



RECEIVED

2009 JAN 27 PM 1 14

January 26, 2009

**UPS NEXT DAY AIR** (Tracking Number 1Z F46 915 13 9365 8746)

Mr. Wayne Price  
Environmental Bureau Chief  
Oil Conservation Division  
New Mexico Energy, Minerals  
& Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Subject: DCP Midstream L.P. Requests Closure of the former Avalon Gas Plant Discharge Permit  
Discharge Permit GW-024  
Eddy County, New Mexico

Dear Mr. Price:

DCP Midstream, LP (DCP) requests closure of the discharge permit for the former Avalon Gas Plant in Eddy County, New Mexico. DCP has never operated this facility and all equipment associated with the former gas plant was removed, prior to the installation of the Rambo Compressor Station at the same physical location.

Enclosed are copies of documents submitted to NMOCD on April 23, 2004, to verify remediation of the pits associated with the former gas plant. An application for a new discharge permit for the Rambo Compressor Station will be submitted under separate cover. A summary of information that should be helpful for closure of the discharge permit associated with the former gas plant follows.

#### **BACKGROUND INFORMATION**

The site is located approximately four miles north of Carlsbad, New Mexico, in Eddy County. The legal description for the location is the NW quarter of the SE quarter of Section 9, Township 21 South and Range 27 East. Latitude and longitude for the location are 32.4938 and -104.1919, respectively. The site is topographically flat with a slight slope to the south.

Under DCP's former name of Duke Energy Field Services, LP (DEFS), a notice regarding the inactive status of the Avalon Gas Plant was submitted to NMOCD in 2001. Prior to the 2001 notice, all equipment associated with the former gas plant was removed. A work plan for closure of three pits was submitted to NMOCD on February 13, 2004, and an addendum to the work plan was submitted on March 26, 2004.



## CLOSURE ACTIVITIES FOR THE FORMER GAS PLANT

Under our former company name of Duke Energy Field Services, LP (DEFS) performed a site evaluation at the Rambo Compressor Station, previously the Avalon Gas Plant location (Discharge Permit No. GW-024), for the purpose of closing via backfilling, three historic pit areas associated with the former gas plant and never used by DEFS. The historic pits were identified in 2000 and investigated in April 2003, at the then proposed Rambo Compressor Station. The specific uses/origins of the flare pit and the trash pit were ascertained from each pit contents. Figure 1 is a facility plot plan that indicates the location of the three former pits. Copies of the pit closure reports are enclosed and a brief historic summary of the pits from the pit closure work plan follows.

Additionally, the site was visually inspected to determine if any hydrocarbon-impacted soils associated with the former gas plant are present. No hydrocarbon-impacted soil was encountered.

In 2004, DEFS proposed: 1) backfill of the pits using existing berm materials and additional fill material from a local source if necessary; 2) re-grading and contouring consistent with the use of the location as a gas gathering booster station; and 3) removal and disposal of all trash in both the trash and flare pits prior to any dirt work.

NMOCD approved the pit closure work plan on April 7, 2004. DEFS submitted three pit closure reports to NMOCD on April 23, 2004.

Analytical data for all pit sidewalls and the pit bottoms or three feet below the bottom of each pit revealed that soil levels for benzene, BTEX and TPH were below the NMOCD Recommended Remedial Action Levels determined from NMOCD ranking criteria list below.

### NMOCD ranking criteria

#### Location of the former Avalon Gas Plant and the current Rambo Compressor Station

Criteria	Site Characteristics	Ranking Score
Depth to Water	Greater than 100 feet below pits	0 points
Well Head Protections	Greater than 200 feet from a domestic well and greater than 1,000 feet from all other water sources	0 points
Distance to Surface Water	Greater than 1,000 feet to any surface water	0 points
Total Ranking Score: 0 points		

Based on the above site specific ranking score, the following clean up levels were applied to the pit soil samples.

- Benzene 10 ppm
- BTEX 50 ppm
- TPH (EPA 8015M) 5,000 ppm

In a letter dated April 7, 2004, Mr. Mike Stubblefield of OCD approved the ranking score assessment and the pit closure work plan. Samples were collected from all four walls of the pits and the pit bottoms and/or three feet below the pit bottoms. No soil was encountered above the clean up levels. Summaries of the analytical results from confirmation soil samples collected from the three former pits are provided below.



#### Flare Pit Analytical Results in mg/kg

	GRO	DRO	TPH	Benzene	Toluene	Ethylbenzene	Total Xylenes	BTEX
North Wall	ND	ND	ND	-	-	-	-	-
South Wall	ND	ND	ND	-	-	-	-	-
East Wall	ND	ND	ND	-	-	-	-	-
West Wall	88.2	127	215	-	-	-	-	-
Bottom	123	599	722	ND	0.0413	0.0945	0.750	0.886
3' below bottom	222	196	418	0.020	0.196	0.351	8.55	9.117

#### NW Pit Analytical Results in mg/kg

	GRO	DRO	TPH	Benzene	Toluene	Ethylbenzene	Total Xylenes	BTEX
North Wall	ND	58.8	58.8	-	-	-	-	-
South Wall	ND	90.1	90.1	-	-	-	-	-
East Wall	9.21	72.2	72.2	-	-	-	-	-
West Wall	9.51	10.1	ND	-	-	-	-	-
Bottom	ND	382	382	ND	ND	ND	ND	ND
3' below bottom	ND	ND	ND	-	-	-	-	-

#### Trash Pit Analytical Results in mg/kg

	GRO	DRO	TPH	Benzene	Toluene	Ethylbenzene	Total Xylenes	BTEX
North Wall	ND	ND	ND	-	-	-	-	-
South Wall	ND	32.2	32.2	-	-	-	-	-
East Wall	ND	ND	ND	-	-	-	-	-
West Wall	ND	ND	ND	-	-	-	-	-
Bottom	ND	135	135	ND	ND	ND	ND	ND
3' below bottom	ND	ND	ND	-	-	-	-	-

#### Notes for Tables:

All results are listed in mg/kg

ND Not Detected

- Not Analyzed

GRO Gasoline Range Organics

DRO Diesel Range Organics

TPH Total Petroleum Hydrocarbons

BTEX Total Benzene, Toluene, Ethylbenzene and Xylenes

#### NMOCD 2008 INSPECTION FINDINGS

On August 26, 2008, Leonard Lowe of NMOCD, inspected the site of the former Avalon Gas Plant and noted that "there are no remaining items left from the gas plant other than the flare stack." He further noted that "there were references to a few pits pertaining to the plant but all were closed up. I could not see any remnants of pits or ponds on site." In response to Mr. Lowe's comment regarding the flare stack, DCP investigated the status of the flare stack and determined that it is associated with current operations at the Rambo Compressor Station.



## REQUEST FOR CLOSURE OF DISCHARGE PERMIT GW-024

Given the removal of equipment and pits associated with the former gas plant, DCP requests closure of discharge permit GW-024. A discharge permit application for the existing Rambo Booster Station will be submitted under separate cover.

If you have any questions concerning this request for closure of GW-024, please contact me at (303) 605-2176. Please send any correspondence regarding this request to me at 370 17<sup>th</sup> Street, Suite 2500, Denver, CO 80202 or to [dekocis@dcpmidstream.com](mailto:dekocis@dcpmidstream.com).

Sincerely,  
**DCP Midstream, LP**

A handwritten signature in cursive script, appearing to read "Diane Kocis".

Diane Kocis  
Senior Environmental Specialist

Enclosures

cc: Larry Hill, District Supervisor (*UPS Next Day Air Tracking No. 1Z F46 915 01 9314 5938*)  
NMOCD District 1 Office  
1625 N. French Drive  
Hobbs, New Mexico 88240  
Without pit closure attachments





# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor

**Joanna Prukop**  
Cabinet Secretary  
Acting Director  
Oil Conservation Division

4/7/2004

Duke Energy Field Services  
Att: Mrs. Lynn Ward  
10 Desta Drive  
Suite 400-W  
Midland, TX 79705

Re: Approval letter for Addendum to Evaluation and Work over dated February 13, 2004.  
Pit Closure {3}  
Rambo Compressor Location {previous Avalon Gas Plant}  
Discharge Permit No. GW-024

Dear Mrs. Lynn Ward,

The Oil Conservation Division has received the addendum letter for the pit closure work plan at the Rambo Compressor Location dated February 13, 2004.

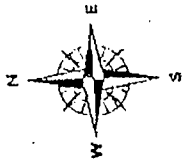
The addition ground water information and Total site ranking score = 0 are approved  
The closure levels for TPH 5000 mg/kg, Benzene 10 mg/kg, & Total Btex 50 mg/kg are approved  
The analytical information as provided in the addendum letter are accepted and approved.

Following completion of the pit closure actives, please submit a pit remediation and closure report to OCD for Each pit area.

If I can be of assistance in this matter please do not hesitate to contact me at 505-748-1283  
Or E-Mail me at [mstubblefield@state.nm.us](mailto:mstubblefield@state.nm.us).

Sincerely,

Mike Stubblefield  
Environ. Eng. Spec.  
E.M.N.R.D./O.C.D.



NOT TO SCALE  
NOTE: SCALE IS APPROXIMATE.  
DRAWING IS BASED ON A  
FIELD SKETCH. ACTUAL  
FACILITIES MAY VARY IN SIZE  
AND POSITION FROM THOSE  
REPRESENTED HERE.

FIGURE 1: PLOT PLAN

RAMBO BOOSTER STATION  
CARLSBAD GATHERING SYSTEM

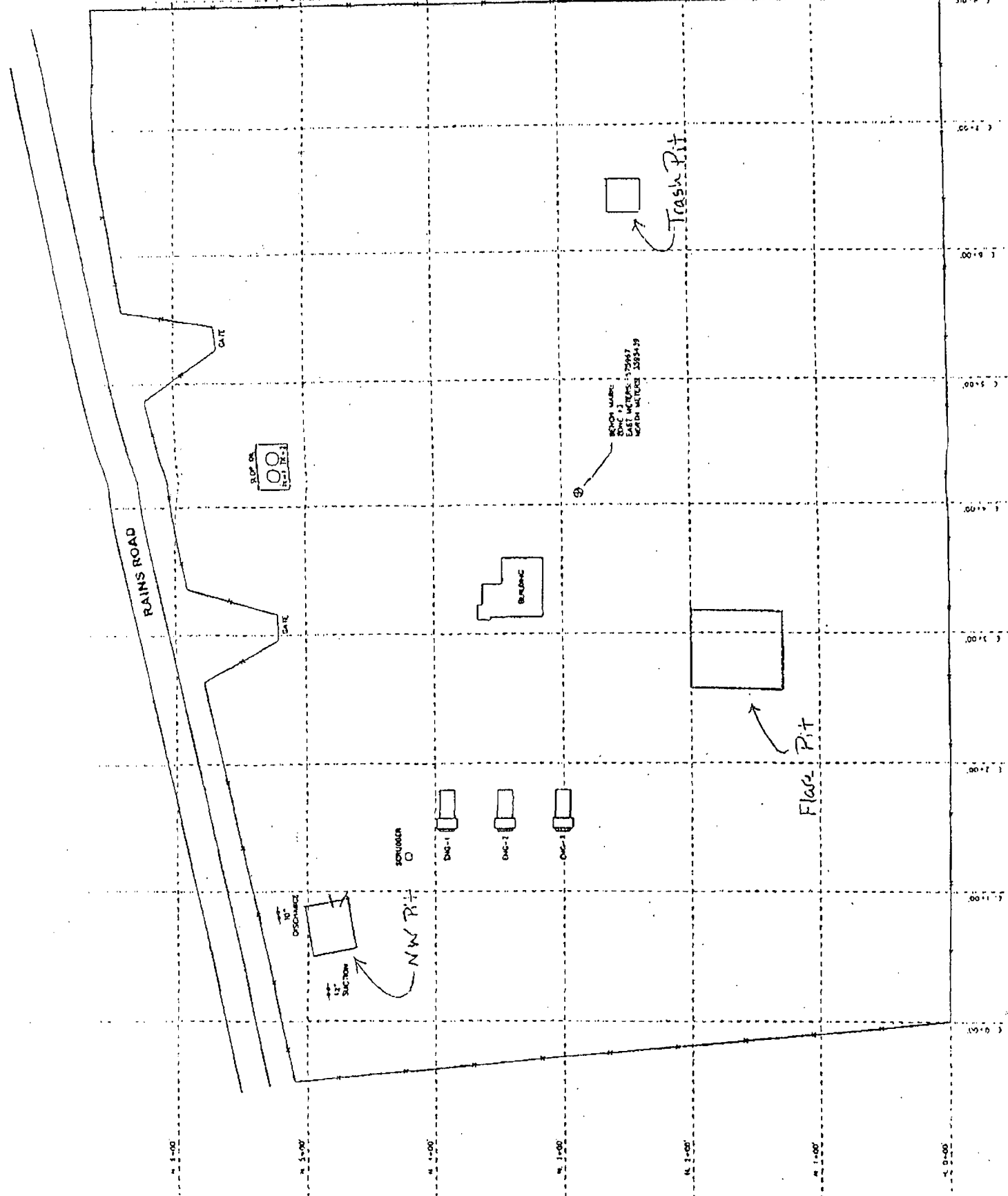
Eddy County  
NEW MEXICO

DWG. NO. P00FS\_ENS\Mapping\NewMexico\Carlsbad\5\_Carlsbad\_Plot



Field Services

REV	DATE	REVISION	BY	CHKD (CHK)	CHKD (CHK)	REV	DATE	REVISION	BY	CHKD (CHK)	CHKD (CHK)
0	6-25-03	DRAWN FROM O.E.F.S. SKETCH (5-30-03)									
1	7-14-03	ADDED ENG-2									
2	10-3-03	ADDED ENG-3									



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Mike Stubblefield  
Oil Conservation Division  
1301 W. Grand Ave.  
Artesia, NM 88210

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature *[Signature]* ☐ Agent ☐ Addressee
- B. Received by *[Printed Name]* C. Date of Delivery *4-28-04*
- D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

2. Article Number  
(Transfer from service)

91 7106 2133 3930 9208 6773

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**Chavez, Carl J, EMNRD**

---

**From:** Kocis, Diane E [DEKocis@dcpmidstream.com]  
**Sent:** Monday, November 10, 2008 6:10 PM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Admire, John D; Bebbington, Jon D; Bradford, Johnnie; Epel, Joshua B; Kardos, Gregory C; Lamb, Johnny F; Lang, Ruth M; Trammell, Ronnie D; Jamerson, Kelly D; Weathers, Stephen W  
**Subject:** DCP response to OCD inspection findings  
**Attachments:** Memo to OCD re inspection findings.doc

Mr. Chavez,

Attached is the DCP response to the OCD inspection findings from the 8/26/08 inspections of the Rambo (former Avalon Gas Plant) Booster Station, the former Indian Hills Gas Plant, the former Hobbs Gas Plant, the Pardue Booster Station and the Jackson Booster Station.

RE our communication today concerning the tank removals at Indian Hills: During further discussion with DCP Operations, it has been determined that the tanks will be removed; however, the pig launcher will be reconfigured into a pig receiver with a potential to release fluids to the soil. Therefore, DCP will submit a discharge permit renewal application for this facility.

Please contact me if you have any questions or need any further information.

