GW - 306

GENERAL CORRESPONDENCE

YEAR(S): 2008 - 2011

Re: Trunk N CDP Page 1 of 2

Lowe, Leonard, EMNRD

From: Bays, David [David.Bays@Williams.com]

Sent: Monday, October 20, 2008 3:25 PM

To: Lowe, Leonard, EMNRD

Subject: Re: Trunk N CDP

Yes, the replacement was done when I sent the original email in June.

Sent from mobile - Please excuse grammar, spelling, and curtness.

---- Original Message ----

From: Lowe, Leonard, EMNRD < Leonard.Lowe@state.nm.us>

To: Bays, David

Sent: Mon Oct 20 16:09:27 2008 Subject: RE: Trunk N CDP

David,

Has this task been completed?

Leonard Lowe

Environmental Engineer

Oil Conservation Division/EMNRD

1220 S. St. Francis Drive

Santa Fe, N.M. 87505

Office: 505-476-3492

Fax: 505-476-3462

E-mail: leonard.lowe@state.nm.us

Website: http://www.emnrd.state.nm.us/ocd/

From: Bays, David [mailto:David.Bays@Williams.com]

Sent: Thursday, July 24, 2008 2:40 PM

To: Lowe, Leonard, EMNRD; Powell, Brandon, EMNRD

Subject: Trunk N CDP

During the recent compliance inspection at Trunk N (GW-306), it was noted that the leak detection system of the below grade, double walled tank contained liquid. Inspection of the tank revealed the inner tank was leaking. The tank has been replaced with a new, identical, 740 gallon double walled steel tank. The excavation indicated that the outer containment sheel had not leaked, so there was no release to the soil.

David Bays, REM

Re: Trunk N CDP	Page 2 of 2
Sr. Environmental Specialist	
Williams Midstream	
Phone: (505) 634-4951	
Fax: (505) 632-4781	
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Bill Richardson

Joanna Prukop Mark Fesmire Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Division Director,

THE SERVICE STREET



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Mr. David Bays from it to be a war ward a gride of the a comparison a calcade a gride of the a Williams Four Corners, ELC and the area area and a second and a second area. 188 Road 4900 Bloomfield, New Mexico 87413

NOTICE OF DEFICENCY Williams Four Corners Compressor Stations San Juan Basin facilities

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and the commence of the commence Dear Mr. Bays:

rainteer on a cheudalain de la cité de la compactifica de la compactifica de la compactificación de la compactific The Oil Conservation Division has performed 26 inspections of Williams Four Corners compressor station located in the San Juan Basin. The following stations have been inspected:

1(GW-108) 30-5 # 1	14. (GW-273) Moore (Idle)
2. (GW-111) 32-8 #2	15. (GW-271) Kernaghan
	16: (GW-272) Kernaghan B-8 (Idle)
4. (GW-287) Snow Shoe	17. (GW-136) 29-7 CDP
5. (GW-122) 29-6 # 4	18. (GW-307) Laguna Seca
. 6. (GW-229) Trunk G (Idle)	19- (GW-364) Bancos CDP
7. (GW-121) 29-6 #2 CDP	20. (GW-365) Eul CDP
8. (GW-118) 31-6 CDP	21. (GW-133) 30 – 8 CDP (Idle)
9. (GW-120) Pipkin	22. (GW-116) 32 - 8 CDP
10. (GW-129) Crouch Mesa	23. (GW-292) Rosa # 1 CDP
11. (GW-208) Hart Mountain (Idle)	24. (GW-306) Trunk N
12. (GW-091) 32-9 CDP	25. (GW-134) Decker Junction (Idle)
13. (GW-087) Cedar Hills	26. (GW-250) Coyote Springs

The OCD has observed several areas of concern after inspecting these sites. They are as follows:

- Condition 6. Waste Disposal and Storage: "The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD." Williams Four Corners has renewed their permits for 5 of the 26 facilities that are "non-operational". These facilities have been non-operational for more than one year and a few still contain waste material on site, i.e. landfarm soil, solid waste and liquids. Williams Four Corners shall properly dispose of their remaining waste for these facilities
- Condition 7. Drum Storage: "The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. Must store empty drums on their sides with the bungs in place and lined up on a horizontal



- plane Must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing." OCD has witness several stations with improper storage of
 - Condition 10. Labeling: "The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their PROPERTY OF THE PROPERTY OF THE PARTY OF THE emergency response plans". Several containers were not labeled.
 - Condition 11. A: "Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours." Several secondary containers were holding a large amount of liquids assumed greater then 72 hours. Williams Four Corners must remove all fluids from secondary containers
 - 5. Condition 8. Process, Maintenance and Yard areas. "The owner/operator shall either pave" and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface" Secondary containers are present at these facilities but best management practices are not followed. The OCD has witnessed the majority of the stations to have hydrocarbon staining within its facility grounds with the majority near the compressor engines. Williams Four Corners shall prevent any discharging of hydrocarbons directly on to the ground. If a discharge does occur it shall be addressed immediately and not allowed to accumulate. Placing clean gravel over the contamination is not an allowable practice.

