



GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

## Permit to Operate

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**Facility Name:** Hovenweep

**Facility Type:** Commercial Waste Disposal Facility

**Location:** Section 18, Township 39S, Range 26E

**County:** San Juan

**Approval Date:** October 1, 2018

**1. Issued to:**

CONTRACT ENVIRONMENTAL SERVICES, INC

**2. Authority:**

Pursuant to Utah Code Ann. §§ 40-6-1 et seq., and Utah Admin. Code §§ R649-9 et seq., the Utah Division of Oil, Gas and Mining ("Division") issues this Permit to operate an E and P waste disposal facility.

**3. Duration:**

This Permit shall expire five years from the Approval Date. The Division may revoke, suspend, or impose additional operating conditions or limitations on a disposal facility permit at any time, for good cause, after notice to the operator. The Division may suspend a waste disposal permit or impose additional conditions or limitations in an emergency to forestall an imminent threat to fresh water, public health, or safety of the environment. Suspension of a disposal facility permit may be for a fixed period of time or until the operator remedies the violation or potential violation. If the Division suspends a disposal facility permit, the disposal facility shall not accept E and P waste during the suspension period.

**4. General:**

4.1 Effect on Prior Permits. This Permit supersedes any existing E and P waste disposal permit previously obtained for the Facility and provides the terms that govern operations at this Facility.

4.2 Incorporation of Application. The Division issues this Permit in response to Contract Environmental Services, Inc.'s "Permit Renewal Application" dated 05/24/2018 and received by the Division on 05/25/2018, ("Application"). The Facility shall operate in accordance with the best management practices described in the Application.

4.3 Compliance with Applicable Laws. The Facility shall comply with Utah Code Ann. §§ 40-6-1 et seq. and Utah Administrative Code §§ R649-9 et seq..

**5. Reporting and Recordkeeping Requirements:**

The Facility shall comply with the reporting and recordkeeping requirements in Utah Admin. Code § R649-9-11.



**6. Modifications:**

This Permit only applies to the Facility as it is described in the Application. Any additions to the Facility or modifications of the waste treatment processes described in the Application are not allowed and require a permit modification.

**7. Enforcement:**

The issuance of this permit does not supersede local ordinances, county planning and zoning requirements, or other permits required to conduct business at the Facility. A copy of this approval should be kept at the Hovenweep field office, and field personnel shall be aware of the Conditions of Approval.

**8. Approval:**

Therefore, having met all the technical permit requirements of Utah Admin. Code §§ R649-9 et seq., final approval to operate the Facility in accordance with this Permit is hereby granted.

**9. Contact Information:**

The following are Division of Oil, Gas and Mining contacts and their telephone numbers:

Dayne Doucet, Permit Manager: 801-538-5303

Bart Kettle, Operations Manager: 435-820-0862

Ammon McDonald, Environmental Scientist: 801-538-5337

**Approved By:**

Dayne  
Doucet

Digitally signed by Dayne Doucet  
DN: cn=Dayne Doucet, o, ou,  
email=daynedoucet@utah.gov,  
c=US  
Date: 2018.10.04 11:15:52 -0600'

By: Dayne Doucet  
Title: Permit Manager

**Conditions of Approval:**

**1. Evaporation Facilities**

1.1 A minimum of 2 feet of freeboard shall be maintained in the pit(s) at all times, and that a method of obviously displaying the freeboard shall be devised and implemented. Utah Admin. Code § R649-9-4.6.4.

1.2 Pit(s) are to be maintained such that hydrocarbons will not collect on the surface. Hydrocarbon accumulations, other than de minimis quantities, shall be removed within 24 hours. Utah Admin. Code § R649-9-4.6.4.

1.3 Spraying water to accelerate evaporation should be closely monitored. Overspray outside the lined pit area is considered a violation. Utah Admin. Code § R649-9-4.9.2.

1.4 The leak detection system must be checked weekly. Any leak must be reported to the Division immediately, and corrective measures must be taken as directed by the Division.

1.5 The compacted secondary containment berms at the Facility shall be inspected quarterly and after a major rainstorm or windstorm to ensure integrity Utah Admin. Code § R649-9-11.3.2.

1.6 Evaporation ponds are permitted to accept produced water.

**2. Landfarms**

2.1 E and P waste accepted by the landfarm shall be sufficiently free of liquid content to pass a 60-mesh liquid paint filter test (i.e., no produced water or drilling mud).

2.2 Pooling of liquids in the landfarm is prohibited.

2.3 Within 72 hours after receipt of E and P waste, the operator shall prepare materials for remediation.

2.4 Soils shall be turned regularly, a minimum of once a month.

2.5 Additional materials shall not be added until the soil concentrations of the current lift meet the Division's salinity and hydrocarbon cleanup standards.