Thank you,

Diane E. Kocis  
*Sr. Environmental Specialist*  
DCP Midstream

303.605.2176 direct line  
720.236.2285 cell

[DEKocis@dcpmidstream.com](mailto:DEKocis@dcpmidstream.com)

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

11/12/2008



MEMORANDUM

DATE: November 10, 2008

TO: Carl Chavez, New Mexico Oil Conservation Division, Environmental Engineer

FROM: Diane Kocis, DCP Midstream, Sr. Environmental Specialist

SUBJECT: Response to August 26, 2008, New Mexico OCD Inspection Findings:  
Rambo Booster Station (former Avalon Gas Plant), former Indian Hills Gas Plant,  
former Hobbs Gas Plant, Pardue Booster Station and Jackson Booster Station

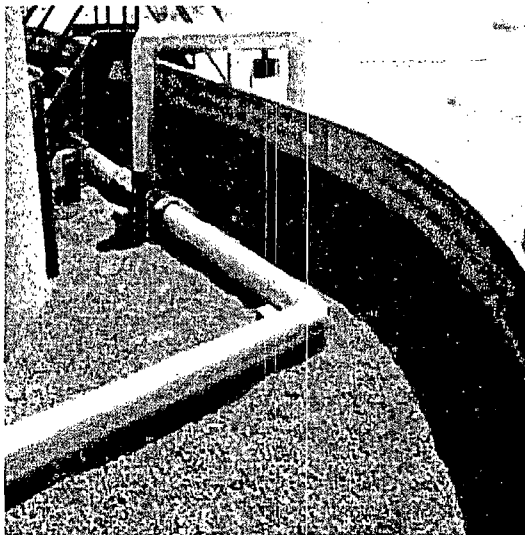
**Former Avalon Gas Plant (Discharge Permit GW-024; Permit Expired 9/18/2005) and Current Site of Rambo Booster Station:**

Former Avalon Gas Plant: The OCD inspector noted that "there are no remaining items left from the gas plant other than the flare stack. Flare stack needs to be removed." DCP Operations has demolished the flare stack and placed it in the onsite scrap pile. DCP has committed to submit a discharge permit closure plan for the discharge permit associated with the former gas plant. OCD was also aware that the former gas plant had a few pits pertaining "but were all closed up". DCP submitted pit closure reports and analytical results on 4/7/04. DCP will provide OCD with a copy of the pit closure reports.

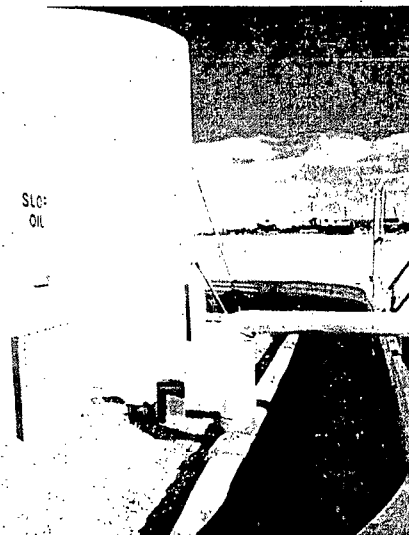
Rambo Booster Station: DCP has initiated preparation of a discharge permit for this facility. During the site inspection, the OCD inspector noted that:

- 1) "Two ASTs had overflowed" within secondary containment and "still had residual contamination".

**DCP Response:** The gravel within the secondary containment has been replaced with new gravel. Please see DCP Rambo Photo 1 below.



OCD Rambo Photo 2



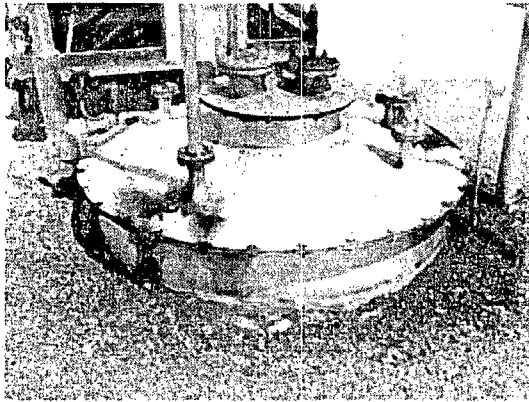
DCP Rambo Photo 1 of secondary containment  
taken 11/04/2008

- 2) Standing fluids were observed in several secondary containment areas;

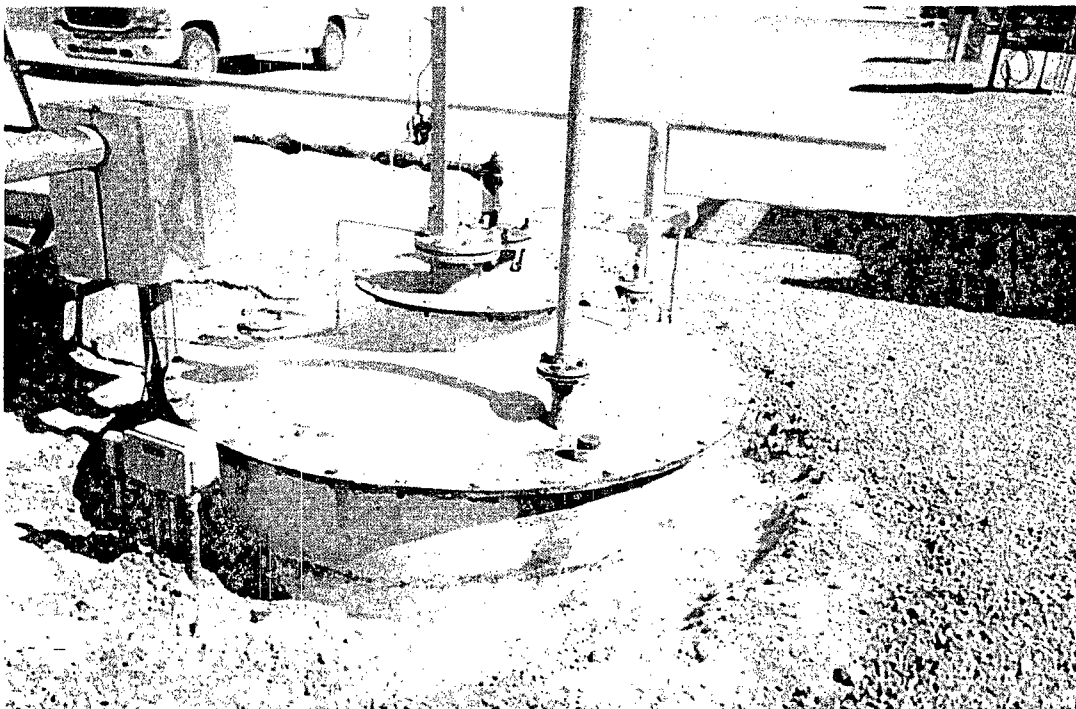
**DCP Response:** DCP Operations is currently working with a contractor to have the fluids removed and we will update OCD when this item is completed.

- 3) The below-grade tank had overflowed. No release report was filed with OCD.

**DCP Response:** Please see the DCP Rambo Photo 2 below. A release report was not filed because the release was calculated to be under the 5 barrel reporting threshold. Excavation around the sump proved that the contamination was shallow and the estimated volume released is less than 5 barrels.



OCD Rambo Photo 17



DCP Rambo Photo 2 taken 10/22/08

- 4) "Improper storage of tanks";

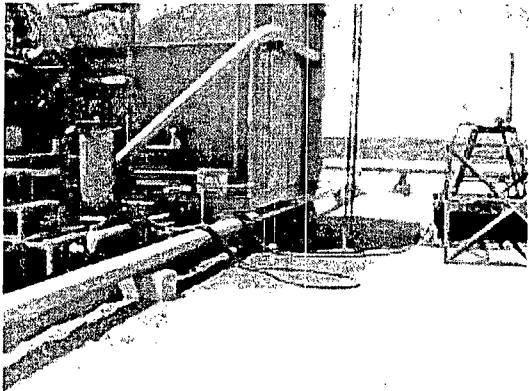
**DCP Response:** DCP is currently addressing this issue and will update OCD when this issue is resolved.

- 5) "Questionable storage of used oil"; and 6) "Container for the filter area was triple-contained but still had a discharge to the ground";

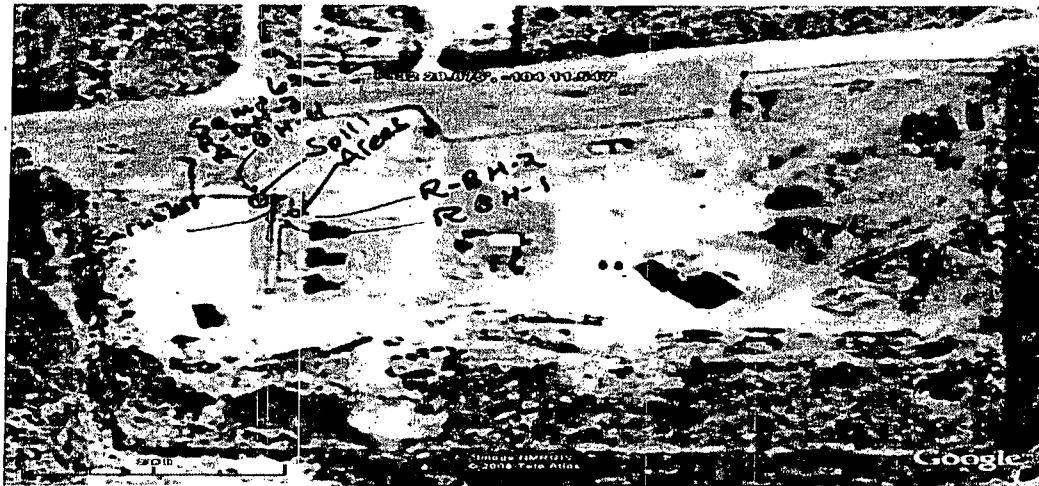
**DCP Response:** DCP will need clarification on these two items and will respond after OCD provides further information. Were both items 5 and 6 regarding the same used filter storage area?

- 7) "Ground contamination around the engines"; there appears to be "a crack in the cement containment around the engine".

**DCP Response:** Operations removed some stained soil and gravel around the engines. A consultant has collected samples to determine if the remaining soil and gravel are below OCD action levels. Please see the consultant's sample collection location map below. "BH" indicates a "bottom hole" sample. DCP expects analytical results during the week of 11/10/08. Operations has arranged for the repair of the crack in the cement containment around the engine on 11/10/08.



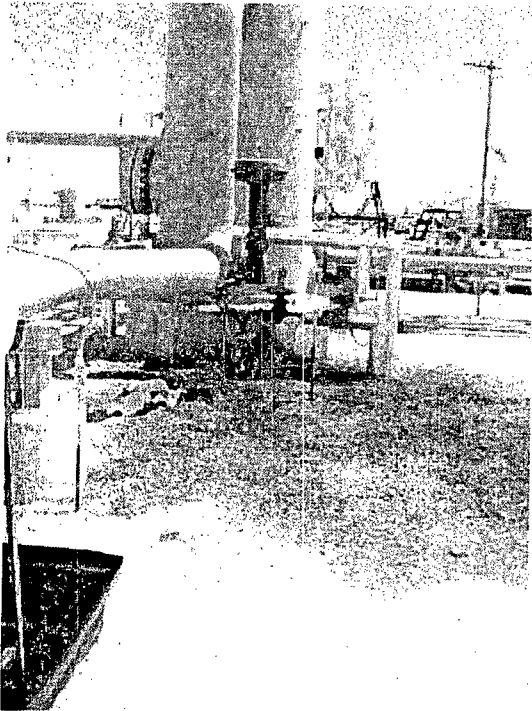
OCD Rambo Photo 14



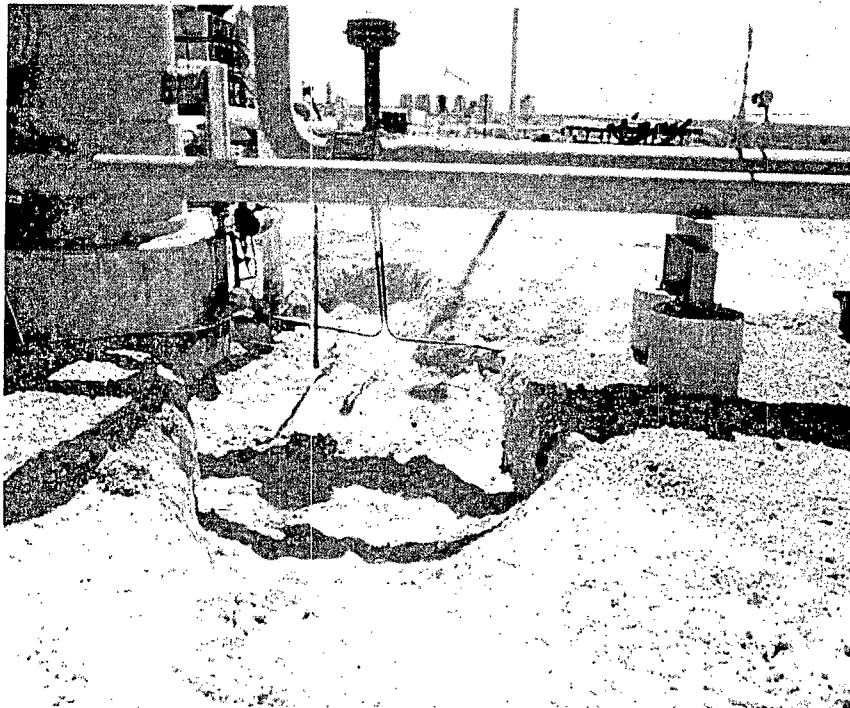
Rambo  
Stackpile Sample  
R-BH-3

8) Discharge to the ground of "black stuff near the H<sub>2</sub>S treater".

**DCP Response:** The equipment referred to is actually a scrubber. Soil and gravel around the scrubber have been removed. DCP is currently waiting confirmation sample results and will update OCD after the results are received and evaluated.



OCD Photo 26



DCP Rambo Photo 3 taken 10/22/08

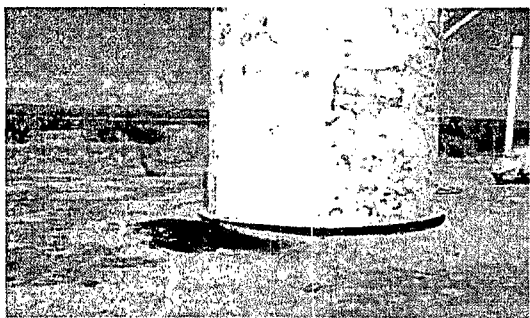


**Indian Hill Gas Plant (Discharge Permit GW-042; Permit Expired 4/6/02)**

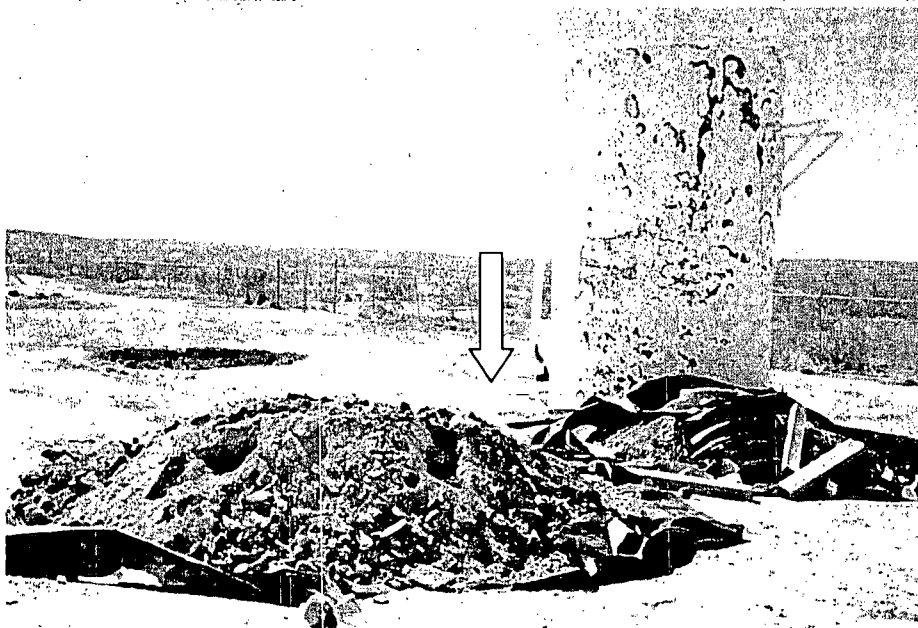
The Indian Hills Gas Plant was dismantled prior to ownership by DCP and it's predecessor companies. Only a meter facility, an active gas pipeline, and pig launcher currently exist at the site. OCD was notified of the facility status on 12/10/01 and requested a closure plan, prior to the 8/16/08 site inspection. After the inspection, OCD provided the following statement: "At the time of inspection the site was not viewed to be closed due to the findings." The two OCD findings were: 1) "Significant equipment remains on site, i.e., tanks and underground piping. Removal needed"; and 2) "One area of small surface contamination was noticed from an unused AST that should be cleaned up".

