safety Program, Hazwoper.

Subsequent Training: Respiratory Protection, Hydrogen Sulfide, Fire Extinguishers, Handling Hazardous Waste, Hazwoper.

Job Title: Blending Foreman

Job Description:

1. Logging all tickets (chemical order) that come into the plant and determine if product is in stock or must be blended.
2. Complete paperwork (tickets, bill of lading, etc.) on all incoming trucks.
3. Supervises blending operations.
4. Assist in unloading and loading trucks with fork lift.
5. Responsible for Housekeeping.
6. Responsible for preparing and verifying inventory.
7. Assist in the blending operations when needed.
8. Responsible for ordering 55, 30, etc. gallon drums on a weekly basis.
9. Respond to unanticipated spills when requested by the supervisor.

Skills:

1. Proficient in mathematics.
2. Organization and ability learn procedures easily.

Education: High School Diploma, 2 years of college desirable.

Initial Training: Safety Program, Fork Lift Operations, Hazard Communication, Contingency Plan, DOT Hazardous Material Transportation, Personal Protective Equipment, Empty Drum Handling, Spill Response Training, Drum Machine, Inventory Procedures, Paperwork.

Subsequent Training: Respiratory Protection, Hydrogen Sulfide, Handling Hazardous Waste, Fire Extinguishers, Fire Prevention, OSHA, SARA, and RCRA, Hazwoper.

Job Title: Quality Control Manager

Job Description:

1. Assuring the quality of all products coming in and going out of the plant.
2. Responsible for checking blended finished products for proper specifications.
3. Responsible for checking raw materials for proper specifications.
4. Responsible for checking and determine disposition of all products returned to plant.
5. Blending off obsolete products or off spec materials.
6. Running formulas for products to be blended.
7. Prints out labels for drums and tanks from the computer.
8. Assist in varies plant operations.
9. Make changes to inventory on computer for variance on formulas.
10. Fills out reports on unanticipated release of chemical.

Skills:

1. Proficient in lab procedures.
2. Knowledge of basic chemistry.

Education: High School Diploma, 2 years of college with some chemistry desirable.

Initial Training: Hazard Communication, Contingency Plan, Person Protective Equipment, Respiratory Protection, Computer Procedures, Q.C. Procedures, Inventory Procedures.

Subsequent Training: Fire Extinguishers, Fire Prevention, Hazwoper.

Job Title: Drummer

Job Description:

1. Responsible for package finished or raw material from vats or tanks into drums or pails.
2. Assist in preparing drums; i.e., labeling, stenciling, sealing.
3. Assist in unloading trucks; i.e., drums, pallets of powder, and stacking drums.
4. Responsible for housekeeping in his work area.
5. Assist in inventory.
6. Responds to unanticipated spills when requested by supervisor.

Skills:

1. Must have the ability to learn procedures easily.

Education: High School Diploma.

Initial Training: Fork Lift Operations, Use of Drumming Machine, Labeling Procedures, Inventory Procedures, DOT Hazardous Material Transportation, Hazard communication, Contingency Plan, Personal Protective Equipment, Respiratory Protection.

Subsequent Training: Fire Extinguishers, Fire Prevention, Handling Hazardous Waste, Empty Drum Handling, Hazwoper.

Job Title: Blender

Job Description:

1. Responsible for blending raw materials to produce finished products.
2. Assist in unloading and loading trucks, cargo trucks, rail cars and tankers of raw materials.
3. Assist in varies duties in the plant operation when needed.
4. Responsible for housekeeping and paperwork in work area.
5. Respond to unanticipated spills when requested by supervisor.

Skills:

1. Ability to learn procedures.

Education: High School Diploma.

Initial Training: Fork Lift Operations, Labeling procedures, Inventory Procedures, Hazard Communication, Contingency Plan, Personal Protective Equipment, Safety Program, Respiratory Protection, Fire Extinguishers, Fire Prevention.

Subsequent Training: Empty Drum Handling, Handling Hazardous Waste, Hazwoper.

Job Title: Blending Supervisor

Job Description:

1. Responsible for blending raw materials to produce finished products.
2. Assist in unloading and loading trucks, cargo trucks, rail cars and tankers of raw materials.
3. Assist in various duties in the plant operation when needed.
4. Responsible for housekeeping and paperwork in work area.
5. Respond to unanticipated spills when requested by supervisor.
6. Responsible for the overall departmental blending functions.

Skills:

1. Supervisory skills.

Education: High School Diploma.

Initial Training: Hazard Communication, Contingency Plan, Personal Protective Equipment, Empty Drum Handling, Fork Lift Operations, Labeling Procedures, DOT Hazardous Material Transportation, Contingency Plan, Empty Drum Handling, Inventory Procedures, Safety Program, Respiratory Protection.

Subsequent Training: Handling Hazardous Waste, Fire Extinguishers, Fire Prevention, Hazwoper.

Job Title: Plant Manager

Job Description:

1. Responsible for all aspects of the plant operations and quality control.
2. Responsible for logging and disposition of Hazardous Waste.
3. Orders equipment and supplies.
4. Updates Material Safety Data Sheet books for plant.
5. Respond to unanticipated spills.

Skills:

1. Ability for organization.
2. Supervisory and management skills.

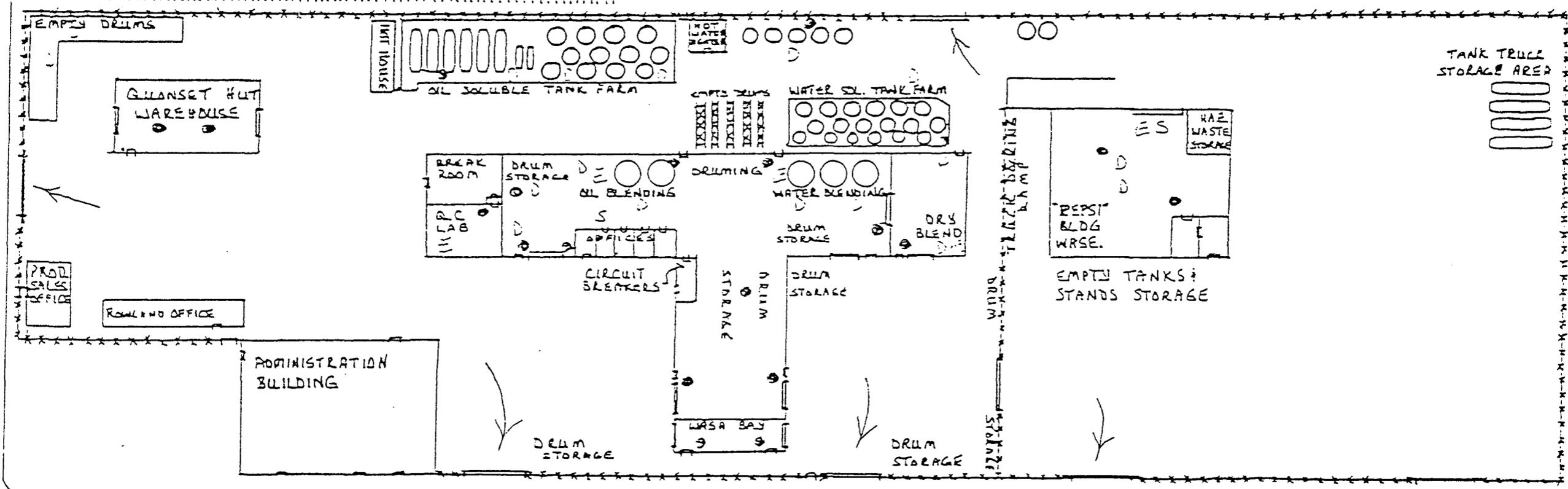
Education: High School Diploma, 2 years college with chemistry desirable.

Initial Training: DOT Hazardous Material Transportation, Hazard Communication, Contingency Plan, Personal Protective Equipment, Hazardous Waste Management, Empty Drum Handling, Fork Lift Operations, Safety Training, Respiratory Protection.

Subsequent Training: OSHA, SARA, and RCRA, Hydrogen Sulfide, Fire Extinguishers, Fire Prevention, Hazwoper level 5.

SEE
EV

CLINTON STREET



LEECH STREET  PRIMARY EVACUATION SITE

PROPERTIES OF HAZARDOUS WASTE AND ASSOCIATED HAZARDS

The basic hazards presented in the hazardous waste generated at the Unichem International Inc. Hobbs blending facility is that of the raw materials used in the blending process. As a general rule, both raw materials and finished products are complex blends of petrochemicals and aqueous solutions and few are found on site as a pure commodity substance. The hazards of these products may be discussed within three general groups of physical and health hazards.

1. Flammability - many of the products used at the Hobbs blending facility pose a moderate risk of fire. This is due to the organic solvents and alcohols present. While most of the flash points represented fall into the range of 73° F to 200° F, the large volume on site presents an ever present hazard. In addition, if involved in a fire, these materials can produce the toxic products of combustion such as SO_x and NO_x.
2. Corrosivity - there are a relatively large proportion of raw materials present that pose a threat of chemical burns to the eyes and skin. These are best represented by caustics, organic amines, and weak acids. If not immediately flushed from the skin and eyes, severe burns could result. Many of these products are used in pH adjustment and the resulting finished products often contain a lesser degree of corrosivity.
3. Toxicity - this hazard ranges from slight irritants to substances that could damage the lungs, liver, or kidneys if breathed in high concentrations for extended periods of time. Some of the organic solvents (naphthas, xylene derivatives, methanol, isopropyl alcohol) can be absorbed through the skin. Industrial hygiene surveys have demonstrated that under normal working conditions, exposures above the permissible exposure levels are not encountered. Contact with the skin can cause defatting and dermatitis.

REQUIREMENTS REGARDING HAZARDOUS WASTE STORAGE,
CONTINGENCY PLANS, EMERGENCY PROCEDURES,
AND PERSONNEL TRAINING

I. (262.34) HAZARDOUS WASTE ACCUMULATION TIME

- A. Storage of hazardous waste for 90 days or less is acceptable without a permit provided that:
1. hazardous waste is to be placed in containers complying with Subpart I, Part 265 [Use and Management of Containers] or placed in tanks complying with Subpart J, Part 265 [Tank Systems] except 265.197(c) & 265.200. The generator is exempt from all requirements in Subpart G & H of Part 265 except 265.11 [Identification Numbers] & 265.114 [Disposal or Decontamination of Equipment, Structures and Soils],
 2. the date of accumulation is marked and visible for inspection on each container,
 3. containers and tanks are labelled "Hazardous Waste", and
 4. the facility complies with requirements for owners and operators in Subpart C [Preparedness and Prevention] & D [Contingency Plan and Emergency Procedures] of 265 and 265.16 [Personnel Training].
- B. Storage of hazardous waste for 90 days or more requires a permit unless excepted.
- C. Satellite accumulation may occur provided that:
1. accumulated waste in containers does not exceed 55 gallons at the point where the waste is generated, and:
 - a. the facility complies with 265.171 [Condition of Containers], 265.172 [Compatibility of Waste with Containers], & 265.173(a) [Containers Closed During Storage], and
 - b. the containers are marked "Hazardous Waste" or with other words that identify the contents of the containers.

I have discussed this contingency plan with Unichem International Inc. personnel and understand and agree to emergency response actions concerning my department/organization as they are presented in this plan. I also have accepted a copy of this plan to use in case of emergency at the Unichem International Inc. plant.

HOBBS FIRE DEPARTMENT

Signature

Date

Name

Title

HOBBS POLICE DEPARTMENT

Signature

Date

Name

Title

LEA REGIONAL HOSPITAL

Signature

Date

Name

Title

LOCAL EMERGENCY PLANNING COMMITTEE

Signature

Date

Name

Title

2. whenever accumulation exceeds 55 gals., compliance with paragraph I.A must occur within three days.
- D. Generators with greater than 100kg but less than 1000kg of waste accumulation per month may store waste for 180 days or less without a permit provided:
1. the quantity never exceeds 6000kg,

2. compliance with Subpart I, Part 265 [Use and Management of Containers] except 265.176 [Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line],
3. compliance with 265.201 of Part 265 in Subpart J [Special Requirements for Generators of Between 100 and 1,000 kg/mo That Accumulate Hazardous Waste in Tanks],
4. compliance with Subpart C 265 [Preparedness and Prevention] and paragraphs I.A.2. and I.A.3. above,
5. the facility has:
 - a. an Emergency Coordinator present or on-call to comply with I.D.5.d. below,
 - b. posted next to telephones the:
 - (1) name and phone number of Emergency Coordinators,
 - (2) location of fire extinguishers and spill control material and, if present, the fire alarms,
 - (3) phone number of fire department, unless connected by direct alarm;
 - c. ensured that all employees are made thoroughly familiar with proper waste handling procedures relevant to their responsibilities during normal operations and emergencies,
 - d. designated the Emergency Coordinator to respond to any emergency that arises.
 - (1) In the event of a fire, the Emergency Coordinator will notify the fire department or attempt to extinguish the fire with fire extinguishers,
 - (2) In the event of a spill, the Emergency Coordinator will contain the flow to the extent possible and as soon as possible, clean

up hazardous waste and any contaminated soil and materials,

(3) In the event of a fire, explosion, or release which could threaten human health outside the facility, or if the spill has reached surface water, the Emergency Coordinator shall notify the National Response Center (800/424-8802) with:

- (a) the name, address, USEPA ID# of the facility,
- (b) the date, time, and type of incident,
- (c) the quantity and type of hazardous waste involved,
- (d) the extent of any injuries, and
- (e) the estimated quantities and disposition of recovered materials.

E. Generators of greater than 100kg and less than 1000kg who offer waste to disposal facilities further than 200 miles may accumulate 270 days if facility complies with I.D. above.

F. Facilities of Small Quantity Generators (>100kg & <1000kg per month) who accumulate more than 6000kg or who accumulate waste for more than 180 days (or 270 days if more than 200 miles from disposal) will constitute a storage facility subject to Parts 264 & 265 & permit requirements of Part 270 unless an extension has been granted.

II. (265.16) PERSONNEL TRAINING

A. Personnel training must include:

- 1. classroom instruction or on-the-job training that teaches employees to perform the duties to ensure facility compliance (program must include all elements of II.D.3. below),
- 2. the program is directed by a person trained in hazardous waste management procedures and includes instruction

which teaches personnel hazardous waste management procedures (including the contingency plan) relevant to their positions, and

3. the training program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including:
 - a. procedures for using, inspecting, repairing, and replacing emergency & monitoring equipment,
 - b. key parameters for automatic waste-feed cut-off systems,
 - c. communications or alarm systems,
 - d. response to fires or explosions,
 - e. response to ground-water contamination incidents, and
 - f. shutdown of operations.
- B. Personnel must complete training within six months of employment at the facility. Employees without training must work with supervision until they have received training.
- C. Employees must receive an annual review of training described in (II.A.) above.
- D. Documents must be developed and maintained at the facility that include:
 1. a job title for each position related to hazardous waste management and the name of each employee filling each job,
 2. written job descriptions that include skill, education or other qualifications and duties,
 3. written descriptions of the type and amount of introductory and continuing training to be given,
and
 4. documentation that the training has been provided.

- E. Training records on current employees must be kept until closure. Former employee records must be kept at least three years.

III. (PART 265 SUBPART C) PREPAREDNESS AND PREVENTION

- A. Required equipment on site must include:
 - 1. an internal communications or alarm system,
 - 2. telephones to summon assistance from local fire and police departments, or state or local emergency response teams,
 - 3. portable fire extinguishers, fire control equipment, special extinguishing equipment (foam, inert gas, dry chemical), spill control equipment, and decontamination equipment, and
 - 4. water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray equipment.
- B. All of the above equipment must be tested and maintained.
- C. There must be access available to the communication or alarm systems.
- D. There must be sufficient aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the waste storage area.
- E. Arrangements with local authorities shall include:
 - 1. attempts made to make appropriate arrangements for each type of waste handled:
 - a. arrangements to familiarize police, fire, and emergency response teams with the layout of the facility, the properties of the hazardous waste, places where personnel will be working, entrances to roads outside the facility and possible evacuation routes,

- b. agreements concerning additional support, where more than one police or fire department might respond, describing primary response actions and responsibility,
 - c. agreements with state emergency response teams, emergency response contractors, and equipment suppliers, and
 - d. arrangements to familiarize local hospitals with properties of waste and type of injuries or illnesses that could result from fires, explosions, or releases.
2. Where state or local authorities decline to enter into arrangements, their refusal shall be documented.

