

GW - 157

**GENERAL
CORRESPONDENCE**

YEAR(S):

1992-2001



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

July 2, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0593

Mr. Jim Gossweiler
Federated Environmental Associates
Bedford Square, 1314 Bedford Avenue
Baltimore, Maryland 21208

RE: Closure Report - Approval
INFAB Inc.
Discharge Plan (GW-157) "Farmington Facility"
San Juan County, New Mexico

Dear Mr. Gossweiler:

The New Mexico Oil Conservation Division (OCD) has received and reviewed the "Closure Report" dated June 19, 2001 from Mr. Harlan Brown of Envirotech Inc. The "Closure Report" was submitted in response to a request for closure of the facility by Federated Environmental Associates representing the bankruptcy holder of the property.

Based upon the content of the "Closure Report" dated June 19, 2001 from Mr. Harlan Brown with Envirotech Inc., the OCD hereby approves of the closure of the discharge plan GW-157 excluding any work or compliance issues that are and will be associated with the close-out of the property.

Note 1: Any and all wastes that are generated with the closure of this facility must be properly characterized for hazardous constituents per 40 CFR Part 261. All non-hazardous and RCRA subtitle C exempt wastes will receive OCD approval prior to their removal from the site. All hazardous wastes will be referred by NEEC to NMED, HRMB for proper disposal.

Note 2: Any spills that occur during the closure process will be reported pursuant to WQCC 1203 and OCD Rule 116 to the OCD Aztec office at (505)-334-6178.

Please note, OCD approval does not relieve INFAB Inc. from liability should it latter be found that contamination exists beyond the scope of this closure report. Further, OCD approval does not relieve INFAB Inc. from compliance with any other federal, state, and local rules and regulations that may apply.

Mr. Jim Gossweiler
GW-157 Closure Approval
July 2, 2001
Page 2

If you have any questions please contact me at (505) 476-3490 or W. Jack Ford at (505)-476-3489.

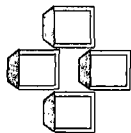
Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long horizontal flourish extending to the right.

Roger C. Anderson
Environmental Bureau Chief

RCA/wjf

cc: Mr. Denny Foust, New Mexico Oil Conservation Division Aztec District III Office.



Federated Environmental Associates, Inc.

RECEIVED
APR 6 2001

CONSERVATION DIVISION

April 4, 2001

Jack Ford
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa fe, New Mexico 87401

Via First Class Mail

RE: Notification of Termination of Operations/Request for Discharge Plan Closure
Five Industrial Buildings on 12.0-Acres/Formal InFab, Inc. Site
5928 U.S. Highway 64
Farmington, New Mexico 87401

Dear Mr. Ford:

Federated Environmental Associates, Inc. notifies herewith the New Mexico Oil Conservation Division (NMOCD) that the above company has entered bankruptcy, and has ceased operations on-site. Federated Environmental requests, based on completion of the regulated waste removal currently in progress, the NMOCD inspect the facility for compliance with INFAB's Closure Plan, and close the Discharge Plan issued to INFAB. The remediation efforts underway on-site include the removal of surface soils containing petroleum hydrocarbons and the removal and disposal of various containerized liquid and solid wastes.

Thank you for your efforts in this matter. If you have any questions regarding any aspect of this matter, please contact me at the telephone number hereon or the local contact, Harlan M. Brown, at Envirotech, Inc. (505 632-0615).

Respectfully,

FEDERATED ENVIRONMENTAL ASSOCIATES, INC.

James C. Gossweiler, REA (CA), RHSP
Senior Vice President

cc: Denny Foust, NMOCD Aztec Office
File #011562

C.I.T. Group

New Je

650 CIT Dr.

Livingston, NJ

07039

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 4-1-99,
or cash received on _____ in the amount of \$ 740.00

from Industrial Fabrication

for Farmington Facility

GW-157

Submitted by: [Signature]

Date: 4-6-99

Submitted to ASD by: [Signature]

Date: 4-8-99

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 _____



9920 U.S. HIGHWAY 64 FARMINGTON, NM 87401 PH. 505-632-2200

GW-157

NATIONSBANK, N.A.
95-32-1070

CHECK DATE

04/01/99

CONTROL NO.



CHECK AMOUNT

\$ 740.00

Seven-Hundred forty & 00/100 Dollars

PAY
TO THE
ORDER
OF

New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

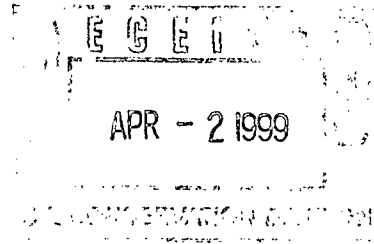
[Signature]
for [Signature]

5928 U.S. Highway 64
Farmington, NM 87401



Office: (505)632-2200
Fax: (505)632-8070

3-31-99



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87401

Dear Mr. Anderson:

Enclosed is the signed agreement to discharge plan GW-157. I have turned one copy into our accounting department for payment of the fees and they should reach your office shortly.

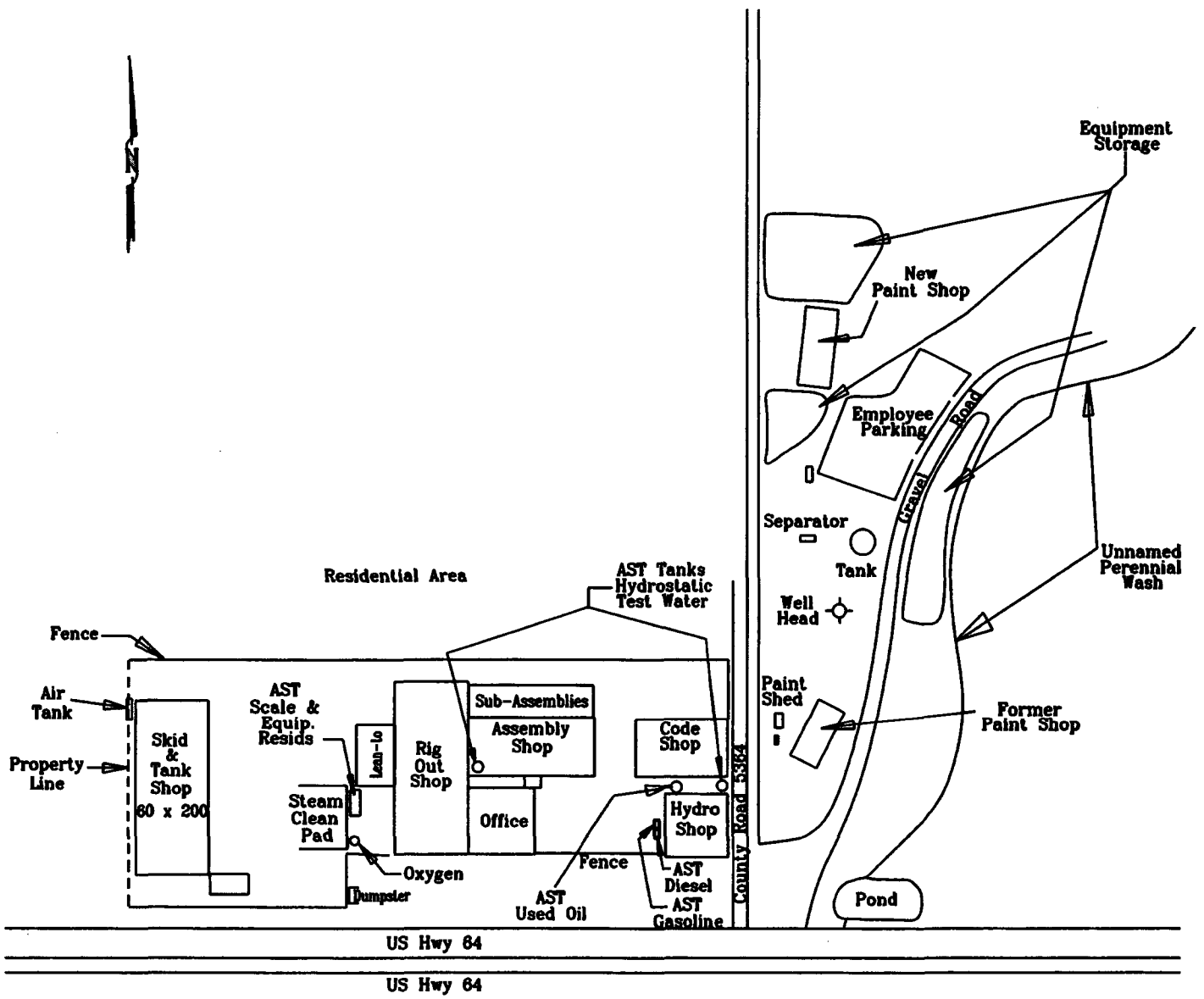
Also enclosed are a few corrections that need to be made to the discharge plan. We missed a couple things. One was that the saddle tanks contain gasoline and diesel fuel. The other was a couple of 55 gallon barrels in the hydro shop. Please replace these pages in your copy of the discharge plan.

Sincerely:

A handwritten signature in cursive script, appearing to read "Barb Griffith".

Barb Griffith

Copy to Denny Foust



All angles, directions, and distances determined by sighting and pacing from existing site features. Accuracy of measurements implied only to the degree of accuracy of method.

<p>InFab</p> <p>5928 US Highway 64 Farmington, NM 87401</p> <p>NE4, Sec.26, T29N, R12W San Juan County, NM</p> <p>Project No.: 98002</p>	<p>Envirotech Inc.</p> <hr/> <p>Environmental Scientists & Engineers</p> <p>5796 US Highway 64 Farmington, New Mexico</p>	<p>Site Map</p>	
		Figure 2	Date: 12/98
		DRW: HMB	PRJ MGR: HMB

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VI. Form (Optional)

Materials Stored or Used at the Facility - For each category of material listed below provide information on the general composition of the material or specific information (including brand names if requested), whether a solid or liquid, type of container, estimated volume stored and location. Submit MSDS information for chemicals as requested. Use of this form is optional, but the information requested must be provided.

Name	General Makeup Or Specific Brand Name (If requested)	Solids(S) or Liquids(L)?	Type of Container (Tank, drum, etc.)	Estimated Volume	Location (Yard, shop, drum storage, etc.)
1. Drilling Fluids (include general makeup & types special additives [e.g. oil, chrome, etc.])	None				
2. Brines - (KCl, NaCl, etc.)	None				
3. Acids/Caustics (Provide names & MSD sheets)	None				
4. Detergents/Soaps	None				
5. Solvents & Degreasers (Provide names & MSD sheets)	Xylene	Liquid	Drum	110 gal.	Paint shop
6. Paraffin Treatment/ Emulsion Breakers (Provide names & MSD sheets)	None				
7. Biocides (Provide names & MSD sheets)	None				
8. Others - (Include other Liquids & solids, e.g. cement etc.)	Triethylene Glycol	Liquid	Drum	100 gal.	Hydro Shop
	Valley Gas	Gases	LP Tank	560 cf	Adjacent to
	Acetylene	Gases	LP Tank	780 cf	rigout shop
	Diesel	Liquid	Tank	1000 gal.	Hydro Shop
	Hydraulic Oil	Liquid	Drum	55 gal.	Hydro Shop
	Motor Oil	Liquid	Drum	75 gal.	Hydro Shop
	Cuttnng Oil	Liquid	Drum	55 gal.	Hydro Shop
	Trans. Fluid	Liquid	Drum	55 gal.	Hydro Shop
	Gear Oil	Liquid	Drum	55 gal.	Hydro Shop
	Bearing Grease	Grease	Drum	55 gal.	Hydro Shop

5928 U.S. Highway 64
Farmington, NM 87401



Office: (505)632-2200
Fax: (505)632-8070

Jack Ford
State of New Mexico Energy and Minerals Dept.
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Ford:

Enclosed is the discharge plan renewal, GW-157. Most of the conditions of the original plan still exist, with some minor changes, and a few corrections to the original plan. As you may notice, some of the floor drains, which could potentially cause problems, have been plugged, and some future improvement plans have been included.

One of the drains that we plugged was in the Assembly area. This drain formerly discharged outside the south side of the building, and had potential for hydrostatic test water to drain outside. The drain has had concrete poured into it near the exit, and the outside sidewalk has had a concrete berm built around it. This containment system has been tested by accident and works very well. The total contents of the hydrostatic test water only came half way up the berm. Another drain that was plugged was in the hydrostatic test area. It was in poor condition and had the potential for leaking.

The future plans include the building of a new paint shop on higher ground, and some drainage improvements. We are keeping close contact and heeding advice from OCD on both of these projects.

I again apologize for getting this discharge plan to you late. The information included in this plan should be very accurate and complete. I hope that this makes up for it. Please let me know if you disagree, and again I thank-you for your patience.

Sincerely:

A handwritten signature in cursive script that reads "Barb Griffith".

Barb Griffith
Safety and Environmental Coordinator

ENVIROTECH inc.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

Discharge Plan Oilfield Service Facility

Renewal
GW-157

Prepared for:

InFab Inc.
5928 U.S. Highway 64
Farmington, New Mexico

Prepared by:

Envirotech Inc.
5796 U.S. Highway 64
Farmington, New Mexico

February 17, 1999

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

February 17, 1999

Ms. Lori Wrotenbery
State of New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Discharge Permit Application
InFab Inc.

Dear Ms. Wrotenbery:

Attached please find a Discharge Plan Application for Oilfield Service Facilities that has been completed for InFab, Inc.

Due to lack of space on the application for supplemental information, the application information is provided in this letter. For your convenience a blank application is attached. This location should be considered a renewal of a permit for a previously issued to P&A for the same type of operations.

1. Type of Business: Oil Field Service Company; Production equipment fabricator
2. Operator: Infab Inc.
Address: 5928 U.S. Highway 64
Farmington, New Mexico 87401
Contact Person: Barbara Griffith; 505-632-2200; 505-320-5305
3. Location: NE4, NE4, Section 26, Township 29 North, Range 12 West
A 7.5 Minute topographic map of the Horn Canyon Quadrangle map is attached.
4. Landowner: Spurgin Curry Industries, LLC
Attn: Bruce Curry
18 Cumberland Circle
El Paso, Texas 79903
5. A plat of the subject property is attached, including the location of tanks, barrels, work areas, painting areas, storage areas, parking, and future location of improvements.

The facility has several tanks on-site as follows:

Two 500 gallon above ground storage tanks (AST) for diesel located along the west side of the Hydro-shop. Secondary containment for these tanks is a welded steel pan measuring 2' x 6' x 14'.

A 170 barrel AST hydro test water tank is located between the Hydro-Shop and the code shop near the east end of the buildings. This is a fresh water storage tank.

A 1000 gallon AST used oil tank is located between the Hydro-Shop and the Code Shop near the west end of the buildings. Secondary containment for this tank is currently under construction.

A 200 barrel hydro test water tank is located inside the Assembly Building near the southwest corner. The floor drain inside the shop has been plugged to prevent the discharge of hydrostatic test water to the outside. In the event of a spill the area outside the south door of the shop has been bermed to hold the contents of the tank.

A 160 barrel holding tank located southeast of the burner shop is usually inactive. This vessel, when used, is used to receive scale, sludge, solids, and wash water generated during the clean out of used oil and gas production equipment. This occurs approximately twice a year.

The property is fenced on three sides. The west boundary is not fenced at the property line. Fencing is continuous around contiguous property shared with SaulCon Constructors. There are no open pits on-site.

6. A Part VI Form is attached.
7. A part VII Form is attached.
8. A Part VIII Form is attached.

8.B.1 All storage onsite is in above ground storage tanks, drums, or smaller containers. Hydrostatic test water is stored in oilfield tanks having a capacity of 100 to 200 barrels. Onsite storage of paint products is in original containers with a typical volume of five gallons. Paint and paint related products are stored in the paint shed at the east end of the property. Xylene is stored in 55 gallon drums on a secondary containment near the paint shop.