**DCP Response:** During the course of discussions with DCP Operations, it has been determined the tanks will be removed; however, the pig launcher will be reconfigured into a pig receiver with a potential to release fluids to the soil. Therefore, DCP will submit a discharge permit renewal application for this facility.

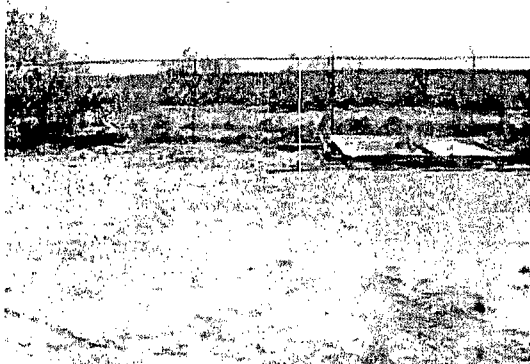
DCP has removed the contaminated soil near the base of the AST (OCD Indian Hills Photo 1). An additional area of stained soil was also removed. Please see DCP photo 1. When the tanks are removed, any stained soil beneath the tanks will be sampled to determine if there is any hydrocarbon contamination above OCD cleanup levels. Soils with hydrocarbon contamination higher than OCD cleanup levels will be removed. Additionally, DCP is in the process of removing the debris from the fence, noted in OCD Indian Hills Photo 7.



OCD Indian Hills Photo 1



DCP Indian Hills Photo 1 taken 10/22/08. Arrow indicates where stained soil was removed at the base of the tank.



OCD Indian Hills Photo 7

**Hobbs Gas Plant (Discharge Permit GW-044; Permit Expired 12/27/2007)**

A discharge permit renewal application was approved by OCD on 3/7/2008; however, DCP contacted the OCD at that time to inform OCD that the facility was closed and that we chose to withdraw the permit renewal.

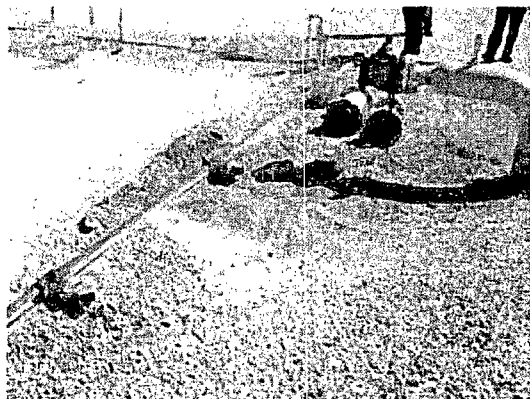
During the 8/26/08 inspection, the OCD inspector noted that: 1) Several remaining concrete skids/slabs "need to be removed"; 2) Several underground conduits need to be removed; 3) Wastes on site are located directly on the ground; and 4) The facility has a ground water monitoring program with further investigation and/or corrective action pending.

**DCP Response:** After the OCD site inspection and communication with OCD, DCP has committed to renew the facility discharge permit because the active groundwater remediation system precludes closure. In recent communication, OCD has inquired if DCP is "going to remove all the concrete slabs and the solid waste on this site." The intent was to remove the slabs after remediation was completed. DCP will power-wash the concrete slabs and remove the on-site wastes and fluids noted during the OCD inspection. DCP will update OCD when this effort is completed.

**Pardue Booster Station (Discharge Permit GW-288, Permit Expired 3/7/08)**

A permit renewal application was approved by OCD but DCP then chose to close the facility instead and terminate the permit renewal process. Prior to the 8/26/08 site inspection, OCD anticipated that DCP would submit a closure plan. OCD inspected this facility as part of its determination of eligibility of closure. During the inspection, the inspector noted: 1) Some equipment remains on site that needs to be removed; and 2) One small area of surface contamination needs to be cleaned up. DCP committed to renew the discharge permit. OCD has inquired if DCP intends to reactivate this site in the future.

**DCP Response:** DCP has determined that the facility could be reactivated and therefore chooses to retain the equipment on site. DCP has removed the area of surface contamination (see DCP Pardue Photo 1 below) and is currently awaiting analytical results from confirmation sampling. DCP will update OCD when the analytical data is received and evaluated and wants to complete the discharge permit renewal process for this facility.



OCD Pardue Photo 6



DCP Pardue Photo 1 taken 10/22/08

**Jackson Booster Station (No existing discharge permit for this facility)**

OCD inspected this facility due to a release that occurred on 5/23/08, when two ASTs overflowed. The spill was not contained within the secondary containment. A prior release, also from the same ASTs, occurred on June 25, 2007 and was reported to OCD. The first release consisted of lube oil and antifreeze from three engine compressors and condensate was released during both incidents. The inspector noted that the area around the below-grade tank had a discharge to the ground. The below-grade tank "could not be inspected" because a nut could not be removed to view "the leak detection access point". He further stated that the "facility workers did not know how to inspect such systems."

**DCP Response:** DCP is addressing items noted during the OCD inspection and after completion of all corrective actions DCP expects to submit a completed final C-141 by 1/15/09 for the Jackson Booster Station. The inspector recommended that this facility apply for a discharge permit. DCP is about to commence preparation of a discharge permit application for the Jackson Booster Station. We will inform OCD when the application is ready for submittal.

To minimize the possibility of a future overflow from the tanks, new gauges have been ordered to replace the malfunctioning gauges that contributed to the overflows. To minimize release of fluids from the secondary containment, the screw holes will be sealed with silicone. Contaminated soil excavation was in progress at the time of the inspection on the north and east sides of the secondary containment. However, other soil contamination was evident in the area of the secondary containment. DCP is in the process of addressing the remaining soil contamination in the area of the secondary containment.



Regarding issues associated with the below-grade tank: knowledgeable DCP staff personnel are reviewing existing company policies and procedures, including best management practices, with the operations personnel responsible for this facility. Contaminated soil and gravel around the BGT will be excavated along with the excavation of the remaining stained soil adjacent to the ASTs. A consultant will conduct confirmation sampling after the areas of contamination have been addressed.

Please contact me if you have any questions concerning this information.

Thank you,  
Diane E. Kocis  
Sr. Environmental Specialist  
DCP Midstream  
(303) 605-2176



cc: John Admire  
Jon Bebbington  
Johnnie Bradford  
Joshua Epel  
Kelly Jamerson  
Greg Kardos  
Johnnie Lamb  
Ruth Lang  
Ronny Trammel  
Stephen Weathers

## **Lowe, Leonard, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, October 02, 2008 4:54 PM  
**To:** Lang, Ruth M; Lowe, Leonard, EMNRD  
**Cc:** Kocis, Diane E; Price, Wayne, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure & Other Facility Inspections Follow-up  
**Attachments:** GW-024 Rambo CS Inspection Photos 8-2008.pdf; GW-042 Indian Hills Inspection Photos.pdf; GW-044 Hobbs Booster inspection photos.pdf; GW-288 Pardue CS Inspection Photos.pdf; Jackson CS inspection photos.pdf

Ms. Lang:

Please find below the DCP facilities that were inspected in August of 2008. Below each facility I inserted a section on "OCD Status" (from prior OCD correspondence from Mr. Chavez), "DCP Status" (from prior DCP Midstream correspondence from Ms. Klein), and "OCD Inspector Lowe's Comments" from the inspections.

The OCD feels that some of the facilities listed below may be closed with the condition that inspection items are adequately addressed, final site cleanup activities are documented, and a final closure report is submitted to Carl Chavez for final site closure approval. Any facility under a monitoring program and/or ground water abatement process with the OCD cannot be closed.

Finally, the Jackson CS requires at a minimum significant corrective action that includes the inspection items listed by Mr. Lowe (see Jackson CS inspection write-up below). The OCD has yet to receive the final C-141 that outlines corrective actions taken to address the initial C-141 submitted, which precipitated the OCD's follow-up of the initial reported release. However, there appears to have been several tank overflow releases that were not reported that need to be addressed.

The OCD would consider and may approve in lieu of a discharge permit application or compliance and enforcement case against DCP Midstream LP, a final C-141 form submittal (within 6 months of the date of this e-mail), which must include all corrective actions taken to restore the facility back to its original condition (see disclaimer below). There may be other options that DCP Midstream LP may wish to propose to the OCD? DCP Midstream LP needs to initiate communication with the OCD about any other options soon.

### **GW-24 Avalon Gas Plant**

**OCD Status:** Rambo CS. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive. According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

**DCP Status:** Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this

facility. An approval letter, dated April 7, 2004, from the OCD was received by the company.

DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004.

**OCD Inspector Lowe Comments** (see inspection attachments w/ photos):

Closure inspection recommendations: DCP Midstream wants to close the Avalon gas plant. This site also has the Rambo compressor station. There are no remaining items left from the gas plant other than the flare stack. Flare stack needs to be removed. There were references to a few pits pertaining to the plant but were all closed up. I could not see any remnants of any pits or ponds on site. The entire area where the plant used to be is being used as a welding area for tubing/piping. I could not verify any soil contamination verification due to working in process at the time. I think they did not want to permit this facility again because they have closed the plant. I do not think they intended to permit the compressor station. I did inspect the Rambo compressor station.

Rambo CS.

Concerns: Two AST's had overflowed. The secondary containment still had residual contamination. A dead bird was noted in the secondary containment area. Improper storage of tanks. Questionable storage of used oil. Container for filter area was triple contained but still had discharge on the ground. Debris appears to be on site for longer than 180 days. Ground contamination around engines. Appears to have a crack in the cement containment around engine. Below ground tank has overflowed and contaminated the ground and left unattended. Standing fluids were observed in several secondary containment areas. Discharge on to the ground of black stuff near H2S treater.

Recommend they permit the compressor station. It looked pretty bad. At the time of inspection, the site is not ready to be closed due to the above and the flare stack remaining on site..

GW-42 Indian Hills Gas Plant (last permit 6/18/1997 Stage 1)

OCD Status: Indian Hills Gas Plant (GW-42): OCO records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

DCP Status: Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

Closure inspection recommendations:

1. Significant equipment remains on site, i.e., tanks and underground piping. Removal needed.
2. One area of small surface contamination was noticed from an unused AST that should be cleaned up.

At the time of inspection the site was not viewed to be closed due to the findings.

GW-44 Hobbs Booster Station (OCD has processed the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater Monitoring Results and Additional Site Characterization Activities at the Hobbs Booster Station: Hobbs, New Mexico  
Units C and D Section 4, T 19 S, R 38 E, NMPPM

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

At the time of inspection, this facility was far from being closed due to the following:

- 1) Several remaining concrete skids/slabs that need to be removed. Several underground conduits need to be removed;
- 2) Waste on site are located directly on the ground, and 3) The facility is under a ground water monitoring program with further investigation and/or corrective action pending.

All items stated above need to be removed and a facility under permit and ground water monitoring cannot be closed by the OCD..

GW-288 Pardue Compressor Station (OCD has process the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

At the time of inspection, this facility cannot be closed due to the following:

Closure inspection recommendations:

1. Some equipment remains on site that needs to be removed.
2. One small area of surface contamination was noticed and needs to be cleaned up.

At the time of inspection the site was not viewed to be closed due to the above findings.

Jackson CS Inspection:

OCD Status: Inspected due to a release on site and C-141 submittal as follow-up.

DCP Status: This facility does not have a permit.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

Two above-ground storage tanks (AST's) had overflowed and discharged from the secondary containment area on to the ground. Excavation was in progress at the time of inspection

Concern: Below grade tank (BGT) could not be inspected due to the leak detection access point (nut) that could not be removed. Facility workers did not know how to inspect such systems.  
The BGT overflowed.

Recommend that this facility apply for a permit.

The OCD would appreciate your responses for each facility listed above within 10 working days of receipt of this message. Thank you for coordinating the inspections. Please contact me if you have questions or we need to communicate on each site together. Thank you.

*Please be advised that NMOCD approval of any plan or corrective action does not relieve DCP Midstream LP of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve DCP Midstream LP of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)



Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

**From:** Lang, Ruth M [mailto:RMLang@dcpmidstream.com]  
**Sent:** Tuesday, August 05, 2008 3:58 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Kocis, Diane E; Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Mr. Lowe,

I am sorry for not getting back to you sooner; I had been waiting on some information from our folks in Carlsbad.

The proposed date is fine and I am planning on meeting you on August 26<sup>th</sup> and I am keeping August 27<sup>th</sup> open if needed. I propose that we meet on August 26<sup>th</sup> at 8:00 am at DCP's Carlsbad office, which is located at:

2010 East Orchard Lane  
Carlsbad, NM 88220  
Carlsbad Office Phone 505-234-6400  
(See attachment for map)

Diane Kocis will accompany me. She is taking over supporting our New Mexico operations from Liz Klein, who was recently promoted to manager of another group at DCP.

I will have maps and driving directions to each of the sites and when we meet we can determine in which order you would like to see them. My contact information is provided below. I am looking forward to August 26<sup>th</sup> and please contact me if you have any additional questions.

Respectfully,  
Ruth Lang, P.G.  
DCP Midstream, LP  
Manager of Water Waste and Remediation Programs  
303-605-1713 (direct office)  
303-619-4995 (cell)  
303-605-1957 (fax)

[rmlang@dcpmidstream.com](mailto:rmlang@dcpmidstream.com)

---

**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Tuesday, August 05, 2008 2:18 PM  
**To:** Lang, Ruth M  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Ruth,

I have not heard from you to confirm the below stated dates for these closure inspections. Please let me know if they work with you or not. When and where shall I meet you?

**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](mailto:leonard.lowe@state.nm.us)

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

**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, July 29, 2008 7:59 AM  
**To:** 'Lang, Ruth M'  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Ruth,

Let's plan for an August 26<sup>th</sup> time frame and maybe August 27<sup>th</sup> if we don't finish in one day.

I'm going to assume these inspections will be brief being that they are closure inspections. It all depends on what I see out there.

Where is your office located? Where shall I meet you? What time?