IV. SUBPART D, PART 265 CONTINGENCY PLAN & EMERGENCY PROCEDURES

- A. The purpose and implementation of the contingency plan shall include:
1. design to minimize hazards to human health or environment from fires, explosions, or unplanned sudden releases or non-sudden releases of hazardous waste or constituents to air, soil, or surface water, and
 2. provisions that the plan must be carried out immediately.
- B. Content of the contingency plan must include:
1. a description of the actions facility personnel must take to comply with 265.51 [Purpose and Implementation of the Contingency Plan] and 265.56 [Emergency Procedures],
 2. if any other contingency plan has been developed, it must be amended to comply with this Part,
 3. a description of arrangements agreed to by local police, fire, hospitals, contractors, and state and local emergency response teams to coordinate emergency services pursuant to 265.37 [Arrangements with Local Authorities (III.E.)],

4. a list of names, addresses, and phone numbers (office & home) of all Emergency Coordinators. (This list must be kept up to date. There must be more than one primary Emergency Coordinator with others listed as alternates listed in order of contact),
 5. a list of all emergency equipment (fire extinguishing equipment, spill control equipment, communications, alarms (internal and external), decontamination equipment, and where such equipment is required. (This list must be kept up to date and include the location and physical description of each item on the list with a brief outline of its capabilities), and
 6. an evacuation plan for facility personnel describing signals to be used, routes and alternate routes to be taken.
- C. Copies of the contingency plan:
1. must be maintained at the facility, and
 2. submitted to local fire and police departments, hospitals, and state and local emergency response teams.
- D. The contingency plan must be reviewed and immediately amended whenever:
1. regulations are revised,
 2. the plan fails in an emergency,
 3. the facility changes in design, construction, operation, maintenance, or other circumstances in such a way that materially increases potential for fires, explosions or releases or changes the response necessary in an emergency,
 4. the list of Emergency Coordinators changes, or
 5. the list of emergency equipment changes.
- E. Emergency Coordinators must at all times be present or on-call (to respond in a short period of time) and be responsible for coordinating all emergency response measures. The Emergency Coordinator must be thoroughly familiar with all aspects of

the contingency plan, all operations and activities of the facility, locations and characteristics of the waste handled, the location of all records in the facility and the facility layout. The Emergency Coordinator must have authority to commit the resources needed.

- F. Emergency procedures shall be developed.
1. The Emergency Coordinator must immediately:
 - a. activate internal facility alarms or communications system to notify all personnel, and
 - b. notify state or local agencies with designated response roles if help is needed.
 2. The Emergency Coordinator must identify the characteristics, the exact source, amount and real extent of released materials by observation, review of records, or chemical analysis.
 3. The Emergency Coordinator must assess possible hazards to human health or environment (direct and indirect effects such as toxic, irritating, or asphyxiating gases generated or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire or heat induced explosions).
- G. Reports of findings must be made.
1. Evacuations of local areas may be advisable. The Emergency Coordinator must notify local authorities and be available to help decide whether local areas are to be evacuated.
 2. Report to the National Response Center (800/424-8802):
 - a. the name and phone number of the reporting person,
 - b. the name and address of the facility,
 - c. the time and type of incident,
 - d. the name and quantity of materials involved,
 - e. the extent of any injuries, and

- b. the name, address, and phone number of the facility,
- c. the date, time and type of incident,
- d. the name and quantity of materials involved,
- e. the extent of injuries,
- f. an assessment of actual or potential hazards to human health or environment, and
- g. the estimated quantity and disposition of recovered materials that resulted from the incident.

APPENDIX F

SUPPLEMENT TO HAZARDOUS WASTE CONTINGENCY PLAN

New Mexico Requirements

For facilities subject to notification and reporting requirements of the Oil Conservation Division, report any fire, break, leak, spill, or blowout at any injection or disposal facility or at any oil and gas drilling, producing, transporting, or processing facility to:

New Mexico Energy, Minerals, & Natural Resources Department
Santa Fe
Oil Conservation Division
(8 to 5) 505/827-5800

In addition, make "immediate" and/or "subsequent" notifications for any fire, break, leak, spill, or blowout to the appropriate district office:

<u>DIST</u>	<u>CITY</u>	<u>NUMBERS</u>	<u>AFTER HOURS</u>
I	Hobbs	505/393-6161	505/393-6161
II	Artesia	505/748-1283	505/748-1283
III	Aztec	505/334-6178	505/334-6178
IV	Santa Fe	505/827-5810	505/471-1068

Immediate notification means reporting as soon as possible by telephone or in person to the appropriate district office or if after hours to the district supervisor. Immediate notification must be followed by subsequent notification.

"Subsequent" notification means a written report of the incident in duplicate to the appropriate district office within 10 days of the discovery of the incident.

Verbal and written reports shall include:

1. Location of the incident by quarter-quarter, section, township, and range;
2. Location by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground;
3. The nature and quantity of the loss;
4. The general conditions prevailing in the area to include precipitation, temperature, and soil conditions; and
5. Measures that have been taken and are being taken to remedy the situation.

Notifications shall be in accordance with the following:

1. Well blowout - immediate notification
2. Major and minor breaks, spills or leaks; gas leaks and line breaks; tank fires; drilling pits, slush pits, storage pits and ponds:

MATERIAL	QUANTITY (bbls)	WATER COURSE	NOTIFICATION
Crude Oil or Condensate	>= 25	No	Immediate
	5<25	No	Subsequent
	>= 1	Yes	Immediate
(Tank Fires)	>= 25	---	Immediate
(Tank Fires)	5<25	---	Subsequent
(Endangering Life or Property)	Any Quantity	---	Immediate
Salt Water	>= 100	No	Immediate
	>= 25	Yes	Immediate
	25<100	No	Subsequent
(Endangering Life or Property)	Any Quantity	---	Immediate
Gas			
(Endangering Life or Property)	Any Quantity	---	Immediate
(No Danger)	>=1000MCF	---	Subsequent
Related Materials			
(Endangering Life or Property)	Any Quantity	---	Immediate
-Drilling pits, slush pits, storage pits and ponds			
(Endangering Life or Property)	Any Quantity	---	Immediate
(No Danger)	Any Quantity	---	Subsequent

Water Course is any lake bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

Related materials include hydrocarbons, hydrocarbon waste or residue, strong caustics, strong acids or other deleterious chemicals or harmful contaminants.

Report leaks from natural gas and other gas pipelines within two hours of discovery to:

New Mexico State Corporation Commission, Santa Fe
Pipeline Division

OFFICE NUMBERS (8 TO 5)

HOME NUMBERS

505/827-4581 or 4497
505/827-4521 (Alternate)
505/827-4009 (Alternate)
505/827-4494 (Alternate)

505/983-1810 (Rey S. Medina)
505/473-1923 (Albino O. Zuniga)
505/473-0717 (Ray Elliott)
505/892-2274 (Joe Johnson)

For facilities not subject to the reporting and notification requirements of the Oil Conservation Division, report any discharge from any facility of oil or any other water contaminant whose quantity may, within reasonable probability, injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, as soon as possible after learning of such a discharge, but in no event more than 24 hours thereafter to:

New Mexico Health & Environment Department, Santa Fe
Environmental Improvement Division
Ground Water Bureau

(8 to 5) 505/827-2917
505/827-0188 (UST Section)
(24 hour) 505/827-9329 (Alternate)

Verbal reports must include:

1. The name, address, and telephone number of the person(s) in charge of the facility;
2. The owner/operator of the facility;
3. The name and address of the facility;
4. The date, time, location, and duration of the discharge;
5. A description of the discharge, including its chemical composition;
6. The estimated volume of the discharge; and
7. Any actions taken to mitigate immediate damage from the discharge.

Within one week after the discharge, the facility owner/operator must send written notification verifying prior oral notification as to each of the items above along with any additions or corrections to:

New Mexico Health & Environment Department
Environmental Improvement Division
Chief, Ground Water Bureau
Harold Runnels Building
1100 Saint Francis Drive
Santa Fe, NM 87503

APPENDIX G

**POTW WASTE MINIMIZATION PROGRAM
PROCEDURES FOR HANDLING SPILLS
UNICHEM SPILL REPORT FORM
DIRECTIONS FOR ANY SPILLED CHEMICAL
LEAK AND SPILL RESPONSE**

PUBLICLY OWNED TREATMENT WORKS (POTW) WASTE MINIMIZATION PROGRAM

In our efforts to keep chemical contamination to the Publicly Owned Treatment Works (POTW) at a minimum, we have implemented the following procedures in the Hobbs Plant.

PROCEDURE FOR CLEANING TANK TRUCKS, TOTE TANKS AND TANKS:

1. The driver is responsible for cleaning the compartment, he then goes to the Quality Control Manager and requests a rinse drum for the product being washed out.
2. The Quality Control Manager gives the driver a drum number for a compatible or like product.
3. The driver locates the rinse drum, hooks up the hose from the compartment and puts a stinger into the drum.
4. The driver then rinses the compartment, hose and pump with soft water into the rinse drum until all are clean.
5. The driver then disconnects the hoses, closes the drum and stores it in the designated storage area.
6. The driver reports back to the Quality Control Manager the amount of rinsate put into the drum.
7. The Quality Control Manager logs the amount onto a sheet for that drum number and files it in the Rinsate Book.

PROCEDURES FOR RINSING WATER VATS AND LINES WHEN PRODUCT IS PACKAGED INTO DRUMS:

1. The drummer drums the product into the drum.
2. The drummer gets a rinse drum number from the Quality Control Manager and places the rinse drum under the lance.

3. The blender rinses the vat, lines and pump into a rinse drum until all are clean.
4. The drummer closes the drum and returns it to the designated storage area. He then reports to the Quality Control Manager on the amounts stored in the drum.

PROCEDURE FOR USING RINSE DRUMS:

1. The Quality Control Manager runs the formulation sheets and writes the rinse drum numbers and totals that are to be used on the blend sheet. This is either the same product rinse or a like product rinse. An oil soluble rinse is used in TC470 and TC456. The rinse drums are added as the water component of the blend.
2. When the blend sheet and QC samples are taken to the lab, the Quality Control Manager logs the date and manufacturing order number on the Rinse Drum Log Sheet. He then puts the Rinse Drum Log Sheet into the Empty Rinse Drum File to be used the next time.

PROCEDURE FOR HANDLING SPILLS:

1. If less than a pint or pound of chemical is spilled, it is wiped up with a towel or a Pig and placed in a satellite waste drum in the work area.
2. If more than a pint or pound is spilled, it is reported to the Supervisor in charge. The spill report is filled out and sent to the Safety Department. The Safety Supervisor determines the proper way to clean up the spill.
3. If more than one gallon is spilled, the Emergency Response Team is called. The area is cordoned off and the Emergency Coordinator determines the proper way to clean up the spill.
4. If a spill occurs anywhere that there is a possibility of the spill entering POTW, dirt is poured into the sump and the POTW valves are shut off.

POTW NOTIFICATION:

If a release of chemical or pollutant has reached the POTW, then the operator of the POTW shall be notified immediately. Call City of Hobbs, Mr. Arkie Wheeler. Also, notify Unichem's Environmental Department.

SPILL REPORT FORM

DIRECTIONS ON REVERSE SIDE

No.:

Substance Trade Name: _____

Date Spill Occurred/Discovered: _____ Time: _____ Time to cleanup: _____

Location (Be Specific): _____

Location Address: _____ County: _____ St: _____

Size/Type of Container: _____ Physical State: _____

Volume or Weight of Spill: _____ Qty. Material Collected: _____

Describe all persons and events leading to the spill: _____

Describe methods, tools, equipment, and materials used in containment & cleanup: _____

List of all persons participating in cleanup and containment: _____

Reported by: _____ Reported to: _____

Date Reported: _____ Time Reported: _____

FOR OFFICE USE ONLY

Constitutients

Percent

RQ Value

Lab Tests by: _____ pH: _____ Flash Point: _____

Disposal Procedures: _____

ADDITIONAL REPORTS

Agency Name(s): _____ Phone #: _____

Individuals Contacted: _____ Ext. Report#: _____

Reported By: _____ Date: _____ Time: _____

Comments: _____

Dollars assigned to spill: _____

REPORT FORM

Directions: Any spill of a chemical substance in a quantity greater than one pound or one pint must be reported immediately to your supervisor and the Safety Department. The term spill refers to any contact between a chemical substance and soil, pavement, concrete or water, whether inside or outside of the workplace. A spill may also involve the evaporation of a volatile chemical substance into the air which may require a report. All spills must be properly contained and disposed of. The proper personal protective equipment (goggles, rubber gloves, respirator, coveralls, rubber boots, etc.) must be worn at all times.

In the event of a spill, follow these steps:

1. Determine the nature of the chemical substance. Visually estimate the quantity spilled;
2. Prevent others from entering the area and report to your supervisor or the Safety Department;
3. Wear the appropriate personal protective equipment as determined by the MSDS, consultations with your supervisor and/or consultations with the safety department;
4. Eliminate all sources of ignition. It may be necessary to shut off nearby electrical circuits;
5. Contain the substance by appropriate methods. Check the MSDS and consult with your supervisor or the Safety Department. Measure the amount spilled;
6. Place all material and, if applicable, all soil, sand, gravel, etc. in a clean or undamaged previously used container (open top drum, five gallon pail or bucket, etc.) and seal tightly. Place all disposable cleanup items (rags, towels, absorbent pigs, coveralls, gloves, etc.) in an appropriate container and seal;
7. Mark the top and side of the containers with the identification number provided by the Safety Department. Do not move containers offsite unless the spill occurred at a location not owned by Unichem. If necessary, move the containers to the nearest Unichem owned facility;
8. Complete the Report Form on the opposite side. Complete all blanks in the upper portion of the form. If an answer is not applicable or unknown then write "N/A" or "UNK". Be very specific and detailed in writing the descriptions. Describe the physical state as liquid, solid, vapor, or gas. Describe the container from which the spill occurred: 55 gal. steel unlined drum, '87 Chev Tank #2, XYZ Storage Tank Valve. Sign the report in the space: "Reported By:"; and
9. Turn in the report to your supervisor or Safety Department.

LEAK AND SPILL RESPONSE

1 CLEAR THE AREA - CHECK FOR INJURIES

Move all personnel a safe distance away and cordon off the area. Do not allow re-entry to spill area until personnel are properly equipped or clean-up is complete and the area is safe. Modify the cordoned area as the condition changes. Render first aid to injured persons.

2 IDENTIFY WHAT HAS HAPPENED

Size of spill? Vapors? Odors? Mists? Smoke? Drums? Tank? Truck? Piping? Warning labels? Confined space or in open area? Hazardous or non-hazardous? Any unusual or special conditions?

3 INITIATE SAFETY/HAZARD CONTROLS

Eliminate all possible sources of ignition. Ventilate the area as appropriate. Use high level personal protective equipment. Put all possible safeguards in place and maintain all controls until hazardous conditions are eliminated. USE VENTILATION FANS. (Explosion proof for flammables)

4 IDENTIFY ALL HAZARDS INVOLVED

Determine exactly what chemicals and conditions you are dealing with. Get MSDS. Note conditions that might effect responders ability to attack spill. If personnel must enter spill area to determine this information use the highest level of personal protective equipment.

Assume all spills are dangerous until proven otherwise!

5 CONTAIN THE SPILL

Prime consideration should be to contain any spill at its source and stop the spread of material in the environment.

Absorbent socks, booms, pillows, and dirt provide excellent means of both containment and clean-up. Use them quickly if you are not put at risk.

6 CALL FOR BACK-UP ASSISTANCE

If spill is medium to large, call local HAZMAT squad. If a large flammable liquid spill call the fire department to provide back-up assistance and stand-by fire protection. Even trained responders should not attempt spill response actions without back-up of some kind.

It is better to over respond than to be overwhelmed.

7 PLAN OF ATTACK

Spill should be attacked according to a coordinated plan that spells out the actions and reactions of all response team members and their back-up units.

Make a plan of action and follow it!

8 CLEAN-UP SPILLED MATERIAL

Remove contained spill residues using sorbents and spill response equipment. Use of sorbents does not reduce or significantly change the hazardous properties of a sorbed liquid. Handle spill clean-up materials with the same precautions as you would the liquid. Neutralize spill if necessary.

Maintain all safety/hazard controls until spill residues are in closed containers and the area is declared safe.

9 PACKING - LABELING - DISPOSAL

Pack all spill residues in containers which are DOT approved for the spilled liquid.

Container labeling must be in accordance with DOT and EPA regulations applicable to the spilled liquid. Date the label.

Disposal must be in accordance with all local, state, and federal regulations according to the RCRA status of the spilled liquid.

