NMCMINRD 2000

(194)

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

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

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Oil Conservation Division
MAY 24 2000
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APPLICATION FOR WASTE MANAGEMENT FACILITY

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

RECEIVED
MAY 24 2000
Environmental Bureau
Oil Conservation Division

☐ Commercial ☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other
   ☒ Solids/Landfarm ☐ Treating Plant
2. Operator: Ronald Bradshaw
   Address: 317 W. Blanco Hobbs, NM (505)397-4785
   Contact Person: Eddie W. Seay, Agent Phone: (505)392-2236
3. Location: W 1/2 of w 1/2 Section 31 Township 21 Range 38
   Submit large scale topographic map showing exact location
4. Is this a modification of an existing facility? ☐ Yes ☒ No
5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.
6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.
8. Attach a contingency plan for reporting and clean-up for spills or releases.
9. Attach a routine inspection and maintenance plan to ensure permit compliance.
10. Attach a closure plan.
11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.
12. Attach proof that the notice requirements of OCD Rule 711 have been met.
13. Attach a contingency plan in the event of a release of H_2S.
14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.
15. CERTIFICATION

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

Name: Eddie W. Seay Title: Agent

Signature: Eddie W. Seay Date: April 12, 2000

2) DD Landfarm
Ronald Bradshaw

3) W 1/2 of the W 1/2 of Section 31, Tws. 21, Range 38 E., Lea Co.
a 160 acre tract

4) No

5) Attachment - Landowners of Record within 1 mile.

6) The 160 acre proposed site will be operated according to OCD guidelines.
   a) The entire facility will be fenced with 4 strain barbed wire.
   b) A 100 ft. buffer zone will be maintained around the facility.
   c) Berms will be installed around the site to direct runoff and run-on of rainwater. These berms will be constructed 3 ft. wide x 2 ft. high, this should control and contain any moisture from a 100 yr. flood. Also, water will not be allowed to pond. Any excess rain will be vacuumed up and taken to an approved disposal.
   d) All accesses and gates will be locked at all times.
   e) Soils will only be allowed when DD personnel are on location.
   f) Hwy 176 runs through the property leaving approximately 30 acres on the South side and 130 acres on the North. Also, on the very southern end, an El Paso Natural Gas line runs East and West along the fence line. No landfarming will occur within 20 ft. of the line.
   g) A sign will be posted at entrance and will detail all the OCD requirements, phone, permit no., name, etc.

7) Diagram within.

8) DD will adhere to OCD Rule 116.
   a) Report any accidental discharge by phone immediately.
   b) Cleanup and/or remediate according to OCD policy.
   c) File written reports as necessary.

9) Inspection and Maintenance Plan
   a) The facility will be fenced and gates locked at all times. Personnel will be on location at all times when material is being hauled, and each load will be documented.
   b) When and if any water accumulated on the property from rain, it will be vacuumed up and hauled to an approved OCD disposal.
   c) Water may be added to the landfarm from time to time for dust control and to enhance remediation and will help keep any odor down, if that were to occur.
   d) Berms will be inspected and maintained on a routine basis so as to prevent erosion, especially after rainfall or windstorm.

e) Because a landfarm is designed to remediate contaminated soils and not transfer contaminants into underlying native soil and/or groundwater, "Treatment Zone Monitoring" will be used at the facility. The treatment zone monitoring will consist of:

1) Test the background soil at the facility at a depth of 2 to 3 ft. The samples will be analyzed for TPH, BTEX, Cations/Anions and heavy metals using approved EPA methods.
2) A treatment zone not to exceed 3 ft. beneath the landfarm will be monitored. Samples will be taken from each cell on a quarterly schedule and analyzed for BTEX and TPH and for BTEX, TPH, Cations/Anions and heavy metals annually. All Sample holes will be filled with an impermeable material such as cement or bentonite. All test results will be submitted to the OCD in Santa Fe.
3) Only exempt oil and gas waste will be accepted at the landfarm unless special approval by OCD. The material accepted will have documentation as to where, what company, who delivered it and signed by an authorized company person. The material will be hauled in by truck, spread in 6 in. lifts and disked every other week.
4) A new lift may be added only after testing and approval from OCD.

10) Closure Plan: once DD has stopped operations, it is estimated that it will take approximately two years to finish remediating what soils are left in the landfarm. We will continue to disk, test, and monitor until facility meets with OCD guidelines. After all criteria is met, the area will be leveled, contoured and seeded.

Closure cost for this two year period is as follows:
(Estimating that there will be 20-five acre cells in use at time of closure)

Analytical tests for 2 years	
BTEX - 8 quarters - $40.00 x 20	$ 6,400
TPH - 8 quarters - $50.00 x 20	$ 8,000
Metals - 2 years - $200.00 x 20	$ 8,000
Cations/Anions - 2 years - $100.00 x 20	$ 4,000
TOTAL	$26,400

Quarterly sampling, time and labor for 20 cells
Labor at $50.00 per hour
30 Minutes per cell
20 cells equals 10 hours per sampling event plus 1 hr. for report
11 hrs. x $50.00 x 8 quarters

TOTAL	$4,400

Disking for two years every two weeks
Actual disking area approximately 100 acres (roads, buffer zone, pipeline, etc.)
$30.00 per hr. - 15 min. per acre
100 acres x 15 min. x 52 weeks 2 years = 78000 min. = 1300 hrs.
1300 hrs. x $30.00 per hour

TOTAL disking & tilling	$39,000

Freshwater as needed
$120.00 per load
$120 x 12 loads x 10 events in two years

TOTAL	$14,400

Leveling and Contouring Landfarm
D-6 dozer with operator $75.00 per hr.
$75 x 160 acres