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

**From:** Lang, Ruth M [<mailto:RMLang@dcpmidstream.com>]  
**Sent:** Monday, July 28, 2008 7:59 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Mr. Lowe,

I am sorry I was in a meeting when you called today. I am available for these inspections on August 19, 20, 21, 26, 27, or 28<sup>th</sup>. I hope one of these dates will be convenient for you. How long do you think you will need to spend at each site? I would like to put together a preliminary schedule and route to reach these four locations.

For your lodging arrangements - 3 of the facilities are within 10-15 miles of Carlsbad and last facility is in the Hobbs area.

Thank you,

**Ruth M. Lang, P.G.**

**DCP Midstream, LP**

Manager of Water Waste and Remediation  
EHS - Environmental Protection Department  
303-605-1713 office  
303-619-4995 cell  
303-605-1957 fax

**From:** Lowe, Leonard, EMNRD [<mailto:Leonard.Lowe@state.nm.us>]  
**Sent:** Monday, July 28, 2008 11:58 AM  
**To:** Lang, Ruth M  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** DCP Midstream LP. Closure Inspection

Ms. Ruth Lang,

Good morning.

When are you able to perform these inspections of these 'closing' facilities? Let me know what dates you have planned and will reply to those dates.

Are these locations closer to Hobbs, Carlsbad or Artesia? This will aid me in planning my lodging.

I will be in the office the rest of today, Monday July 28<sup>th</sup> and will be here Tuesday morning, July 29<sup>th</sup>. I will be out of the office the rest of the week to return late Friday afternoon, August 1<sup>st</sup>.

llowe

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

---

This inbound email has been scanned by the MessageLabs Email Security System.

---



Photo 7: Used oil filter holding area.

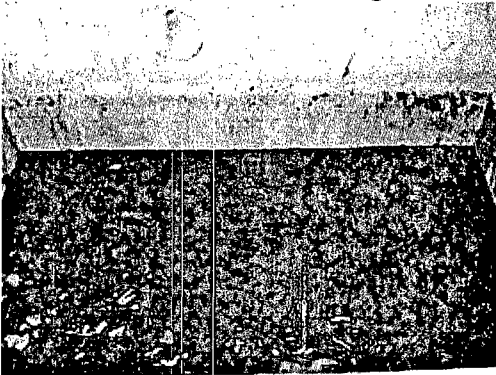


Photo 8: Inside of used oil filter holding area.

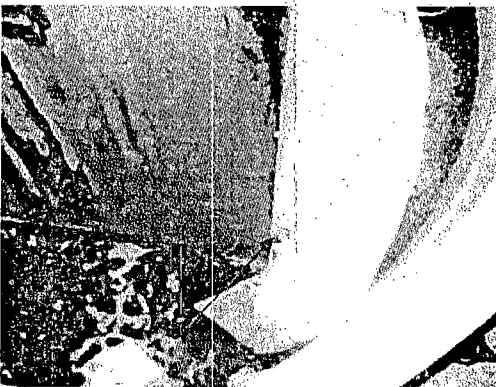


Photo 9: Arrow shows the used oil filter secondary containment plug.

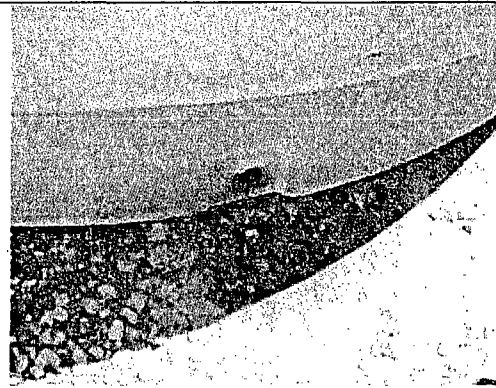


Photo 10: Third containment barrier for used filter holding area missing its bung, with discharge on to the ground.

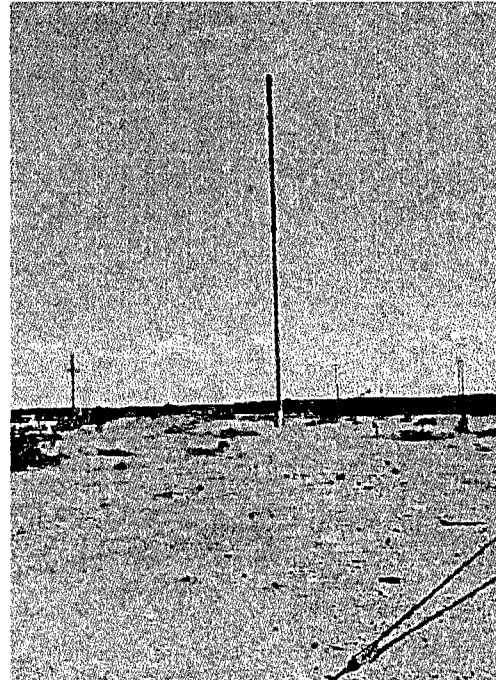


Photo 11: Avalon gas plant's flare stack located on the south side yard.

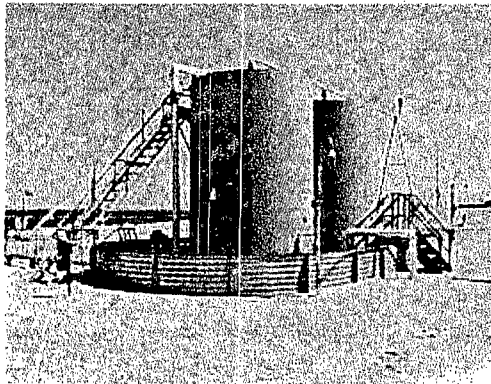


Photo 1: Two AST's with secondary containment.

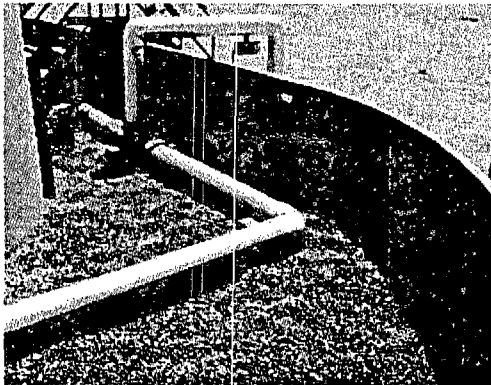


Photo 2: discharge within the secondary containment area

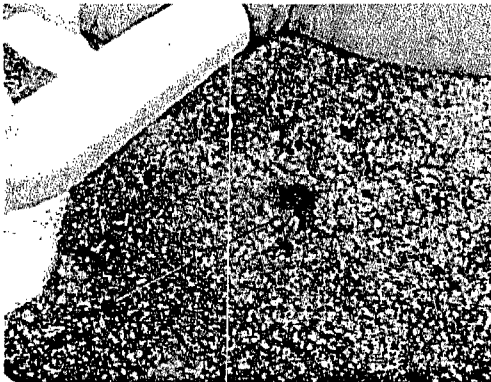


Photo 3: Free liquids still present in secondary containment. Dead fowl.



Photo 4: Free liquids in secondary containment.

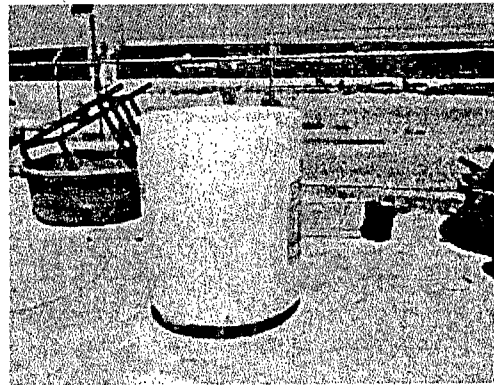


Photo 5: Upside down empty barrel.

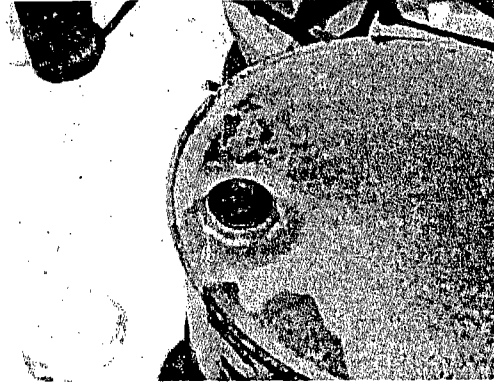


Photo 6: Barrel located directly on the ground missing its bung.



Photo 12: Debris and waste located in a bin.

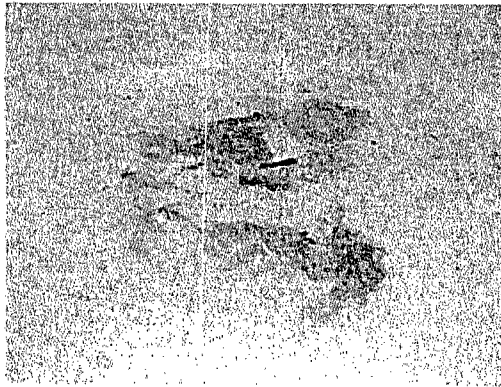


Photo 13: Soil staining south of compressor location.

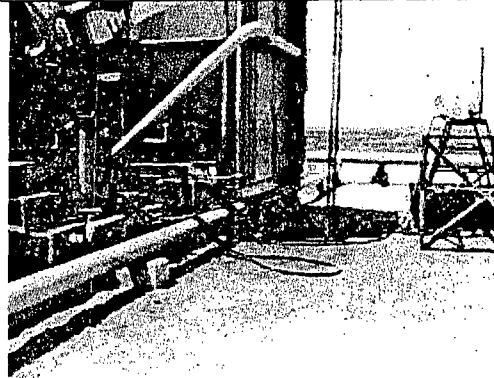


Photo 14: Ground contaminated around compressor



Photo 15: A secondary containment area with cracks and presence of leaks.

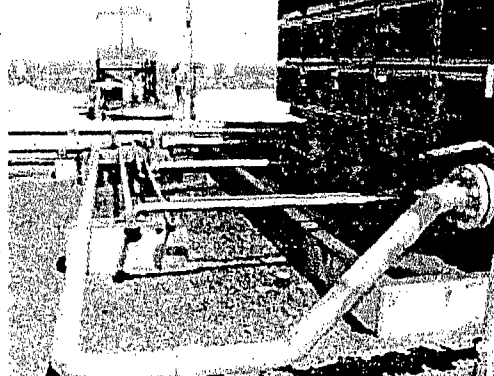


Photo 16: Gravel soiled around compressor.

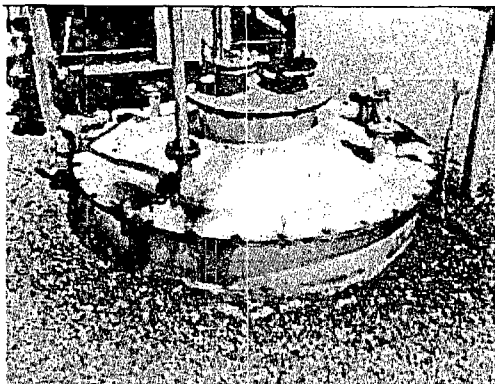


Photo 17: BGT with discharge around its area.

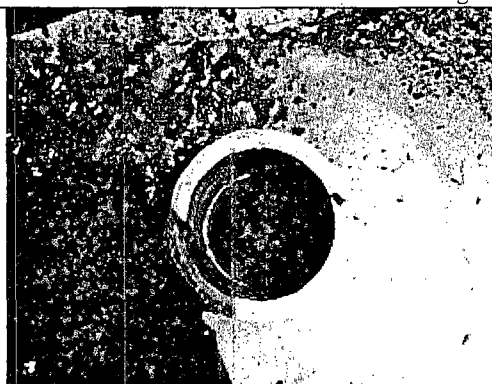


Photo 20: Fluids are present in leak detection system.

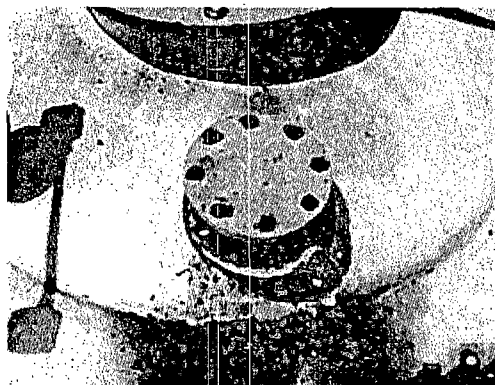


Photo 18: Flange resting over port above BGT. Pressurized, flow of "air".

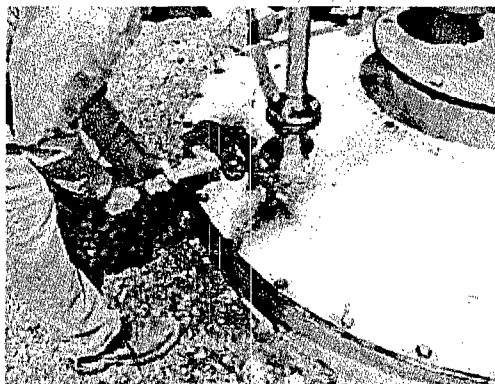


Photo 19: Leak detection being removed using a tool.

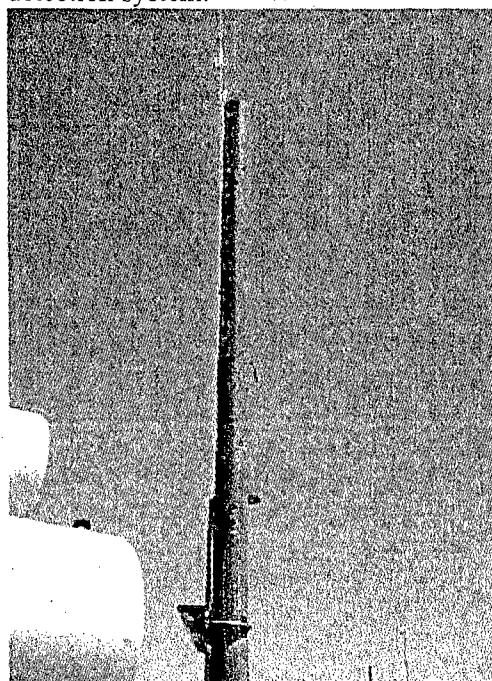


Photo 21: BGT fluids appears to have been discharged from riser.



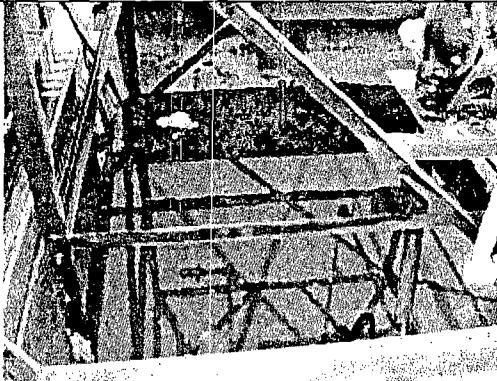


Photo 22: Secondary containment holding fluids.

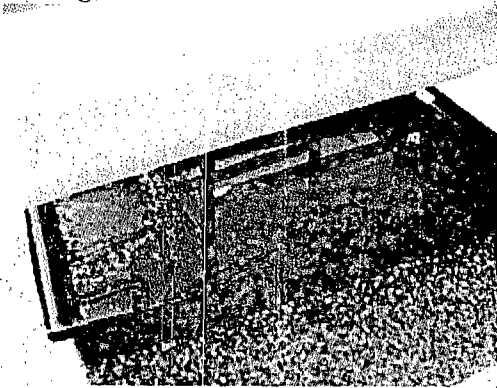


Photo 23: Another secondary containment full of fluids.