10 REPORTING - INCIDENT REVIEW

Certain chemical spills must be reported to local, state, or federal agencies. These reports must be timely and accurate. Call safety department for guidance.

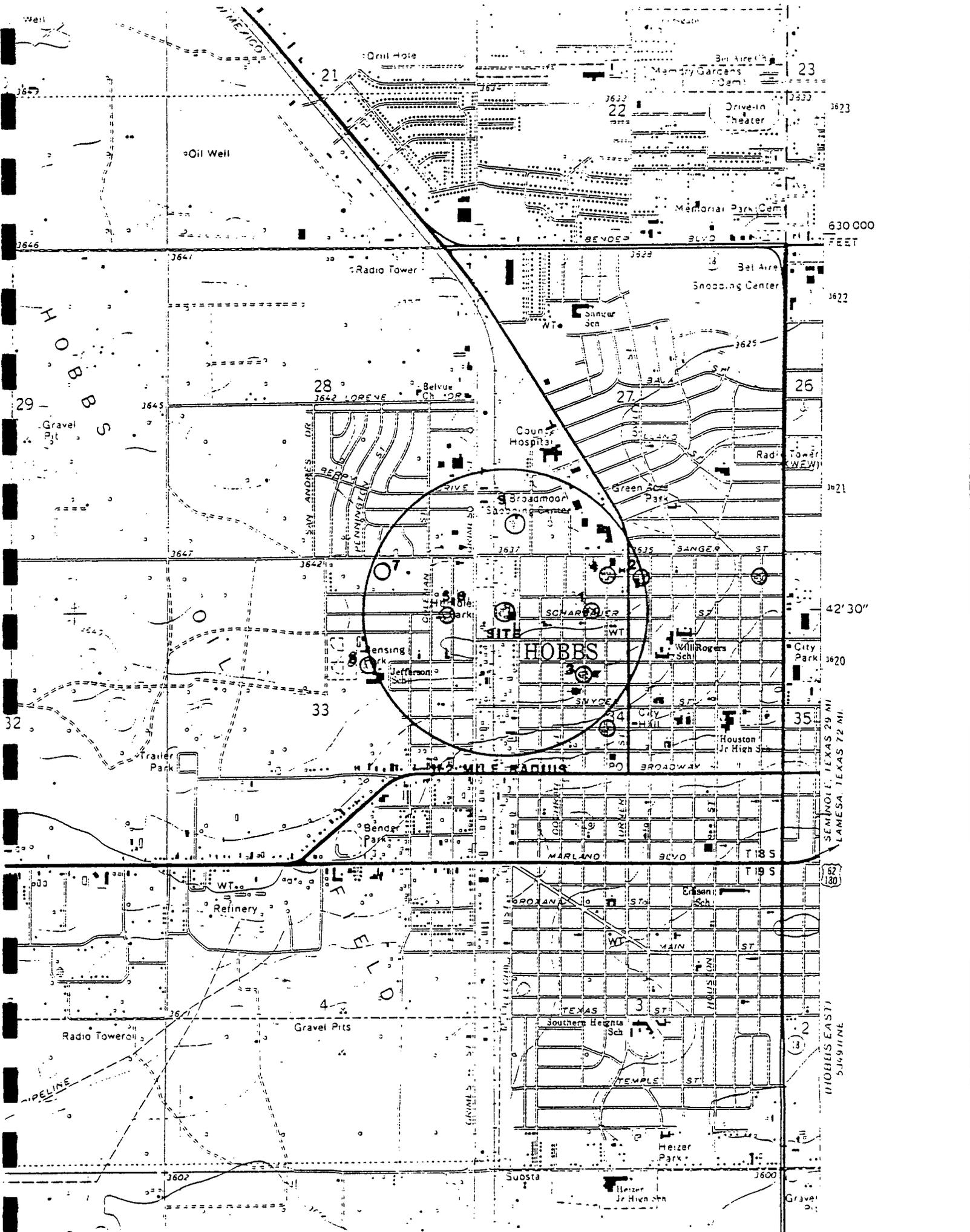
Each spill must be reviewed to determine what steps must be taken to prevent a recurrence. Fill out the spill report.

11 REORDERING SUPPLIES

All disposable supplies such as sorbents, gloves, coveralls, respirators, etc. should be reordered to be immediately available for future use.

THESE ARE GUIDELINES FOR SPILL RESPONSE AND THE ACTUAL ORDER THAT ITEMS ARE PERFORMED MAY VARY DEPENDING ON THE SITUATION.

APPENDIX H
WATER WELL RECORDS



Well

385

3846

29

32

36

3602

Oil Well

Radio Tower

Gravel Pit

Trailer Park

Refinery

Radio Tower

PIPELINE

Gravel Pit

Drill Hole

Radio Tower

Belvue Ch. DP

Gravel Pit

Gravel Pit

Gravel Pit

Gravel Pit

Gravel Pit

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3632

3642

3637

3644

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FEET

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82
130

HOBBS EAST
5169 LINE

SEMINOLE, TEXAS 29 MI
LAMESA, TEXAS 72 MI

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L
D

SITE
HOBES

TEXAS

SAN ANDRES DR
PENNINGTON ST
BROADMOOR ST
CALLEMAN ST
JEFFERSON ST

SCHARFNER ST
WILL ROGERS SCH
SUYDOR ST
ARMOUR CO

MARLAND BLVD
T 18 S
T 19 S
ROXANA ST
MAIN ST
NO. EIGHTH ST
TEMPLE ST

Southern Hegins Sch
HEZZER PARK
HEZZER JR HIGH SCH

Suosta

Bel Aire (A)
Memorial Gardens (Cem)
Drive-in Theater

Memorial Park (Cem)
Bel Aire Shopping Center

County Hospital
Broadmoor Center
Green Park

City Park
Houston Jr High Sch

Erison Sch

Heizer Park

Heizer Jr High Sch

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INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and shall be accompanied by a filing fee of \$5.00. Each of triplicate copies must be properly signed and attested. A separate application for permit must be filed for each well used. Secs. 1-4—Fill out all blanks fully and accurately. Sec. 5—Irrigation use shall be stated in feet depth or acre feet of water per acre to be applied on the land. If for domestic, municipal, or other purposes, state total quantity in acre feet to be used annually. Domestic use may include the irrigation of not more than one acre of lawn and garden for noncommercial use. Sec. 6—Describe only the lands to be irrigated. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and the survey to some permanent, easily located natural object. Sec. 7—Estimate time reasonably required to commence and to complete project. Sec. 8—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought. If additional space is necessary, use a separate sheet or sheets and attach securely hereto.

APPROVAL OF THE STATE ENGINEER

Number of this permit L-2903 Date received corrected
 Recorded in Book LC-11 Publication of notice ordered
 Page 2903 Name of paper
 Application received April 4, 1955 Affidavit of publication filed
 Date returned for correction Date of approval June 28, 1955
 This application is approved for 3

subject to all prior valid and existing rights to use of the waters of said underground source and provided that the applicant complies with all rules and regulations of the State Engineer pertaining to the drilling of wells
Well to be drilled by drilling contractor licensed in the State of New Mexico.
Diameter of well not to exceed 7 inches. Appropriation of water to be limited
at all times to 3 acre feet per annum for domestic purposes and the irrigation
of not more than 1 acre of non-commercial garden.

Works shall be completed and proofs filed on or before
 Water shall be applied to beneficial use and proofs filed on or before
 This is to certify that I have examined the above application for permit to appropriate the underground waters of the State of New Mexico and hereby approve the same subject to the foregoing provisions and conditions.
 Witness my hand and seal this 28th day of June, A. D., 1955.
 By Frank E. Irby Chief, Water Rights Div. John H. Bliss State Engineer

LOCATE WELL AND ACREAGE TO BE IRRIGATED AS ACCURATELY AS POSSIBLE ON FOLLOWING PLAT:
 Section (s) 34 Township 18 S Range 38 E N.M.P.M.

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$5.00. Each of triplicate copies must be properly signed and attested.
 A separate application for permit must be filed for each well used.
 Secs. 1-4—Fill out all blanks fully and accurately.
 Sec. 5—Irrigation use shall be stated in feet depth or acre feet of water per acre to be applied on the land. If for domestic, municipal, or other purposes, state total quantity in acre feet to be used annually. Domestic use may include the irrigation of not more than one acre of lawn and garden for noncommercial use.
 Sec. 6—Describe only the lands to be irrigated. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and the survey to some permanent, easily located natural object.
 Sec. 7—Estimate time reasonably required to commence and to complete project.
 Sec. 8—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.
 If additional space is necessary, use a separate sheet or sheets and attach securely hereto.

Date returned for correction _____
 Application received April 25, 1955
 Name of paper _____
 Publication of notice ordered _____
 Recorded in Book LC-11

IMPORTANT—READ INSTRUCTION ON BACK BEFORE FILLING OUT THIS FORM

APPLICATION FOR PERMIT

To appropriate the Underground Waters of the State of New Mexico

LEA COUNTY UNDERGROUND BASIN

Application No. L-2903 Book LC-11 Date Received April 4, 1955

1. Name of applicant Thomas V. Marks
 Postoffice address Hobbs,
 County of Lea State of New Mexico

2. Source of water supply Shallow ground water basin.
(state whether artesian or shallow ground water basin)
 located in Lea co. water basin.
(name of underground stream, valley, artesian basin, etc.)

3. The well is to be located in the SE 1/4, NE 1/4, NW 1/4
 of section 34 Township 18 Range 38 N.M.P.M.
 on land owned by Thomas V. Marks

4. Description of well: driller Spudder by licenced driller to be drilled 130 feet;
 diameter (outside) of casing 7 1/8 inches; type of pump and power plant to be used
1 1/4" Electric Reda submersible pump.
power from New Mexico electric line.

5. Quantity of water to be appropriated and beneficially used 3 acre feet
(feet depth of acre feet per acre)
 for Resident yard. (lawn) purposes.

6. Acreage to be irrigated 3 acre feet acres
 located and described as follows (describe only lands to be irrigated):

Subdivision	Sec.	Twp.	Range	Acres Irrigated	Owner of Land
Hobbs, Town Site	34	18	38	3 acre feet	Thomas V. Marks
Highland, Park Add. Description on tax schedule.					
Description of land.					

60' x 140' described by metes and bounds as follows:
 Beginning at a point lying 660' north and 180' west of N.E. corner of lot 1, Block 163, Highland park Add. to Hobbs, go west for a distance of 140'; Thence north 60'. Thence East 140', Thence South 60' to the point of beginning.
(Note: location of well and acreage to be irrigated must be shown on plat on reverse side.)

7. Time required to commence construction 10 days
 Time required to complete the works 5 days
 Time required to fully apply water to beneficial use 15 days

8. Additional statements or explanations (including data on any other water rights appurtenant to the land)
None

FILED
 JUN 7 1955
 OFFICE
 GROUND WATER SUPERVISOR
 ROSWELL, N.M. CO.

REGISTERED
 JUN 22 1955
 AM PM
 7 8 9 10 11 12 1 2 3 4 5 6

I, Thomas V. Marks, being first duly sworn upon my oath, depose and say that I have carefully read the foregoing statement and each and all of the items contained therein, and that the same are true to the best of my knowledge and belief.

Thomas V. Marks applicant

Subscribed and sworn to before me this 30 day of March A.D. 19 55

My Commission expires 12-22-55

APR 4 1955
 OFFICE
 GROUND WATER SUPERVISOR
 ROSWELL, N.M. CO.

APPROVAL OF THE STATE ENGINEER

Recorded in Book 10-9
 Number of this permit 1-2321
 Date received corrected
 Publication of notice ordered

WELL RECORD

2

Date of Receipt September 28, 1953

Name of permittee Rex Murdock
E. Corbitt

Street or P. O. 118 ~~W. 11th St.~~ City and State HA

1. Well location and description: The shallow well is located in A
(shallow or artesian)

R6 34 % of Section 18S Township 38E Range; Elevation of top of

casing above sea level, _____ feet; diameter of hole, 7 inches; total depth, 136 feet;

depth to water upon completion, 90 feet; drilling was commenced sept. 9- 1953

and completed sept. 18- 1953; name of drilling contractor J. E. Barton

_____ ; Address, Box 42 Hobbs N.M.; Driller's License No. WD14

2. Principal Water-bearing Strata:

	Depth in Feet		Thickness	Description of Water-bearing Formation
	From	To		
No. 1	<u>90</u>	<u>136</u>	<u>46</u>	<u>Watersand</u>
No. 2				
No. 3				
No. 4				
No. 5				

3. Casing Record:

Diameter in inches	Pounds per ft.	Threads per inch	Depth of Casing or Liner		Feet of Casing	Type of Shoe	Perforation	
			Top	Bottom			From	To
<u>6 5/8</u>			<u>0</u>	<u>127</u>	<u>127</u>	<u>none</u>	<u>90</u>	<u>127</u>
<u>Gravel packed</u>								

4. If above construction replaces old well to be abandoned, give location: _____ % _____ % _____ %

of Section _____ Township _____ Range _____; name and address of plugging contractor,

date of plugging _____ 19____; describe how well was plugged: _____

MAR 18 1953

SEP 28 1953

PROOF OF COMPLETION OF WORKS

UNDERGROUND WATERS

Date of Receipt February 18, 1955 Permit No. L-2325

1. Name of permittee Rex Murdock

P. O. address 118 N. Corbett St. City and State Hobbs, New Mexico

Permit No. L-2325 to Appropriate
(appropriate, repair well, change location of well)

In the Lea County Underground Basin
(name of underground reservoir, artesian basin, etc.)

2. Description of well: location, NH W, NH W, NE W of Section 34

Township 18 Range 38; total depth 156 feet; outside diameter of top casing

(or hole, if uncased) 7 inches; if artesian, is well equipped with gate valve? _____; name

and address of driller, J. E. Barton, 920 E. Gypay St., Hobbs, New Mexico

Date drilled, Sept. 10 1953

3. Record of Pumping Test (to be supplied by person or firm making test; Name and address of person making

test, No. test

date of test, None 19____; depth to water before test, _____ feet, and im-

mediately afterward _____ feet; Length of test, _____ hours; average discharge, _____ G.P.M.;

Specific capacity of well, _____ gal. per min. per ft. of drawdown.

4. Description of pump: Make, Peerless Champion Electric 5 HP

type, SC14; if turbine type, give size of column, _____ inches; diameter of

bowls _____ inches; number of bowls _____; length of suction pipe, _____ feet; total

length of column, bowls and suction pipe, _____ feet; if centrifugal type, give size of pump _____

inches; if other type, describe, _____

rated capacity of pump (if known) _____ G.P.M. at _____ rev. per min. from a depth of _____ feet.

5. Description of power plant: make, _____

type, _____; rated horsepower (if available) _____; type of drive connection

to pump, _____; date of installation of power plant, _____ 19____

6. Actual discharge of pump, _____ G.P.M. at 3450 rev. per min. from a depth of _____ feet;

Date of test _____ 19____; Name and address of dealer supplying pump and power

plant, _____

FEB 18 1955

OFFICE

APPLICATION FOR PERMIT

7. Permit acreage to be served by well, Domestic acres, to receive a total of _____ acre feet of water allowed by permit.

8. The distribution system consists of overnight storage reservoir No and _____ feet of main canal; (yes or no) give approximate capacity of reservoir or tank (if any) _____ cubic feet.

9. If above construction replaces an old well to be plugged or abandoned, fill out the following: the well abandoned is located in the _____ 1/4 _____ 1/4 _____ 1/4 of Section _____ Township _____ Range _____

Name of plugging contractor, _____

Well was plugged in accordance with terms of permit _____ 19 _____

10. Give date "Well Record" was filed with State Engineer's Office, Sept. 18 19 53

11. Pump and power plant were installed and works completed _____ 19 _____

The undersigned, owner and holder of Permit No. L-2323, being first duly sworn upon his oath, states that he has read the foregoing statements and that the same are true to the best of his knowledge and belief.