The OCD would like to point out these deficiencies. Please correct as soon as possible and provide the OCD a progress report within 90 days from the date of this letter. These conditions are assumed by the OCD to be present at all of Williams Four Corners 70 + compressor stations that have a discharge permit. Please reflect these concerns to all of the permitted compressor stations and gas plants owned by Williams Four Corners, LLC. NMSA 1978, Section 70-2-31 (A) authorizes penalties of up to one thousand dollars (\$1000.00) per day per violation for any knowing and willful violation of any provision of the Oil and Gas Act or any rule adopted pursuant to the Act.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard lowe@state.nm.us WOOD OF CHE Sincerely,

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Environmental Engineer Service and the service of the servi xc: Daniel Sanchez, Enforcement and Compliance Manager Wayne Price, Environmental Bureau Chief Brandon Powell, District III Environmental Specialist

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AFFIDAVIT OF PUBLICATION

Ad No. 554816

RECEIVED

2008 APR 2 PM 3 30 **COPY OF PUBLICATION**

STATE OF NEW MEXICO **County of San Juan:**

CONNIE PRUITT, being duly sworn asavs: That she is the ADVERTISING DIREC THE DAILY TIMES, a daily newsp general circulation published in En Farmington, said county and state, the hereto attached Legal Notice published in a regular and entire issu said DAILY TIMES, a daily newspa qualified for the purpose within the me Chapter 167 of the 1937 Session Lav State of New Mexico for publica

March 12, 2008

day(s):

document.

And the cost of the publication is \$

appeared in The Daily Times on the

appeared before me, whom I know p to be the person who signed th

Commission Expires

para su Trunk N Compressor Station localizada en el NW/4, NE/4 de la Sección 17, Municipio 32 Norte, Recorren 7 Oeste en San Juan County, New Mexico. La instalación, nordeste de aproximadamente 15 millas localizado de Archuleta, proporciona servicios de acondicionamiento y compresión de gas naturales. Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, presentaron una aplicación de renovación en el marzo de 2008 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para la descarga antes aprobada planean GW-306

lación no descarga para revestir o subrevestir los echares agua, y por los tanto la cantidad y la calidad de las descargas no son aplicables. Toda la estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 200-500 pies. El total se disolvió se espèra que la concentración de sólidos del agua sub-El plan de descarga se dirige como las caidas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/prode desecho aceitoso del equipo se lavan abajo, y glicol. La cantidad de dores equipados con la contención secundaria. La basura transportó offsite será dispuesto o reciclado en una instalación permitida por la agencia wastewater generado es 100 - 5000 galones por año por motor. La instabasura generada será temporalmente almacenada en tanques o conteneterránea de área esté en la variedad de 200-2,000 partes por millón.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, INEW INVENTOR CONTINUES and Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-time of interest regarding the renewal and will create a facility-time.

to con Leonard Lowe en el Nuevo México OCD en 1220 Sur San. Francis Drive, Santa Fe, Nuevo México 87505, Teléfono (505) 476-3492. El OCD

y creará una lista de direcciones específica de instalación para personas

que desean recibir futuros avisos.

presentar comentarios o solicitar para ser colocado en una lista de direcciones específica de instalación para futuros avisos por ponerse en confac-

Cualquier persona interesada o personas pueden obtener la información

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in March 2008 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-306 for their Trunk N Compressor Station located in the NW/4, NE/4 of Section 17, Township 32 North, Range 7 West in San Juan County, New Mexico. The facility, located approximately 15 miles northeast of Archuleta, provides natural gas compression and condi-

gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be in the range of The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generatwater, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100-5000 or used at the facility include natural gas condensate/produced 200-500 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million. ioning services.

PO Box 450 Farmington, NM 87499

Date: 03/13/08

DIL CONSERVATION DIVISION

OIL CONSERVATION DIVISIO 1220 SOUTH ST. FRANCIS DRIVE SANTA FE, NM 87505

(505) 476-3440

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AFFIDAVIT OF PUBLICATION

Ad No. 59883

STATE OF NEW MEXICO County of San Juan:

BOB WALLER, being duly sworn says: That he 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 and appeared in the Internet at The Daily Times web site on the following day(s):

Wednesday

March 12, 2008

And the cost of the publication is \$232.64

ON 3/14/08 BOB WALLER appeared before me, whom I know personally to be the person who signed the above document.