TOTAL	$12,000

Revegetation for 160 acres
Tractor and drill $30.00 per hr. at 15 min. per acre, 160 acres = $1,200
Seed cost & material
$10.00 per lb. at 5 lbs. per acre x 160 acres = $8,000

TOTAL REVEGETATION	$ 9,200

TOTAL ESTIMATED CLOSURE COST WOULD BE = $105,400

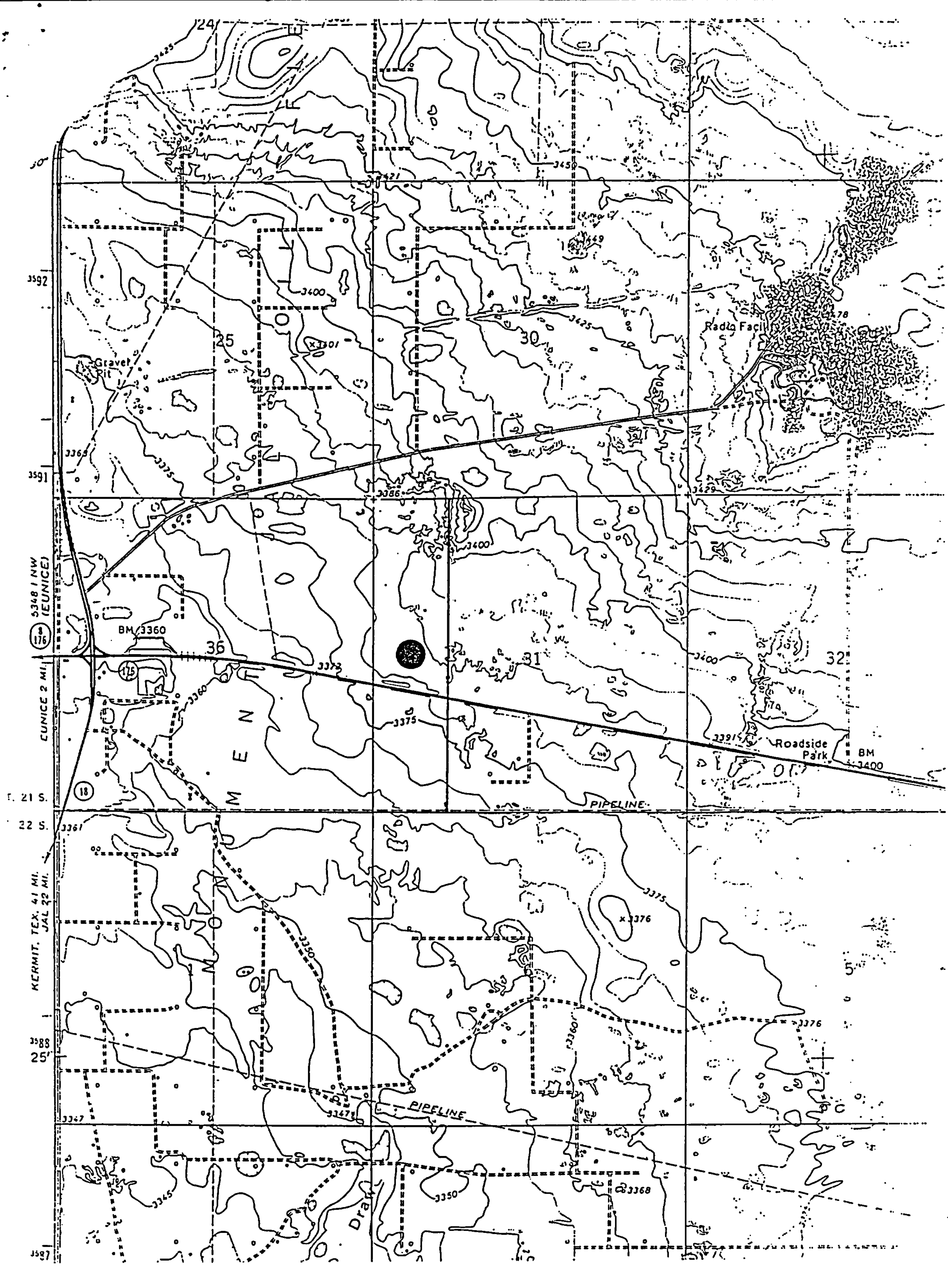
11) Geology - Hydrology
Geographically, the site is situated in the southeastern corner of the southern extension of the High Plains in southeastern New Mexico.

The Eunice plains is underlain by a hard caliche surface and is almost entirely covered by reddish brown dune sand. In some places, underlying surface consists of alluvial sediments, most commonly calcareous silt in buried valleys of Quarternary lake basins. The primary source of drinking water for the Eunice area is piped in from the Hobbs area approximately 25 miles north and are completed in the Ogallala formation. What water that is found in this area is alluvium. The alluvium is found at levels of between 50 and 120 ft. The closest known water is over a mile away. No water wells or windmills are found in the area of review.

12) Notice of requirement to offsets.

13) An open system such as a landfarm should not have an H2S problem. If H2S becomes a problem, proper testing and notification will be conducted.

14) DD will adhere to all applicable rules and regulations pertaining to this permit.



Gravel Pit
Radio Facil
BM 3360
36
25
30
31
32
Roadside Park
BM 3400
PIPELINE
PIPELINE
5348 I NW (EUNICE)
EUNICE 2 MI.
KERMIT, TEX. 41 MI.
JAL 22 MI.
21 S.
22 S.
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