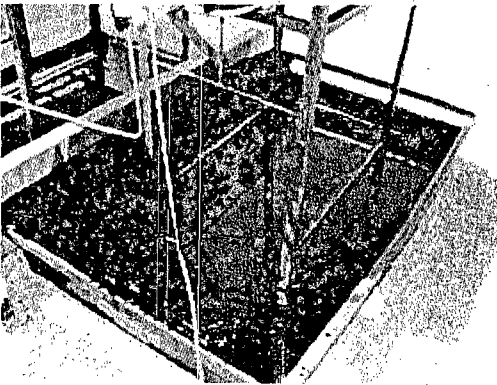


Photo 24: Another secondary container holding fluids.



Photo 25: Sulfur unit with discharge on to ground.

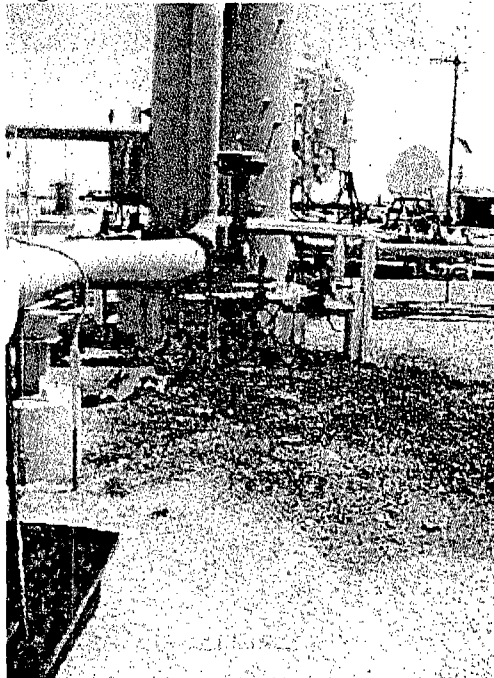


Photo 26: Sulfur unit with discharge on ground.



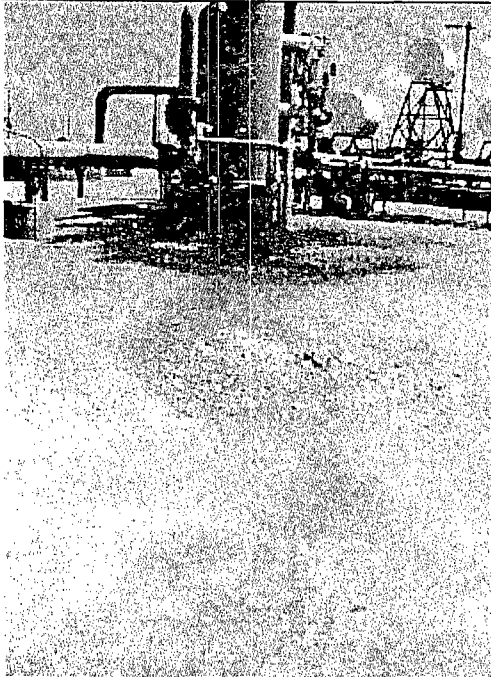


Photo 27: Discharge on ground from sulfur unit, allowed to drain.

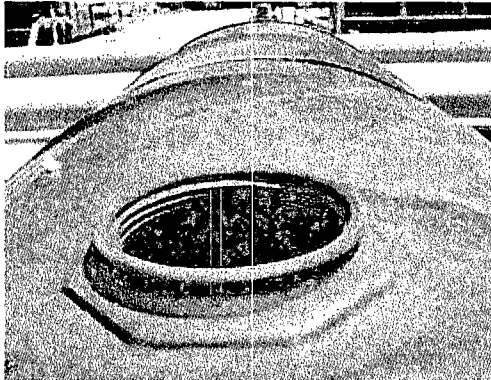


Photo 28: Saddle tank missing bung, two of three tanks missing lid.

OCD Inspection: DCM Midstream Indian Hills C.S., GW - 042

Inspector(s): Leonard Lowe

Company Rep: Ruth Lang, Diane Kocis, Robert St. John

Date: 08.26.08

Time: 10:40 - 11:10

Page 1



Photo 1: Used tank not in service.  
Leaking substance on to ground.



Photo 2: Close up of leak in photo 1.

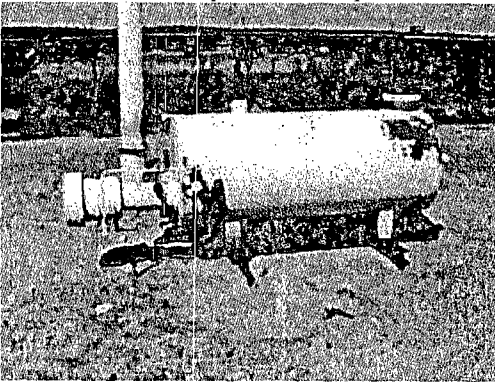


Photo 3: Used not in service equipment.

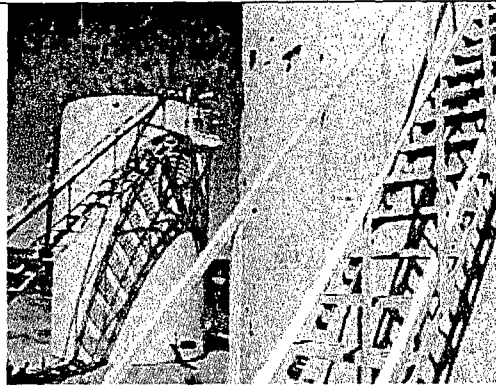


Photo 4: Empty used ASTs.

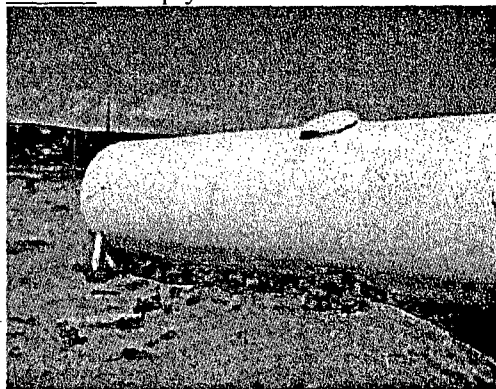


Photo 5: Tank not in use.

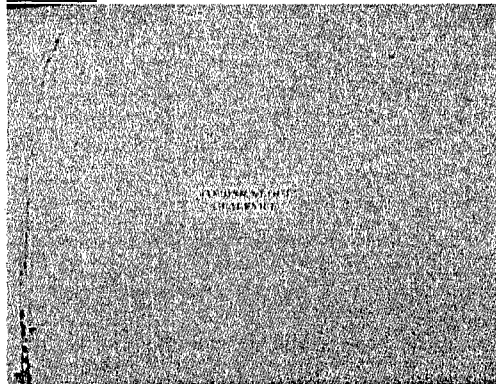


Photo 6: Close of identified tank in  
photo 5.

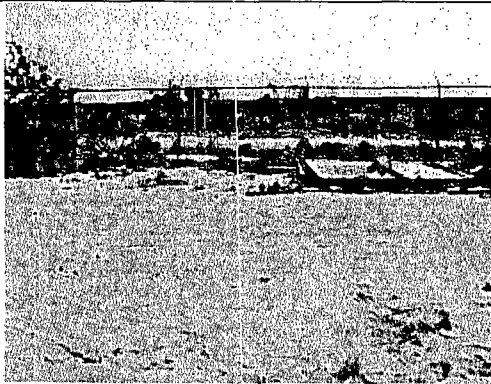


Photo 7: Debris located near facility boundry.

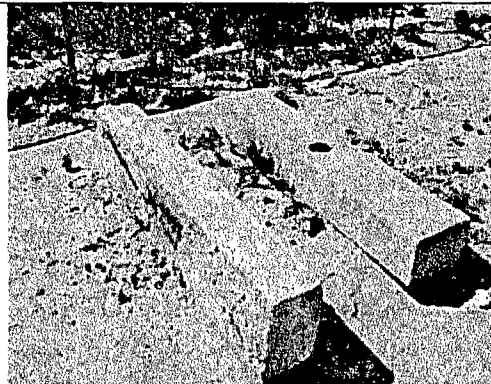


Photo 10: Two cement blocks near fence.

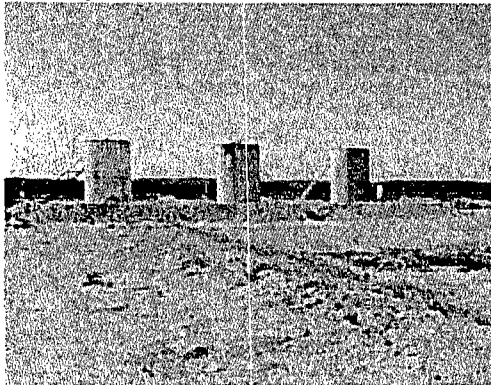


Photo 8: Three ASTs located on south side of grounds.

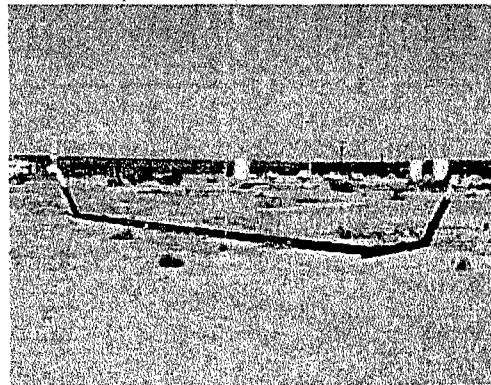


Photo 11: Conduit on grounds.

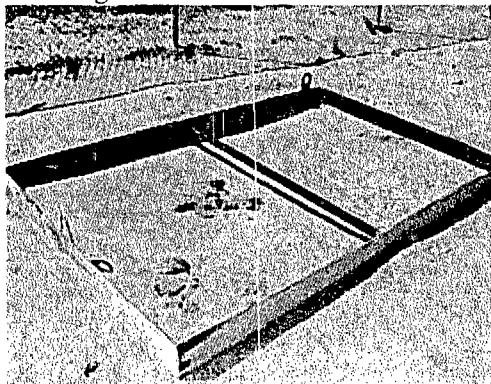


Photo 9: Metal debris remaining.

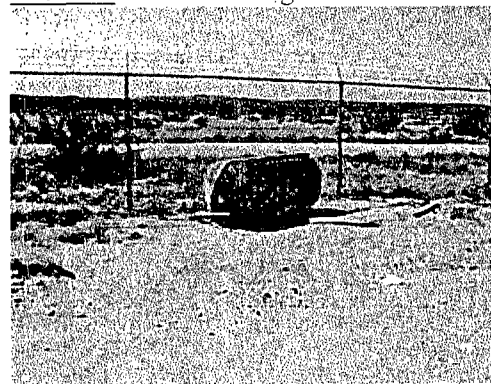


Photo 12: Fiberglass tank near fence, not in use.

OCD Inspection: DCM Midstream Indian Hills C.S., GW - 042

Inspector(s): Leonard Lowe

Company Rep: Ruth Lang, Diane Kocis, Robert St. John

Time: 10:40 - 11:10

Date: 08.26.08

Page 3

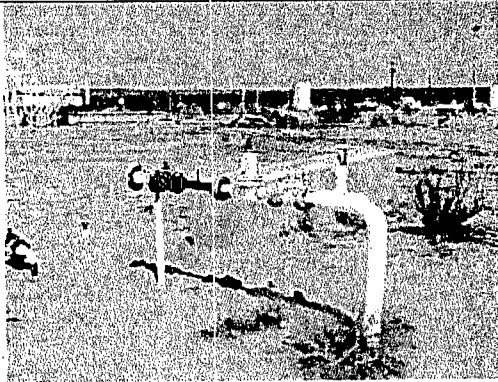


Photo 13: Remaining protruding  
underground conduit.

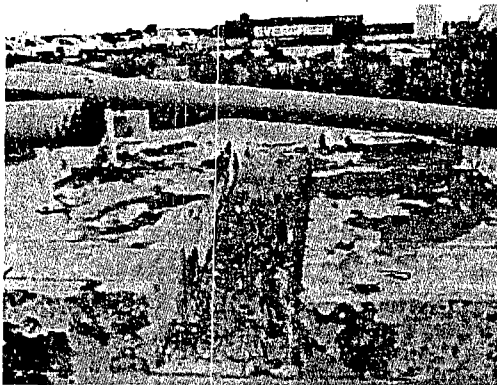


Photo 1: Concrete skids still in place.

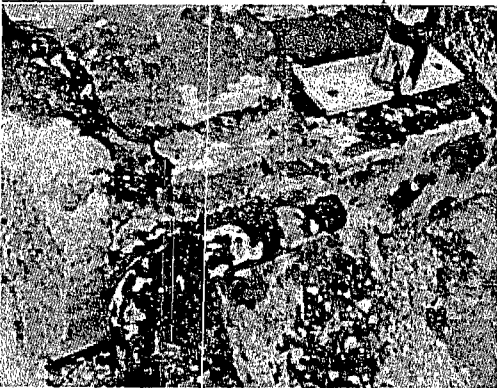


Photo 2: Protruding underground conduits remaining.

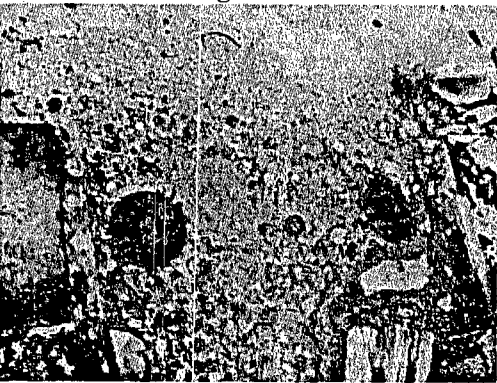


Photo 3: Exposed underground piping.

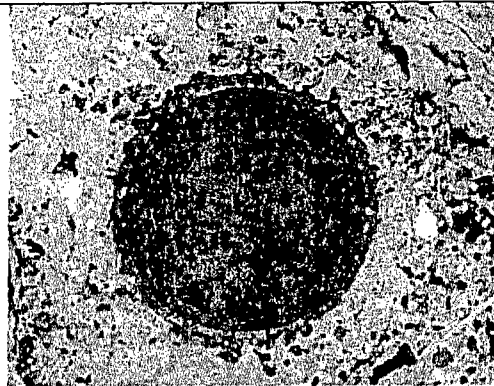


Photo 4: Close up of several underground conduits remaining on site.



Photo 5: concrete slab remaining.



Photo 6: Underground piping holding fluids.



OCD Inspection: DCM Midstream Hobbs Booster. CW - 044

Inspector(s): Leonard Lowe

Company Rep: Robert St. John

Date: 08.26.08

Time: 16:15 - 17:30

Page 2

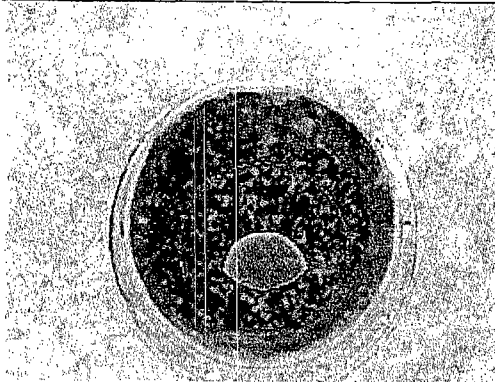


Photo 7: Underground conduit holding fluids.