2.6 This approval does not include the Phase B expansion cells. They will be approved at a later date after the required information is received by the Division.

**FAILURE TO COMPLY WITH THE ABOVE LISTED CONDITIONS OF APPROVAL MAY RESULT IN CLOSURE OF THE FACILITY.**

### Five Year E&P Waste Disposal Facility Permit Renewal Checklist

**Name of Facility Operator:** Contract Environmental Services, Inc.

**Name of Facility:** Hovenweep

**Location:** S18 T39S R26E

**Date:** 05/25/18

**Preparer:** Yoshi Okano

For Division Use Only

**Compliance Review Completed:**

**No outstanding compliance**

**Active violation/compliance matter**

**Signature:** Dayne Doucet

Digitally signed by Dayne Doucet  
DN: cn=Dayne Doucet, o, ou,  
email=daynedoucet@utah.gov, c=US  
Date: 2018.05.25 14:02:44 -0500

For Division Use Only Below This Line

Received Date	Initials	Reviewed Date	Initials	Permit Renewal Application Submission	Comments
05/25/18	DD	09/26/18	DD	Submit an assessment of site reclamation requirements from a certified third party contractor R649-9-8.2	
05/25/18	DD	09/26/18	DD	Submit closure cost estimates from a certified third party contractor R649-9-8.2	
07/31/18	BW	08/21/18	BW	Provide bond amount approved by the Division R649-9-8 <span style="border: 1px solid black; padding: 2px;">\$ 25,000</span>	

**Review Completed:** Dayne Doucet Digitally signed by Dayne Doucet  
DN: cn=Dayne Doucet, o, ou,  
email=daynedoucet@utah.gov, c=US  
Date: 2018.10.04 09:27:02 -0600

**Application Status:**  APPROVED

<span style="border: 1px solid black; padding: 2px;">06/13/18</span>	<span style="border: 1px solid black; padding: 2px;">ASM</span>	<p><b>Detailed Site Description</b></p> <p>Function of the waste disposal facility</p> <p>Current facility map</p> <p>Site descriptions annotated with facility infrastructure and associated function</p>	<p>Allow expansion cells?</p> <p>Reclaiming cells?</p> <p>Elevated salinity in landfarm cells.</p>
<span style="border: 1px solid black; padding: 2px;">06/13/18</span>	<span style="border: 1px solid black; padding: 2px;">ASM</span>	<p><b>Contamination Assessment</b></p> <p>Description of existing contamination with sample results</p> <p>Proposed monitoring/remediation</p> <p>Proposed practices to prevent further contamination</p>	
<span style="border: 1px solid black; padding: 2px;">06/13/18</span>	<span style="border: 1px solid black; padding: 2px;">ASM</span>	<p><b>Equipment Assessment</b></p> <p>Description and assessment of equipment located at the facility</p> <p>Describe in detail service life for equipment used in facility operations Description of testing completed for equipment (tanks, piping, liners, leak detection equipment, evaporation fans)</p>	
<span style="border: 1px solid black; padding: 2px;">06/13/18</span>	<span style="border: 1px solid black; padding: 2px;">ASM</span>	<p><b>Practices Assessment</b></p> <p>Assessment of management practices utilized to operate the facility Identify alternative practices which could improve operations or reduce probability of future contamination</p>	

Received Date	Initials
06/13/18	ASM

**Monitoring Program**

Detailed description of monitoring programs in use or being proposed (visual inspections of equipment, pressure tests, leak detection systems, waste accountability, automated systems, proposed practices which can reduce the risk of future contamination)

**Comments**

**Estimating Closure Cost and Bonding Evaluation**

06/14/18	BTW
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**Contamination Costs**

Removal / Remediation  
Sampling  
Post closure monitoring

06/14/18	BTW
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**Infrastructure Removal Costs**

Expenses to remove all infrastructure and equipment

The small building, fence, and most of the berms will remain in place to support the Land Fill. (not our bond)

06/14/18	BTW
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**Contouring or Regrading Costs**

Project expense to contour site back to original grade  
Volumes of material  
Equipment costs  
Labor costs

The earthwork will include prep for seed, Estimate of 12 hours worth. + Mob - demob, (50 acres only). No E&P or other waste has been placed on the west 80 acres yet, 24 acre land farm (phase B) was approved in 2001 but not utilized yet.

06/14/18	BTW
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**Seeding Costs**

Method of reseeding  
Species used for revegetation

Estimates provided look reasonable.

**Notes:**

If the operator wants to expand or renew the application for "Phase B" I believe they will have to re apply, and at that time we will need to reevaluate the bond. the amount proposed by the operator is below the minimum rule amount of \$25,000.

The bond amount for this facility is to be the minimum amount \$25,000.

Phase B land farm cells need engineer drawings, hydraulic conductivity for soils and may require additional geologic information -BTK 6/15/18