Ben M. Dock

Subscribed and sworn to before me this 17th day of February 19 55

My commission expires MAY 14, 1958 Anna Kimberly Notary Public

Affidavit of State Engineer's Representative

I hereby certify that I have duly inspected the above Works and find them adequate and properly constructed according to the terms and conditions of the permit. Note any exceptions _____

Date Feb 25 19 55

Leinie Jensen
Groundwater Supervisor or other representative of State Engineer

APPLICATION FOR PERMIT

To appropriate the Underground Waters of the State of New Mexico

LEA COUNTY UNDERGROUND BASIN

3

Application No. 1-1340 Book 10-5 Date Received JANUARY

- 1. Name of applicant J. D. Hill
Postoffice address Box 697, Hobbs, New Mexico
County of Lea State of New Mexico
- 2. Source of water supply Shallow ground water basin
(state whether artesian or shallow ground water basin)
located in LEA COUNTY UNDERGROUND BASIN
(name of underground stream, valley, artesian basin, etc.)
- 3. The well is to be located in the SE 34 of section 34 Township 18 S Range 38 E N.M.P.M.
on land owned by J. D. Hill
- 4. Description of well: driller Musslewhite Drilling Co. depth to be drilled 100 feet;
diameter (outside) of casing 7 inches; type of pump and power plant to be used
Jet pump-Electric motor
- 5. Quantity of water to be appropriated and beneficially used 3 acre feet
(feet depth or acre feet per acre)
for Household & Domestic garden purposes.
- 6. Acreage to be irrigated less than 1 acre acres
located and described as follows (describe only lands to be irrigated):

Subdivision	Sec.	Twp.	Range	Acres Irrigated	Owner
<u>SE 1/4</u>	<u>34</u>	<u>18 S</u>	<u>38 E</u>	<u>1.0</u>	<u>J. D. Hill</u>
<u>(South 80' of Lots</u>					
<u>1 & 2, Blk. 116,</u>					
<u>Highland Park Addn.</u>					
<u>to Hobbs, N. M.</u>					

(Note: location of well and acreage to be irrigated must be shown on plan on reverse side.)

- 7. Time required to commence construction soon as possible
- Time required to complete the works 1 mo.
- Time required to fully apply water to beneficial use 1 year
- 8. Additional statements or explanations (including data on any other water rights appurtenant to above lands)

FILED
JAN 1 1952
OFFICE ARTESIAN WELL SUPERVISOR HOBBS, NEW MEXICO

I J. D. Hill being first duly sworn upon my oath, depose and say that I have carefully read the foregoing statement and each and all of the items contained therein, and that the same are true to the best of my knowledge and belief.

J. D. Hill applicant

Subscribed and sworn to before me this 2nd day of January A. D. 1952

My Commission expires Sept. 26, 1953
John W. Pheasant Notary Public.

114
11-1-52

APPROVAL OF THE STATE ENGINEER

Number of this permit L-1340 Date received corrected _____
 Recorded in Book LC-5 Publication of notice ordered _____
 Page 1340 Name of paper _____
 Application received January 16, 1952 Affidavit of publication filed _____
 Date returned for correction _____ Date of approval January 18, 1952

This application is approved for 3 _____ acre feet of water
 subject to all prior valid and existing rights to the use of the waters of said underground source and provided that
 the applicant complies with all rules and regulations of the State Engineer pertaining to the drilling of wells _____
Well to be drilled by drilling contractor licensed in the State of New Mexico.
Diameter of well not to exceed 7 inches. Appropriation of water to be limited
at all times to 3 acre feet per annum for domestic purposes and the irrigation
of not more than 1 acre of non-commercial garden.

Works shall be completed and proofs filed on or before January 18, 1953

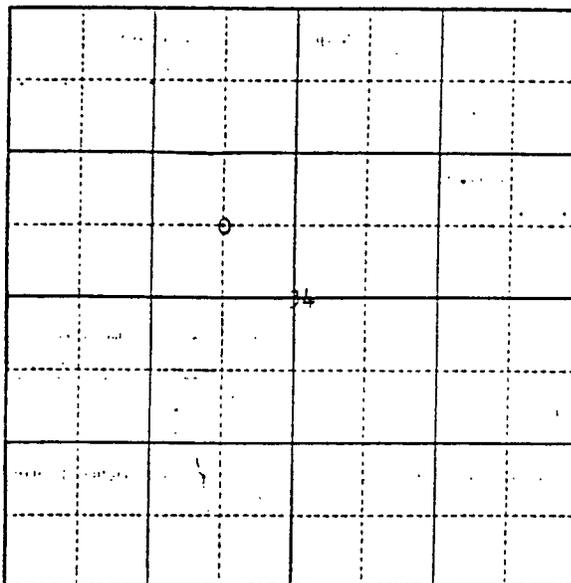
Water shall be applied to beneficial use and proofs filed on or before _____

This is to certify that I have examined the above application for permit to appropriate the underground waters
 of the State of New Mexico and hereby approve the same subject to the foregoing provisions and conditions.

Witness my hand and seal this 18th day of January, A. D. 19 52

[Signature]
 Assistant State Engineer

LOCATE WELL AND ACREAGE TO BE IRRIGATED AS ACCURATELY AS POSSIBLE ON FOLLOWING PLAT:
 Section (s) 34, Township 18 S, Range 38 E, N.M.P.M.



INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$5.00.
 Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5—Irrigation use shall be stated in feet depth or acre feet of water per acre to be applied on the land. If for
 domestic, municipal, or other purposes, state total quantity in acre feet to be used annually. Domestic use may include
 the irrigation of not more than one acre of lawn and garden for noncommercial use.

Sec. 6—Describe only the lands to be irrigated. If on unsurveyed lands describe by legal subdivision "as pro-
 jected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some perma-
 nent, easily located natural object.

Sec. 7—Estimate time reasonably required to commence and to complete project.

Sec. 8—If lands are irrigated from any other source, explain in this section. Give any other data necessary to
 fully describe water right sought.

If additional space is necessary, use a separate sheet or sheets and attach securely hereto.

[Handwritten mark]
 11/15/52

~~RECORD OF DEEP WELLS~~

WELL RECORD

FEB 13 1952

STATE ENGINEER

Date of Receipt: _____ Permit No. 1310

Name of permittee, J. D. Hill

Street or P.O., Box 697 City and State Hobbs, New Mexico

1. Well location and description: The Shallow well is located in _____ N. S.E. _____ W. _____ E. of Section _____ Township 18a Range 38E; Elevation of top of casing above sea level, _____ feet; diameter of hole, 7 inches; total depth, 102 feet; depth to water upon completion, 80 feet; drilling was commenced Feb. 4 1952 and completed Feb. 6 1952; name of drilling contractor, O.R. Muslowwhite Box 56; Address, Hobbs, New Mexico; Driller's License No. 40-99

2. Principal Water-bearing Strata:

No.	Depth in Feet		Thickness	Description of Water-bearing Formation
	From	To		
No. 1	<u>75</u>	<u>102</u>	<u>27</u>	<u>Red Sand Fine & Sand Rock</u>
No. 2				
No. 3				
No. 4				
No. 5				

3. Casing Record:

Diameter in inches	Pounds per ft.	Threads per inch	Depth of Casing or Liner		Feet of Casing	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>7</u>	<u>20</u>				<u>15</u>			

4. If above construction replaces old well to be abandoned, give location: _____ N. _____ E. _____ W. _____ E. of Section _____ Township _____ Range _____; name and address of plugging contractor: _____

date of plugging, _____ 19 _____; describe how well was plugged: _____

FEB 11 1952

STATE ENGINEER
WELL SUPERVISOR
ROSWELL, NEW MEXICO

9/12/52

WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1

(A) Owner of well Buster Florence
 Street and Number 1000 N. Ship St.
 City Hobbs St
 Well was drilled under Permit No. L-1082
NE 1/4 NE 1/4 NW 1/4 of Section 34 Twp.
 (B) Drilling Contractor _____
 Street and Number _____
 City _____ State _____
 Drilling was commenced _____ 19____
 Drilling was completed _____ 19____

(Plat of 640 acres)

Elevation at top of casing in feet above sea level _____ Total depth of well _____
 State whether well is shallow or artesian _____ Depth to water upon completion _____

Section 2

PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1				
2				
3				
4				
5				

1963 JUL 17 PM 1:12
 STATE ENGINEER OFFICE
 SANTA FE, N.M.

Section 3

RECORD OF CASING

Dia. in.	Pounds ft.	Threads in.	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To

Section 4

RECORD OF MUDDING AND CEMENTING

Depth in Feet		Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To				

Section 5

PLUGGING RECORD

Name of Plugging Contractor O. R. Musslewhite License No. WD99
 Street and Number Box 56 City Hobbs State New Mexico
 Tons of Clay used _____ Tons of Roughage used _____ Type of roughage _____
 Plugging method used Filled with rock & cemented Date Plugged July 1, 1963
 Plugging approved by: _____

Cement Plugs were placed as follows:

No.	Depth of Plug		No. of Sacks Used
	From	To	
1	0	5	1

FOR USE OF STATE ENGINEER ONLY

Date Received 1963 JUL 18 AM 8:13

File No. L-1082 Use Dom. Location No. 18.38.34/22

[Signature]
Basin Supervisor

L-1082

WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1

(A) Owner of well Juster Florence
 Street and Number 1000 North 5th
 City Wabbs State New Mexico
 Well was drilled under Permit No. 1022 and is located in the
1/4 1/4 1/4 of Section 34 Twp. 12 Rge. 32E
 (B) Drilling Contractor O. P. MUSTLEY-1775 License No. ND 99
 Street and Number 305 36
 City Wabbs State New Mexico
 Drilling was commenced Repair Oct. 3 19 55
 Drilling was completed Oct. 4 19 55

(Plat of 640 acres)

Elevation at top of casing in feet above sea level _____ Total depth of well 155
 State whether well is shallow or artesian shallow Depth to water upon completion 65

Section 2

PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1	110	155	25	Red Sand
2				
3				
4				
5				

Section 3

RECORD OF CASING

Dia in.	Pounds ft.	Threads in.	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To

Section 4

RECORD OF MUDDING AND CEMENTING

Depth in Feet		Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To				

Section 5

PLUGGING RECORD

Name of Plugging Contractor _____ License No. _____
 Street and Number _____ City _____ State _____
 Tons of Clay used _____ Tons of Roughage used _____ Type of roughage _____
 Plugging method used _____ Date Plugged _____ 19 _____
 Plugging approved by: _____

Cement Plugs were placed as follows:

No.	Depth of Plug		No. of Sacks Used
	From	To	

FOR USE OF STATE ENGINEER ONLY--

Date Received OCT 13 1955

OFFICE
GROUND WATER SUPERVISOR
ROSEMBO, NEW MEXICO

File No. L-1082 Use 80 Altd. Location No. 18 38 39 127

L-1082

APPROVAL OF THE STATE ENGINEER

Number of this permit L-1082 Date received corrected _____
 Recorded in Book LC-4 Publication of notice ordered _____
 Page 1082 Name of paper _____
 Application received March 14, 1951 Affidavit of publication filed _____
 Date returned for correction _____ Date of approval March 16, 1951
 This application is approved for 3 acre feet of water

subject to all prior valid and existing rights to the use of the waters of said underground source and provided that the applicant complies with all rules and regulations of the State Engineer pertaining to the drillings of wells
Appropriation of water to be limited at all times to 3 acre feet per annum for domestic purposes and the irrigation of not more than 1 acre of non-commercial garden.

Works shall be completed and proofs filed on or before March 16, 1952
 Water shall be applied to beneficial use and proofs filed on or before _____

This is to certify that I have examined the above application for permit to appropriate the underground waters of the State of New Mexico and hereby approve the same subject to the foregoing provisions and conditions.

Witness my hand and seal this 16th day of March A. D. 1951
[Signature]
 Assistant State Engineer

LOCATE WELL AND ACEEAGE TO BE IRRIGATED AS ACCURATELY AS POSSIBLE ON FOLLOWING PLAT:
 Section (s) 34 Township 18 South Range 38 East N.M.P.M.

	0		
Within the City Limits			
of Hobbs.			
Section 34			

0 well site

INSTRUCTIONS

- 1. This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$5.00. Each of triplicate copies must be properly signed and attested.
 - 2. A separate application for permit must be filed for each well used.
 - 3. Secs. 1-4—Fill out all blanks fully and accurately.
 - 4. Sec. 5—Irrigation use shall be stated in feet depth or acre feet of water per acre to be applied on the land. If for domestic, municipal, or other purposes, state total quantity in acre feet to be used annually. Domestic use may include the irrigation of not more than one acre of lawn and garden for noncommercial use.
 - 5. Sec. 6—Describe only the lands to be irrigated. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and the survey to some permanent, easily located natural object.
 - 6. Sec. 7—Estimate time reasonably required to commence and to complete project.
 - 7. Sec. 8—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.
- If additional space is necessary, use a separate sheet or sheets and attach securely hereto.

APPLICATION FOR PERMIT

To appropriate the Underground Waters of the State of New Mexico

Lea County Underground Basin

Application No. L-1082 Book VIC-4 Date Received March 14, 1951

1. Name of applicant Buster Florence
 Postoffice address 1000 North Shipp; Hobbs
 County of Lea State of New Mexico

2. Source of water supply Shallow ground water basin
(State whether artesian or shallow ground water basin)
 located in Lea County Underground Basin
(Name of underground stream, well, artesian basin, etc.)

3. The well is to be located in the NE 4, NE 4, NW 4,
 of section 34 Township 18 South Range 38 East N.M.P.M.
 on land owned by Buster Florence

4. Description of well: driller Abbott Brothers; depth to be drilled 100 M or L feet;
 diameter (outside) of casing 6 inch hole inches; type of pump and power plant to be used
Domestic pressure system

5. Quantity of water to be appropriated and beneficially used (3) three
(feet depth or acre feet per acre)
 for Domestic and family garden and lawn purposes.

6. Acreage to be irrigated 1.0 (One) acres
 located and described as follows (describe only lands to be irrigated):

Subdivision	Sec.	Twp.	Range	Acres Irrigated	Owner
<u>NE 1/4 NE 1/4 NW 1/4</u>	<u>34</u>	<u>18S</u>	<u>38E</u>	<u>1.0</u>	<u>Buster Florence</u>

More particularly described as Lot 190, Block 8 of the Park Addition to the Town of Hobbs.

RECEIVED

MAR 14 1951

STATE ENGINEER

(Note: location of well and acreage to be irrigated must be shown on Form on reverse side.)

7. Time required to commence construction 3 weeks
 Time required to complete the works 2 months
 Time required to fully apply water to beneficial use 1 year

8. Additional statements or explanations (including data on any other water rights appurtenant to above lands)
City water is not available at these locations

FILED

MAR 16 1951

OFFICE
 ARTESIAN WELL SUPERVISOR
 ROSWELL NEW MEXICO

I, Mrs. Clyde Abbott for Buster Florence being first duly sworn upon my oath, depose and say that I have carefully read the foregoing statement and each and all of the items contained therein, and that the same are true to the best of my knowledge and belief.

Buster Florence applicant

by Mrs. Clyde Abbott

Subscribed and sworn to before me this 8th day of March A.D. 1951

My Commission expires Sept. 26, 1953

J. W. Shearman
 Notary Public

187
 L-1082

APR 17 1952

WELL RECORD

STATE ENGINEER

Date of Receipt _____

Permit No. I-1082

Name of permittee Buster Florence

Street or P.O. 1000 N. Shipp City and State Hobbs, New Mexico

1. Well location and description: The Shallow well is located in NE 4. NE 4.
(shallow or artesian)

NW 4 of Section 34 Township 18 South, Range 38 East; Elevation of top of

casing above sea level X feet; diameter of hole 7 inches; total depth 110 feet;

depth to water upon completion 50 feet; drilling was commenced March 15 1951

and completed March 16 1951; name of drilling contractor Abbott Brothers

P.O. Box 537; Address Hobbs, New Mexico; Driller's License No. 4D-46

2. Principal Water-bearing Strata:

No.	Depth in Feet		Thickness	Description of Water-bearing Formation
	From	To		
No. 1	50	110	60	Water Sand
No. 2				
No. 3				
No. 4				
No. 5				

3. Casing Record:

Diameter in inches	Pounds per ft.	Threads per foot	Depth of Casing or Liner From Top Section	Feet of Casing	Type of Shoe	Perforations From To
<u>surface only</u>						

4. If above construction replaces old well to be abandoned, give location: _____ 4. _____ 4. _____ 4.

of Section _____ Township _____ Range _____; name and address of plugging contractor, _____

date of plugging _____ 19____; describe how well was plugged: _____

APR 11 1952
 OFFICE
 ARTESIAN WELL SUPERVISOR

L-1082

RECEIVED

(This form to be executed in triplicate)

APR 17 1952

PROOF OF COMPLETION OF WORKS BY STATE ENGINEER
UNDERGROUND WATERS

Date of Receipt _____ Permit No. L-1082

1. Name of permittee Buster Florence

P. O. address 1000 N. Shipp City and State Hobbs, New Mexico

Permit No. L-1082 to Appropriate water
(appropriate, repair well, change location of well)

In the LEA COUNTY UNDERGROUND BASIN
(name of underground reservoir, artesian basin, etc.)