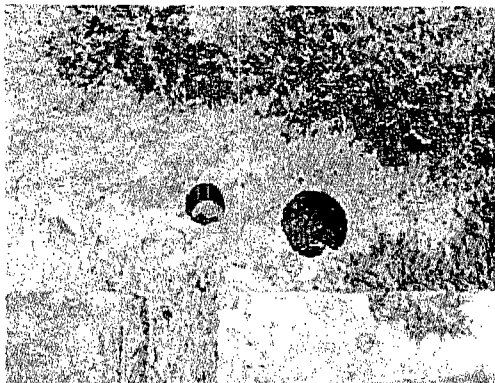


Photo 8: Underground piping holding fluids.

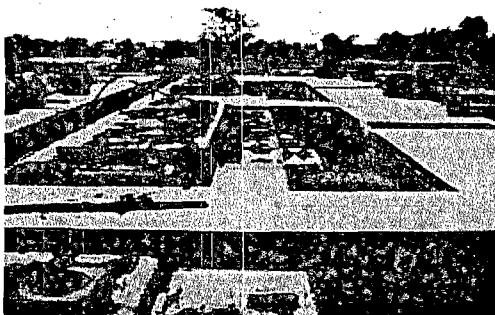


Photo 9: Concrete slabs remaining.

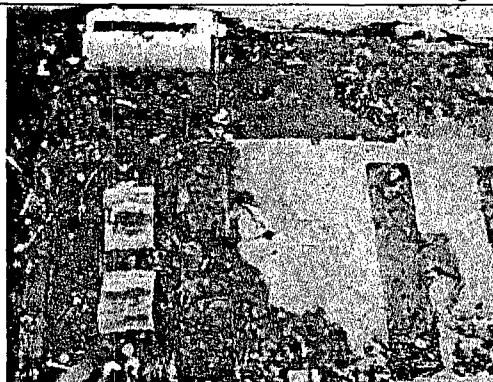


Photo 10: Concrete skid holding fluids.



Photo 11: Debris and concrete on location.

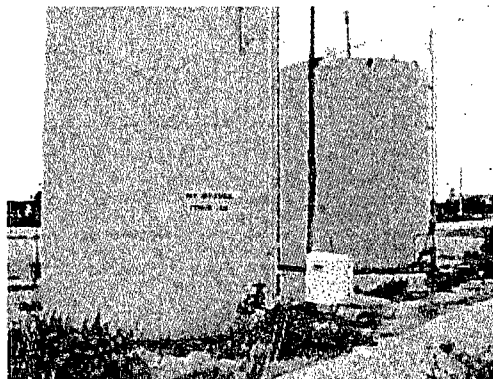


Photo 12: Two AST's still in use.

OCD Inspection: DCM Midstream Hobbs Booster. GW - 044

Inspector(s): Leonard Lowe

Company Rep: Robert St. John

Time: 16:15 - 17:30

Date: 08.26.08

Page 3



Photo 13: Used/new filters piled and remaining.

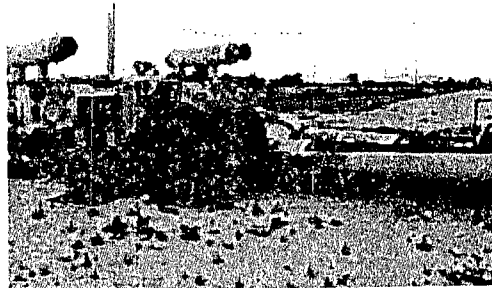


Photo 16: Used equipment on site.



Photo 14: Flare stack remaining.

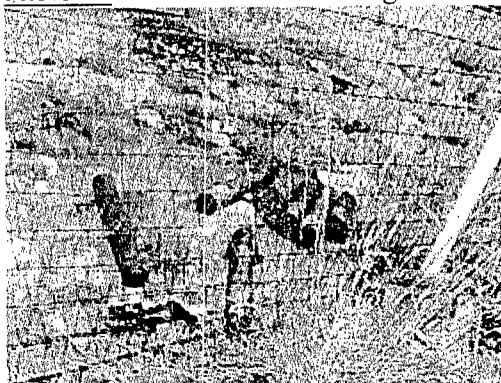


Photo 15: Used filters located directly on ground.

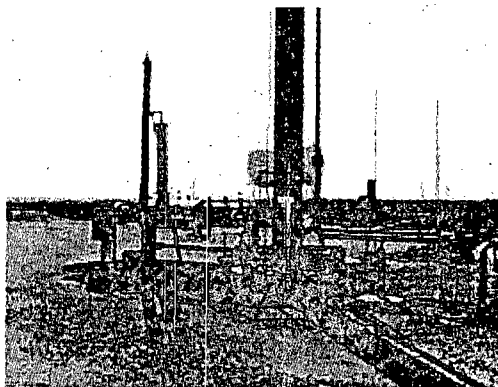


Photo 1: Remaining equipment.

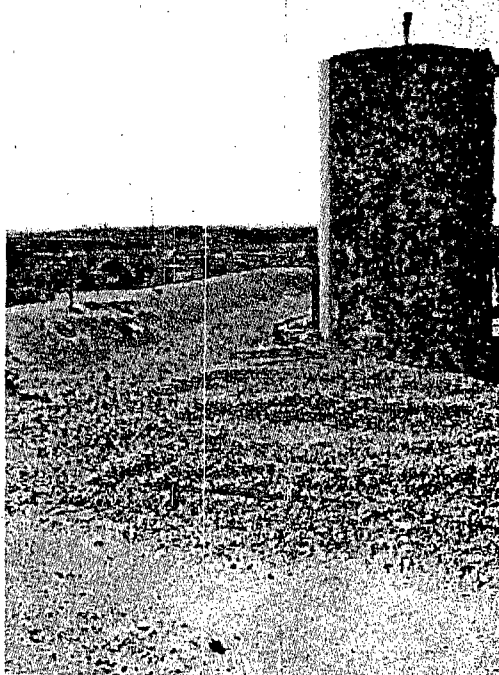


Photo 2: Out of service AST.



Photo 3: Labeled AST.

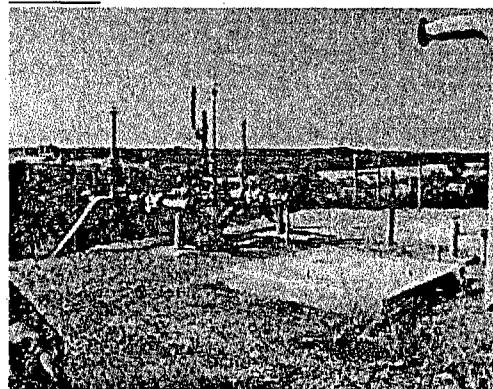


Photo 4: Remaining concrete slabs with exposed conduits.

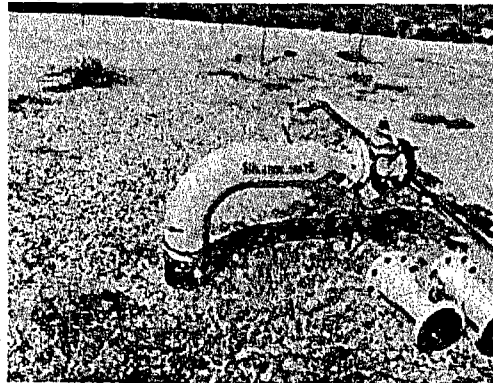


Photo 5: Remaining underground conduits.



OCD Inspection: DCM Midstream Purdue C.S., GW - 288

Inspector(s): Leonard Lowe

Company Rep: Ruth Lang, Diane Kocis, Robert St. John

Date: 08.26.08

Time: 9:35 – 10:00

Page 2

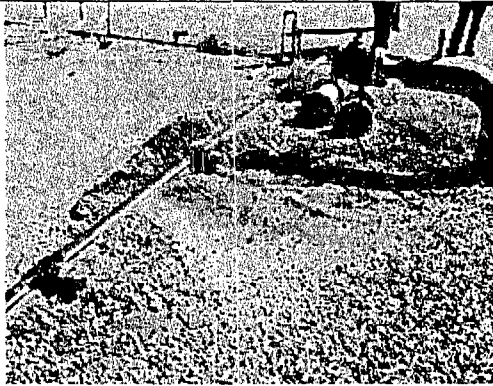


Photo 6: Contaminated soil near compressor skid.

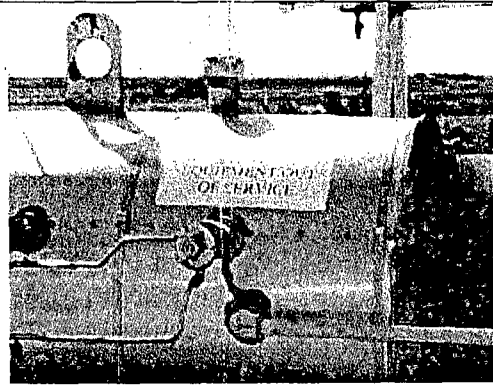


Photo 8: Out of service equipment.

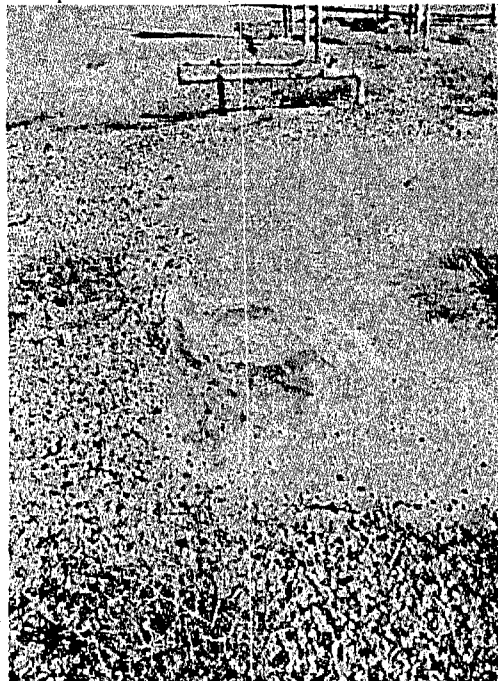


Photo 7: Contaminated soil.

OCD Inspection: DCM Midstream Jackson C.S., No DP Permit

Inspector(s): Leonard Lowe

Company Rep: Ruth Lang, Diane Kocis, Johnnie Bradford

Date: 08.26.08

Time: 14:30 – 14:50

Page: 1

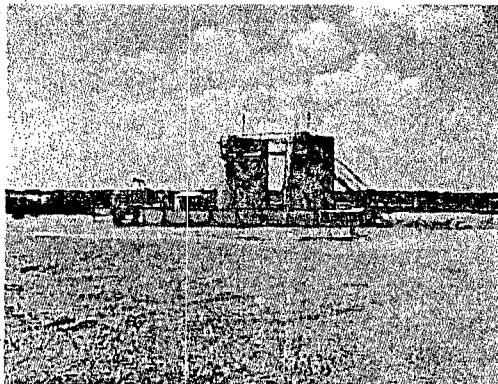


Photo 1: Tank batteries in use, located on north side of yard.

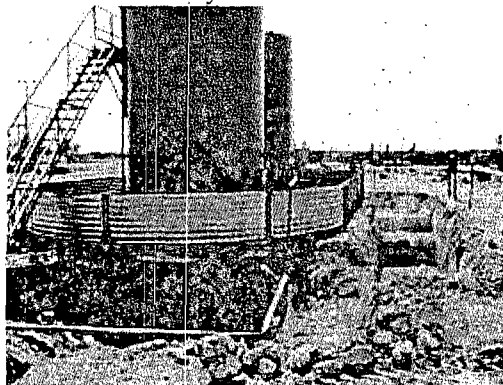


Photo 2: Excavation of spill on north and east side of tank batteries.

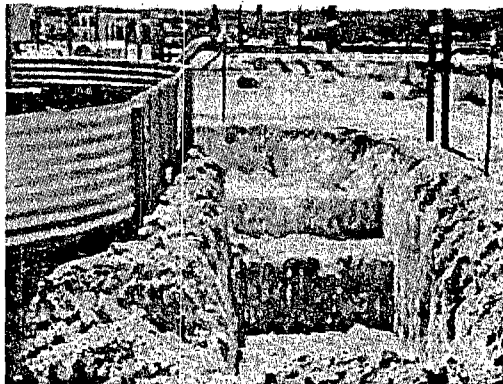


Photo 3: Close up of north side excavation.

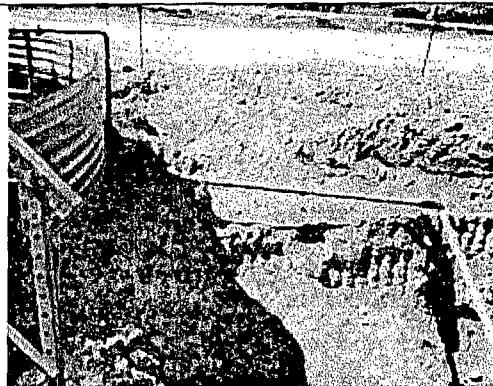


Photo 4: East side of excavation.

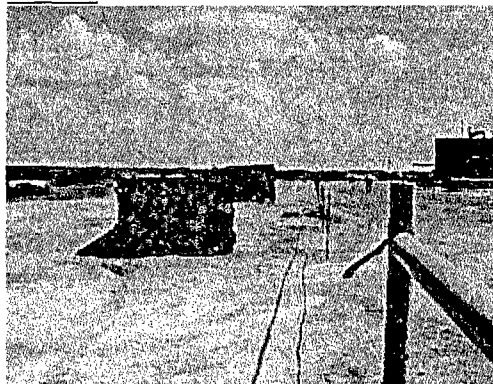


Photo 5: Bins where contaminated soils are being placed. Located on far east side outside of fenced area.

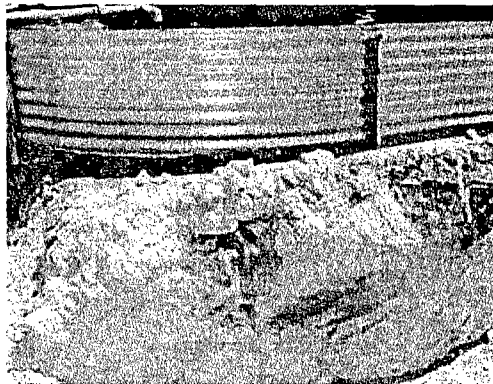


Photo 6: Close up of north side of contamination.

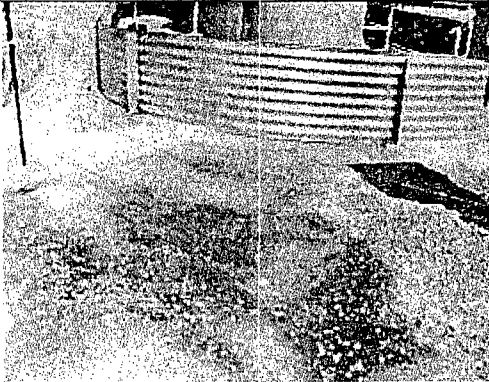


Photo 7: West side of batteries.

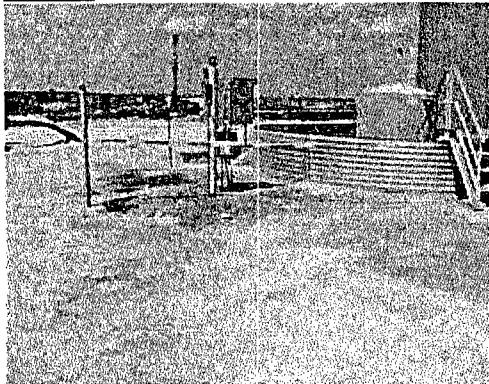


Photo 8: West side of batteries.