My Complission expires 170-17

COPY 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 (20.6.2.3106 NMAC); the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220. 5. Saint Francis Drive, Sainta Fe, New Mexico 87505. Telephone (505): 476-3440.

(GW-092) El Paso Natural Gas Company's Richard Duarte, Senior Environmental Engineer, 380.1 Afrisco Blvd. NW, Albuquerque, NM 87.120 has submitted a renewal discharge plan application for their Rio Vista compressor station, located in the SE/4 SW/4 of Section, 27. Township 29 North, Range 1.1 West, NMPM, San Juan County, New Mexico. The facility is located south of Bloomfield, N.M., approximately 0.38 miles south of the San Juan River and // mile east of highway 550. The facility provides compression of pipeline quality natural gas via the San Juan cross-over pipeline. Approximately 8000 gallons of used lube oil, 1000 gallons of oil /waste water and 400 gallons of new oil will be stored onsite in above storage tanks (AST). These containers, shall be placed upon cemented, berned areas. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 30 leet, with a total dissolved solids concentration of approximately 1,200 - 4,775 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks; and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-306) Williams Four Corners, Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Trunk N Compressor Station, located in the NW/4 NE/4 of Section 17, Township 32 North, Range 7, West, NMPN, San Juan County, New Mexico, approximately 15 miles northeast of Archuleta, New Mexico. The station provides metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery. Approximately 2000-8000 bbl/year of produced water/natural gas condensate; 100-5000 gal/year/unit of waste water and 500-2000 gal/year/engine of used engine oil are generated and stored in OCD approved containers onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill leak or accidental discharge is at a depth of approximately 200-500 feet, with a total dissolved solids concentration of approximately 200 2000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be man aged in order to protect fresh water.

(GW-376) Champion Technologies, # 40 County Road 3145, Az tec, New Mexico 87410 has submitted a request for a new dis charge plan permit for their Aztec oil and gas field service facility, located in the NW/4 NE/4 of Section 2, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately half mile east of county road 3500, 2 miles southeast of the Animas River and 5.2 miles north of the San Juan river. Approximately 20,000 gallons of oil and 67,000 gallons of downhole treatment chemicals will be stored onsite in tote drums and above ground storage tanks. These holding tanks shall be located on cemented bermed containment areas. Groundwater most like by to be affected by a spill, leak or accidental discharge is at a depth of approximately 150 feet with a total dissolved solids concentration of approximately 1500 4,000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills; leaks, and other accidental discharges to the surface will be managed in order to protect fresh water

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application, and will create a facility-specific mailing list for persons who wish to respect things process. Persons interested in obtaining further informations.

Monday, through, Friday, or, may, also be viewed, at the NMOCD web sile! http://www.emnrd.state.im.us/ocd/. Persons interested in obtaining a copy of the application, and draft permit may contact the NMOCD; at the address given above Prior, to riving on; any proposed discharge, permit or major, modification, the Director shall allow a period, of at sleast, thirty (30) days after, the date of publication of this no tice: during (which interested persons may, submit comments or request that NMOCD hold a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held of the Director determines that other is significant public interest.

If no public hearing is held the Director will approve or disapprove the proposed permit based on information available including all comments, received it is public hearing is held the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing

Para obtener mass información sobre esta isolicitud en espan?ol sir vase comunicarse por favor si New Mexico Energy, Minerals and Natural Resources Department (Depto Dell'Energia Minerals y Recursos Naturales de Nuevo Mexico) Oil Conservation Division (Depto Conservation Del Retroleo) 1220/South 51 Francis Drive Santo Fe New Mexico (Contacto Dorothy Phillips, 505:476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe New Mexico on this 7th day of March, 2008

U. STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S.E.A.L. Mark Festing Director

Legal No. 59883 published in The Daily Times Farmington New Mexico on Wednesday March 12, 2008

THE SANTA FE NEW MEXICAN Founded 1849

NM EMNRD OIL CONSERV. DIV.