There are two active floor drains on the site. One floor drain is located in the southeast corner of the Hydro Shop. The drain is connected to the 170 barrel hydro static test water storage tank located outside the northeast corner of the building. Fluids received by the sump are pumped to the tank.

A second floor drain is located at the center of the code shop. This drain is primarily for storm water. The drain will be cleaned and inspected as part of the annual sump and line inspections.

8.B.2 Diesel is stored in two 500 gallon ASTs located near the Hydro Shop. The tanks are located in steel fabricated secondary containment.

The 170 barrel AST located at the northeast corner of the Hydro Shop does not have secondary containment. A 1000 gallon AST for used oil is located at the northwest corner of the Hydro Shop. Secondary containment for this tank is currently under construction. The 200 barrel AST hydrostatic test water holding tank in the assembly area does not have secondary containment. Water stored in this tank is a 5% Triethylene Glycol mixture for testing production equipment. The floor drain in the assembly area has been sealed with concrete grout to prevent discharge to drainage south and east of the shop area. An unlined berm has been constructed outside of the personnel door to contain any catastrophic releases of test water. A 160 barrel tank located near the Burn Shop is used to collect solids, sludges, and steam cleaning residuals from the cleaning of used oilfield production equipment.

8.B.3 The facility is less than 25 years old. Only one buried pipeline is in service.

8.C.1 On-site disposal does not occur at this site, with the exception of domestic sewage to a septic system and leach field.

8.C.2 Waste streams generated as a result of operations at the facility are handled by permitted vendors. Used motor oil is collected by Safety Kleen, 4210 Hawkins Road, Farmington, New Mexico.

Spent hydrostatic test water and other petroleum hydrocarbon contaminated water is disposed of by either Basin Disposal (exempt waters only), #6 Road 5046, Bloomfield, New Mexico or Key Energy's Injection Facility (exempt or nonhazardous non-exempt), 345 Road 3500, Aztec, New Mexico.

Petroleum hydrocarbon contaminated scale, sludge, and soil is remediated at Envirotech Inc.'s NMOCDC permitted Soil Remediation Facility, Landfarm #2.

Paint wastes are collected and disposed of by Perma-Fix Environmental Services Inc., 7928 Ranchito Loop, Albuquerque, New Mexico.

Trash is collected twice weekly by Waste Management of Four Corners, located at 101 Spruce Street, Farmington, New Mexico for placement at San Juan Regional Landfill. A maximum four oil filters per week are allowed for disposal through this method. Formal approval for less than four filters per month is not needed per Brian Bowen, Manager, WMINM, San Juan Regional Landfill.

9. Proposed Modifications

InFab proposes two modifications to on-site operations with renewal of the discharge plan. Pending revisions and approval of plans a new paint shop is under construction. The new paint shop will be located on top of the hill in an area previously identified as the pipe yard. The new location is better located to prevent paint and paint related products from reaching a nearby perennial stream. The second modification under consideration involves drainage at the northwest property line. Run-on from offsite property up-gradient from the burner shop has a potential to flood the work area.

Other modifications to the facility since the original permit was issued include the following:

- 1) A floor drain in the hydro shop has been plugged to prevent seepage of potentially contaminated water from suspect pipe.
- 2) A grate covered trough in the assembly shop has been plugged to prevent drainage of hydrostatic test water to the environment from an open pipe located between the office and the Hydro Shop.
- 3) Drip pans have been placed where appropriate.
- 4) Screens will placed in cutting oil pans to separate cuttings and cutting oil at threading operations and oil cooled cutting locations.

10. 10.A The facility will be inspected monthly by management for leaks and spillage. Current practice includes daily cleanup of minor spills and leaks by maintenance. Records of each inspection will be kept at the main office. Any reportable quantities will be reported to the NMOCD.

10.B There are no monitor wells on the site.

10.C The fresh water hydrostatic test tank at the northeast corner of the Hydro Shop will not have secondary containment. Tankage containing potential contaminants and exposed to the elements will have appropriate secondary containment. Drums exposed to the elements will be sealed with water tight lids and stored on secondary containment to prevent run-off of contaminated storm water.

11. 11.A Whereas all material is stored in secondary containment or concrete working surfaces inside the shops (as a minimum), potential spillage will be into contained areas. There is not any anticipated threat

to surface or groundwater.

Spillage of chemical or refined products with volumes of five approximately five (5) gallons will be collected from its containment and placed into its container (or equivalent) for continued storage or appropriate disposal. The NMOCD will not be notified of spills less than reportable quantities or five gallons.

11.B All containment is visually inspectable from all sides, which makes a leak of any quantity easily detectable. Monthly inspections by management and frequent use of the facilities by employees ensure that leaks are repaired in a timely manner and with only minor spillage.

11.C There is not an injection well at this site.

12. 12.A.1 The San Juan River is located approximately one mile south of the facility. An unnamed perineal stream borders the east boundary of the InFab property. All streams in the vicinity of the site flow to the San Juan River.

12.A.2 Water well locations located on the attached map. All water wells are assumed to be for domestic use. There may be up to 47 water wells located within a one mile radius of the site, with 6 of the wells located within 1/4 mile of the property. These wells were located according to "Records of Water Wells and Springs prior to 1978", "Records of Water Wells in San Juan County 1978-1983", and "Listing of Points of Diversion for the San Juan Basin in New Mexico, 2/7/92".

12.A.3.a Soil types in the vicinity of the site are typically cobble filled sandy loams ranging to sandy and clayey sands. Soils are typically moist, loose, non-cohesive, and have a high permeability.

12.A.3.b The name of the aquifer below the site is unknown.

12.A.3.c The aquifer characteristics are unknown, however typical strata include poorly graded medium sand with varying amounts of cobble and silt.

12.A.3.d Depth to bedrock is undetermined, however, it is anticipated to be 30-60' below natural grade.

12.A.4.a There is a potential for flooding along the east boundary of the property along the unnamed wash. For this reason painting operations are being moved to a new shop at the top of the hill northeast of the assembly area. Drainage concerns along the northwest edge of the property are currently being addressed. Flood control measures are not necessary for the rest of the facility.

Run-off is possible from the tank and skid shop. Potential contaminants are either under roof or in secondary containment.

12.A.4.b Flood protection measures at the site are not necessary.

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VI. Form (Optional)

Materials Stored or Used at the Facility - For each category of material listed below provide information on the general composition of the material or specific information (including brand names if requested), whether a solid or liquid, type of container, estimated volume stored and location. Submit MSDS information for chemicals as requested. Use of this form is optional, but the information requested must be provided.

Name	General Makeup Or Specific Brand Name (If requested)	Solids(S) or Liquids(L)?	Type of Container (Tank, drum, etc.)	Estimated Volume	Location (Yard, shop, drum storage, etc.)
1. Drilling Fluids (include general makeup & types special additives [e.g. oil, chrome, etc.])	None				
2. Brines - (KCl, NaCl, etc.)	None				
3. Acids/Caustics (Provide names & MSD sheets)	None				
4. Detergents/Soaps	None				
5. Solvents & Degreasers (Provide names & MSD sheets)	Xylene	Liquid	Drum	110 gal.	Paint shop
6. Paraffin Treatment/ Emulsion Breakers (Provide names & MSD sheets)	None				
7. Biocides (Provide names & MSD sheets)	None				
8. Others - (Include other Liquids & solids, e.g. cement etc.)	Triethylene Glycol	Liquid	Drum	100 gal.	Hydro Shop
	Valley Gas	Gases	LP Tank	560 cf	Adjacent to
	Acetylene	Gases	LP Tank	780 cf	rigout shop
	Diesel	Liquid	Tank	1000 gal.	Hydro Shop
	Hydraulic Oil	Liquid	Drum	55 gal.	Hydro Shop
	Motor Oil	Liquid	Drum	75 gal.	Hydro Shop
	Cutting Oil	Liquid	Drum	55 gal.	Hydro Shop
	Trans. Fluid	Liquid	Drum	55 gal.	Hydro Shop

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VII. Form (Optional)

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.). Use of this form is optional, but the information requested must be provided.

Waste Type	General Composition and Source (Solvents from small parts cleaning, oil filters from trucks, etc.)	Volume Per Month (bbl or gal)	Major additives (e.g. degreaser fluids from truck washing, soap In steam cleaners)
1. Truck Wastes (Describe types of original Contents trucked [e.g. brine, products water, drilling fluids, oil wastes, etc.])			
	Hydro test water: domestic water (Lee Acres WUA) which is used to pressure test field equipment (Pressure vessels). Water is reused and stored in above ground tank behind Hydro Shop.	100 bbl	None
2. Truck, tank, & Drum Washing		None	
3. Steam Cleaning of Parts, Equipment, Tanks			
	Steam cleaning of used equipment. An oil/water mixture is drained to a 210 BBL tank where it is Stored for later disposal.	5 bbl	Oil/Water Mixture
4. Solvent/Degreaser Use		None	
5. Spent Acids, Caustics, Or Completion Fluids (Describe)	Parts Cleaner	.5 gallon / mo.	Petroleum Hydrocarbons

Waste Type	General Composition and Source (Solvents from small parts cleaning, oil filters from trucks, etc.)	Volume Per Month (bbl or gal)	Major additives (e.g. degreaser fluids from truck washing, soap In steam cleaners)
6. Waste Slop Oil	Shop cutting oil used in threading Pipe and cutting metal.	10 gal. / Month	None
7. Waste Lubrication and Motor Oils	Motor used for forklifts and cranes.	45 gal / month	None
8. Oil Filters	Forklifts and cranes	4 filters / month	None
9. Solids, Sludges from Tanks (Describe types of materials [e.g. crude oil tank bottoms, Sand, etc.]	210 bbl tank used for steaming cleaning tanks May have oil/water mixture with oil sludge in bottom.	2 gal / month	None
10. Painting Waste	Xylene used to thin paints. Note; changing paints to Mineral spirit or water based cleanup. Used xylene currently filtered then blended to thin paint before application. Minimizes waste.	50 gal. / month	None
11. Sewage (Indicate if other wastes mixed with sewage; if no commingling, domestic sewage under jurisdiction of The NMEID).	None		
12. Other Waste Liquids (Describe in detail)	None		
13. Other Waste Solids (Cement, construction, materials, used drums)	None		

DISCHARGE PLAN APPLICATION

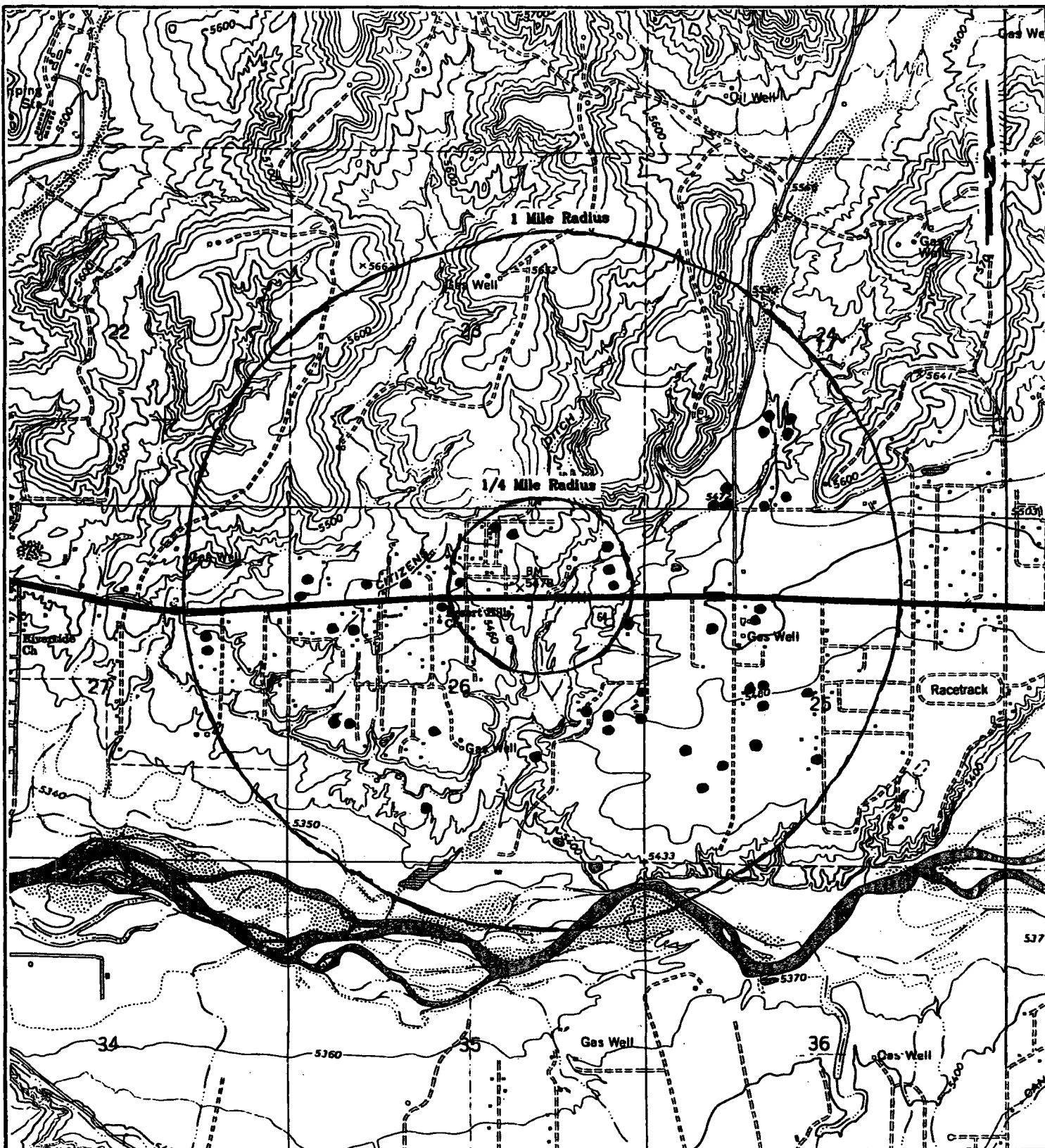
Oilfield Service Facilities

Part VIII. Form (Optional)

Summary Description of Existing Liquid and Solid Waste Collection and Disposal - For each type of waste 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.

Waste Type	Tank(T)/ Drum(S)	Floor Drain(F)/ Sump(S)	Pits- Lined (L) or Unlined(U)	Onsite Injection Well	Leach Field	Offsite Disposal
1. Truck Wastes						
Hydro test water	T	F	L Cement Floor	None	None	Basin Disp. Or Key Energy
2. Truck, Tank, and drum Washing		None				
3. Steam Cleaning of Parts, Equipment, and Tanks						
Steam cleaning used production equipment	T	F	L Steel	None	None	Liquids-to Basin Disp. or Key Energy Sludge to Envirotech Landfarm
4. Solvent / Degreaser Use		Parts washing table/ bath		None	None	Safety Kleen
5. Spent Acids, Caustics, or Completion Fluids		None				
6. Waste Slop Oil	T	No	L pipe	None	None	Mesa Oil or Safety Kleen Oily soil to Envirotech Inc

Waste Type	Tank(T)/ Drum(S)	Floor Drain(F)/ Sump(S)	Pits- Lined (L) or Unlined(U)	Onsite Injection Well	Leach Field	Offsite Disposal
7. Waste Lubrication And Motor Oils	Tank	None	Steel Lined Secondary	None	None	Pickup by Used oil vendor, EPA permitted
8. Oil Filters	Dumpster	n/a	n/a	n/a	n/a	WMI Landfill
9. Solids and Sludges	T	F*	L	None	None	Envirotech Landfarm
180 bbl tank at burner shop to collect wash water, residual oil, dirt, and scale.						
10. Painting Wastes	Drum	None	n/a	None	None	Blend filtered used xylene; shoot with paint as thinner; Spent residual picked up by Safety Kleen.
11. Sewage	None	None	None	None	None	
Note: Septic system not connected to shop floor drains.						
12. Other Waste Liquids	None					
13. Other Waste Solids	Drums	n/a	Cement Pad	None	None	Envirotech Inc
Scale from cleaning oil and gas Production equipment and petroleum hydrocarbon contaminated soil						



InFab

5928 US Highway 64
Farmington, NM 87401
NE4, Sec.26, T29N, R12W
San Juan County, NM

Project No.: 98002

Envirotech Inc.