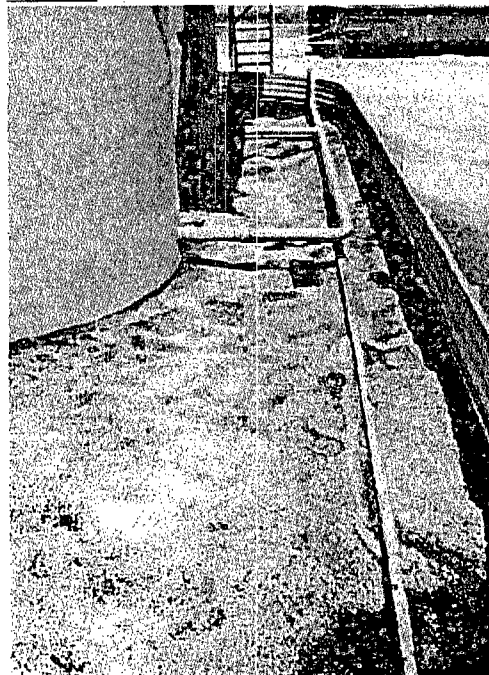


Photo 9: Inside secondary containment area of tank batteries.

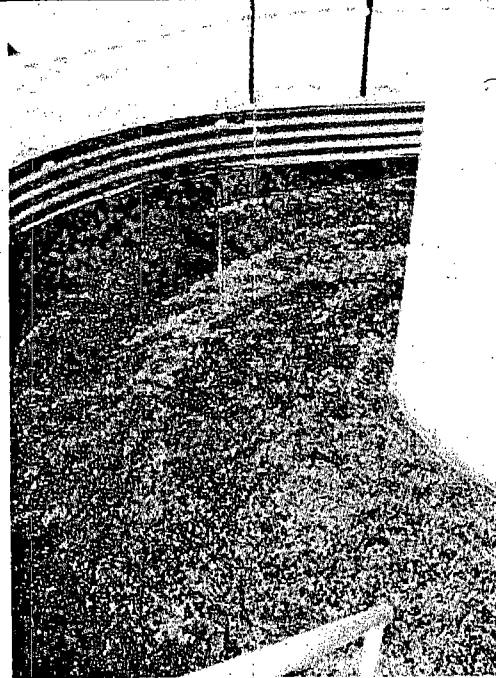


Photo 10: Inside secondary containment.

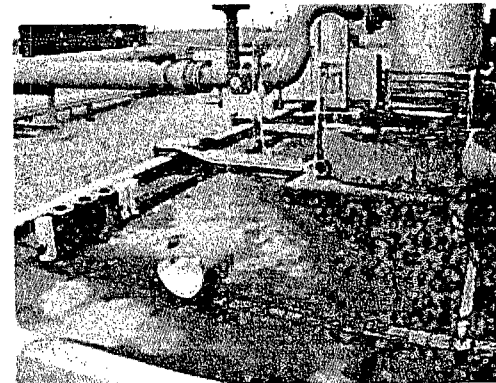


Photo 11: Compressor skid with draining filters.

OCD Inspection: DCM Midstream Jackson C.S., No DP Permit

Inspector(s): Leonard Lowe

Company Rep: Ruth Lang, Diane Kočis, Johnnie Bradford

Date: 08.26.08

Time: 14:30 - 14:50

Page 3

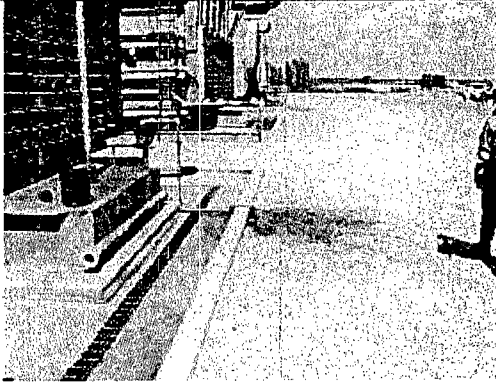


Photo 12: Gravel contamination near fans.

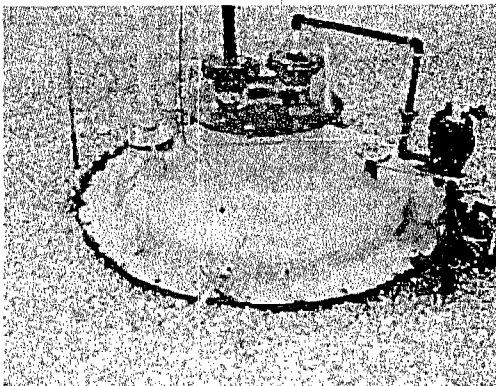


Photo 13: Below grade tank with leak.

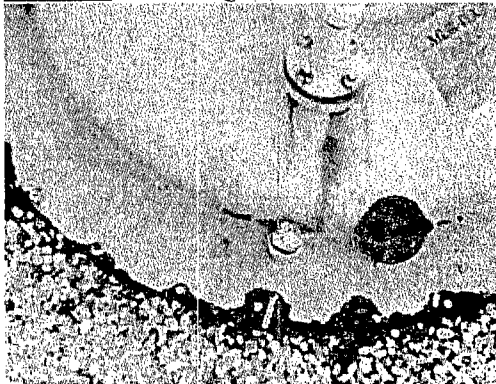


Photo 14: Leak detection cover was not able to be removed for inspection.

**Chavez, Carl J, EMNRD**

---

**From:** Kocis, Diane E [DEKocis@dcpmidstream.com]  
**Sent:** Monday, November 10, 2008 6:10 PM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Admire, John D; Bebbington, Jon D; Bradford, Johnnie; Epel, Joshua B; Kardos, Gregory C; Lamb, Johnny F; Lang, Ruth M; Trammell, Ronnie D; Jamerson, Kelly D; Weathers, Stephen W  
**Subject:** DCP response to OCD inspection findings  
**Attachments:** Memo to OCD re inspection findings.doc

Mr. Chavez,

Attached is the DCP response to the OCD inspection findings from the 8/26/08 inspections of the Rambo (former Avalon Gas Plant) Booster Station, the former Indian Hills Gas Plant, the former Hobbs Gas Plant, the Pardue Booster Station and the Jackson Booster Station.

RE our communication today concerning the tank removals at Indian Hills: During further discussion with DCP Operations, it has been determined that the tanks will be removed; however, the pig launcher will be reconfigured into a pig receiver with a potential to release fluids to the soil. Therefore, DCP will submit a discharge permit renewal application for this facility.

Please contact me if you have any questions or need any further information.

Thank you,

Diane E. Kocis  
*Sr. Environmental Specialist*  
DCP Midstream

303.605.2176 direct line  
720.236.2285 cell

[DEKocis@dcpmidstream.com](mailto:DEKocis@dcpmidstream.com)

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

11/12/2008



MEMORANDUM

DATE: November 10, 2008

TO: Carl Chavez, New Mexico Oil Conservation Division, Environmental Engineer

FROM: Diane Kocis, DCP Midstream, Sr. Environmental Specialist

SUBJECT: Response to August 26, 2008, New Mexico OCD Inspection Findings:  
Rambo Booster Station (former Avalon Gas Plant), former Indian Hills Gas Plant,  
former Hobbs Gas Plant, Pardue Booster Station and Jackson Booster Station

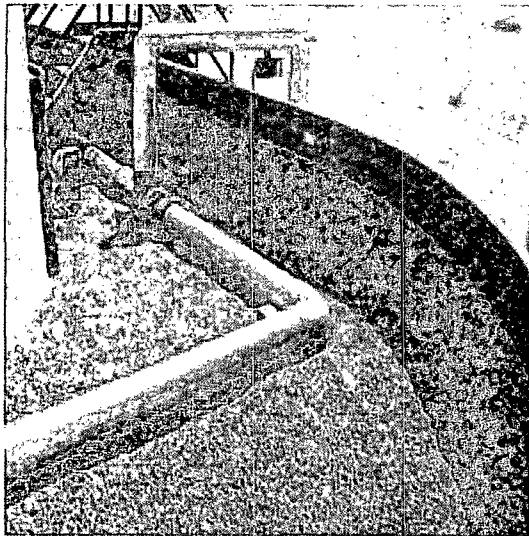
**Former Avalon Gas Plant (Discharge Permit GW-024; Permit Expired 9/18/2005) and Current Site of Rambo Booster Station:**

Former Avalon Gas Plant: The OCD inspector noted that "there are no remaining items left from the gas plant other than the flare stack. Flare stack needs to be removed." DCP Operations has demolished the flare stack and placed it in the onsite scrap pile. DCP has committed to submit a discharge permit closure plan for the discharge permit associated with the former gas plant. OCD was also aware that the former gas plant had a few pits pertaining "but were all closed up". DCP submitted pit closure reports and analytical results on 4/7/04. DCP will provide OCD with a copy of the pit closure reports.

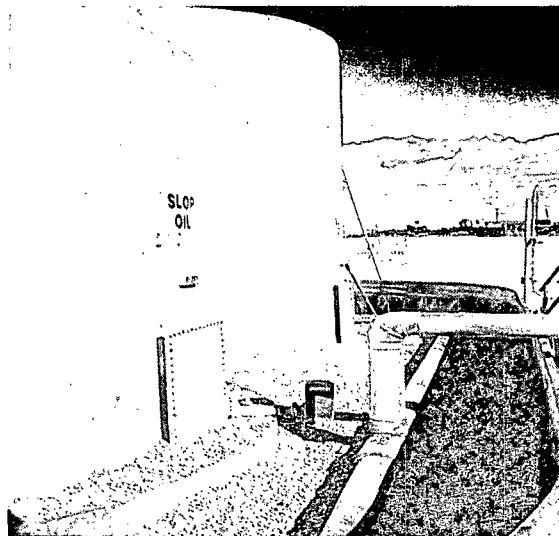
Rambo Booster Station: DCP has initiated preparation of a discharge permit for this facility. During the site inspection, the OCD inspector noted that:

- 1) "Two ASTs had overflowed" within secondary containment and "still had residual contamination".

**DCP Response:** The gravel within the secondary containment has been replaced with new gravel. Please see DCP Rambo Photo 1 below.



OCD Rambo Photo 2



DCP Rambo Photo 1 of secondary containment  
taken 11/04/2008

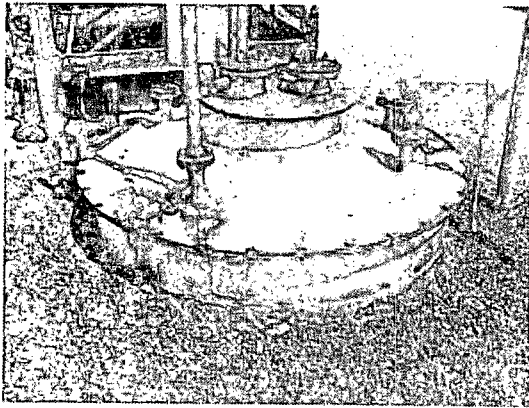


- 2) Standing fluids were observed in several secondary containment areas;

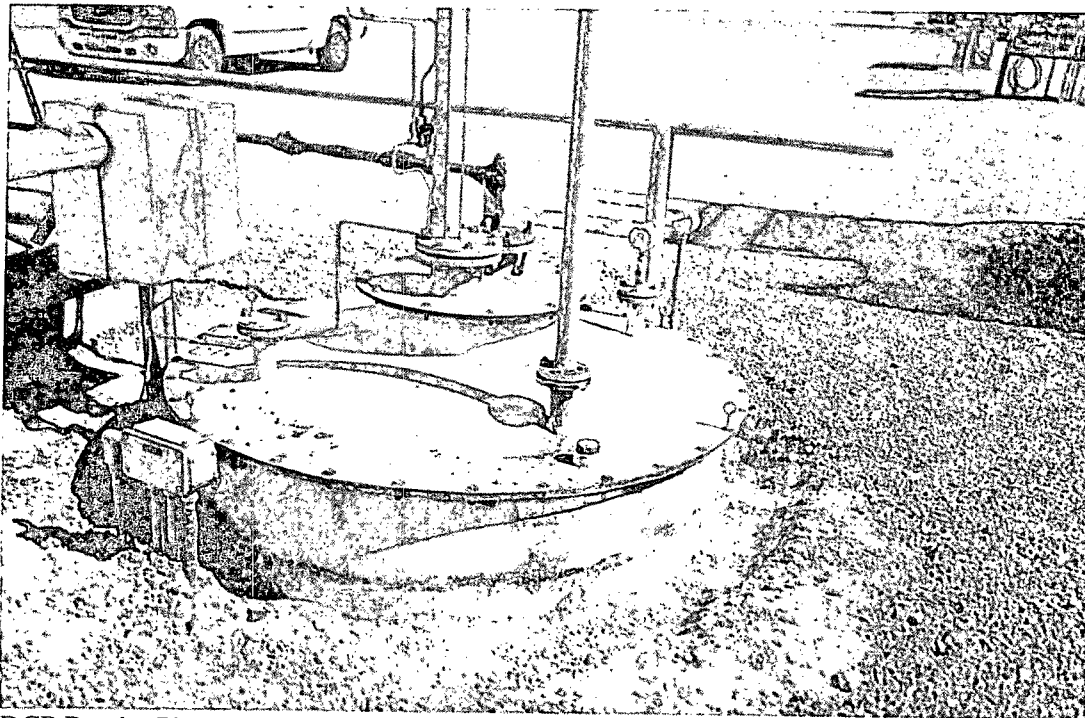
**DCP Response:** DCP Operations is currently working with a contractor to have the fluids removed and we will update OCD when this item is completed.

- 3) The below-grade tank had overflowed. No release report was filed with OCD.

**DCP Response:** Please see the DCP Rambo Photo 2 below. A release report was not filed because the release was calculated to be under the 5 barrel reporting threshold. Excavation around the sump proved that the contamination was shallow and the estimated volume released is less than 5 barrels.



OCD Rambo Photo 17



DCP Rambo Photo 2 taken 10/22/08

- 4) "Improper storage of tanks";

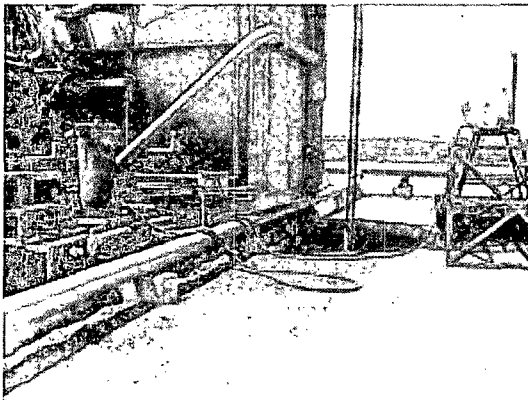
**DCP Response:** DCP is currently addressing this issue and will update OCD when this issue is resolved.