2. Description of well: location, NE $\frac{1}{4}$, NE $\frac{1}{4}$, SW $\frac{1}{4}$ of Section 34

Township 18 South, Range 38 East; total depth, 110 feet; outside diameter of top casing

(or hole, if uncased) 7 inches; if artesian, is well equipped with gate valve? No; name

and address of driller, Abbott Brothers, P.O. Box 637, Hobbs, New Mexico

Date drilled, March, 1951

3. Record of Pumping Test (to be supplied by person or firm making test; Name and address of person making

test, None made

date of test, _____, 19____; depth to water before test, _____ feet, and im-

mediately afterward, _____ feet; Length of test, _____ hours; average discharge, _____ G.P.M.;

Specific capacity of well, _____ gal. per min. per ft. of drawdown.

4. Description of pump: Make, Johnston

type, jet; if turbine type, give size of column, _____ inches; diameter of

bowls, _____ inches; number of bowls, _____; length of suction pipe, _____ feet; total

length of column, bowls and suction pipe, _____ feet; if centrifugal type, give size of pump, _____

inches; if other type, describe, 2 1/2 X 2" tubing 80'

rated capacity of pump (if known) 10 G.P.M. at 3500 rev. per min. from a depth of 80 feet.

5. Description of power plant: make, G.E. Electric

type, electric; rated horsepower (if available) 2; type of drive connection

to pump, direct; date of installation of power plant, April, 1951

6. Actual discharge of pump, 10 est. G.P.M., at _____ rev. per min. from a depth of _____ feet;

Date of test, _____, 19____; Name and address of dealer supplying pump and power

plant, Bought from individual second hand

26
APR 17 1952

FILED
APR 11 1952
ARTESIAN WELL SUPERVISOR
ROSWELL, NEW MEXICO

L/1082

7. Permit acreage to be served by well, 2.0 acres, to receive a total of 3 acre feet of water allowed by permit.

8. The distribution system consists of overnight storage reservoir 10 and _____ feet of main canal; (1/2 or so)
give approximate capacity of reservoir or tank (if any) _____ cubic feet.

9. If above construction replaces an old well to be plugged or abandoned, fill out the following: the well abandoned is located in the _____ $\frac{1}{4}$ _____ $\frac{1}{4}$ _____ $\frac{1}{4}$ of Section _____ Township _____ Range _____;

Name of plugging contractor, _____;

Well was plugged in accordance with terms of permit _____ 19 _____

10. Give date "Well Record" was filed with State Engineer's Office, April 1951

11. Pump and power plant were installed and works completed ~~XXXXX~~ April 1951

The undersigned, owner and holder of Permit No. L-1082, being first duly sworn upon his oath, states that he has read the foregoing statements and that the same are true to the best of his knowledge and belief.

Buster Florence

Subscribed and sworn to before me this 10th day of April 1952.

My commission expires Sept. 26, 1953

John W. Dorman
Notary Public.

Affidavit of State Engineer's Representative

I hereby certify that I have duly inspected the above Works and find them adequate and properly constructed according to the terms and conditions of the permit. Note any exceptions _____

Delton Kinchloe
Groundwater Supervisor or other representative of State Engineer.

Date, April 15 1952

(EXECUTE IN TRIPLICATE ACCOMPANIED BY \$1.00 FILING FEE)

APPLICATION FOR PERMIT TO REPAIR WELL

Lee County

(Name of Underground Water Basin)

Book LC-4

File No. L-1082

Application received September 4 1955

1. Name of applicant Buster Florence

Postoffice address 1000 North Ship St. Hobbs, New Mexico

County of Lee State of New Mexico

2. Source of supply Shallow
(State whether artesian or non-artesian)

3. The well to be repaired or deepened is located in the NE $\frac{1}{4}$ NE $\frac{1}{4}$
NW $\frac{1}{4}$ of section 34 Township 18S
Range 32E N.M.P.M.

4. Water rights under above described well are recorded in the office of the State Engineer under File No. L-1082

5. Lands with valid water rights irrigated under above well comprise _____ acres described as follows

Subdivision	Sec.	Twp.	Range	Acres	Owner
	<u>34</u>	<u>18S</u>	<u>32E</u>	<u>1</u>	<u>Buster Florence</u>

6. If above lands receive water from any source other than above well, or if well irrigates lands other than above, describe fully:

7. Repairs contemplated: (give comprehensive statement of proposed work, including present and proposed depths. If well is to be deepened) Present depth 100 ft.
Clean out and drill deeper to 135 ft.

8. Name of drilling contractor: D. R. Musslewhite

9. Estimated date upon which repairs can be completed: 1 month

SEP 15 1955

FILED
SEP 6 1955
OFFICE
GROUND WATER SUPERVISOR
ROSWELL, NEW MEXICO

L-1082

I Buster Florence being first duly sworn, do hereby certify that I am the sole owner and holder of said water right, File (sole, partial, agent for, etc.)

No. L-1082; that the above statements are true to the best of my knowledge and belief; and that I will comply with all provisions stipulated by the State Engineer in his approval of this application.

Subscribed and sworn to before me this 2nd day of Sept 1955

My Commission Expires

4-16-7-1956

ROBERT
Notary Public

ACTION OF STATE ENGINEER

Number of this application L-1082

Date of receipt of application September 6, 1955

Recorded in book LC-4 Page 1082

Approved September 20, 1955

Repairs shall be completed on or before September 30, 1956

This application is approved provided that all rules and regulations of the State Engineer pertaining to the drilling and repair of wells be complied with Well to be repaired by drilling contractor licensed in the State of New Mexico. Works shall be completed and Proof of Completion filed on or before September 30, 1956.

This is to certify that I have examined the above application for permit to repair or deepen well and hereby approve the same subject to the foregoing provisions and conditions.

Witness my hand and seal this 20th day of September A. D. 1955

S. E. REYNOLDS

State Engineer

BY:

D. E. Kienlen

D. E. Kienlen
Asst. to CHIEF
WATER RIGHTS DIVISION

PROOF OF COMPLETION OF WORKS

UNDERGROUND WATERS

Date of Receipt October 13, 1955 Permit No. L-1082

1. Name of permittee Theresa Florence

P. O. address 1006 North Shipp City and State Hobbs, N. M.

Permit No. L-1082 to repair well
(appropriate, repair well, change location of well)

in the Lea County
(name of underground reservoir, artesian basin, etc.)

2. Description of well: location, N 7 W 4, N 7 W 4, N 4 W 4 of Section 34

Township 12S Range 36E; total depth, 155 feet; outside diameter of top casing

(or hole, if uncased) 7 inches; if artesian, is well equipped with gate valve? _____; name

and address of driller, O. P. Musslewhite Box 30 Hobbs, N. M.

Date drilled, October 7, 1955, 19__

3. Record of Pumping Test (to be supplied by person or firm making test; Name and address of person making

test, None

date of test, NONE, 19__; depth to water before test, _____ feet, and im-

mediately afterward _____ feet; Length of test, _____ hours; average discharge, _____ G.P.M.;

Specific capacity of well _____ gal. per min. per ft. of drawdown.

4. Description of pump: Make, 1 1/2 H. P. Beta Submersible

type, turbine; if turbine type, give size of column, 1 1/2 inches; diameter of

bowls 7 7/8 inches; number of bowls 12; length of suction pipe, _____ feet; total

length of column, bowls and suction pipe, _____ feet; if centrifugal type, give size of pump _____

inches; if other type, describe, _____

rated capacity of pump (if known) 30 G.P.M. at _____ rev. per min. from a depth of _____ feet.

5. Description of power plant: make, electric

type, _____; rated horsepower (if available) _____; type of drive connection

to pump, _____; date of installation of power plant, _____, 19__

6. Actual discharge of pump, _____ G.P.M. at _____ rev. per min. from a depth of _____ feet;

Date of test, _____, 19__; Name and address of dealer supplying pump and power

plant, O. P. Musslewhite

Box 30 Hobbs, N. M.

OCT 13 1955
AT 71

OCT 13 1955
OFFICE
GROUND WATER SUPERVISOR
RICHARD L. W. BENDIS

L-1082

7. Permit acreage to be served by well _____ acres, to receive a total of _____ acre feet of water allowed by permit.
8. The distribution system consists of overnight storage reservoir _____ and _____ feet of main canal; (yes or no)
- give approximate capacity of reservoir or tank (if any) _____ cubic feet.
9. If above construction replaces an old well to be plugged or abandoned, fill out the following: the well abandoned is located in the _____ $\frac{1}{4}$ _____ $\frac{1}{4}$ _____ $\frac{1}{4}$ of Section _____ Township _____ Range _____;
- Name of plugging contractor, _____;
- Well was plugged in accordance with terms of permit _____ 19 _____
10. Give date "Well Record" was filed with State Engineer's Office, October 10, 19 55
11. Pump and power plant were installed and works completed October 2, 19 55

The undersigned, owner and holder of Permit No. 4-1082, being first duly sworn upon his oath, states that he has read the foregoing statements and that the same are true to the best of his knowledge and belief.

Justis Florence J.
By C. R. Muslewski

Subscribed and sworn to before me this 10th day of Oct 19 55

My commission expires 4-16-1957 R. M. M.
 Notary Public

Affidavit of State Engineer's Representative

I hereby certify that I have duly inspected the above Works and find them adequate and properly constructed according to the terms and conditions of the permit. Note any exceptions _____

James J. Jager
 Groundwater Supervisor or other representative of State Engineer

Date, Oct. 14, 19 55

WELL RECORD

Recorded in Book LC-11 Publication of notice ordered _____
 Page 2766 Name of paper _____
 Application received September 22, 1955 Affidavit of publication filed _____
 Date returned for correction _____ Date of approval November 2
 This application is approved for three

5

subject to all prior valid and existing rights to the use of the waters of said underground source
 the applicant complies with all rules and regulations of the State Engineer pertaining to the drilling of wells
Well to be drilled by drilling contractor licensed in the State of New Mexico.
Diameter of well not to exceed 7 inches. Appropriation of water to be limited
at all times to 3 acre feet per annum for domestic purposes and the irrigation
of not more than 1 acre of non-commercial garden. This permit will automatically
expire, unless this well is drilled and the Well Record filed on or before
October 31, 1956.

Works shall be completed and proofs filed on or before _____

Water shall be applied to beneficial use and proofs filed on or before _____

This is to certify that I have examined the above application for permit to appropriate the underground waters of the State of New Mexico and hereby approve the same subject to the foregoing provisions and conditions.

Witness my hand and seal this 2nd day of November, A.D. 1955.

BY: D. E. Kienlen Asst. to CHIEF S. E. REYNOLDS State Engineer
 D. E. Kienlen, WATER RIGHTS DIVISION

LOCATE WELL AND ACREAGE TO BE IRRIGATED AS ACCURATELY AS POSSIBLE ON FOLLOWING PLAT:
 Section (s) 33 Township 18 S Range 38 E, N.M.P.M.

					0

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$5.00. Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5—Irrigation use shall be stated in feet depth or acre feet of water per acre to be applied on the land. If for domestic, municipal, or other purposes, state total quantity in acre feet to be used annually. Domestic use may include the irrigation of not more than one acre of lawn and garden for noncommercial use.

Sec. 6—Describe only the lands to be irrigated. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some permanent, easily located natural object.

Sec. 7—Estimate time reasonably required to commence and to complete project.

Sec. 8—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.

If additional space is necessary, use a separate sheet or sheets and attach securely hereto.

APPLICATION FOR PERMIT

To Appropriate the Underground Waters of the State of New Mexico

LEA COUNTY UNDERGROUND BASIN

Application No. L-2766 Book LC-11 Date Received September 22, 1955

1. Name of applicant C. B. Medlin
 Postoffice address STAR RT # City or Town Hobbs
 County of LEA State of N.M.

2. Source of water supply SHALLOW
(State whether artesian or shallow ground water basin)
 located in Lea Shallow Water Basin
(Name of underground stream, well, artesian basin, etc.)

3. The well is to be located in the N.E. 1st 1/4 Block 3 1st Unit Westview add.
 of section 33 Township 18S Range 38E N.M.P.M.
 on land owned by C. B. Medlin

4. Description of well: driller L. E. Gatten W.D. No. _____; depth to be drilled 80 feet;
 diameter (outside) of casing 7" inches; type of pump and power plant to be used
1/2 hp Pump

5. Quantity of water to be appropriated and beneficially used Domestic
(feet depth or acre feet per acre)
 for _____ purposes.

6. Acreage to be irrigated _____ acres
 located and described as follows (describe only lands to be irrigated):

Subdivision	Sec.	Twp.	Range	Acres Irrigated	Owner
Location of Well	SEINE UNIT	33-18S-38E			

(Note: location of well and acreage to be irrigated must be shown on plat on reverse side.)

7. Time required to commence construction _____
 Time required to complete the works _____
 Time required to fully apply water to beneficial use _____

8. Additional statements or explanations (including data on any other water rights appurtenant to above lands)

I, _____, being first duly sworn upon my oath, depose and say that I have carefully read the foregoing statement and each and all of the items contained therein, and that the same are true to the best of my knowledge and belief.
C. B. Medlin applicant

Subscribed and sworn to before me this 20th day of Sept A.D. 1955
 My Commission expires 2-18-57
 _____ Notary Public.

OCT 13 1955
 OFFICE
 GROUND WATER DIVISION
 ALBUQUERQUE, N.M.

OCT 13 1955
 OFFICE
 GROUND WATER DIVISION
 ALBUQUERQUE, N.M.

WELL RECORD

134
7,819

6

Date of Receipt L-2272

Name of permittee, Dallas Wilson

Street or P. O. Box 1883, City and State Hobbs, New Mexico

1. Well location and description: The shallow well is located in SE $\frac{1}{4}$, NE $\frac{1}{4}$,
(shallow or artesian)

NE $\frac{1}{4}$ of Section 33, Township 18S, Range 38E; Elevation of top of

casing above sea level, _____ feet; diameter of hole, 7 inches; total depth, 105 feet;

depth to water upon completion, 60 feet; drilling was commenced July 9, 1953

and completed Sept. 10, 1953; name of drilling contractor J. E. Barton

Address, Box 42 Hobbs, N. M.; Driller's License No. WD-14

2. Principal Water-bearing Strata:

	Depth in Feet		Thickness	Description of Water-bearing Formation
	From	To		
No. 1	<u>60</u>	<u>105</u>	<u>45</u>	<u>water sand</u>
No. 2				
No. 3				
No. 4				
No. 5				

3. Casing Record:

Diameter in inches	Pounds per ft.	Threads per inch	Depth of Casing or Liner		Feet of Casing	Type of Shoe	Perforation	
			Top	Bottom			From	To
<u>5 1/2</u>		<u>welded</u>	<u>0</u>	<u>105</u>	<u>10.5</u>		<u>85</u>	<u>105</u>

4. If above construction replaces old well to be abandoned, give location: _____ $\frac{1}{4}$, _____ $\frac{1}{4}$, _____ $\frac{1}{4}$

of Section _____, Township _____, Range _____; name and address of plugging contractor, _____

date of plugging _____, 19____; describe how well was plugged: _____

SEP 16 1953

[Handwritten signature]

Number of this permit L-2272 Date received corrected _____
 Recorded in Book LC-9 Publication of notice ordered _____
 Page 2272 Name of paper _____
 Application received July 9, 1953 Affidavit of publication filed _____
 Date returned for correction _____ Date of approval July 10, 1953

This application is approved for 3 acre feet of water
 subject to all prior valid and existing rights to the use of the waters of said underground source and provided that
 the applicant complies with all rules and regulations of the State Engineer pertaining to the drilling of wells
Well to be drilled by drilling contractor licensed in the State of New Mexico.
Diameter of well not to exceed 7 inches. Appropriation of water to be limited
at all times to 3 acre feet per annum for domestic purposes and the irrigation
of not more than 1 acre of non-commercial garden.

Works shall be completed and proofs filed on or before July 30, 1954
 Water shall be applied to beneficial use and proofs filed on or before _____

This is to certify that I have examined the above application for permit to appropriate the underground waters
 of the State of New Mexico and hereby approve the same subject to the foregoing provisions and conditions.

Witness my hand and seal this 30th day of July, A. D. 19 53
[Signature]
 ASSISTANT State Engineer

LOCATE WELL AND ACREAGE TO BE IRRIGATED AS ACCURATELY AS POSSIBLE ON FOLLOWING PLAT:
 Section (s) 33 Township 18S Range 38E N.M.P.M.