Environmental Scientists & Engineers

5796 US Highway 64
Farmington, New Mexico

**Water Well
Locations**

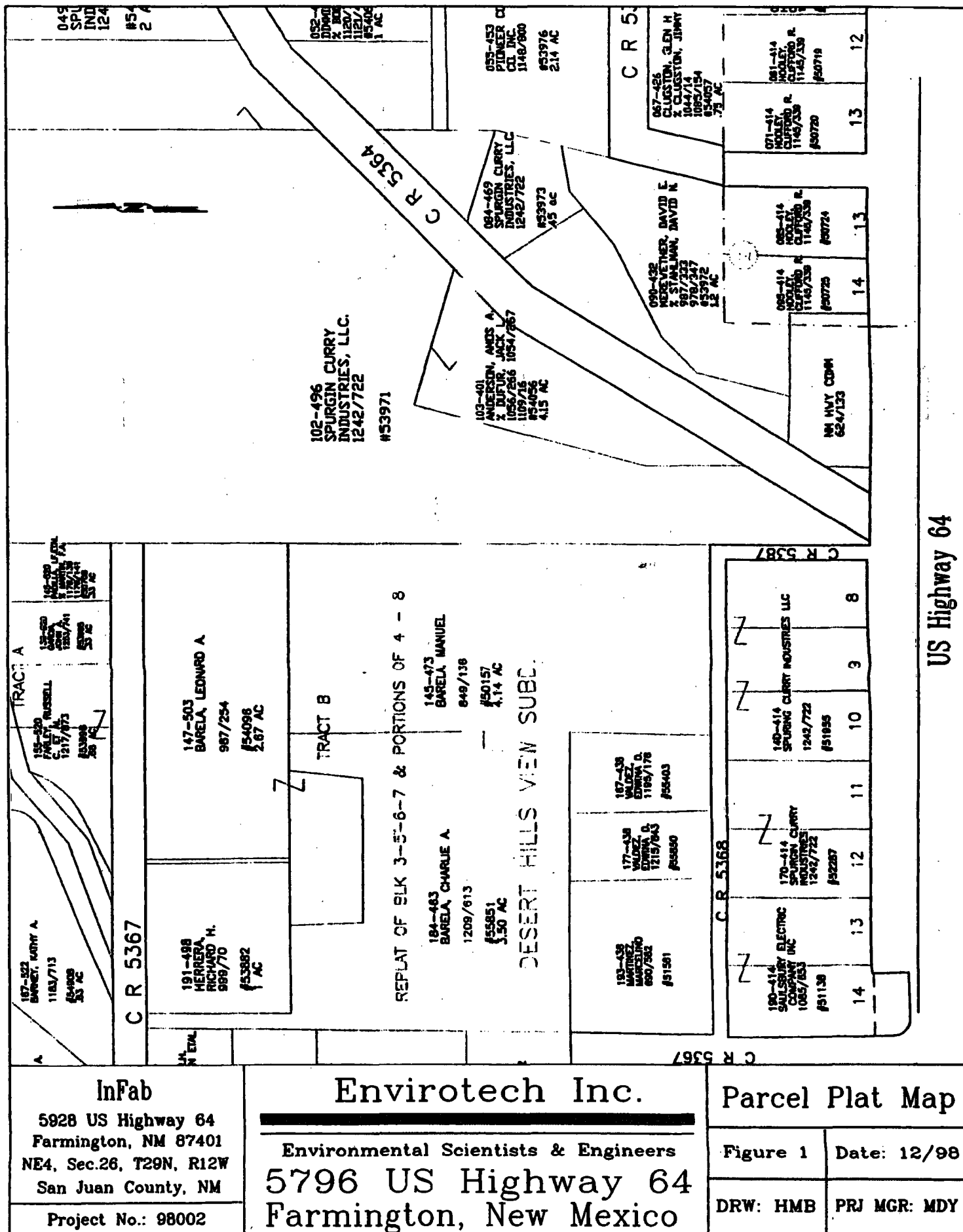
Figure 1

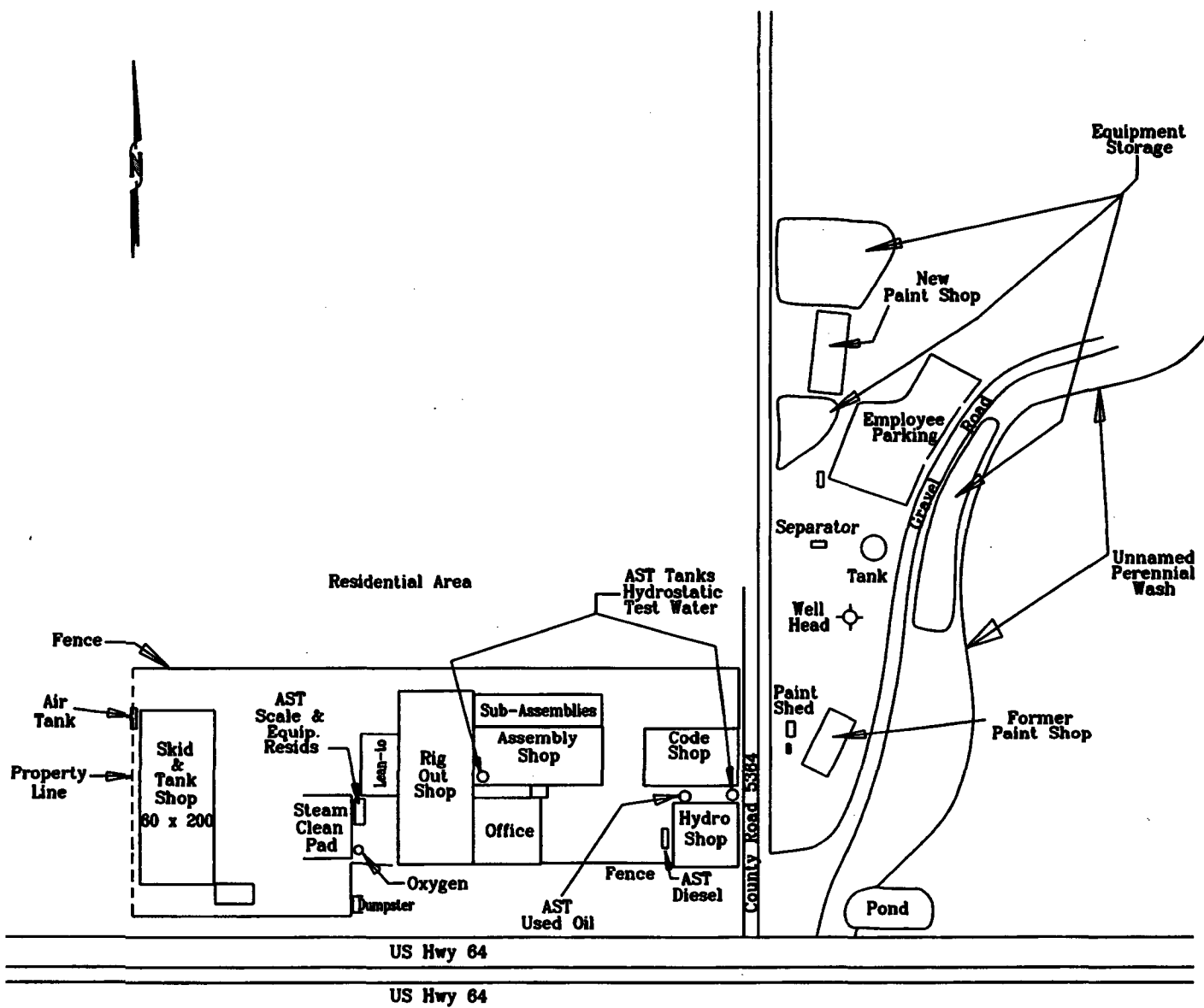
Date: 2/99

DRW: HMB

PRJ MGR: HMB

US Highway 64





All angles, directions, and distances determined by sighting and pacing from existing site features. Accuracy of measurements implied only to the degree of accuracy of method.

<p>InFab</p> <p>5928 US Highway 64 Farmington, NM 87401</p> <p>NE4, Sec.26, T29N, R12W</p> <p>San Juan County, NM</p> <p>Project No.: 98002</p>	<p>Envirotech Inc.</p> <hr/> <p>Environmental Scientists & Engineers</p> <p>5796 US Highway 64 Farmington, New Mexico</p>	<p>Site Map</p>	
		<p>Figure 2</p>	<p>Date: 12/98</p>
		<p>DRW: HMB</p>	<p>PRJ MGR: HMB</p>

AFFIDAVIT OF PUBLICATION

No. 40808

COPY OF PUBLICATION

STATE OF NEW MEXICO

County of San Juan:

ALETHIA ROTH LISBERGER, being duly sworn says: That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Wednesday, March 3, 1999

and the cost of publication is: \$74.11

Alethia Rothlisberger

On 3-4-99 ALETHIA ROTH LISBERGER appeared before me, whom I know personally to be the person who signed the above document.

Sunny Beck

My Commission Expires April 2, 2000.

Legals

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 application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-157) - Infab Inc., Barbara Griffith, (505) 632-2200, 5928 U.S. Highway, Farmington, New Mexico 87401, has submitted a discharge plan renewal application for the Farmington Facility located in the NE/4 NE/4 of Section 26, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 140 gallons per day of water is used for hydropressure testing of equipment. The water has a total dissolved solids concentration of approximately 580 mg/l and is stored in an above ground storage tank and recycled. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of approximately 5 feet with a total dissolved solids concentration of approximately 2,500 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(s) 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 application(s), the Director of the Oil Conservation Division shall allow at least (30) days after the date of publication of this notice during which comments may be submitted and a 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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of February 1999.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

/s/ Roger Anderson
for LORI WROTENBERY, Director

Legal No. 40808, published in The Daily Times, Farmington, New Mexico, Wednesday, March 3, 1999.

The Santa Fe New Mexican

Since 1849 We Read You

NM OCD

ATTN: LUPE SHERMAN
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 71236 ACCOUNT: 56689
LEGAL NO: 64937 P.O.#: 99199000357
172 LINES 1 time(s) at \$ 75.73
AFFIDAVITS: 5.25
TAX: 5.06
TOTAL: 86.04

AFFIDAVIT OF PUBLICATION

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 application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-157) - Infab Inc., Barbara Griffith, (505) 632-2200, 5928 U.S. Highway, Farmington, New Mexico 87401, has submitted a discharge plan renewal application for the Farmington Facility located in the NE/4 NE/4 of Section 26, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 140 gallons per day of waste water is used by hydropressure testing of equipment. The water has a total dissolved solids concentration of approximately 580 mg/l and is stored in an above ground storage tank and recycled. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of approximately 5 feet with a total dissolved solids concentration of approximately 2,500 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(s) 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 application(s), 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 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 plan(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of February 1999.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION

LORI WROTENBERY,
Director

Legal #64937
Pub. March 2, 1999

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B. Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTE 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 #64937 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/02/1999 and 03/02/1999 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 2 day of March, 1999 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

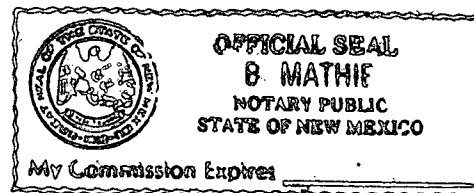
Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
2 day of March A.D., 1999

Notary

Commission Expires

3-13-2001



Jack

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 application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

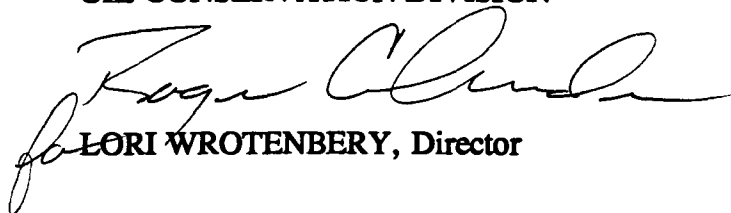
(GW-157) - Infab Inc., Barbara Griffith, (505) 632-2200, 5928 U.S. Highway, Farmington, New Mexico 87401, has submitted a discharge plan renewal application for the Farmington Facility located in the NE/4 NE/4 of Section 26, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 140 gallons per day of water is used for hydropressure testing of equipment. The water has a total dissolved solids concentration of approximately 580 mg/l and is stored in an above ground storage tank and recycled. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of approximately 5 feet with a total dissolved solids concentration of approximately 2,500 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(s) 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 application(s), 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 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 plan(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of February 1999.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**

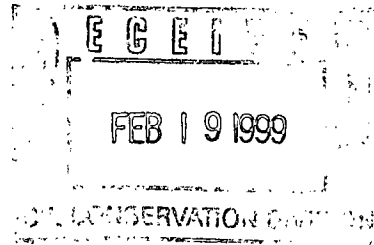

LORI WROTENBERY, Director

S E A L

5928 U.S. Highway 64
Farmington, NM 87401



Office: (505)632-2200
Fax: (505)632-8070



Roger Anderson
State of New Mexico Energy and Minerals Dept.
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

Enclosed is the discharge plan renewal, GW-157. Most of the conditions of the original plan still exist, with some minor changes, and a few corrections to the original plan. As you may notice, some of the floor drains, which could potentially cause problems, have been plugged, and some future improvement plans have been included.

One of the drains that we plugged was in the Assembly area. This drain formerly discharged outside the south side of the building, and had potential for hydrostatic test water to drain outside. The drain has had concrete poured into it near the exit, and the outside sidewalk has had a concrete berm built around it. This containment system has been tested by accident and works very well. The total contents of the hydrostatic test water only came half way up the berm. Another drain that was plugged was in the hydrostatic test area. It was in poor condition and had the potential for leaking.

The future plans include the building of a new paint shop on higher ground, and some drainage improvements. We are keeping close contact and heeding advice from OCD on both of these projects.

I again apologize for getting this discharge plan to you late. The information included in this plan should be very accurate and complete. I hope that this makes up for it. Please let me know if you disagree, and again I thank-you for your patience.

Sincerely:

A handwritten signature in cursive script that reads "Barb Griffith".

Barb Griffith
Safety and Environmental Coordinator



5928 U.S. Highway 64
Farmington, NM 87401

Office: (505)632-2200
Fax: (505)632-8070

Roger Anderson and Jack Ford
State Of New Mexico Energy and Minerals Dept.
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Sirs:

I am the new Safety and Environmental Coordinator for InFab in Farmington, NM. I have become aware that we have a groundwater discharge plan #GW-157, that expires on December 28, 1998. This company has had ownership and management changes recently, causing this matter to be pushed to the side. I have contacted ENVIROTECH of Farmington to get the process started, and taken a serious look at our environmental management planning. This letter has two purposes. The first is to transfer ownership of the plan to the new owners, and the second is to inform you that we are aware of the plan and its terms and are working to ensure that we are not in violation.

Current ownership of this facility is Spurgin Curry Industries, LLC, doing business as Industrial Fabrication.