1220 S ST FRANCIS DR SANTA FE NM 87505

Attn Leonard Lowe

ALTERNATE ACCOUNT: 56689

AD NUMBER: 00248454 ACCOUNT: 00002212

LEGAL NO: 82471

P.O. #: 52100-7521

555 LINES 1 TIME(S)

J. #: 32100-732. 483.28

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TAX:

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AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, T. Valencia, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices advertisements under the provisions of Chapter 167 on Session Laws 1937; that the publication #82471 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/13/2008 and 03/13/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 13rd day of March 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

151 T Valencia

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 13rd day of March, 2008

Notary

Commission Expires:

31,2011

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www.santafenewmexican.com

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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-294) Plains Mar-keting, L.P. Wayne E. Roberts, 432-686-1767, 3705 E. Hwy 158, Mid-land, Texas 79706, has submitted discharge permit renewal appli-cations for the Town-Remediation send Site located in the SW/4 SW/4 of Section 11, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in event of an accidental discharge is at a depth exceeding 50 feet with a total dissolved solids concentration of approximately 500-2000 mg/l. The Townsend site is a crude oil release site from previous operations. The discharge permit ad-dresses how the impacted groundwater will be cleaned up, re-injected, and how recovered crude oil including contamigroundwater nated and associated op-erations will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

Plains Marketing, L.P. Wayne E. Roberts, 432-686-1767, 3705 E. Hwy 158, Midland, Hwy 158, Midland, Texas 79706, has submitted discharge permitted discharge per-mit renewal applica-tions for the following Crude Oil Pump sta-tions. The station(s) receives, store, and transfers crude oil from various leases in ties, New Mexico.
Crude oil products,
waste oil and water may be stored in above ground tanks prior to being trans-ported off-site to OCD approved approved The discharge permit addresses how oil-field products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the sur-face will be managed in order to protect fresh water.

(GW-289) Loco Hills Crude Oil Pump Station located in the NW/4 of Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth exceeding 400 feet with a total/dissolved solids concentration of approximately 3000 mg/l.

(GW-351) Lea Crude
Oil Pump Station located in the SW/4
NW/4 of Section 23,
Township 17 South,
Range 31 East, NMPM,
Lea County, New Mexico. Ground water
most likely to be affected in the event of
an accidental discharge is at a depth
of 30 feet with a total
dissolved solids concentration of approximately 1600 mg/i.

(GW-114) - Schlum-berger Technology berger ' Corporation, Darwin Thompson, Facility Manager, PO Box 300 Artesia NM, 88211, has submitted a re-newal application for newal application for the previously ap-proved discharge per-mit (GW-114) for their Artesia Facility, lo-cated in the S_ of the SW_ of Section 4 Township 17S Range 26E, Eddy County, New Mexico, approxi-mately 2 miles northmately 2 miles north-east of Artesia, New east of Artesia, New Mexico. Approximately 500,000 gallons of truck wash water, 180 gallons of parts cleaning solvent, 5500 gallons of used oil, 3000 pounds of used oil filters and because 1 absorbent pads, 18 cubic feet of cement testing residue, and 360 cubic feet of wash bay sludge are generated on site annually, which are collected and temporarily stored in containment vessels prior to trans-port and disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental dis-charge is at a depth of approximately 9 to 17 feet, with a total dissolved solids concentration of approximately 2700 to 7500 mg/L. The discharge permit addresses permit addresses how oilfield products and waste will be handled, properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the sur-face will be managed in order to protect fresh water. The discharge permit re-quires that ground-water contamination at the site will be re-mediated according to an NMOCD-ap-proved plan.

(GW-306) Williams Four Corners, Mr.

David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Trunk N Compressor Station, located in the NW/4 NE/4 of Section 17, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico, approxi-mately 15 miles north-east of Archuleta, New Mexico. The sta-tion provides metering, compression, and dehydration services to various producers for the gathering of natural gas for treat-ment and delivery. Approximately 2000-8000 bbl/year of produced water/natural gas condensate; 100-5000 gal/year/unit waste water and 500-2000 gal/year/engine of used engine oil are generated and stored in OCD approved containers on-site within a bermed area prior to disposal at an NMOCD ap-proved facility. Groundwater most likely to be affected by a spill, leak or acci-dental discharge is at a depth of approxi-mately 200-500 feet, with a total dissolved solids concentration of approximately 200 -2000 mg/l. The dis-charge plan adcharge plan ad-dresses how oilfield products and waste will be properly hanwill be properly nan-dled, stored, and dis-posed of, including how spills, leaks, and other accidental discharges to the sur-face will be managed in order to protect fresh water.

(GW-092) El Paso Natural Gas Company's Richard Duarte, Senior Environmental Engineer, 3801 Atrisco Blvd. NW, Albuquerque, NM 87120 has submitted a re-