Water well to be located
 1223' from north line &
 from east line of Section
 18S-38E in Block 1, Lot
 first unit, Westview Add
 to City of Hobbs, New Me.

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$3.00.
 Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5—Irrigation use shall be stated in feet depth or acre feet of water per acre to be applied on the land. If for
 domestic, municipal, or other purposes, state total quantity in acre feet to be used annually. Domestic use may include
 the irrigation of not more than one acre of lawn and garden for noncommercial use.

Sec. 6—Describe only the lands to be irrigated. If on unsurveyed lands describe by legal subdivision "as pro-
 jected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some perma-
 nent, easily located natural object.

Sec. 7—Estimate time reasonably required to commence and to complete project.

Sec. 8—If lands are irrigated from any other source, explain in this section. Give any other data necessary to
 fully describe water right sought.

If additional space is necessary, use a separate sheet or sheets and attach securely hereto.

DEC 15 1952

WELL RECORD

NEER

7

Date of Receipt _____

Name of permittee, Gulf Oil Corp.

Street or P.O., Box 1290 City and State _____

1. Well location and description: The shallow well is located in NE $\frac{1}{4}$, NW $\frac{1}{4}$,
(shallow or artesian)

NE $\frac{1}{4}$ of Section 33, Township 188, Range 38; Elevation of top of

casing above sea level, unknown feet; diameter of hole, unknown inches; total depth, unknown feet;

depth to water upon completion, _____ feet; drilling was commenced _____ 19____

and completed unknown 19____; name of drilling contractor _____

Address, unknown; Driller's License No. _____

2. Principal Water-bearing Strata:

No.	Depth in Feet		Thickness	Description of Water-bearing Formation
	From	To		
No. 1				
No. 2				
No. 3				
No. 4				
No. 5				

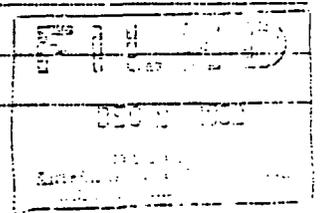
3. Casing Record:

Diameter in inches	Pounds per ft.	Threads per inch	Depth of Casing or Liner		Feet of Casing	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>8-1/4"</u>	<u>unknown</u>		<u>0</u>	<u>92</u>	<u>92</u>	<u>none</u>	<u>unknown</u>	
<u>6"</u>	<u>"</u>		<u>0</u>	<u>58</u>	<u>58</u>	<u>"</u>	<u>"</u>	

4. If above construction replaces old well to be abandoned, give location: _____ $\frac{1}{4}$, _____ $\frac{1}{4}$, _____ $\frac{1}{4}$

of Section _____ Township _____ Range _____; name and address of plugging contractor _____

date of plugging _____ 19____; describe how well was plugged: _____



Handwritten mark or signature

APPROVAL OF THE STATE ENGINEER
Data received corrected
Publication of notice ordered
L-1268
This form to be executed in triplicate

PROOF OF COMPLETION OF WORKS

STATE ENGINEER

UNDERGROUND WATERS

Date of Receipt December 15, 1952 Permit No. L-1268

1. Name of permittee Gulf Oil Corp.

P. O. address Box 1290 City and State Fort Worth, Texas

Permit No. L-1268 to appropriate
(appropriate, repair well, change location of well)

in the Lea County Basin
(name of underground reservoir, artesian basin, etc.)

2. Description of well: location, NE $\frac{1}{4}$, NW $\frac{1}{4}$, NE $\frac{1}{4}$ of Section 33

Township 18S Range 38E; total depth, unknown feet; outside diameter of top casing

(or hole, if uncased) 6 inches; if artesian, is well equipped with gate valve? _____; name

and address of driller, unknown

Date drilled, _____ 19____

3. Record of Pumping Test (to be supplied by person or firm making test; Name and address of person making

test, unknown

date of test, _____ 19____; depth to water before test, unknown feet, and im-

mediately afterward, _____ feet; Length of test, _____ hours; average discharge, _____ G.P.M.;

Specific capacity of well, unknown gal. per min. per ft. of drawdown.

4. Description of pump: Make, Pamona

type, turbine; if turbine type, give size of column, _____ inches; diameter of

bowls 4 inches; number of bowls 7; length of suction pipe, 0 feet; total

length of column, bowls and suction pipe, 85 feet; if centrifugal type, give size of pump

inches; if other type, describe, _____

rated capacity of pump (if known) _____ G.P.M. at _____ rev. per min. from a depth of _____ feet.

5. Description of power plant: make, General Electric

type, electric; rated horsepower (if available) 7 1/2; type of drive connection

to pump, shaft; date of installation of power plant, unknown 19____

6. Actual discharge of pump, unknown G.P.M. at unknown rev. per min. from a depth of unknown feet;

Date of test unknown 19____; Name and address of dealer supplying pump and power

plant, _____

Name of dealer at time of installation unknown

Handwritten initials/signature

Handwritten initials/signature

DEC 15 1952

(This form to be executed in triplicate)

WATER RECORD

domestic use

7. Permit acreage to be served by well _____ acres, to receive a total of _____ acre feet of water allowed by permit.

8. The distribution system consists of overnight storage reservoir YES and 4000 feet of main canal; give approximate capacity of reservoir or tank (if any) 2,807 cubic feet.

9. If above construction replaces an old well to be plugged or abandoned, fill out the following: the well abandoned is located in the _____ % of Section _____ Township _____ Range _____ Name of plugging contractor, _____

Well was plugged in accordance with terms of permit _____ 19 _____

10. Give date "Well Record" was filed with State Engineer's Office, _____ 19 _____

11. Pump and power plant were installed and works completed unknown 19 _____

The undersigned, owner and holder of Permit No L-1268, being first duly sworn upon his oath, states that he has read the foregoing statements and that the same are true to the best of his knowledge and belief.

Chas Taylor
Chas. Taylor
Area Prod. Supt.

Subscribed and sworn to before me this 21th day of November 19 52.

My commission expires 9-21-56
Dates Boles
Notary Public.

Affidavit of State Engineer's Representative

I hereby certify that I have duly inspected the above Works and find them adequate and properly constructed according to the terms and conditions of the permit. Note any exceptions.

W. G.
Groundwater Supervisor or other representative of State Engineer.

Date, 12 12 19 52

GENERAL CONDITIONS OF APPROVAL
 TO BE READ BY APPLICANT AND APPROVED BY THE STATE ENGINEER OF NEW MEXICO IN ACCORDANCE WITH THE PROVISIONS OF THE UNDERGROUND WATER ACT OF 1952. THESE CONDITIONS SHALL NOT BE APPLIED TO THIS PERMIT UNLESS THE APPLICANT HAS FIRST READ AND UNDERSTOOD THEM.

APPLICATION FOR PERMIT

To appropriate the Underground Waters of the State of New Mexico

LEA COUNTY UNDERGROUND WATER BASIN

Application No. L-1268 Book LC-5 Date Received April 13, 1953.

1. Name of applicant Gulf Oil Corporation
 Postoffice address Box 2167, Hobbs, New Mexico
 County of Lea State of New Mexico

2. Source of water supply Shallow Ground Water Basin
(State whether artesian or shallow ground water basin)
 located in Lea County
(Name of underground stream, valley, artesian basin, etc.)

3. The well is to be located in the NE $\frac{1}{4}$ NW $\frac{1}{4}$ NE $\frac{1}{4}$
 of section 33 Township 18 Range 38 N.M.P.M.
 on land owned by W. D. Grimes

4. Description of well: driller Existing Well; depth ~~100~~ 95' feet;
 diameter (outside) of casing 7" inches; type of pump and power plant to be used
4" Pamona

5. Quantity of water to be appropriated and beneficially used 1,000 bbls per month
(feet depth or acre feet per acre)
 for domestic purposes

6. Acreage to be irrigated _____ acres
 located and described as follows (describe only lands to be irrigated):

Subdivision	Sec.	Twp.	Range	Acres Irrigated	Owner

RECEIVED
 APR 14 1953
 STATE ENGINEER'S OFFICE
 ALBUQUERQUE, NEW MEXICO

FILED
 APR 14 1953
 OFFICE
 STATE ENGINEER
 ALBUQUERQUE, NEW MEXICO

(Notes location of well and acreage to be irrigated must be shown on plan on reverse side.)

7. Time required to commence construction _____
 Time required to complete the works _____
 Time required to fully apply water to beneficial use _____

8. Additional statements or explanations (including data on any other water rights appurtenant to above lands)
Existing well originally drilled for development of oil lease.
Water now used for domestic purposes only.

I Chas. Taylor, being first duly sworn upon my oath, depose and say that I have carefully read the foregoing statement and each and all of the items contained therein, and that the same are true to the best of my knowledge and belief.

GULF OIL CORPORATION, applicant
 by: Chas. Taylor

Subscribed and sworn to before me this 10th day of April, A. D., 1953

My Commission expires 9-24-56
Bates Poles
 Notary Public.

IMPORTANT—READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM

APPLICATION FOR PERMIT

To appropriate the Underground Waters of the State of

3

Application No. L-3729 Book LC-14 Date Received Nov

1. Name of applicant Don G. McClellan
Postoffice address Box 94, Lea City or Town Hobbs, New Mexico.
County of Lea State of New Mexico.
2. Source of water supply Shallow ground Water Basin.
located in Lea Co. Shallow ground water Basin.

For Don G. McClellan.

Beginning at a point 2390.0 feet East and north 00 03' west
I557/ 4 feet from the south west corner, of Section 33, township I8
South, Range 38 East: thence North 00 03' west 500.0 feet, thence east
100.0 feet, thence South 00 03' east 100.0 feet, thence south 00 03'
East 500.0 feet, thence west 100.0 feet to the point of beginning.
Being in the NE 1/4 of SW 1/4 of Section 33 Township I8 South, Range 38 East.
N.M.P.M. Lea Co. New Mexico. Containing 1.148 Acres more or less.

Quantity of water to be appropriated and beneficially used 3
Domestic-Non-commercial (feet depth or acre feet per acre)
for purposes.

4. Acreage to be irrigated One acres
located and described as follows (describe only lands to be irrigated):

Table with 6 columns: Subdivision, Sec., Twp., Range, Acres Irrigated, Owner. Row 1: 33, I8 S, 38 E, One, Don G. McClellan.

(Note: location of well and acreage to be irrigated must be shown on plot on reverse side.)

7. Time required to commence construction At once
Time required to complete the works 2 weeks.
Time required to fully apply water to beneficial use 3 weeks.

8. Additional statements or explanations (including data on any other water rights appurtenant to above lands)

Don G. McClellan.

I, Don G. McClellan, being first duly sworn upon my oath, depose
and say that I have carefully read the foregoing statement and each and all of the items contained therein, and that
the same are true to the best of my knowledge and belief.

Signature of Don G. McClellan, Applicant

Subscribed and sworn to before me this 20 day of November A.D., 1957

My Commission expires Nov 28-1957.

Signature of Ernest D. Donnell, Notary Public

Handwritten stamp: RECEIVED NOV 23 AM 10:16

FILED NOV 22 1957 OFFICE GROUND WATER SUPERVISOR LOSWELL NEW MEXICO

L-372

GENERAL CONDITIONS OF APPROVAL

(Three Acre Feet Per Annum)

1. Name and Address of Applicant:

Thomas B. Schnaubert
% Cashway Super Markets
512 North Dal Paso
Hobbs, New Mexico 88240

2. Describe well location under one of the following subheadings:

a. $\frac{1}{4}$ SW $\frac{1}{4}$ SW - $\frac{1}{4}$ of Sec. 27 Twp. 18 S. Rge. 38 E. N. M. P. M., in
Lea County,

b. Tract No. _____ of Map No. _____ of the _____ District.

c. Lot No. _____ of Block No. _____ of the _____ Subdivision, of record in
Lea County.

d. (Describe location by direction and distance from known land marks.)

3. Give street address or route and box No. of property upon which well is to be located, if possible:

4. Name of driller, if known: J. E. Barton

5. Approximate depth of well (if known) 130 feet; outside diameter of casing 7 inches.

6. Use of water (check appropriate box or boxes):

- Household, trees, lawn and non-commercial garden not to exceed 1 acre.
- Livestock watering.
- Drinking and sanitary purposes or the irrigation of non-commercial trees, shrubs and lawns in conjunction with a commercial operation.
- Prospecting, mining or drilling operations to discover or develop natural resources.
- Construction of public works, highways and roads.

If any of the last three were marked, give name and nature of business under Remarks. (Item 7)

7. Remarks:

I, Thomas Schnaubert affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.

Thomas Schnaubert Applicant

By: _____

Date: _____

ACTION OF STATE ENGINEER

This application is approved for the use indicated, subject to all general conditions and to the specific conditions numbered 1 & 4 on the reverse side hereof. This permit will automatically expire unless this well is drilled or driven and the well record filed on or before March 19, 1966

S. E. Reynolds, State Engineer

By: *Delbert W. Nelson*
Delbert W. Nelson
Assistant District Supervisor
Date: March 19, 1965

1965 MAR 19 AM 8:23
STATE ENGINEER OFFICE
NO. 1111 STATE

APPENDIX I

MEMO DISCUSSING FLOOD OF MAY 22, 1992



June 18, 1992

TO: Environmental File
FROM: Wayne Price *Wayne Price*
SUBJECT: HOBBS FLOOD - FRIDAY, MAY 22, 1992

On Friday, May 22, 1992 the City of Hobbs experienced a rainstorm of large magnitude in the late afternoon. Resultant rainfall was approximately 6" measured on a rain gauge that fell in about a two hour time frame. This occurred around 3:00 p.m. to 5:00 p.m. At approximately 4:30 p.m. the Hobbs plant begin to take in water along with the Pepsi building. The City of Hobbs had made a radio announcement around 4:00 p.m. that the City waste treatment plant was flooded and out of service and asked all Hobbs residents and business not to pour any water to the sewer system.

At approximately 5:00 p.m. the plant had approximately 6" of water inside and all of the tanks farms were rising to levels where some electric motors were being submerged. There was also some tanks that were in question as to whatever they were beginning to float which could cause possible line breakage and failure, which might have caused catastrophic dangerous conditions both from a safety and environmental standpoint.

At this point I notified Jim Britton of the situation and recommended immediate action to the situation. All plant crews responded and begin pumping the rainwater out of the plant and tank farms on to the ground. The Pepsi building was also flooded with approximate 4"-12" of water throughout.

Jay Miller took immediate action and personally responded by raising sacks of chemical material that was an oxidizer to a higher level, and was then removed by fork truck and carried to the dry powder room which had very little water at that time.

Rowland Trucking was called to help pump water out of the Pepsi building unloading area. Wes Johnston brought in a back-hoe from Midwestern Construction Company and built a small diversion dam to divert the water which was coming in from the northwest corner of the plant property so that water would not come in the Pepsi building but would go around the north side to the street.

Hobbs Flood - Friday, May 22, 1992

Page 2

June 18, 1992

The Hobbs laboratory located down the street called and indicated that water was coming in from the storage area. C. Root supervised a truck crew and pumped that area out and relieved that situation.

At around 8:00 p.m. that night most of the water had been pumped out to a point where it was considered safe. Most of the crews were sent home between 8:00 - 9:00 p.m.

Equipment used during the emergency operations was several Unichem delivery and transport trucks, plant pumps, Rowland Trucking Company transports and a backhoe.

Attached is a copy of the plot plan which indicate direction of water flows during the storm.

During the emergency event I noticed only on one occasion a small rainbow of possible hydrocarbon floating on the water, this rainbow was very small approximately 6" wide by 2 feet long. It was located adjacent to an empty drum that was floating on its side in the Pepsi building. During the Hobbs plant pumping operations I personally inspected all pumping operations and saw no indication of any other problems of this nature.

Attached is the Hobbs News Sun article and certain other documentation back-up material for reference.