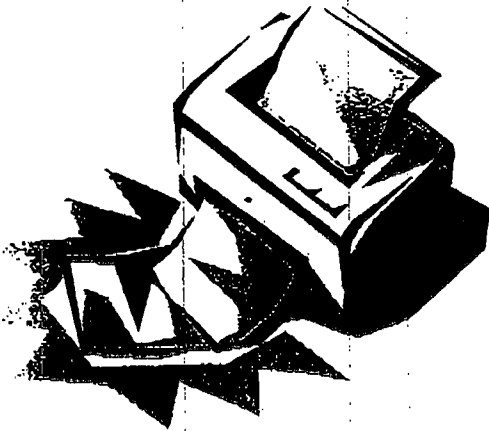
There have been no changes to methods and materials used at this facility. The current plan is still workable and reasonable. In the near future we have plans to build a paint shop, moving painting operations to a different location. These plans will be included with our new application. The only other modification to the plant in the near future will be the construction of a parking lot. This too will be included in our application. I just finished talking to Harlan from ENVIROTECH. He stated that we can have the rough draft in to OCD for review by Dec. 28, 1998, and have it implemented by January 28, 1999. We are committed to being as environmentally friendly as possible for an industry of this type, and request the time indicated to comply with the laws outlined to help us achieve that goal.

Sincerely:

A handwritten signature in cursive script that reads "Barbara Griffith".

Barbara Griffith

InFab



5928 U.S. HIGHWAY 64
FARMINGTON, NM 87401

PHONE: (505)632-2200
FAX: (505)632-8070

FAX MESSAGE

DATE: 12-14-98

Page 1 of 2

TO: Roger Anderson
and Jack Ford

FROM: Barb Griffith
RE: GW157

MESSAGE: _____



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 30, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-000

Mr. John H. Cole
President
Energy Production Systems, Inc.
5928 U.S. Highway 64
Farmington, New Mexico 87401

RE: Discharge Plan GW-157 Renewal
Farmington Facility
San Juan County, New Mexico

Dear Mr. Cole:

On December 28, 1993, the groundwater discharge plan, GW-157, for the Energy Production Systems, Inc. Farmington Facility located in the NE/4 NE/4 of Section 26, Township 29 North, Range 12 West, NMPM, San Juan 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 approved for a period of five years. **The approval will expire on December 28, 1998.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, 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. **To date the OCD has not received an application for renewal of GW-157.** Please indicate whether Energy Production Systems, Inc. has made or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

Mr. John H. Cole
Farmington Facility
July 30, 1998
Page 2

The discharge plan renewal application for the **Farmington 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 \$50.00 plus a renewal flat fee of \$690.00 for oil field service companies, this is equal to one-half of the original flat fee required. The \$50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

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 Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is also available on OCD's website at www.emnrd.state.nm.us/oecd/).

If the Energy Production Systems, Inc.'s Farmington Facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If Energy Production Systems, Inc. has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

cc: OCD Aztec District Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

April 24, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-139

Mr. John H. Cole
President
Energy Production Systems, Inc.
5928 U.S. Highway 64
Farmington, NM 87401

RE: Discharge Plan GW-157 - Spill Investigation Approval
Energy Production Systems, Inc., Farmington facility
San Juan County, New Mexico

Dear Mr. Cole:

The OCD Santa Fe office has received the "Discharge Plan GW-157 Spill Investigation" dated April 19, 1996 as submitted by Energy Production Systems. This investigation addressed the concerns outlined in the OCD letter to Energy Production Systems, Inc. dated November 30, 1995. Based on the results of the "Discharge Plan GW-157 Spill Investigation" the OCD will not require any further corrective action be taken with regards to this spill, and the work plan/investigation is hereby approved.

Please, note that OCD approval does not relieve Energy Production Systems, Inc. of liability should it latter be found that contamination was a result of this spill. Further, OCD approval does not relieve Energy Production Systems, Inc. from compliance with other Federal, State, and Local rules/regulations that may apply to this spill.

If you any questions please feel free to contact me at (505)-827-7156.

Sincerely,

A handwritten signature in cursive script, reading "Patricio W. Sanchez".

Patricio W. Sanchez
Petroleum Engineering Specialist

xc: Mr. Denny Foust

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 8:35 AM	Date 3-22-96
<u>Originating Party</u>		<u>Other Parties</u>
Pat Sanchez - OCD		John Cole - EPS
Returning 3-19-96 call.		
<u>Subject</u> Spill Investigation.		

Discussion

(1) John has background samples all over the site from 1992 that show levels of Ba, Cd, Cr, and Pb.

(2) John will sample the water (Hydrotect) for Ba, Cd, Cr, and Pb.

(3) John will submit a report showing the results of (1) and (2) Above

Conclusions or Agreements

EPS will follow through with (1), (2), and (3) above and Submit to the OCD within a couple of weeks.

Distribution File.

Signed

Patrick W. [Signature]

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 11:15 AM

Date 3-19-96

Originating Party

Other Parties

Mr. John Cole - EPS

Pat Sanchez - OCD

Returning my call from 3-18-96

Subject

Metals Investigation from spill. (EPS-6W-157)

Discussion

Mr. Cole said they have been up to their ears in litigation due to Chapter 11 proceedings.

I suggested that he look only at the 4 Metals that tested bad - Ba, Cr, Cd, and Pb - Not hazardous but could potentially cause groundwater standards to be exceeded because depth only 5' and citizens ditch nearby.

Conclusions or Agreements

Mr. Cole will follow up on investigation. (Next few days.)
He needs to look at background / and hydrotest water. to compare to spill site area.

Distribution File.

Signed

Patricia W. Sanchez

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time 10:00 AM

Date 12/11/95

Originating Party

Other Parties

John Cole - EPS

Pat Sanchez - ocd

Subject EPS spill investigation (NE/4, NE/4, sec. 26, T29N, R12W,
GW-157 (San Juan County)

Discussion

- (1) Agreed with results being non-haz.
- (2) WQCC standards impacted on 4 - Metals.
- (3) Mr. Cole said they are filing chapter 11.
- (4) He wanted recommendations:
 - I told him I could not recommend consultants.
 - He needs a sample of hydrotest water.
 - (a) Establish background levels outside the spill area.
 - (b) determine the depth of the spill impact -
i.e. how far down has the contamination leached.

Note: Stream Near by $\frac{1}{2}$ ground water only at 5 feet.

Conclusions or Agreements

*(Mr. Cole said amoco had closed pit near his facility and possibly the metals could have leached from the closure.)

Mr. Cole will submit the Plan as outlined in the letter from
Distribution the ocd.

Signed

File; Bill Olson.

Patricia V. Sanchez

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time 7:55 AM

Date 12/6/95

Originating Party

Other Parties

Pat Sanchez - OGD

Darby West - EPS

Subject

Letter I sent them on 11/30/95 about the spill.

Discussion

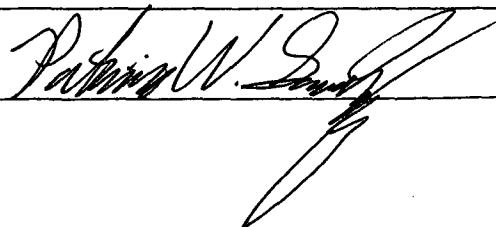
1. Mr. West thought that the Envirotech report had met all levels - I told that all Haz waste levels were met but the levels of the contaminants were above WQCC 3103.A standards - in other words with the Leachable Metals present and the presence of the Arroyo and depth to Groundwater only 5 feet.
2. Mr. West will follow up on the investigation and get with his consultant - I told him that Envirotech does have a copy of the WQCC regulations.

*Note: This is a discharge plan facility if EPS should also have a copy of the WQCC regulations for previous OGD permitting of the facility.

Mr. West to get back with us with an investigation Plan.

Distribution

Signed



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 7:35 AM	Date 12/6/95
<u>Originating Party</u>		<u>Other Parties</u>
Pat Sanchez - OCD		Denny Foust - OCD

Subject EPS spill letter sent (GW-157) on 11/30/95

Discussion

Denny was wondering why I used the Standards from WRCC on a soil.

1. The counts [levels] are totals and are still leachable to the groundwater. - i.e. if you use TCLP the levels are non-haz. but still above WRCC 3103A standards.

2. depth to groundwater only about 5 feet, also the presence of a stream running near the property.

Conclusions or Agreements

Denny now understands why I am requiring further investigation. I will give Darby West with EPS a call, Randall Popplenell no longer with EPS.

Distribution

Signed

Patricia W. Smith

OIL CONSERVATION DIVISION

2040 SOUTH PACHECO

Santa Fe, NM 87505

November 30, 1995

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-962-981

Mr. Randall Popplewell
Energy Production Systems, Inc.
5928 U.S. Highway 64
Farmington, NM 87401

RE: Discharge Plan GW-157 - Spill Investigation
Energy Production Systems, Inc., Farmington facility
San Juan County, New Mexico

Dear Mr. Popplewell:


On October 23, 1995 the OCD Santa Fe office received the "Soil Sample Analysis Results" submitted by ENVIROTECH INC. dated September 26, 1995 representing Energy Production Systems Inc. This document presented the results of the spill site sampling at Energy Production Systems, Inc. The standards of WQCC section 3-103 A. were exceeded for barium and cadmium, and the elevated levels for chromium and lead are also of concern to the OCD.

Therefore the OCD shall require Energy Production Systems, Inc. to submit a work plan within 45 days of receipt of this letter to address the following:

1. The extent of the contamination area.
2. A course of action to clean up the spill site so that WQCC groundwater standards will not be exceeded.
3. Energy Production Systems, Inc. will contact Mr. Denny Foust at the Aztec OCD office at 334-6178 at least 72 hours in advance of any remedial action or sampling.

Submit the original copy of the work plan to the Santa Fe OCD office for approval and a copy to the Aztec OCD district office. If Energy Production Systems, Inc. has any questions regarding this matter feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer, Environmental Bureau.

XC: Mr. Denny Foust - Environmental Geologist

MEMORANDUM OF MEETING OR CONVERSATION

X TELEPHONE PERSONAL TIME 10:45 AM/PM

DATE 8/30/95

ORIGINATING PARTY: Denny Faust

OTHER PARTIES: Roger, Chris, and Pat

SUBJECT: EPS Inc. GW-157

DISCUSSION: Water running off the facility towards
a running ditch - arroyo.

Roger told Denny to tell them to stop - and
SAMPLE IMMEDIATELY. B110/B112, Major Cations, and
Heavy Metals.

Also, they need to stop hauling water to Basin
and Sanco - as these facilities can only accept
exempt wastes.

CONCLUSIONS/AGREEMENTS: Roger said the next time
this type of spillage occurs to fine them
\$10,000. Because they made commitments with
their GW-157 and are not complying

PATRICIO W. SANCHEZ: *Patricio W. Sanchez*

XC: FILE,

Note: The depth to groundwater \approx 5' ; TDS \approx 2,500 mg/L.

CONSERVATION DIVISION
RECEIVED

Pat Sanchez

MEMORANDUM OF MEETING OR CONVERSATION

TELEPHONE ☒ PERSONAL TIME 11:00 AM/PM

DATE 8/30/95

ORIGINATING PARTY: Denny Foust - Aztec District

OTHER PARTIES: Pat & EPS - Discharge Pkn

Randall Popplewell, Clayton Roberts


SUBJECT: Hydrotest and washwater Running
Across Parking Lot

DISCUSSION: I pointed out to Mr. Popplewell and Mr. Roberts that water on the ground was a violation of their discharge permit, especially since this water was approaching the live stream at the Eastern edge of the permitted facility.

Mr. Popplewell was instructed to obtain a soil test for 8010, 8020, major cations/anions and heavy metals from the affected area. Jack Collins from Envirotech sampled the soil.

Water originated from washing dirt out of a new tank at the west end of the property and from a manifold at the hydrotest bldg on the East end of property both utilizing fresh water. Hoses were left to drain or siphon or/and manifold leaked during hydrotest.

CONCLUSIONS/AGREEMENTS: Mr. Popplewell is to contact Pat Sanchez about alternatives for hydrotest water disposal. Can new equipment hydrotest go to Class II well?
No it can't

 Denny G. Foust

XC: FILE,

Pat Sanchez

* Randall
Popplewell
w/ EPS

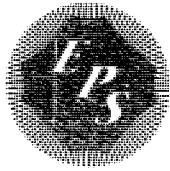
Per Denny -
Should call!

RECEIVED

AUG 31 1995

Environmental Bureau
Oil Conservation Division

CONSERVATION DIVISION
RECEIVED
AUG 31 AM 8 52



Energy Production Systems, Inc.

Formerly P & A, Inc.

APRIL 21, 1995

CHRIS EUSTICE
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505

DEAR CHRIS:

PLEASE BE INFORMED THAT P AND A INC. OFFICIALLY CHANGED NAME TO
ENERGY PRODUCTION SYSTEMS, INC. ON OCTOBER 25, 1994.

THE SCC # IS 0820878. THE DISCHARGE PLAN IS (GW157). OUR CHECK
NUMBER 17225 IN THE AMOUNT OF \$1,380.00 WAS SENT 3-21-95.

IF I CAN BE OF FURTHER HELP, PLEASE CONTACT ME.

SINCERELY,

ART PERKINS, V.P.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 3/21/95

or cash received on 3/29/95 in the amount of \$ 1380.00

from ENERGY PRODUCTION SYSTEMS

for EPS FARMINGTON FACILITY 610-1104
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: ROGER ANDERSON Date: 3/29/95

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility ☒ Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____



ENERGY PRODUCTION
SYSTEMS, INC.
FORMERLY P & A INC.
5928 U.S. HWY. 64
FARMINGTON, NM 87401
PH. 505-632-2200 FAX 505-632-8070

FIRST NATIONAL BANK
FARMINGTON, AZTEC, BLOOMFIELD,
SHIPROCK, NEW MEXICO
95-54-1022

PAY

DATE

CHECK NO.

CHECK AMOUNT

03/21/95

*****\$1,380.00

ONE THOUSAND THREE HUNDRED EIGHTY AND 00/100 DOLLARS

TO
THE
ORDER
OF

NMED-WATER QUALITY MGMT
P.O. BOX 2088
SANTA FE, NM 87504

[Signature]



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 8:15 AM	Date 3-21-95
Originating Party Chris Eustice OCD		Other Parties Clayton Roberts - Energy Prod. Systems FORMERLY P&A, Inc.	
Subject Delinquent fee for discharge plan approval and change of operator name.			

Discussion

1-19-95 OCD sent P&A, Inc a 'notice of delinquent fees.' We've yet to receive a response

Denny Faust (OCD-AZTEC) notified me of a name change from 'P&A, Inc.' to 'Energy Productions Systems', Inc.

Clayton Roberts told me it was a name change, not a facility transfer.

Conclusions or Agreements

I told Clayton to propose, in writing, that the operator has changed names and the OCD should note this.

Also told him to send delinquent fees, now.

He agreed to comply

Continuation

Signed

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



January 19, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-090

Energy Prod Sys

Mr. Clayton Roberts
P&A, Inc.
5928 U.S. Highway 64
Farmington, New Mexico 87401

Re: Discharge Plan (GW-157)
P&A, Inc. Farmington Service Facility
San Juan County, New Mexico

Dear Mr. Roberts:

A review of the file for discharge plan GW-157 for the P&A, Inc. Farmington Service Facility located in the NE/4 NE/4, Section 26, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico has revealed that the thirteen hundred eighty dollar (\$1380.00) payment for the December 23, 1993 discharge plan approval has not been submitted to the Oil Conservation Division (OCD). These fees were due at the time of approval and were not received.

In order to be in compliance with Water Quality Control Commission (WQCC) Regulation 3-114 B.6, please remit the remaining balance in full to the OCD immediately. All checks should be made payable to: NMED-WATER QUALITY MANAGEMENT and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please contact me at (505) 827-7153.

Sincerely,

A handwritten signature in cursive script that reads "Chris Eustice".

Chris Eustice
Geologist

cc: OCD-Aztec 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

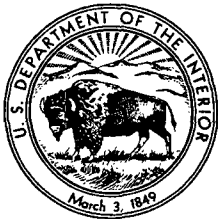
Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

Oil Conservation
827-7131



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

November 29, 1993

Permit #GW94007

Mr. William J. Lemay
New Mexico Energy, Minerals, and
Natural Resources Department
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 November 16, 1993, regarding the Oil Conservation Division (OCD) discharge plan applications submitted by P&A, Farmington Service Facility, on fish, shellfish, and wildlife resources in New Mexico.

The Service has the following comments on the issuance of the following discharge permits:

GW-157 P&A, located in the NE/4 NE/4, section 26, T29N, R12W, San Juan County, New Mexico. Approximately 140 gallons per day of water is used for hydropressure testing of equipment and stored in above-ground tanks and reused.

The above ground steel tank capacities should be able to contain all the water produced during periods of inclement weather when it is not possible to drain the tank on a regular schedule. The tanks should also exhibit strong corrosion resistance to those fluids the tank will store. The tanks should be exposed entirely to visually detect leaks. If leaks are detected, surface soil monitoring and runoff prevention measures should be implemented. The permit requests did not indicate if the tanks were completely closed. If tops are open, tanks should be netted to prevent potential threats to endangered species or migratory birds that may be found in the area.

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

Sincerely,

Sonja Fowler-Propst
for Jennifer Fowler-Propst
State Supervisor

cc:

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

Oil Conservation Division
notice is hereby given that pursuant
to New Mexico Water Quality Control
Commission (WQCC) Regulations,
the following discharge plan applica-
tion and discharge plan renewal
application 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:
Eric Edger-

827-5800. (GW-157) - P&A, Eric Edger-ton, 5928 U.S. Highway 84, Farm-ington, New Mexico 87401, has submitted a discharge plan application for their Farmington Service Facility located in the NE/4 NE/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approx-imately 140 gallons per day of water is used for hydropressure testing of equipment. The water has a total dissolved solids con-centration (TDS) of approximately 580 mg/l and is stored in an above ground tank and reused. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 5 feet with a TDS of approximately 2500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be

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 the publication of this notice during which comments may be submitted to him a 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 10th day of November, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
William J. LeMay
Director

Journal: November 24, 1993

SS

OIL CONSERVATION DIVISION
RECEIVED

'93 NOV 29 AM 10 00

Paul D. Campbell 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, 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 24 day of Nov., 1993, and the subsequent consecutive publications on Dec. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 1993.

Paul D Campbell

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 24 day of, Nov. 1993.

PRICE \$30.85

Statement to come at end of month.

KMB

CLA-22-A (R-1/93) ACCOUNT NUMBER 0 81184

OFFICIAL SEAL

SECRET

LIBRARY PUBLIC-NEW MEXICO

JOINTLY FILED WITH SECRETARY OF STATE
My Commission Expires _____

AFFIDAVIT OF PUBLICATION

No. 32540

STATE OF NEW MEXICO,
County of San Juan:

C.J. SALAZAR being duly
sworn, says: "That she is the
CLASSIFIED MANAGER of
The Farmington Daily Times, a daily
newspaper of general circulation
published in English in Farmington,
said county and state, and that the
hereto attached LEGAL NOTICE

was published in a regular and entire
issue of the said Farmington Daily
Times, a daily newspaper duly quali-
fied for the purpose within the
meaning of Chapter 167 of the 1937
Session Laws of the State of New
Mexico for ONE consecutive
(DAYS) (//////) on the same day as
follows:

First Publication FRIDAY, NOVEMBER 19, 1993

Second Publication _____

Third Publication _____

Fourth Publication _____

and the cost of publication was \$ 48.06

C.J. Salazar
On Dec. 2, 1993 C.J. Salazar
appeared before me, whom I know personally to be
the person who signed the above document.

Gunny Beck

Notary Public, San Juan County,
New Mexico

My Comm expires: APRIL 2, 1996

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 Reg-
ulations, the following discharge plan application has been submitted to the Director of the Oil Conser-
vation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone
(505) 827-5800:

(GW-157) - P&A, Eric Edgerton, 5928 U.S. Highway 64, Farmington, New Mexico 87401, has submit-
ted a discharge plan application for their Farmington Service Facility located in the NE/4 NE/4, Sec-
tion 26, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately
140 gallons per day of water is used for hydropressure testing of equipment. The water has a total
dissolved solids concentration (TDS) of approximately 580 mg/l and is stored in an above ground
tank and reused. Groundwater most likely to be affected in the event of an accidental discharge is
at a depth of approximately 5 feet with a TDS of approximately 2500 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 5:00
p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Di-
rector 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 shall 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 informa-
tion 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 10th day of November, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

SEAL

Legal No. 32540 published in the Farmington Daily Time, Farmington, New Mexico on Friday,
November 19, 1993.

**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, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-157) - P&A, Eric Edgerton, 5928 U.S. Highway 64, Farmington, New Mexico 87401, has submitted a discharge plan application for their Farmington Service Facility located in the NE/4 NE/4, Section 26, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 140 gallons per day of water is used for hydropressure testing of equipment. The water has a total dissolved solids concentration (TDS) of approximately 580 mg/l and is stored in an above ground tank and reused. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 5 feet with a TDS of approximately 2500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

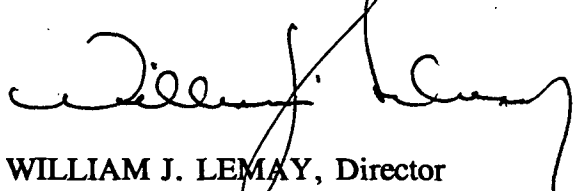
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday 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. Request for public hearing shall set forth the reasons why a hearing shall 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 10th day of November, 1993.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**


WILLIAM J. LEMAY, Director

SEAL

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

OIL CONSERVATION DIVISION
RECEIVED

NOV 15 9 19

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES

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

- I. TYPE: PRODUCTION EQUIPMENT FABRICATOR
- II. OPERATOR: P & A, INC.
ADDRESS: 5928 U.S. HIGHWAY 64, FARMINGTON, NM 87401
CONTACT PERSON: CLAYTON ROBERTS PHONE: 632-8061
- III. LOCATION: NE /4 NE /4 Section 26 Township 29N Range 12W
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of all materials stored or used at the facility.
- VII. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
- VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
- IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
- X. Attach a routine inspection and maintenance plan to ensure permit compliance.
- XI. Attach a contingency plan for reporting and clean-up of spills or releases.
- XII. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XIII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- 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:

M Clayton Roberts

Title:

Quality Control Mgr.

Signature:

M Clayton Roberts

Date:

11-9-93

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

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

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES

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

- I. TYPE: PRODUCTION EQUIPMENT FABRICATOR
- II. OPERATOR: P & A, INC.
ADDRESS: 5928 U.S. HIGHWAY 64, FARMINGTON, NM 87401
CONTACT PERSON: CLAYTON ROBERTS PHONE: 632-8061
- III. LOCATION: NE /4 NE /4 Section 26 Township 29N Range 12W
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of all materials stored or used at the facility.
- VII. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
- VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
- IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
- X. Attach a routine inspection and maintenance plan to ensure permit compliance.
- XI. Attach a contingency plan for reporting and clean-up of spills or releases.
- XII. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XIII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- 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: M Clayton Roberts Title: Quality Control Mgr.
Signature: M Clayton Roberts Date: 11-9-93

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.



OIL CONSERVATION DIVISION
RECEIVED

P & A, Inc.

Energy Production Systems

'93 NOV 4 AM 8 54

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
P.O. BOX 2088
SANTA FE, NM 87504-2088

Discharge Plan For P&A Inc.

I Type of Operation:

P&A Inc. is manufacturing facility for oil field equipment. P&A Inc. manufactures all types of water/oil separators, natural gas dehydration units, and storage tanks.

II Name of legal party:

The corporation is owned by a group of share holders. A list of the share holders can be sent out upon request.

III Location:

The property owned by P&A Inc. is located at 5928 HWY 64 between Bloomfield and Farmington, New Mexico. A legal description of property can be mailed at a later date if necessary, it is not available to meet the deadline of this application. A survey of the area is included in this report.

IV Land Owners:

The land as described above is own by P&A Incorporated.

V Facility Diagram:

A facility diagram showing location of fences, pits, and tanks is shown in figure 1.

VI Material Stored or Used at the Facility:

- XYLENE
- HI HEAT SYLICON CAULKING
- MAPP GAS
- PAINTS

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
P.O. BOX 2088
SANTA FE, NM 87504-2088

- VALLEY GAS 3
- ACETYLENE
- DIESEL
- HYDRAULIC OIL
- MOTOR OIL
- CUTTING OIL
- GLYCOL

VII Sources and Quantities of Effluent and Waste Solids:

See optional form.

VIII Summary Description of Existing Liquid and Solids Waste Collection and Disposal.

See optional form.

IX. Proposed Modifications.

Collection and storage systems meet the criteria of Section VIIB, therefore, no modifications are proposed at this time.

X. Inspection Maintenance and Reporting.

A. Description of routine inspection procedures:

- 1.) **Tanks** - Tanks are inspected whenever periodic maintenance is performed on them but no less than twice yearly. These tanks include; Diesel, Steam Cleaner, and Hydro - test water.
- 2.) **Pits** - The only pits located on the property are lined with cement and are located in the hydro - test building. Regular city water is used to pressure test field equipment and is

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
P.O. BOX 2088
SANTA FE, NM 87504-2088

drained into these pits. The water from these pits is pumped to a 210 Barrel tank located behind and reused over the course of one year. Once a year the cement pits are inspected for cracking and any repairs are made if necessary. Also, the water from the 210 barrel tank is disposed of by an off site disposal company. The disposal companies P&A Inc. is uses are:

- Sunco Trucking Company, Farmington, NM.
- Basin Disposal Company, Farmington, NM.

B.) Ground water is not used to monitor leak detection, all inspection are visual.

C.) All environmentally hazardous materials stored at P&A Inc. are in enclosed areas. No run-off water from precipitation should come in contact with any of these materials which would result in contaminants leaving this facility.

XI. Spill / Leak Prevention and Reporting Procedures (Contingency Plans)

Spills or leaks that P&A Inc. is most concerned about would be in the hydro - test building or with our diesel tanks located in the pipe yard. See appendix A for P&A Inc.s' Emergency Response for Accidents Involving Hazardous Materials. In this report are details of who is contacted and what actions are taken to contain the spill or leak.

XII Site Characteristics

- 1.) A water drainage ditch is located parallel to HWY 64 which runs along the south end of P&A Incs' property. The ditch only runs when it rains. No other bodies of water are located near the area.
- 2.) P&A Inc. is working on getting a ground water level and the information will be forwarded to your department when its available. If your department has any information on ground water levels for our area, please let us know.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
P.O. BOX 2088
SANTA FE, NM 87504-2088

- 3.) The soil around P&A Incs' property is mostly sandy.
- 4.) The buildings located on the property are not in a flood plane.

XIII Other Information

P&A Inc. has filed a report with the Fire department which details all hazardous materials stored on location and their locations. In the event of any spills or incidents, the Fire department will be notified. If there are any questions on this Discharge Plan please don't hesitate to contact me at (505) 632-2200

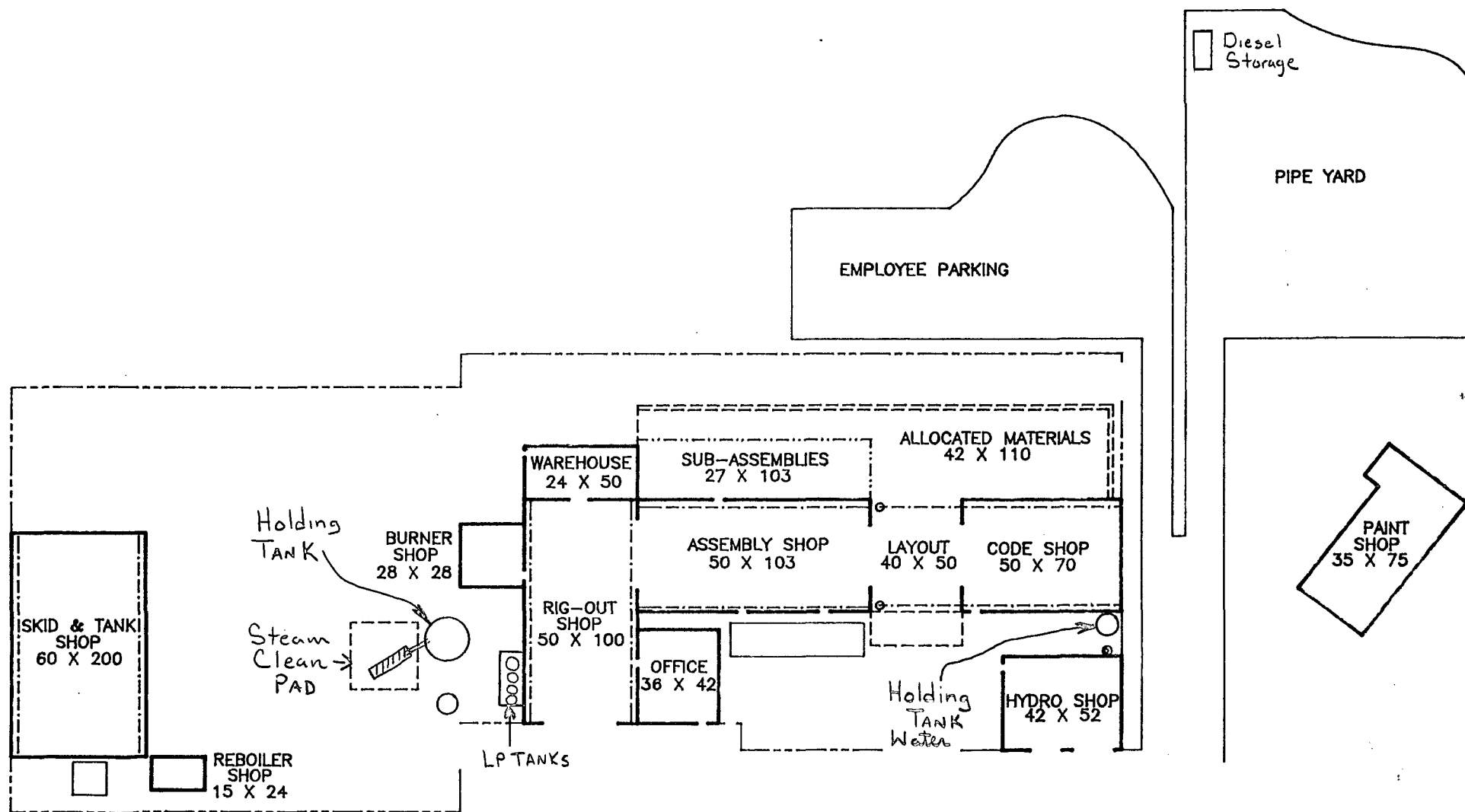
Respectfully,



10/25/93

Eric Edgerton
Staff Engineer

P&A INC.
MANUFACTURING PLANT FACILITIES



SCALE 1"=65'

US HIGHWAY 64

FIGURE 1

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VI. Form (Optional)

Materials Stored or Used at the Facility - For each category of material listed below provide information on the general composition of the material or specific information (including brand names if requested), whether a solid or liquid, type of container, estimated volume stored and location. Submit MSD information for chemicals as requested. Use of this form is optional, but the information requested must be provided.

Name	General Makeup or Specific Brand Name (if requested)	Solids(S) or Liquids(L)?	Type of Container (tank drum, etc.)	Estimated Volume Stored	Location (yard, shop, drum storage, etc.)
1. Drilling Fluids (include general makeup & types special additives [e.g. oil, chrome, etc.]	Hydraulic oil Motor oil Cutting oil Trans fluid	L	Drums	55 Gal. 75 Gal. 55 Gal. 55 Gal.	Hydro shop - - -
2. Brines - (KCl, NaCl, etc.)	None				
3. Acids/Caustics (Provide names & MSD sheets)	Diesel	L	Tank	800 Gal.	Pipe yard
4. Detergents/Soaps	None				
5. Solvents & Degreasers (Provide names & MSD sheets)	Xylene	L	Container	110 Gal.	Paint shop
6. Paraffin Treatment/ Emulsion Breakers (Provide names & MSD sheets)	None				
7. Biocides (Provide names & MSD sheets)	None				
8. Others - (Include other liquids & solids, e.g. cement etc.)	Glycol Mapp gas Valley gas 3 Acetylene	L Gases Gases Gases	Drun LP tanks LP tanks LP tanks	100 Gal. 560 CF 560 CF 780 CF	Hydro shop - Adjacent to rigout shop

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VII. Form (Optional)

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.). Use of this form is optional, but the information requested must be provided.