LWP:jd

Enc.

cc: J. Britton
C. Root
J. Miller

STORMWATER FLOW - DURING HOBBS
FLOOD - MAY 22, 1992

- FIRE Extinguishers
- D- SATELLITE DRUMS
- E- EYE WASH
- S- SPILL KITS

LLNICHEM INTERNATIONAL INC.
707 NORTH LEECH ST.
HOBBS, NEW MEXICO
PHONE 393-7751

ELEVATION MARKERS

SECONDARY EVACUATION SITE

CLINTON STREET

(-2'4 1/4") (-2 1/4")

ELEVATION REF. PT.
TOP OF RAIL (0'0")

(+1 1/4")

(-12")

X (-13 1/4")

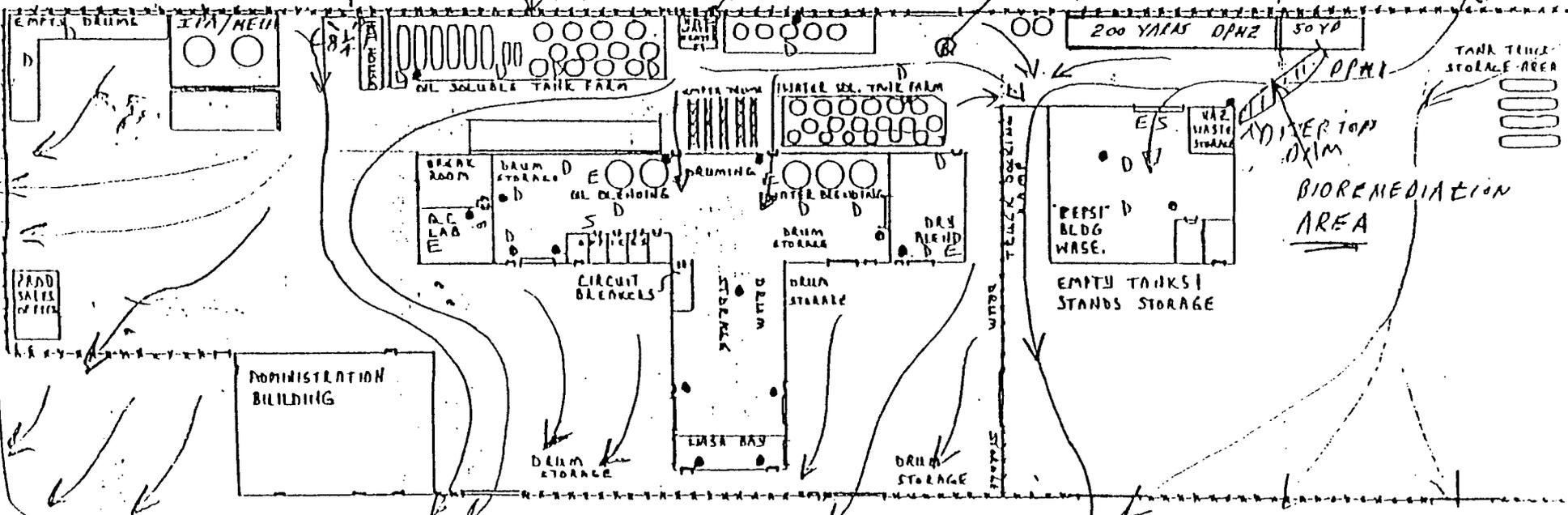
WATER WAS UP TO STEEL
RAILS ON TRACK ALMOSE
COVERING THEM ALL AT 4:00PM

TOP ARM (+3 1/4")

(-3 1/4")

@(-2'2")

(-1'10")



PRIMARY EVACUATION SITE

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 7/20/92,
or cash received on 7/24/92 in the amount of \$ 50.00
from Unichem International Inc.

for Hobbs Service Facility 6W-94
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 7/24/92

Received in ASD by: Sherry Gonzales Date: 7/24/92

Filing Fee X New Facility _____ Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____



UNICHEM INTERNATIONAL INC.
P.O. BOX 1499 (505) 393-7751
HOBBS, NEW MEXICO 88240

FIFTH THIRD BANK OF MIAMI VALLEY
P.O. BOX 1117
PIQUA, OHIO 45356-1117

56-219
422

CONTROL NUMBER [REDACTED]	
CHECK DATE	CHECK NO.
7/20/92	[REDACTED]
CHECK AMOUNT	

***\$50.00**



VOID AFTER 180 DAYS FROM DATE

PAY TO THE
ORDER OF

New Mexico Environmental Department
Water Quality Management
310 Old Santa Fe Trail
Santa Fe, NM 87505

James H. Burt
M. S. Ellis
AUTHORIZED SIGNATURE



Affidavit of Publication

No. 14070

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly

sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

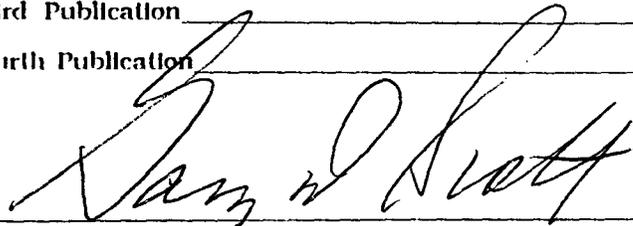
was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication September 2, 1992

Second Publication _____

Third Publication _____

Fourth Publication _____



Subscribed and sworn to before me this 8th day of September 19 92

Barbara Ann Bowers
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Publication

LEGAL NOTICE

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone: (505) 827-1800: (GW-127) Centennial Natural Gas Company, Robert W. Shain, Vice President, 4200 E. Skelley Drive, Suite 560, Tulsa, Oklahoma 74135, has submitted a discharge plan application for their Burton Flats Gas Processing Plant located in the SW/4 NE/4, Section 9, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. Approximately 275 gallons per day of waste

water with a total dissolved solids concentration of approximately 2600 mg/l is stored in an above-ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 800 feet with a total dissolved solids concentration ranging from 5000 mg/l to 10000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-94) - UNICHEM International, James H. Britton, Vice President of Operations, P.O. Box 1499, Hobbs, New Mexico 88240, has submitted a discharge plan application for their Hobbs Service Facility located in the W/2 NW/4, Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is disposed

of, after testing, by the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hear-

interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of August 1992.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY,
Director

SEAL
Published in the Artesia Daily Press, Artesia, N.M. September 2, 1992.

**NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL
RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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(GW-04) - UNICHEM International, James H. Britton, Vice President of Operations, P.O. Box 1499, Hobbs, New Mexico 88240, has submitted a discharge plan application for their Hobbs Service Facility located in the W/2 NW/4, Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is disposed of, after testing, to the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of August, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Journal: September 2, 1992

STATE OF NEW MEXICO

County of Bernalillo

ss

OIL CONSERVATION DIVISION
RECEIVED

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 2 day of Sept, 1992, and the subsequent consecutive publications on 2, 1992.

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 2 day of Sept, 1992.

PRICE \$ 28.85

Statement to come at end of month.

ACCOUNT NUMBER C 21184

OFFICIAL SEAL

Bernadette Ortiz

BERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO

NO FILED WITH SECRETARY OF STATE
Commission Expires 12-18-93

CLA-22-A (R-12/92)

92 SEP 9 00

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-127) - Centennial Natural Gas Company, Robert W. Shain, Vice President, 4200 E. Skelley Drive, Suite 560, Tulsa, Oklahoma 74135, has submitted a discharge plan application for their Burton Flats Gas Processing Plant located in the SW/4 NE/4, Section 9, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. Approximately 275 gallons per day of waste water with a total dissolved solids concentration of approximately 2600 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 800 feet with a total dissolved solids concentration ranging from 5000 mg/l to 10000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-94) - UNICHEM International, James H. Britton, Vice President of Operations, P.O. Box 1499, Hobbs, New Mexico 88240, has submitted a discharge plan application for their Hobbs Service Facility located in the W/2 NW/4, Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 3600 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is disposed of, after testing, to the City of Hobbs Publicly Owned Treatment Works (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

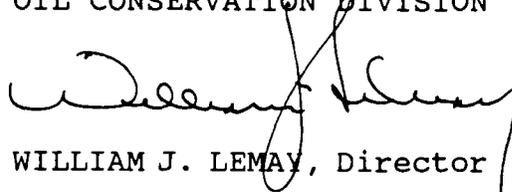
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing

may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of August, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

RECEIVED

JUL 21 1992

OIL CONSERVATION DIV.
SANTA FE

July 21, 1992

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Dear Mr. LeMay:

Discharge Plan Application - Hobbs Facility - Lea County, New Mexico

Please accept this letter as our application for the Hobbs facility discharge plan required pursuant to Part 3-104 and part 3-106 of the WQCC Regulations. Enclosed is a \$50.00 check which is required when submitting a new discharge plan.

Due to the actual size of this plan it is being shipped via Federal Express, also per verbal agreements with Mr. Roger Anderson of your staff, we have shipped two complete copies instead of the three requested.

Each plan is comprised of ten books (1, 1A - 1I); copies are denoted by (2, 2A, - 2I), etc., which is submitted for your review. The first book of the plan contains the primary information requested plus several supportive appendices and a supplement section. The supplement section refers to the other nine books, A through I. The two copies are differentiated by numbering sequence. Books B through I are raw material safety data sheets (MSDS) which are cross referenced to the master chemical list located in Book A, by item number. Book A is primary responding to question VI of the guidelines and includes a map of the raw material storage locations, a master chemical list of all raw materials and finished products, typical finished product bulletins with material safety data sheets, and Form VI (applicable categories list).

This plan was prepared by Unichem International's technical and engineering staff with guidance and assistance coming from a third party "Carter & Burgess, Inc. an Engineering and Environmental Consultant.

The plan has been signed-off by Unichem International's Vice-President of Operations, Mr. Jim Britton. located in Hobbs, New Mexico.

If there are any questions on this matter, please feel free to contact Mr. Wayne Price at (505)393-7751, extension 238. We anxiously await your reply.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price
Wayne Price
Staff Engineer

LWP:jd

Enclosures

cc: J. Britton
C. Root

UNICHEM INTERNATIONAL INC.

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

OIL CONSERVATION DIVISION

February 26, 1992



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MATTHEW BACA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-756-903-828

Mr. Wayne Price
Unichem International
P.O. Box 1499
Hobbs, New Mexico 88240

**RE: SOIL BIOREMEDIATION
UNICHEM HOBBS FACILITY
LEA COUNTY, NEW MEXICO**

Dear Mr. Price:

The New Mexico Oil Conservation Division (OCD) has completed a review of Unichem's February 13, 1992 proposal for onsite bioremediation of non-hazardous contaminated soils generated during recent remedial activities at the Hobbs facility.

The OCD approves of the above referenced soil bioremediation proposal with the following conditions:

1. All fluid applications will be contained within the synthetically lined, bermed area.
2. Unichem will submit the laboratory results of the final remediated soils to OCD for approval before the soils can be used as backfill.

Please be advised that OCD approval does not relieve Unichem of liability should the operation result in actual pollution of surface water, ground waters or the environment which may be actionable under any other laws and/or regulations.

If you have any questions, please call me at (505) 827-5885.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Olson".

William C. Olson
Hydrogeologist

xc: Chris Eustice, OCD Hobbs Office

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

LAND OFFICE BUILDING - 310 Old Santa Fe Trail

Oil Conservation Division
P.O. Box 2088 87504-2088
827-5800

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

OIL CONSERVATION DIVISION



December 19, 1991

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MATTHEW BACA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-690-155-042

Mr. Wayne Price
Unichem International
P.O. Box 1499
Hobbs, New Mexico 88240

Re: DISCHARGE PLAN GW-94
HOBBS SERVICE FACILITY
LEA COUNTY, NEW MEXICO

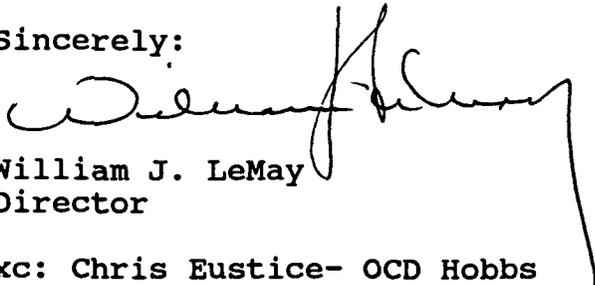
Dear Mr. Price:

The Oil Conservation Division (OCD) has received your request, dated December 5, 1991, for a 240 day extension for the submission of a discharge plan for the above referenced facility. The requested extension will allow Unichem Int. sufficient time to produce a complete and comprehensive plan that will encompass the thousands of chemicals and chemical formulations used at the facility.

Based on the information provided in your request and for good cause shown, a 240 day extension to July 22, 1992, to submit a discharge plan application for the Hobbs Service Facility is hereby approved. In addition, a 240 day extension to October 22, 1992, to discharge without an approved discharge plan is hereby approved.

If you have any questions, please contact Roger Anderson at (505) 827-5812.

Sincerely:


William J. LeMay
Director

xc: Chris Eustice- OCD Hobbs

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

LAND OFFICE BUILDING - 310 Old Santa Fe Trail

Oil Conservation Division
P.O. Box 2088 87504-2088
827-5800



OIL CONSERVATION DIVISION
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'91 DEC 9 AM 8 51

Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

December 5, 1991

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

**RE: DISCHARGE PLAN REQUIREMENT
HOBBS FACILITY
LEA COUNTY, NEW MEXICO**

Dear Mr. LeMay

We are in receipt of your letter dated November 22, 1991 reference discharge plan requirement, Hobbs Service Facility, Lea County, New Mexico.

Unichem takes pleasure in letting you know we support your efforts in this area and will abide by all regulations necessary in order to obtain a certified discharge plan. However, due to the complex nature of such a plan particularly for our main facility located at 707 N. Leech, Hobbs, NM. We feel we will need the full 240 days extension if allowed; just one example would be that we have thousands of MSDS sheets which are required to be submitted.

Therefore, we are requesting an extension of 240 days to complete the discharge plan. If you have any questions, please, don't hesitate to call or write concerning this issue. We anxiously await your reply and will be taking the initial steps in gathering all the data necessary.

Cordially Yours,

A handwritten signature in cursive script that reads 'Wayne Price'.

Wayne Price
Staff Engineer

LWP:drm

cc: Jim Britton
Charles Root
Max Zachary



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MATTHEW BACA
DEPUTY SECRETARY

November 22, 1991

CERTIFIED MAIL
RETURN RECEIPT NO. P-756-903-900

Mr. Jim Britton
Vice President of Operations
Unichem International
707 N. Leech
Hobbs, New Mexico 88240

**RE: DISCHARGE PLAN REQUIREMENT
HOBBS SERVICE FACILITY
LEA COUNTY, NEW MEXICO**

Dear Mr. Britton:

Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for your existing Hobbs Service Facility located at 707 N. Leech, Lea County, New Mexico.

This notification of discharge plan requirement is pursuant to Part 3-104 and Part 3-106 of the WQCC Regulations. The discharge plan, defined in Part 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the facility or adjacent to the facility site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in below grade sumps, buried underground process tanks and/or piping), and closure plans for any pits or ponds whose use will be discontinued.

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
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Administrative Services
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827-5900

Mining and Minerals
827-5970

LAND OFFICE BUILDING - 310 Old Santa Fe Trail
Oil Conservation Division
P.O. Box 2088 87504-2088
827-5800

Mr. Jim Britton
November 22, 1991
Page - 2

A copy of the regulations is enclosed for your convenience. Also enclosed is an application and a copy of OCD Guidelines for the Preparation of Discharge Plans at Oil Field Service Facilities. Three copies of your discharge plan should be submitted for review purposes.

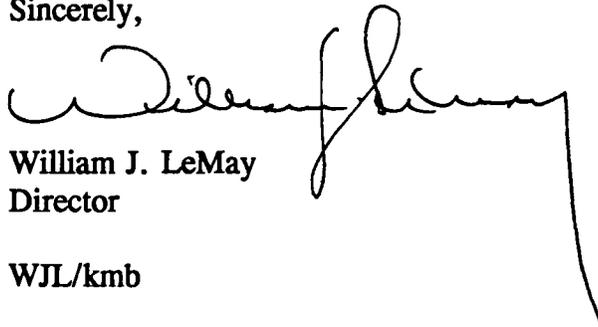
Section 3-106.A. of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Part 3-106.A. also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the Director of the OCD that a discharge plan is required. An extension of this time may be sought and approved for good cause.

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3-114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund". WQCC Rule 3-114 became effective as of August 18, 1991, and is found on page 33.1 of the enclosed WQCC Rules and Regulations.

Every billable facility submitting a new discharge plan will be assessed a fee equal to the filing fee plus either a flat fee or discharge fee. The filing fee is fifty (50) dollars and shall be submitted with the discharge plan application (nonrefundable). The remainder of the "total fee" for oil and gas service companies falls under the "flat fee" category and is equal to one-thousand, three-hundred and eighty dollars (\$1380). The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval. Please make all checks out to the **NMED - Water Quality Management**.