<i>Waste Type</i>	<i>General Composition and Source (solvents from small parts cleaning, oil filters from trucks, etc.)</i>	<i>Volume Per Month (bbl or gal)</i>	<i>Major Additives (e.g. degreaser fluids from truck washing, soap in steam cleaners)</i>
1. <i>Truck Wastes</i> (Describe types of original contents trucked [e.g. brine, produced water, drilling fluids, oil wastes, etc])	Hydro test water: regular city water which is used to pressure test field equipment (pressure vessels). Water is reused and stored in above ground storage tank behind Hydro shop.	100 BBL.	None !!!
2. <i>Truck, Tank & Drum Washing</i>	None		
3. <i>Steam Cleaning of Parts, Equipment, Tanks</i>	Steam cleaning of used equipment. An oil/water mixture is drained to a 210 BBL tank where it is stored for later disposal.	5 BBL.	Oil/Water Mixture
4. <i>Solvent/Degreaser Use</i>	None		
5. <i>Spent Acids, Caustics, or Completion Fluids</i> (Describe)	Diesel fuel Used to operate cranes and fork lifts.	400 Gal./Month	None
	Trans Fluid	10 Gal./Month	

Waste Type	General Composition and Source (solvents from small parts cleaning, oil filters from trucks, etc.)	Volume Per Month (bbl or gal)	Major Additives (e.g. degreaser fluids from truck washing, soap in steam cleaners)
6. Waste Slop Oil Shop cutting oil used in threading pipe and cutting metal.		10 Gal./Month	None
7. Waste Lubrication and Motor Oils Motor oil used for forklifts and cranes.		3 Gal./Month	None
8. Oil Filters None			
9. Solids and Sludges from Tanks (Describe types of materials [e.g. crude oil tank bottoms, sand, etc.])	210 BBL. tank used for steam cleaning tanks - may have oil/water mixture with oil sludge in bottom.	2 Gal./Month	None
10. Painting Wastes	Xylene - used to thin paints.	50 Gal./Month	None
11. Sewage (Indicate if other wastes mixed with sewage; if no commingling, domestic sewage under jurisdiction of the NMEID)	None		
12. Other Waste Liquids (Describe in detail)	None		
13. Other Waste Solids (Cement, construction materials, used drums)	None		

DISCHARGE PLAN APPLICATION

Oilfield Service Facilities

Part VIII. Form (Optional)

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.

Waste Type	Tank(T)/ Drum(S)	Floor Drain/(F) Sump(S)	Pits- Lined(L) or Unlined(U)	Onsite Injection Well	Leach Field	Offsite Disposal
1. Truck Wastes						
Hydro Test water	T	F	L cement	None	None	Waste Disposal Co. disposes of water once a year.
2. Truck, Tank and Drum Washing						
None						
3. Steam Cleaning of Parts, Equipment, Tanks						
Steam cleaning tank of used equipment	T	F	L steel	None	None	Oil/water mixture is disposed of as necessary by off site disposal co.
4. Solvent/Degreaser Use						
None						
5. Spent Acids, Caustics, or Completion Fluids						
Diesel fuel used to operate crane and forklift.	T	N	L pipe	None	None	Not required
6. Waste Slop Oil						
Shop cutting oil used in threading pipe and cutting metal	T	N	L pipe	None	None	Off site disposal co. collects

<i>Waste Type</i>	<i>Tank(T)/ Drum(S)</i>	<i>Floor Drain/(F) Sump(S)</i>	<i>Pits- Lined(L) or Unlined(U)</i>	<i>Onsite Injection Well</i>	<i>Leach Field</i>	<i>Offsite Disposal</i>
7. <i>Waste Lubrication and Motor Oils</i>						
Moto oild used for forklifts and crane	T	None	L	None	None	Off site disposal co. collects oil if necessary
8. <i>Oil Filters</i>						
None						
9. <i>Solids and Sludges from Tanks</i>						
210 BBL. tank used for steam celaning. oil sludge buildup.	T	F	L	None	None	Disposal by off site collection co.
10. <i>Painting Wastes</i>						!! !!
11. <i>Sewage</i>						
None						
12. <i>Other Waste Liquids</i>						
None						
13. <i>Other Waste Solids</i>						
None						

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
P.O. BOX 2088
SANTA FE, NM 87504-2088

APPENDIX A



5928 US HYWAY 64
P. O. BOX 2350
FARMINGTON, NEW MEXICO 87499
(505) 632-8061 • FAX (505) 632-8070

EMERGENCY RESPONSE
for
ACCIDENTS INVOLVING HAZARDOUS MATERIALS

Scope:

The scope of this document is to provide specific instructions in the event of an emergency that involves hazardous material either generated or stored at P&A Inc., located at 5928 US Highway 64, Farmington, NM.

Purpose:

The purpose of this document is to set Company policy as it relates to accidents involving hazardous material and to provide all Company personnel with the required information to safely and expediently.

General:

Notification shall be sent to all local authorities whose agency and or services might be used in case of unplanned discharge or fire involving hazardous materials. The following agencies have been so notified:

1. San Juan Regional Medical Center
2. San Juan County Sheriff's Department
3. San Juan County Fire Marshal

Equipment and Materials that will be maintained on premises for accidents that may occur are as follows:

1. Two Way Radio
2. Fire Extinguisher
3. Shovels
4. Absorbant Materials

In the event of an accident involving painting materials, the following steps must be taken to prevent injury to employees and to minimize damage to the environment.

1. Upon discovery of spill or fire, the first response shall be to communicate to management via the two way radio that an emergency condition exists. In case of after hours contact 911 for appropriate dispatch of emergency services. As soon as practical, contact M. Clayton Roberts @ 325-3078 or Pat Lohman @ 326-3035. Management will in turn notify NMED Hazardous and Radioactive Materials Bureau.
2. If a fire has occurred, every effort shall be made to contain it using fire extinguishers and shovels as appropriate.
3. In the case of a spill, all electrical power shall be turned off to prevent sparking from electrical equipment and every effort made to contain spill using shovels and absorbant materials. All contaminated absorbants and earth will be disposed of in closed containers.

All Employees whose work requires them to work with paint and related products are required to read and familiarize themselves with this document.



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



EPA I.D. NUMBER

INSTALLATION ADDRESS

NMD986682219

PGA INC

PO BOX 2350

FARMINGTON, NM 87499

JOHN COLE, PRESIDENT

5920 US HWY 64

FARMINGTON, NM 87401



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY



July 30, 1992

P&A Inc.
5928 US Highway 64
Farmington, New Mexico, 87401
ATTN: JOHN COLE

Dear Mr. Cole:

Enclosed please find for your files, a copy of the Notification of Hazardous Waste Activity form you recently submitted to us.

The U.S. Environmental Protection Agency has issued an identification number to your facility which is recorded on the top line of the form. This number should be used on all manifests and other documents concerning the transportation, treatment and disposal of your waste.

Please remember that this number has been assigned to the specific location and facility indicated on the form. Should any changes occur in any of this information, you must file a Subsequent Notification form with our agency.

If you have any questions about management of your hazardous waste, call the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau at (505) 827-4308.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anna J. Walker".

Anna J. Walker
Management Analyst
Hazardous and Radioactive Materials Bureau

AJW:s1

Encl.

cc: file

MATERIAL SAFETY DATA SHEET
DIETHYLENE GLYCOL

OTHER PROTECTIVE
EQUIPMENT..... Chemical type apron recommended

SECTION IX - SPECIAL HANDLING

HANDLING AND STORAGE..... Store away from oxidizers or materials bearing a yellow "DOT" label. Keep out of sun and away from heat. Clean up leaks immediately to prevent soil or water contamination.

PRECAUTIONARY MEASURES... Avoid contact with skin, eyes, and clothing. After handling this product, wash hands before eating, drinking, or smoking. If contact occurs, remove contaminated clothing. If needed, take first aid action shown in Section V. Use with adequate ventilation.

HAZARD CLASS..... NON HAZARDOUS

DOT SHIPPING NAME..... CHEMICALS, NOS

REPORTABLE QUANTITY (RQ). None

UN NUMBER..... None

UN #..... None

PACKAGING SIZE..... N/A

SECTION X - REGULATORY

IPA ACUTE..... YES

IPA CHRONIC..... NO

IPA IGNITABILITY..... NO

IPA REACTIVITY..... NO

IPA SUDDEN RELEASE OF
PRESSURE..... NO

PERCLA RQ VALUE..... None

ARA TPO..... None

ARA RQ..... None

SECTION 313..... No

IPA HAZARD WASTE #..... None

LEANAIR..... Yes Section 111

LEAN WATER..... No

DOT NOTES N/A - not applicable N/D - no data available
< - means less than > - means greater than
App. - approximate Est. - estimated

PREPARED BY:..... Glen White, S.I.S., 817-560-4631

MATERIAL SAFETY DATA SHEET
DIETHYLENE GLYCOL

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE.... Recommended 5 MG/M3 based on oil mist.

ROUTES OF ENTRY	INHALATION?	SKIN?	INGESTION?
	Irritant	Mild irritant	Irritant

HEALTH HAZARDS..... ACUTE: Vapors or liquid may be irritating to skin, eyes, or mucous membranes. Avoid inhalation or skin/eye contact.

CARCINOGENICITY	NTP?	IARC MONOGRAPHS?	OSHA REGULATED
NO	NO	NO	NO

OVER EXPOSURE EFFECTS.... Skin irritation develops slowly after contact. Eye irritation develops immediately upon contact.

FIRST AID PROCEDURES..... In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention. Wash clothing before reuse. If swallowed, do not induce vomiting, get immediate medical attention. If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

SECTION VI - REACTIVITY DATA

CHEMICAL STABILITY..... Product is stable

CONDITIONS TO AVOID..... Heat may cause internal pressure which could rupture container.

INCOMPATIBLE MATERIALS... Oxidizers or Oxidizing Materials.

DECOMPOSITION PRODUCTS... From fire; Smoke, Carbon dioxide, & Carbon Monoxide.

HAZARDOUS POLYMERIZATION. Will not occur

POLYMERIZATION AVOID..... None

SECTION VII - SPILL OR LEAK PROCEDURE

FOR SPILL..... In case of spillage, absorb with inert material and dispose of in accordance with applicable regulations.

WASTE DISPOSAL METHOD.... Industrial Waste. Follow Federal, State and Local laws.

SECTION VIII - SPECIAL PROTECTION

RESPIRATORY PROTECTION... When ventilation is not adequate, use of NIOSH approved organic vapor gas cartridge respirator is recommended.

VENTILATION..... Required in closed areas

MECHANICAL EXHAUST..... Required in closed areas

LOCAL EXHAUST..... Desired

PROTECTIVE GLOVES..... Wear impervious gloves

EYE PROTECTION..... Use chemical goggles or full face shield.

MATERIAL SAFETY DATA SHEET
DIETHYLENE GLYCOL

THIS PRODUCT'S HEALTH AND SAFETY INFORMATION IS PROVIDED TO ASSIST OUR CUSTOMERS IN ASSESSING COMPLIANCE WITH HEALTH, SAFETY AND ENVIRONMENTAL REGULATIONS. THE INFORMATION CONTAINED HEREIN IS BASED ON DATA AVAILABLE TO US AND IS BELIEVED TO BE ACCURATE, ALTHOUGH NO GUARANTEE OR WARRANTY IS PROVIDED OR IMPLIED BY THE COMPANY IN THIS RESPECT. SINCE THE USE OF THIS PRODUCT IS WITHIN THE EXCLUSIVE CONTROL OF THE USER, IT IS THE USER'S RESPONSIBILITY TO DETERMINE THE CONDITIONS OF SAFE USE. SUCH CONDITIONS MUST COMPLY WITH ALL GOVERNMENTAL REGULATIONS.

MATERIAL SAFETY DATA SHEET
POLYETHYLENE GLYCOL

1 HMIS HEALTH
1 HMIS FLAMMABILITY
0 HMIS REACTIVITY
B HMIS PERSONAL PROTECTION

SECTION I - IDENTIFICATION

DISTRIBUTED BY..... COASTAL CHEMICAL COMPANY, INC
P.O. BOX 820
ABBEVILLE, LA 70511-0820
(318) 893-3862
EMERGENCY PHONE NUMBER... (318) 893-3862 OR CHEMTREC (800) 424-9300
EFFECTIVE DATE..... 02/26/90
MANUFACTURER'S NAME..... UNION CARBIDE
DOW CHEMICAL
TEXACO
OXY-PETROCHEMICAL
TRADE NAME..... TRIETHYLENE GLYCOL
CHEMICAL FAMILY..... POLYETHYLENE GLYCOL
CAS NUMBER..... 112-27-6
CHEMICAL FORMULA..... C6H14O4

SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	%	TLV (Units)	PROD. CAS #
TRIETHYLENE GLYCOL	99	None Established	112-27-6

SECTION III - PHYSICAL DATA

FREEZING POINT (F)..... -7 Deg. C., 19 Deg. F.
VAPOR PRESSURE (mm Hg).... <1 mm
VAPOR DENSITY (Air=1).... 5.2, air = 1
SOLUBILITY IN H2O..... Completely soluble in all proportions
APPEARANCE/ODOR..... Clear, colorless, viscous liquid with slight odor.
SPECIFIC GRAVITY (H2O=1). 1.1 @ 77 Deg. F., 25/25 Deg.C
PH..... N/D

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT..... 350 Deg. F.
LOWER FLAME LIMIT..... 0.9
HIGHER FLAME LIMIT..... 9.2
EXTINGUISH MEDIA..... Use water fog or spray, Alcohol Foam, Dry Powder, Carbon Dioxide (CO2).
UNUSUAL FIRE HAZARD..... Containers may explode from internal pressure if confined to fire. Cool with water. Keep unnecessary people away. Approach fire from upwind side. Avoid breathing smoke, fumes, mist or vapors on the downwind side.

MATERIAL SAFETY DATA SHEET

91

MANUFACTURER'S NAME
THE SHERWIN - WILLIAMS Co.
101 PROSPECT AVE. N.W.
CLEVELAND, OH 44115

EMERGENCY TELEPHONE NO.
(216) 566-2917
INFORMATION TELEPHONE NO.
(216) 566-2902

DATE OF PREPARATION
1 - JAN - 91

©1991, The Sherwin-Williams Co.

Industrial Enamel - VOC Complying

B54V

SECTION II— CAS No. HAZARDOUS INGREDIENT (percent by weight)		ACGIH TLV <STEL>	OSHA PEL <STEL>	UNITS	V.P.	WZ101 Pure White	WZ102 Midtone Base	WZ103 Deep tone Base	TZ104 Ultra deep Base	WZ10 Brilliant White	BZ11 Black	(YZ17) OSHA Yellow	(RZ18) OSHA Red	(EZ19) OSHA Orange	YZ37 Safety Yellow	RZ38 Safety Red	EZ39 Safety Orange
107-21-1	Ethylene Glycol	C 50	C 50	PPM	0.1	<5% may be added in tinting											
64742-47-8	Mineral Spirits	100	100	PPM	2.0	22	19	18	18	13	15	18	16	17	16	14	14
64742-68-7	Mineral Spirits 140-Flash.	100	100	PPM	0.5	14	17	21	23	20	23	17	21	18	22	24	24
108-65-6	1-Methoxy-2-Propanol Acetate	Not Established			1.6				1				1				
14807-96-8	Talc	2	2	Mg/M3	as Resp. Dust	4	5	5	6	3		2	5	2			
471-34-1	Calcium Carbonate	10	15[5]	Mg/M3	as Dust [Resp. Fraction]						6					5	
13463-67-7	Titanium Dioxide.	10	10[5]	Mg/M3	as Dust [Resp. Fraction]	16	11	8		24		5		1	14	3	9
1333-86-4	Carbon Black.	3.50	3.50	Mg/M3	as Dust						2						
1344-37-2	Lead Chromate.	0.05	0.05	Mg/M3								15		14			
12856-65-6	Molybdate Orange.	0.05	0.05	Mg/M3									11	3			
§ Lead compound [% Lead]												15[9.1]	11[6.6]	17[10.2]			
§ Chromium compound [% Chromium]												15[1.5]	11[1.2]	17[2.5]			
Weight per Gallon (lbs.)						8.96	8.66	8.36	7.97	9.48	8.08	9.26	8.70	9.13	8.74	8.25	8.42
Volatile Organic Compounds (VOC - lbs./gal.)						3.43	3.35	3.39	3.40	3.33	3.19	3.43	3.41	3.39	3.45	3.34	3.38
Flash Point (°F)						112	112	112	112	112	112	112	112	112	105	101	102
HMIS (NFPA) Rating (health - fire - reactivity)						2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2* 2 0	2* 2 0	2* 2 0	2 2 0	2 2 0	2 2 0

§ Ingredient subject to the reporting requirements of the Superfund Amendments and Reauthorization Act (SARA) Section 313, 40 CFR 372.65 C

MATERIAL SAFETY DATA SHEET

91

MANUFACTURER'S NAME
THE SHERWIN - WILLIAMS Co.
101 PROSPECT AVE. N.W.
CLEVELAND, OH 44115

EMERGENCY TELEPHONE NO.
(216) 566-2917
INFORMATION TELEPHONE NO.
(216) 566-2902

DATE OF PREPARATION
1 - JAN - 91

©1991, The Sherwin-Williams Co.

Industrial Enamel

B54

—SECTION II— CAS No. HAZARDOUS INGREDIENT (percent by weight)		ACGIH TLV <STEL>	OSHA PEL <STEL>	UNITS	V.P.	B54W101 Pure White	B54W102 Midtone Base	B54W103 Deepstone Base	B54T104 Ultradeep Base	B54W10 Brilliant White	B54B11 Black	B54A12 Tower Gray	B54A13 Slate Gray	B54R15 Deck Red	B54N16 Walnut Brown
107-21-1 §	Ethylene Glycol.	C 50	C 50	PPM	0.1	<5% may be added in tinting									
84742-47-8	Mineral Spirits.	100	100	PPM	2.0	38	40	41	43	37	44	42	42	42	46
471-34-1	Calcium Carbonate	10	15[5]	Mg/M3 as Dust [Resp. Fraction]		7	10	11	16	5	7	9	9	9	6
13463-67-7	Titanium Dioxide.	10	10[5]	Mg/M3 as Dust [Resp. Fraction]		16	11	8		21		10	10	1	
1333-86-4	Carbon Black.	3.5	3.5	Mg/M3 as Dust							2				
Weight per Gallon (lbs.)						9.04	8.82	8.87	8.36	9.38	8.03	8.67	8.66	8.68	8.15
Volatile Organic Compounds (VOC - lbs./gal.)						3.62	3.65	3.67	3.72	3.62	3.89	3.71	3.73	3.77	3.81
HMIS (NFPA) Rating (health - fire - reactivity)						2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0

—SECTION II— CAS No. HAZARDOUS INGREDIENT (percent by weight)		ACGIH TLV <STEL>	OSHA PEL <STEL>	UNITS	V.P.	B54G14 Cedar Green	(B54Y17) OSHA Yellow	(B54R18) OSHA Red	(B54E19) OSHA Orange	(B54Y27) Safety Yellow	(B54R28) Safety Red	(B54E29) Safety Orange	B54Y37 Safety Yellow	B54R38 Safety Red	B54E39 Safety Orange
84742-47-8	Mineral Spirits.	100	100	PPM	2.0	45	38	42	40	42	43	44	42	43	42
471-34-1	Calcium Carbonate	10	15[5]	Mg/M3 as Dust [Resp. Fraction]		7	7	6	7	7	5			5	
13463-67-7	Titanium Dioxide.	10	10[5]	Mg/M3 as Dust [Resp. Fraction]			4	1		9	2	4	14	3	9
1308-38-9	Chromium Oxide	0.50		Mg/M3		3									
1344-37-2	Lead Chromate.	0.05	0.05	Mg/M3			15		15						
12656-85-8	Molybdate Orange.	0.05	0.05	Mg/M3				11	3						
§ Lead compound [% Lead]							15 [8.7]	11 [6.8]	18 [10.6]						
§ Chromium compound [% Chromium]						3 [2.2]	15 [1.4]	11 [1.3]	18 [2.6]						
Weight per Gallon (lbs.)						8.15	9.47	8.73	9.25	8.59	8.18	8.04	8.66	8.18	8.33
Volatile Organic Compounds (VOC - lbs./gal.)						3.72	3.67	3.78	3.78	3.70	3.63	3.67	3.73	3.66	3.67
HMIS (NFPA) Rating (health - fire - reactivity)						2* 2 0	2* 2 0	2* 2 0	2* 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0	2 2 0

§ Ingredient subject to the reporting requirements of the Superfund Amendments and Reauthorization Act (SARA) Section 313, 40 CFR 372.85 C

Section III — PHYSICAL DATA

PRODUCT WEIGHT — See TABLE	EVAPORATION RATE — Slower than Ether
SPECIFIC GRAVITY — 1.24-1.52	VAPOR DENSITY — Heavier than Air
BOILING RANGE — 277-416 °F	MELTING POINT — N.A.
VOLATILE VOLUME — 43-62 %	SOLUBILITY IN WATER — N.A.

Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION See TABLE	FLASH POINT See TABLE	LEL 0.7	UEL 6.0
EXTINGUISHING MEDIA Carbon Dioxide, Dry Chemical, Foam			
UNUSUAL FIRE AND EXPLOSION HAZARDS Keep containers tightly closed. Isolate from heat, electrical equipment, sparks, and open flame. Closed containers may explode when exposed to extreme heat. Application to hot surfaces requires special precautions. During emergency conditions overexposure to decomposition products may cause a health hazard. Symptoms may not be immediately apparent. Obtain medical attention.			
SPECIAL FIRE FIGHTING PROCEDURES Full protective equipment including self-contained breathing apparatus should be used. Water spray may be ineffective. If water is used, fog nozzles are preferable. Water may be used to cool closed containers to prevent pressure build-up and possible autoignition or explosion when exposed to extreme heat.			

Section V — HEALTH HAZARD DATA

ROUTES OF EXPOSURE Exposure may be by INHALATION and/or SKIN or EYE contact, depending on conditions of use. To minimize exposure, follow recommendations for proper use, ventilation, and personal protective equipment.	
ACUTE Health Hazards EFFECTS OF OVEREXPOSURE Irritation of eyes, skin and respiratory system. May cause nervous system depression. Extreme overexposure may result in unconsciousness and possibly death.	
SIGNS AND SYMPTOMS OF OVEREXPOSURE Headache, dizziness, nausea, and loss of coordination are indications of excessive exposure to vapors or spray mists. Redness and itching or burning sensation may indicate eye or excessive skin exposure.	
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE None generally recognized.	
EMERGENCY AND FIRST AID PROCEDURES If INHALED: If affected, remove from exposure. Restore breathing. Keep warm and quiet. If on SKIN: Wash affected area thoroughly with soap and water. Remove contaminated clothing and laundry before re-use. If in EYES: Flush eyes with large amounts of water for 15 minutes. Get medical attention. If SWALLOWED: Get medical attention.	
CHRONIC Health Hazards B50N2, B50N6, B50Y1 and E41N1 contain Chromate. Chromates are listed by IARC and NTP. Studies have associated exposure to Chromium VI compounds with an increased risk of respiratory cancer. Prolonged overexposure to solvent ingredients in Section II may cause adverse effects to the liver, urinary, and reproductive systems. Rats exposed to titanium dioxide dust at 250 mg./m3 developed lung cancer, however, such exposure levels are not attainable in the workplace. Reports have associated repeated and prolonged overexposure to solvents with permanent brain and nervous system damage.	

Section VI — REACTIVITY DATA

STABILITY — Stable
INCOMPATIBILITY None known.
HAZARDOUS DECOMPOSITION PRODUCTS By fire: Carbon Dioxide, Carbon Monoxide, Oxides of Metals in Section II
HAZARDOUS POLYMERIZATION — Will Not Occur

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Remove all sources of ignition. Ventilate and remove with inert absorbent.
WASTE DISPOSAL METHOD Waste from this product may be hazardous as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261. Waste must be tested for ignitability to determine the applicable EPA hazardous waste numbers. B50N2, B50N6, B50Y1 and E41N1 must also be tested for extractability. Incinerate in approved facility. Do not incinerate closed container. Dispose of in accordance with Federal, State, and Local regulations regarding pollution.

Section VIII — PROTECTION INFORMATION

PRECAUTIONS TO BE TAKEN IN USE Use only with adequate ventilation. Avoid breathing vapor and spray mist. Avoid contact with skin and eyes. Wash hands after using. This coating may contain materials classified as nuisance particulates (listed "as Dust" in Section II) which may be present at hazardous levels only during sanding or abrading of the dried film. If no specific dusts are listed in Section II, the applicable limits for nuisance dusts are ACGIH TLV 10 mg./m3 (total dust), OSHA PEL 15 mg./m3 (total dust), 5 mg./m3 (respirable fraction).
VENTILATION Local exhaust preferable. General exhaust acceptable if the exposure to materials in Section II is maintained below applicable exposure limits. Refer to OSHA Standards 1910.94, 1910.107, 1910.108.
RESPIRATORY PROTECTION If personal exposure cannot be controlled below applicable limits by ventilation, wear a properly fitted organic vapor/particulate respirator approved by NIOSH/MSHA for protection against materials in Section II. When sanding, wirebrushing, abrading, burning or welding the dried film, wear a particulate respirator approved by NIOSH/MSHA for protection against non-volatile materials in Section II.
PROTECTIVE GLOVES Wear gloves which are recommended by glove supplier for protection against materials in Section II.
EYE PROTECTION Wear safety spectacles with unperforated side shields.

Section IX — PRECAUTIONS

DOL STORAGE CATEGORY — 1C
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING Contents are FLAMMABLE. Keep away from heat, sparks, and open flame. During use and until all vapors are gone: Keep area ventilated - Do not smoke - Extinguish all flames, pilot lights, and heaters - Turn off stoves, electric tools and appliances, and any other sources of ignition. Consult NFPA Code. Use approved Bonding and Grounding procedures. Keep container closed when not in use. Transfer only to approved containers with complete and appropriate labeling. Do not take internally. Keep out of the reach of children.
OTHER PRECAUTIONS Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal.

This Material Safety Data Sheet conforms to the Hazard Communication standard, 29 CFR 1910.1200(g)(4), for similar complex mixtures.
The above information pertains to this product as currently formulated, and is based on the information available at this time. Addition of reducers or other additives to this product may substantially alter the composition and hazards of the product. Since conditions of use are outside our control, we make no warranties, express or implied, and assume no liability in connection with any use of this information.

MATERIAL SAFETY DATA SHEET

91

MANUFACTURER'S NAME
THE SHERWIN - WILLIAMS Co.
101 PROSPECT AVE. N.W.
CLEVELAND, OH 44115

EMERGENCY TELEPHONE NO.
(216) 566-2917
INFORMATION TELEPHONE NO.
(216) 566-2902

DATE OF PREPARATION
1 - JAN - 91

©1991, The Sherwin-Williams Co.

Primers

B50

SECTION II CAS No. HAZARDOUS INGREDIENT (percent by weight)		ACGIH TLV <STEL>	OSHA PEL <STEL>	UNITS	V.P.	B50N2 KROMIK Brown	B50N6 Universal Brown	B50W1 KROMIK White	B50W3 Galvite White	B50Y1 Zinc Chromate	B50HZ1 KROMIK Tan	B50NZ6 KROMIK	B50WZ1 KROMIK White	E41N1 KROMIK Metal
64742-47-8	Mineral Spirits	100	100	PPM	2.0				24	32				22
64742-88-7	Mineral Spirits 140-Flash.	100	100	PPM	0.5				9					
100-41-4 §	Ethylbenzene.	100 <125>	100 <125>	PPM	7.1	1	1							
1330-20-7 §	Xylene.	100 <150>	100 <150>	PPM	5.9	23	23	16			18	17	15	
64742-95-6	Light Aromatic Naphtha.	100		PPM	3.8	14	15	16	2		11	9	11	
64742-94-5	Heavy Aromatic Naphtha	50		PPM				2						
34590-94-8	2-Methoxymethylethoxypropanol	100 <150>	100 <150>	PPM					2					
14807-98-6	Talc	2	2	Mg/M3 as Resp. Dust		17	18	11	7	31	8	8	7	38
471-34-1	Calcium Carbonate	10	15[5]	Mg/M3 as Dust [Resp. Fraction]				11	37		7	9	10	
7727-43-7	Barium Sulfate.	10	10[5]	Mg/M3 as Dust [Resp. Fraction]				8			7	7	7	
13463-67-7	Titanium Dioxide.	10	10[5]	Mg/M3 as Dust [Resp. Fraction]				10	8		10		11	
1314-13-2	Zinc Oxide	10	10[5]	Mg/M3 as Dust [Resp. Fraction]		4	5							4
11103-88-9	Potassium Zinc Chromate.	0.05		Mg/M3		6	7			5				4
§ Chromium compound [% Chromium]						6[1.5]	7[1.6]			5[1.1]				4[0.9]
§ Zinc compound [% Zinc]						10[5.9]	12[6.1]			5[1.8]				8[4.3]
Weight per Gallon (lbs.)						11.17	11.04	11.79	11.04	10.33	12.37	12.42	12.62	12.10
Volatile Organic Compounds (VOC - lbs./gal.)						4.32	4.31	4.14	3.99	3.37	3.44	3.43	3.42	2.71
Flash Point (°F) / DOL Storage Category						80 / 1C	80 / 1C	87 / 1C	105 / 2	101 / 2	80 / 1B	80 / 1B	80 / 1C	100 / 2
Flammability Classification (Flammable - Combustible)						Flam.	Flam.	Flam.	Comb.	Comb.	Flam.	Flam.	Flam.	Comb.
HMIS (NFPA) Rating (health - fire - reactivity)						2* 3 0	2* 3 0	2 3 0	2 2 0	2* 2 0	2 3 0	2 3 0	2 3 0	2* 2 0

§ Ingredient subject to the reporting requirements of the Superfund Amendments and Reauthorization Act (SARA) Section 313, 40 CFR 372.65 C

Zinc Rich Cold Galvanizing Compound

140-9002

MATERIAL SAFETY DATA SHEET

91

MANUFACTURER'S NAME
THE SHERWIN-WILLIAMS COMPANY
101 Prospect Avenue N.W.
Cleveland, Ohio 44115
DATE OF PREPARATION
1-Jan-91

EMERGENCY TELEPHONE NO.
(216) 566-2917

INFORMATION TELEPHONE NO.
(216) 566-2902

Section I — PRODUCT IDENTIFICATION

PRODUCT NUMBER AND NAME
140-9002 Zinc Rich Cold Galvanizing Compound

Section II — HAZARDOUS INGREDIENTS						
CAS No.	INGREDIENT	% by WEIGHT	ACGIH TLV	OSHA PEL	UNTS	V.P.
74-98-6	Propane (Propellant)	15		1000	PPM	760.0
64742-48-9	V. M. & P. Naphtha.	1	300	300	PPM	12.0
			STEL	400	PPM	
1330-20-7	§ Xylene.	10	100	100	PPM	5.9
			STEL	150	PPM	
78-93-3	§ Methyl Ethyl Ketone.	34	200	200	PPM	70.0
			STEL	300	PPM	
7438-66-6	§ Zinc	38	5		Mg/M3	

§ Ingredient subject to the reporting requirements of the Superfund Amendments and Reauthorization Act (SARA) Section 313, 40 CFR 372.65 C

Section III — PHYSICAL DATA

PRODUCT WEIGHT - N.A.	EVAPORATION RATE - Slower than Ether
SPECIFIC GRAVITY - N.A.	VAPOR DENSITY - Heavier than Air
BOILING RANGE - <0-325 °P	MELTING POINT - N.A.
VOLATILE VOLUME - >75 %	SOLUBILITY IN WATER - N.A.
HMIS (NFPA) Rating - 2 4 1	

Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION FLASH POINT <0 °F PMCC LEL 0.9 UEL 6.0
RED LABEL - Extremely Flammable, Flash below 21 °P
EXTINGUISHING MEDIA
Carbon Dioxide, Dry Chemical, Foam
UNUSUAL FIRE AND EXPLOSION HAZARDS
Closed containers may explode (due to the build-up of pressure) when exposed to extreme heat.
SPECIAL FIRE FIGHTING PROCEDURES
Full protective equipment including self-contained breathing apparatus should be used. Water spray may be ineffective. If water is used, fog nozzles are preferable. Water may be used to cool closed containers to prevent pressure build-up and possible autoignition or explosion when exposed to extreme heat.