If there are any questions on this matter, please feel free to contact Roger Anderson at (505) 827-5812 or Kathy Brown at (505) 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,



William J. LeMay
Director

WJL/kmb

xc: Chris Eustice - OCD Hobbs Office



OIL CONSERVATION DIVISION
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'91 OCT 15 AM 9 40

Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393/6754

October 9, 1991

Ms. Kathy Brown
New Mexico Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

RE: QUONSET HUT FOUNDATION PROJECT # UI-Q-91

Dear Ms. Brown,

Per our telephone conversation on October 9, 1991, we understand we have permission to move approximately 400 yards of dirt and concrete to the Hobbs Municipal Landfill, operated by the Waste Management Corporation.

Waste Management has approved this non-hazardous solid waste through their profile #32105.

Please don't hesitate to call if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads 'L. Wayne Price'.

Mr. L. Wayne Price
Staff Engineer

LWP:drm

cc: Charles N. Root
Max Zachary



OIL CONSERVATION DIVISION
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'91 SEP 24 AM 8 53

Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393/6754

September 23, 1991

Ms. Kathy Brown
New Mexico Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

Dear Ms. Brown,

As per our telephone conversation on the morning of September 23, 1991. We understand we have permission to move the dirt piles DP #1 and DP #2 (reference our site investigation report submitted to your office on May 2, 1991) in order to facilitate access to our newly constructed tank farm located at our Hobbs Yard at 707 N. Leech, Hobbs, NM.

As discussed, our plan is to build a plastic lined, bermed area on our property here in order to Bio-Remediate this dirt. We will not Bio-Remediate until we have sent you a plan of action for your approval.

Sincerely,

A handwritten signature in cursive script that reads 'L. Wayne Price'.

Mr. L. Wayne Price
Staff Engineer

LWP:drm

cc: Charles N. Root
Max Zachary



FACSIMILE TRANSMITTAL SHEET

TOTAL PAGES (Including Cover): 4

Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393/6754

DELIVER TO: ROGER ANDERSON - U.M.O.C.D

FROM: WAYNE PRICE -

DATE: 6/20/91

SUBJECT: NEW METHANOL + IPA TANK FARM
ADDED MONITOR WELLS SUMPS -
FAX # 827-5741

If transmission is not complete or if material is illegible, please notify the above-listed individual immediately at (505) 393-7751. To respond via facsimile, call (505) 393-6754 (automatic unit).

ADDITIONAL COMMENTS:

PLEASE FIND ENCLOSED MARKED DRAWINGS WHICH DETAIL THE MONITOR WELLS THAT WILL BE INSTALLED UNDER OUR SUMPS.

I WILL BE SENDING YOU COMPLETE DRAWINGS & SPEC'S PER YOUR REQUEST. WE HAVE STARTED CONSTRUCTION!!

Verbal approval to continue 6/29/91 RAS

JUN 20 '91 10:03 UNICOM INTL HOBBS NM P02

PIPING SHALL BE AS PER PIPING DETAILS - SHT. 3

100.00
B.M.

5/8" DIAMETER, COPPER-COATED GROUND ROD, TYP. EACH CORNER

0.50%

98.11

98.14

98.22

100.33
T.O. DIKE
(TYP.)

98.09

98.14

11'

TANK FOUNDATION
ELEV. = 98.33'

0.50%

INTERIOR
SUMP

98.09

98.00
T.O. GRATE

0.50%

0.53%

99.26

B

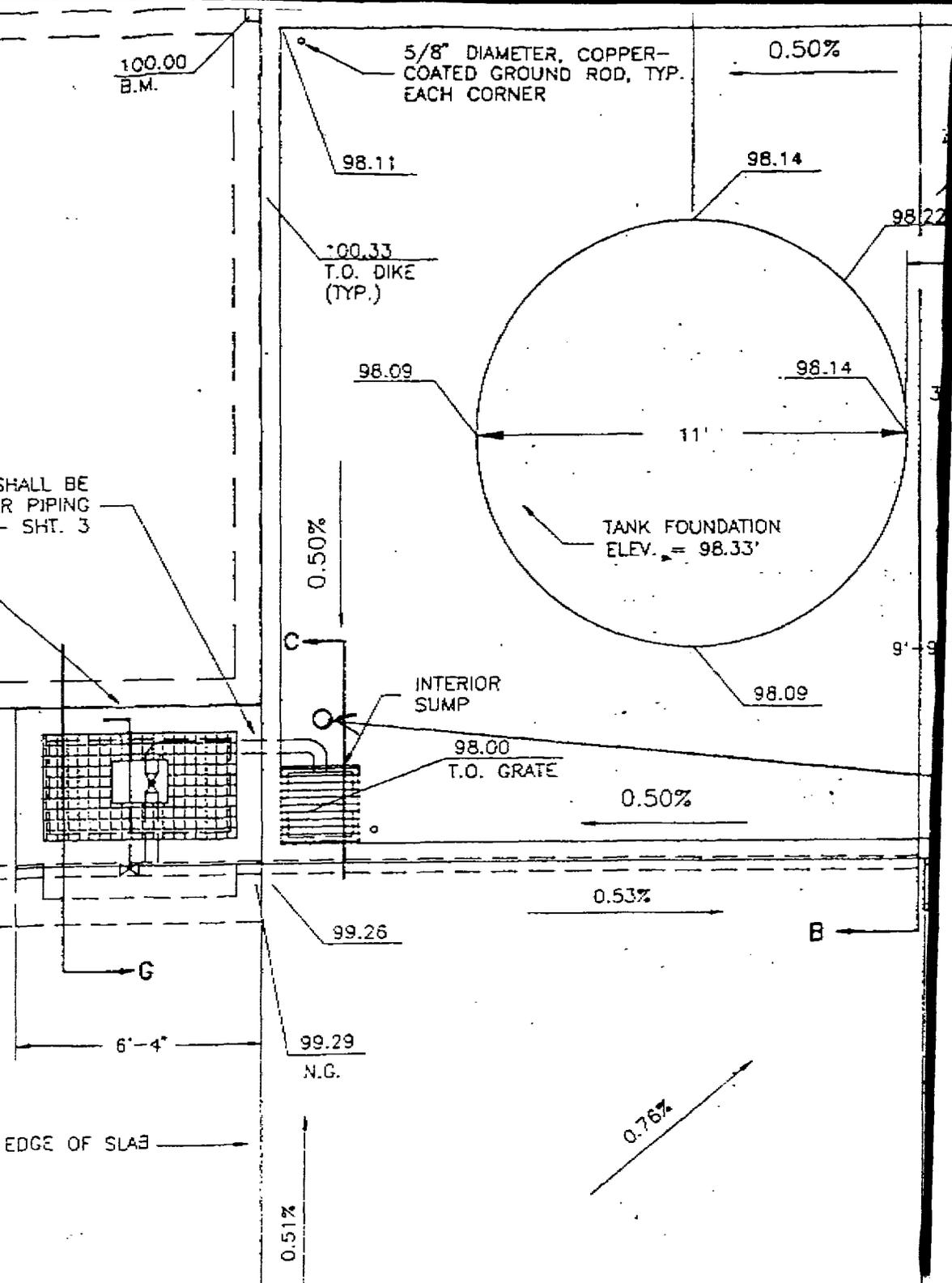
99.29
N.G.

6'-4"

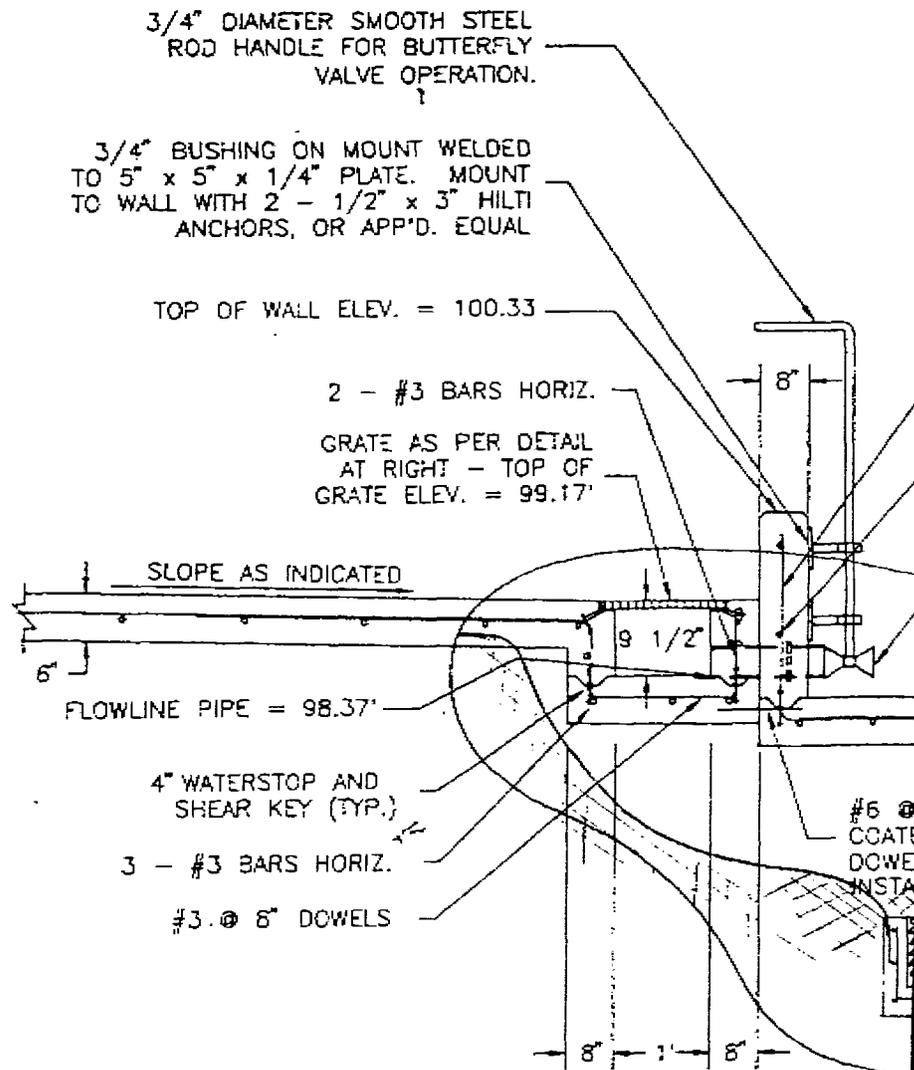
EDGE OF SLAB

0.51%

0.76%



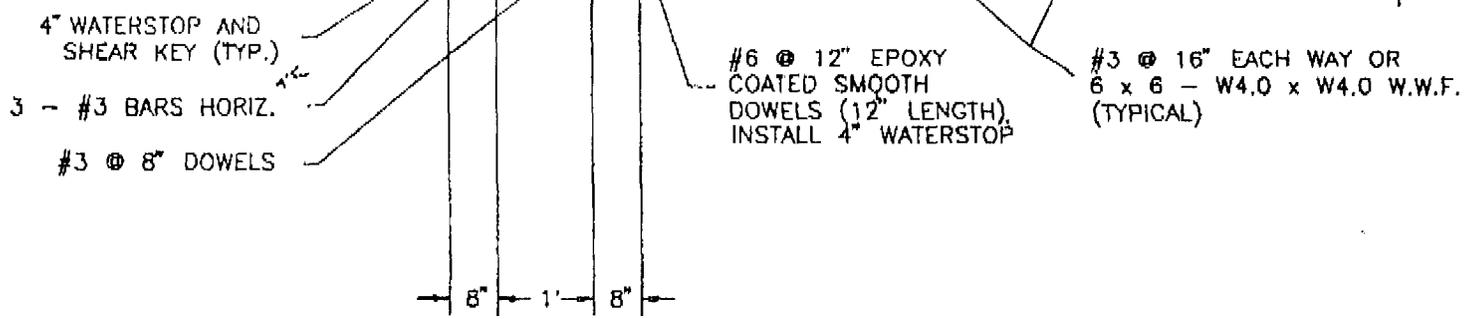
JUN 20 '91 10:05 UNICOM INTL HOBBS NM P04



SECTION A-A - LO

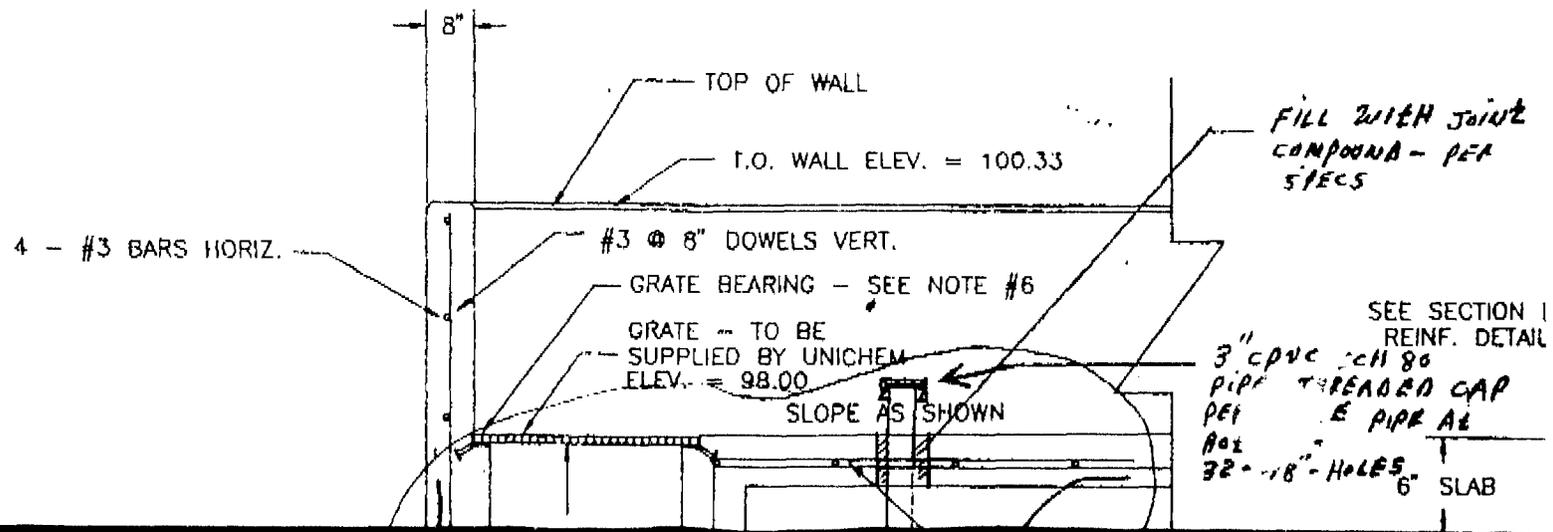
SCALE: 1

FLOWLINE PIPE = 50.37



SECTION A-A - LOADING SUMP

SCALE: 1/2" = 1'-0"





Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

May 2, 1991

RECEIVED

MAY 10 1991

OIL CONSERVATION DIV.
SANTA FE

Mr. David G. Boyer
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Dear Mr. Boyer:

Enclosed are the documents pertaining to the recent soil investigation conducted at Unichem International's property located at 707 N. Leech, Hobbs, NM. This investigation was conducted due to some hydrocarbon contaminated soils that were found when excavating an area for a new proposed chemical storage tank farm.

The results contained in this report reflect that no RCRA Hazardous substances were found. It also indicates that the remaining hydrocarbon present in the soil is at shallow depths and logically does not present a threat to any ground water.

After your review of this report, we would like to have written permission to continue our tank farm project. We would also request that all of the excavated dirt and concrete, approximately 195 yards be approved to be disposed of at the Parabo Inc. disposal site located near Eunice, NM.

We anxiously await your decision on this matter. Please don't hesitate to call if you need further documentation.

Yours truly,

UNICHEM INTERNATIONAL INC.

A handwritten signature in cursive script that reads 'L. Wayne Price'.

L. Wayne Price
Staff Engineer

jd
Enc.

cc: Charles N. Root
Max Zachary

UNICHEM INTERNATIONAL INC.

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 1115	Date 5/30/91
<u>Originating Party</u> Wayne Price - UniChem		<u>Other Parties</u> Bill Olson/Pave Boyer OCD Santa Fe	

Subject
UniChem Hobbs Soil Remediation

Discussion
OCD requested proposal for investigation of lateral & vertical extent at Area B
UniChem wants to build tank farm on Area A and concrete loading pad on Area C. Tank farm would be constructed at concrete atop of synthetic liner
Told him to submit design of any sumps with leak detection to OCD for approval

Conclusions or Agreements
He will submit proposal on Area B investigation and design of sump with leak detection for the loading pad.

OCD gave approval for constructing tank farm at Area A

Distribution
UniChem Hobbs file

Signed
Bill Olson