Section V — HEALTH HAZARD DATA

ROUTES OF EXPOSURE

Exposure may be by INHALATION and/or SKIN or EYE contact, depending on conditions of use. To minimize exposure, follow recommendations for proper use, ventilation, and personal protective equipment.

ACUTE Health Hazards

EFFECTS OF OVEREXPOSURE

Irritation of eyes, skin and respiratory system. May cause nervous system depression. Extreme overexposure may result in unconsciousness and possibly death.

SIGNS AND SYMPTOMS OF OVEREXPOSURE

Headache, dizziness, nausea, and loss of coordination are indications of excessive exposure to vapors or spray mists.

Redness and itching or burning sensation may indicate eye or excessive skin exposure.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE

None generally recognized.

EMERGENCY AND FIRST AID PROCEDURES

If INHALED: If affected, remove from exposure. Restore breathing. Keep warm and quiet.
If on SKIN: Wash affected area thoroughly with soap and water.

Remove contaminated clothing and launder before re-use.

If in EYES: Flush eyes with large amounts of water for 15 minutes. Get medical attention.

If SWALLOWED: Never give anything by mouth to an unconscious person. DO NOT INDUCE

VOMITING. Give several glasses of water. Seek medical attention.

CHRONIC Health Hazards

No ingredient in this product is an IARC, NTP or OSHA listed carcinogen.

Methyl Ethyl Ketone may increase the nervous system effects of other solvents.

Prolonged overexposure to solvent ingredients in Section II may cause adverse effects to the liver, urinary, and reproductive systems.

Reports have associated repeated and prolonged overexposure to solvents with permanent brain and nervous system damage.

Section VI — REACTIVITY DATA

STABILITY - Stable

INCOMPATIBILITY

Contamination with Water, Acids, or Alkalis can cause evolution of hydrogen, which may result in dangerously increased pressures in closed containers.

HAZARDOUS DECOMPOSITION PRODUCTS -- By fire: Carbon Dioxide, Carbon Monoxide

HAZARDOUS POLYMERIZATION - Will Not Occur

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Remove all sources of ignition. Ventilate and remove with inert absorbent.

WASTE DISPOSAL METHOD

Waste from this product may be hazardous as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261. Waste must be tested for ignitability and extractability to determine the applicable EPA hazardous waste numbers.

Do not incinerate. Depressurize container. Dispose of in accordance with Federal, State, and Local regulations regarding pollution.

Section VIII — PROTECTION INFORMATION

PRECAUTIONS TO BE TAKEN IN USE

Use only with adequate ventilation. Avoid breathing vapor or spray mist. Do not get in eyes or on skin.

This coating may contain materials classified as nuisance particulates (listed "as Dust" in Section II) which may be present at hazardous levels only during sanding or abrading of the dried film. If no specific dusts are listed in Section II, the applicable limits for nuisance dusts are ACGIH TLV 10 mg./m3 (total dust), OSHA PEL 15 mg./m3 (total dust), 5 mg./m3 (respirable fraction).

VENTILATION

Local exhaust preferable. General exhaust acceptable if the exposure to materials in Section II is maintained below applicable exposure limits. Refer to OSHA Standards 1910.94, 1910.107, 1910.108.

RESPIRATORY PROTECTION

If personal exposure cannot be controlled below applicable limits by ventilation, wear a properly fitted organic vapor respirator approved by NIOSH/MSHA for protection against materials in Section II.

When sanding, wirebrushing, abrading, burning or welding the dried film, wear a particulate respirator approved by NIOSH/MSHA for protection against non-volatile materials in Section II.

PROTECTIVE GLOVES

Wear gloves which are recommended by glove supplier for protection against materials in Section II.

EYE PROTECTION

Wear safety spectacles with unperforated sideshields.

Section IX — PRECAUTIONS

DO NOT STORAGE CATEGORY - 1A

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Contents are EXTREMELY FLAMMABLE. Keep away from heat, sparks, and open flame. Vapors will accumulate readily and may ignite explosively.

During use and until all vapors are gone: Keep area ventilated - Do not smoke - Extinguish all flames, pilot lights, and heaters - Turn off stoves, electric tools and appliances, and any other sources of ignition.

Consult NFPA Code. Use approved Bonding and Grounding procedures.

Contents under pressure. Do not puncture, incinerate, or expose to temperature above 120°F. Heat from sunlight, radiators, stoves, hot water, and other heat sources could cause container to burst. Do not take internally. Keep out of the reach of children.

OTHER PRECAUTIONS

Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal.

The above information pertains to this product as currently formulated, and is based on the information available at this time. Addition of reducers or other additives to this product may substantially alter the composition and hazards of the product. Since conditions of use are outside our control, we make no warranties, express or implied, and assume no liability in connection with any use of this information.

MATERIAL SAFETY DATA SHEET

91

MANUFACTURER'S NAME
THE SHERWIN-WILLIAMS COMPANY
101 Prospect Avenue N.W.
Cleveland, Ohio 44115
DATE OF PREPARATION
1-Jan-91

EMERGENCY TELEPHONE NO.
(216) 566-2917

INFORMATION TELEPHONE NO.
(216) 566-2902

Section I — PRODUCT IDENTIFICATION

CAS No.	INGREDIENT	% by WEIGHT	ACGIH-TLV	OSHA-PEL	UNITS	V.P.
---------	------------	-------------	-----------	----------	-------	------

PRODUCTS
R2 K 4 Xylol

Section II — HAZARDOUS INGREDIENTS

CAS No.	INGREDIENT	% by WEIGHT	ACGIH-TLV	OSHA-PEL	UNITS	V.P.
---------	------------	-------------	-----------	----------	-------	------

100-41-4	5 Ethylbenzene	5	100	100	PPM	7.1
1330-20-7	5 Xylene.	95	100	100	PPM	5.9
			STEL	125	125	PPM
			STEL	150	150	PPM

5 Ingredient subject to the reporting requirements of the Superfund Amendments and Reauthorization Act (SARA) Section 313, 40 CFR 372.65 C

Section III — PHYSICAL DATA

PRODUCT WEIGHT - 7.17 lb./gal.	EVAPORATION RATE - Slower than Ether
SPECIFIC GRAVITY - 0.86	VAPOR DENSITY - Heavier than Air
BOILING RANGE - 277-292 °F	MELTING POINT - N.A.
VOLATILE VOLUME - 100 %	SOLUBILITY IN WATER - N.A.
VOC (Theoretical) - 7.17 lb. 859 gm.	HMIS - 2 3 0

Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION FLASH POINT 80 °F TCC LEL 1.0 UEL 6.7
RED LABEL - Flammable, Flash below 100 °F
EXTINGUISHING MEDIA
Carbon Dioxide, Dry Chemical, Foam
UNUSUAL FIRE AND EXPLOSION HAZARDS
Keep containers tightly closed. Isolate from heat, electrical equipment, sparks, and open flame. Closed containers may explode when exposed to extreme heat. Application to hot surfaces requires special precautions. During emergency conditions overexposure to decomposition products may cause a health hazard. Symptoms may not be immediately apparent. Obtain medical attention.
SPECIAL FIRE FIGHTING PROCEDURES
Full protective equipment including self-contained breathing apparatus should be used. Water spray may be ineffective. If water is used, fog nozzles are preferable. Water may be used to cool closed containers to prevent pressure build-up and possible autoignition or explosion when exposed to extreme heat.

Section V — HEALTH HAZARD DATA

ROUTES OF EXPOSURE
Exposure may be by INHALATION and/or SKIN or EYE contact, depending on conditions of use. To minimize exposure, follow recommendations for proper use, ventilation, and personal protective equipment.
ACUTE Health Hazards
EFFECTS OF OVEREXPOSURE
Irritation of eyes, skin and respiratory system. May cause nervous system depression. Extreme overexposure may result in unconsciousness and possibly death.
SIGNS AND SYMPTOMS OF OVEREXPOSURE
Headache, dizziness, nausea, and loss of coordination are indications of excessive exposure to vapors or spray mists.
Redness and itching or burning sensation may indicate eye or excessive skin exposure.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE
None generally recognized.

EMERGENCY AND FIRST AID PROCEDURES

If INHALED: If affected, remove from exposure. Restore breathing. Keep warm and quiet.
If on SKIN: Wash affected area thoroughly with soap and water.
Remove contaminated clothing and laundry before re-use.
If in EYES: Flush eyes with large amounts of water for 15 minutes. Get medical attention.
If SWALLOWED: Never give anything by mouth to an unconscious person. DO NOT INDUCE VOMITING. Give several glasses of water. Seek medical attention.

CHRONIC Health Hazards

No ingredient in this product is an IARC, NTP or OSHA listed carcinogen.
Prolonged overexposure to solvent ingredients in Section II may cause adverse effects to the liver, urinary, and reproductive systems.
Reports have associated repeated and prolonged overexposure to solvents with permanent brain and nervous system damage.

Section VI — REACTIVITY DATA

STABILITY - Stable

INCOMPATIBILITY

None known.

HAZARDOUS DECOMPOSITION PRODUCTS

By fire: Carbon Dioxide, Carbon Monoxide

HAZARDOUS POLYMERIZATION - Will Not Occur

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Remove all sources of ignition. Ventilate and remove with inert absorbent.

WASTE DISPOSAL METHOD

Waste from this product may be hazardous as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261. Waste must be tested for ignitability to determine the applicable EPA hazardous waste numbers.

Incinerate in approved facility. Do not incinerate closed container. Dispose of in accordance with Federal, State, and Local regulations regarding pollution.

Section VIII — PROTECTION INFORMATION

PRECAUTIONS TO BE TAKEN IN USE

Use only with adequate ventilation. Avoid breathing vapor and spray mist. Avoid contact with skin and eyes. Wash hands after using.

VENTILATION

Local exhaust preferable. General exhaust acceptable if the exposure to materials in Section II is maintained below applicable exposure limits. Refer to OSHA Standards 1910.94, 1910.107, 1910.108.

RESPIRATORY PROTECTION

If personal exposure cannot be controlled below applicable limits by ventilation, wear a properly fitted organic vapor/particulate respirator approved by NIOSH/MSHA for protection against materials in Section II.

PROTECTIVE GLOVES

Wear gloves which are recommended by glove supplier for protection against materials in Section II.

EYE PROTECTION

Wear safety spectacles with unperforated sideshields.

Section IX — PRECAUTIONS

DOL STORAGE CATEGORY - 1C

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Contents are FLAMMABLE. Keep away from heat, sparks, and open flame.

During use and until all vapors are gone: Keep area ventilated - Do not smoke -

Extinguish all flames, pilot lights, and heaters - Turn off stoves, electric tools and appliances, and any other sources of ignition.

Consult NFPA Code. Use approved Bonding and Grounding procedures.

Keep container closed when not in use. Transfer only to approved containers with complete and appropriate labeling. Do not take internally. Keep out of the reach of children.

OTHER PRECAUTIONS

Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal.

The above information pertains to this product as currently formulated, and is based on the information available at this time. Addition of reducers or other additives to this product may substantially alter the composition and hazards of the product. Since conditions of use are outside our control, we make no warranties, express or implied, and assume no liability in connection with any use of this information.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 10/22/93,
or cash received on 11/5/93 in the amount of \$ 50.00
from P&A Inc.

for P&A Farmington Service Company GW-157
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 11/5/93

Received in ASD by: Angela Love Date: 11/5/93

Filing Fee X New Facility _____ Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 94

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____



P & A, INCORPORATED
P.O. BOX 2350
FARMINGTON, NM 87499-2350

FIRST NATIONAL BANK
FARMINGTON, NEW MEXICO 87499-4540
95-54-1022

PAY
FIFTY AND 00/100 DOLLARS

DATE 10/22/93 CHECK NO. [REDACTED] CHECK AMOUNT *****\$50.00

TO
THE
ORDER
OF

NMED-WATER QUALITY MGMT
P.O. BOX 2088
SANTA FE, NM 87504

E. C. Condeletti



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

July 26, 1993

CERTIFIED MAIL

RETURN RECEIPT NO. P-667-242-003

Mr. Dan Wisener
Manufacturing Superintendent
P & A, Inc.
5928 U.S. Hwy. 64
Farmington, New Mexico 87401

**RE: DISCHARGE PLAN REQUIREMENT
P & A, INC.
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Wisener:

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 P & A, Inc. Service Facility located at 5928 U.S. Hwy. 64, San Juan, 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.

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. Two copies of your discharge plan application should be submitted to the OCD Santa Fe Office and one copy to the Aztec District Office for review purposes.

Mr. Dan Wisener

July 26, 1993

Page 2

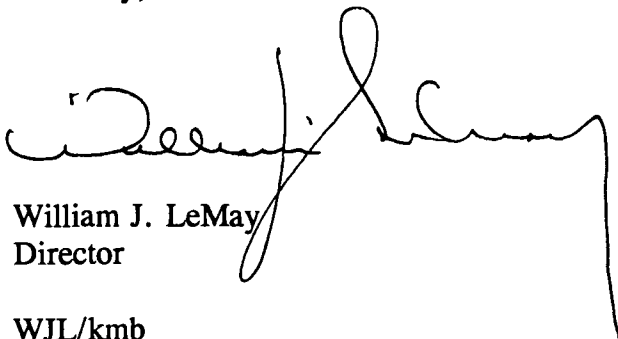
Section 3-106.A. of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Part 3-106.A. also allows the discharge to continue without an approved discharge plan until 240 days 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 Kathy Brown at (505) 827-5884 as she is assigned responsibility for review of service facility discharge plans.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William J. LeMay', is written over the typed name and title. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

William J. LeMay
Director

WJL/kmb

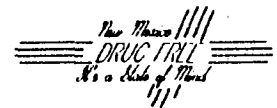
xc: Denny Foust, OCD Aztec Office



STATE OF NEW MEXICO

ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

1000 RIO BRAZOS ROAD
AZTEC, NEW MEXICO 87410
(505) 334-6178

November 24, 1992

P and A Inc.
Attn: Dan Wisener
5928 U S Hwy 64
Farmington, NM 87499

Dear Mr. Wisener:

The Oil Conservation Division will conduct a pre-discharge plan inspection of the P and A Inc. facilities at 8:00 AM on December 10, 1992. This inspection is for the benefit of the operator. Please find "Guidelines for the Preparation of Discharge Plans at Oil Field Service Facilities" enclosed.

Yours truly,

A handwritten signature in cursive script, reading "Denny G. Foust".

Denny G. Foust
Environmental Geologist

XC: OCD-Environmental Bureau