- 5) "Questionable storage of used oil"; and 6) "Container for the filter area was triple-contained but still had a discharge to the ground";

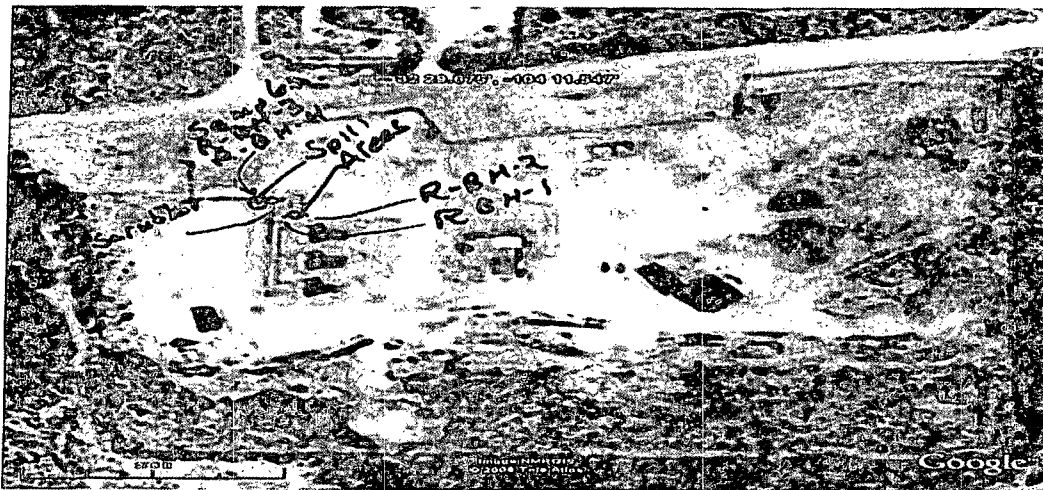
**DCP Response:** DCP will need clarification on these two items and will respond after OCD provides further information. Were both items 5 and 6 regarding the same used filter storage area?

- 7) "Ground contamination around the engines"; there appears to be "a crack in the cement containment around the engine".

**DCP Response:** Operations removed some stained soil and gravel around the engines. A consultant has collected samples to determine if the remaining soil and gravel are below OCD action levels. Please see the consultant's sample collection location map below. "BH" indicates a "bottom hole" sample. DCP expects analytical results during the week of 11/10/08. Operations has arranged for the repair of the crack in the cement containment around the engine on 11/10/08.



OCD Rambo Photo 14

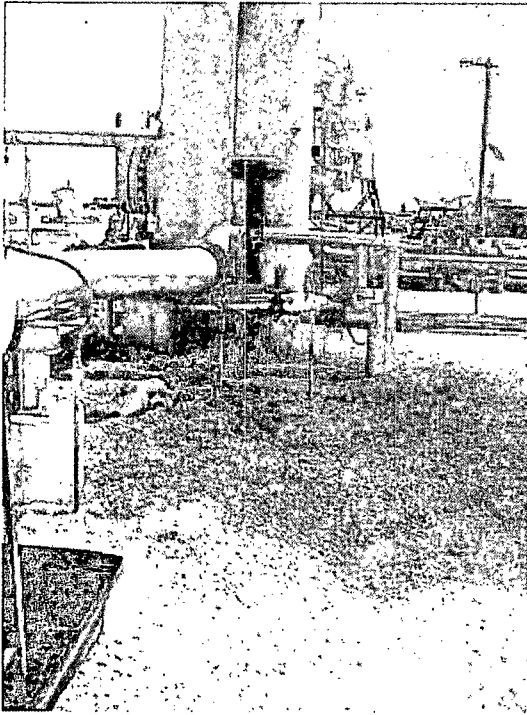


Rambo  
Stockpile Sample  
R-BH-3

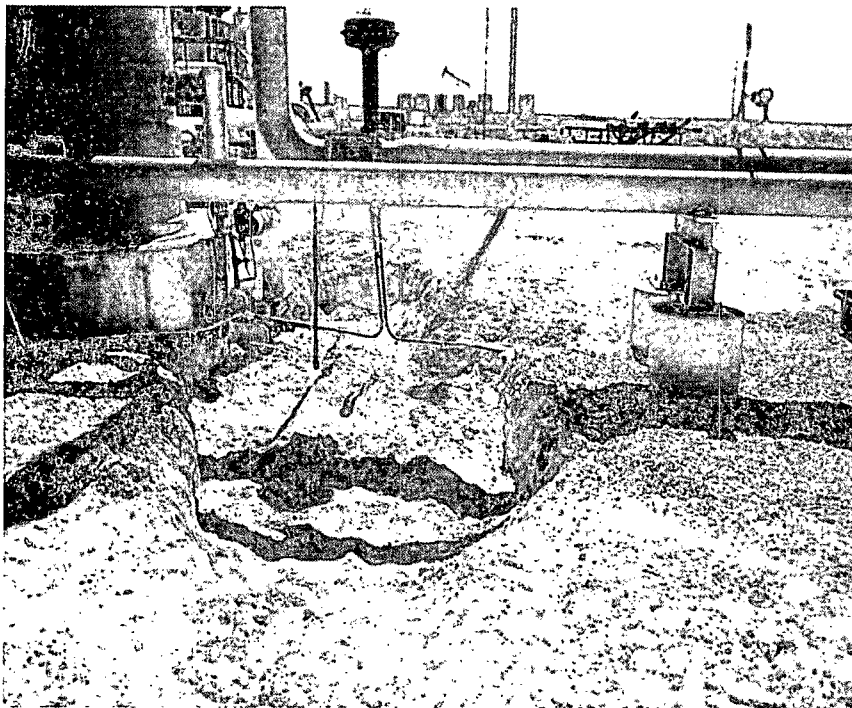


8) Discharge to the ground of "black stuff near the H<sub>2</sub>S treater".

**DCP Response:** The equipment referred to is actually a scrubber. Soil and gravel around the scrubber have been removed. DCP is currently waiting confirmation sample results and will update OCD after the results are received and evaluated.



OCD Photo 26



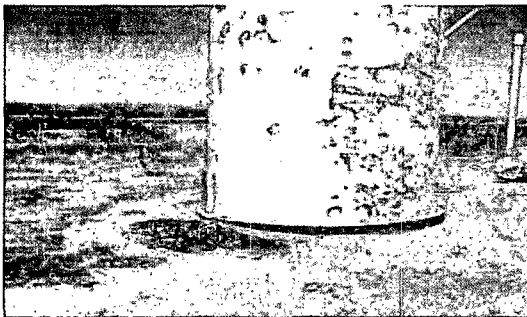
DCP Rambo Photo 3 taken 10/22/08

**Indian Hill Gas Plant (Discharge Permit GW-042; Permit Expired 4/6/02)**

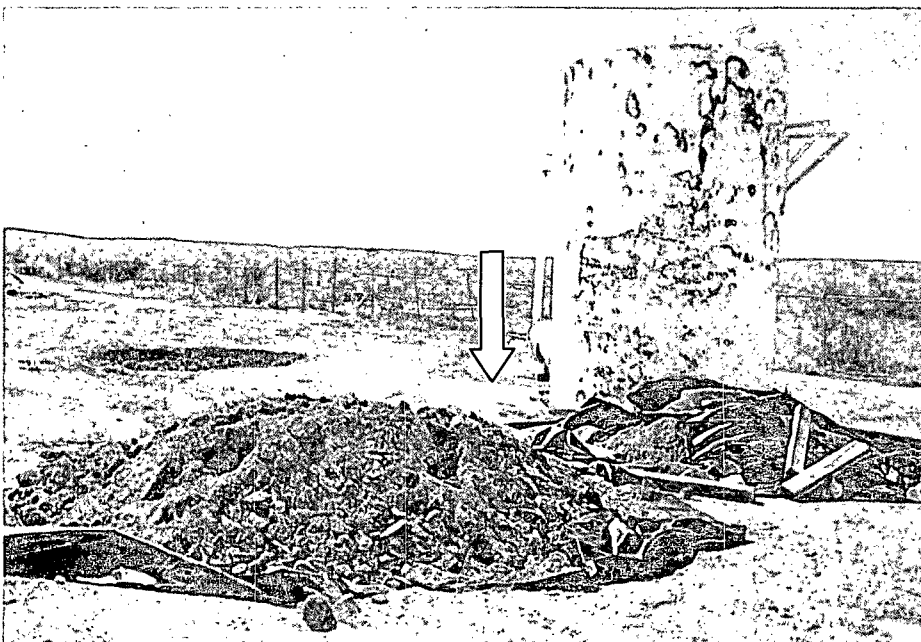
The Indian Hills Gas Plant was dismantled prior to ownership by DCP and its predecessor companies. Only a meter facility, an active gas pipeline, and pig launcher currently exist at the site. OCD was notified of the facility status on 12/10/01 and requested a closure plan, prior to the 8/16/08 site inspection. After the inspection, OCD provided the following statement: "At the time of inspection the site was not viewed to be closed due to the findings." The two OCD findings were: 1) "Significant equipment remains on site, i.e., tanks and underground piping. Removal needed"; and 2) "One area of small surface contamination was noticed from an unused AST that should be cleaned up".

**DCP Response:** During the course of discussions with DCP Operations, it has been determined the tanks will be removed; however, the pig launcher will be reconfigured into a pig receiver with a potential to release fluids to the soil. Therefore, DCP will submit a discharge permit renewal application for this facility.

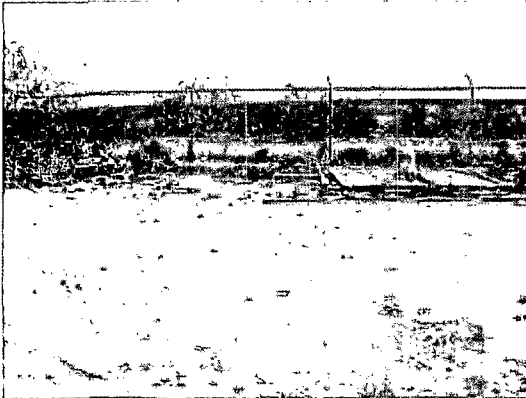
DCP has removed the contaminated soil near the base of the AST (OCD Indian Hills Photo 1). An additional area of stained soil was also removed. Please see DCP photo 1. When the tanks are removed, any stained soil beneath the tanks will be sampled to determine if there is any hydrocarbon contamination above OCD cleanup levels. Soils with hydrocarbon contamination higher than OCD cleanup levels will be removed. Additionally, DCP is in the process of removing the debris from the fence, noted in OCD Indian Hills Photo 7.



OCD Indian Hills Photo 1



DCP Indian Hills Photo 1 taken 10/22/08. Arrow indicates where stained soil was removed at the base of the tank.



OCD Indian Hills Photo 7

**Hobbs Gas Plant (Discharge Permit GW-044; Permit Expired 12/27/2007)**

A discharge permit renewal application was approved by OCD on 3/7/2008; however, DCP contacted the OCD at that time to inform OCD that the facility was closed and that we chose to withdraw the permit renewal.

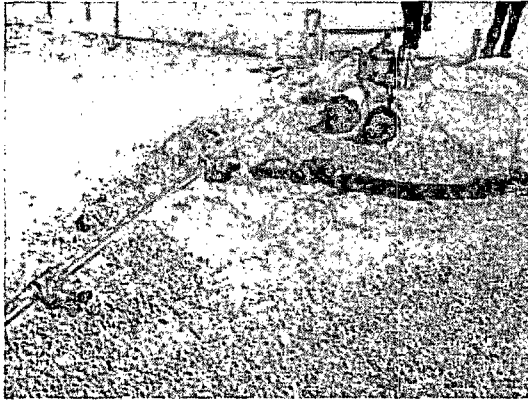
During the 8/26/08 inspection, the OCD inspector noted that: 1) Several remaining concrete skids/slabs "need to be removed"; 2) Several underground conduits need to be removed; 3) Wastes on site are located directly on the ground; and 4) The facility has a ground water monitoring program with further investigation and/or corrective action pending.

**DCP Response:** After the OCD site inspection and communication with OCD, DCP has committed to renew the facility discharge permit because the active groundwater remediation system precludes closure. In recent communication, OCD has inquired if DCP is "going to remove all the concrete slabs and the solid waste on this site." The intent was to remove the slabs after remediation was completed. DCP will power-wash the concrete slabs and remove the on-site wastes and fluids noted during the OCD inspection. DCP will update OCD when this effort is completed.

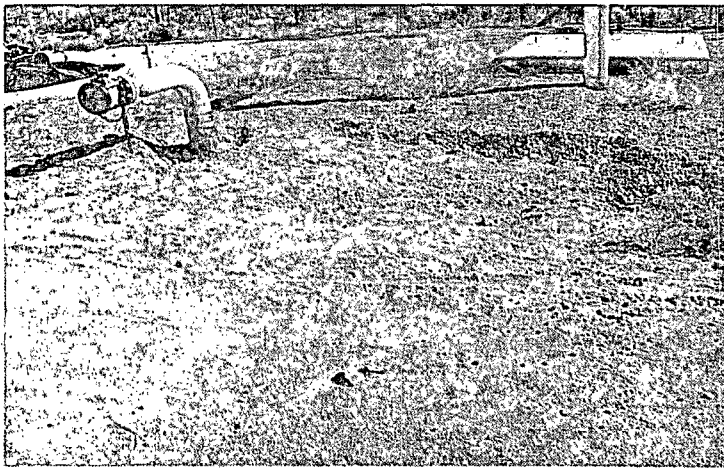
**Pardue Booster Station (Discharge Permit GW-288, Permit Expired 3/7/08)**

A permit renewal application was approved by OCD but DCP then chose to close the facility instead and terminate the permit renewal process. Prior to the 8/26/08 site inspection, OCD anticipated that DCP would submit a closure plan. OCD inspected this facility as part of its determination of eligibility of closure. During the inspection, the inspector noted: 1) Some equipment remains on site that needs to be removed; and 2) One small area of surface contamination needs to be cleaned up. DCP committed to renew the discharge permit. OCD has inquired if DCP intends to reactivate this site in the future.

**DCP Response:** DCP has determined that the facility could be reactivated and therefore chooses to retain the equipment on site. DCP has removed the area of surface contamination (see DCP Pardue Photo 1 below) and is currently awaiting analytical results from confirmation sampling. DCP will update OCD when the analytical data is received and evaluated and wants to complete the discharge permit renewal process for this facility.



OCD Pardue Photo 6



DCP Pardue Photo 1 taken 10/22/08

**Jackson Booster Station (No existing discharge permit for this facility)**

OCD inspected this facility due to a release that occurred on 5/23/08, when two ASTs overflowed. The spill was not contained within the secondary containment. A prior release, also from the same ASTs, occurred on June 25, 2007 and was reported to OCD. The first release consisted of lube oil and antifreeze from three engine compressors and condensate was released during both incidents. The inspector noted that the area around the below-grade tank had a discharge to the ground. The below-grade tank "could not be inspected" because a nut could not be removed to view "the leak detection access point". He further stated that the "facility workers did not know how to inspect such systems."

**DCP Response:** DCP is addressing items noted during the OCD inspection and after completion of all corrective actions DCP expects to submit a completed final C-141 by 1/15/09 for the Jackson Booster Station. The inspector recommended that this facility apply for a discharge permit. DCP is about to commence preparation of a discharge permit application for the Jackson Booster Station. We will inform OCD when the application is ready for submittal.

To minimize the possibility of a future overfill from the tanks, new gauges have been ordered to replace the malfunctioning gauges that contributed to the overflows. To minimize release of fluids from the secondary containment, the screw holes will be sealed with silicone. Contaminated soil excavation was in progress at the time of the inspection on the north and east sides of the secondary containment. However, other soil contamination was evident in the area of the secondary containment. DCP is in the process of addressing the remaining soil contamination in the area of the secondary containment.



Regarding issues associated with the below-grade tank: knowledgeable DCP staff personnel are reviewing existing company policies and procedures, including best management practices, with the operations personnel responsible for this facility. Contaminated soil and gravel around the BGT will be excavated along with the excavation of the remaining stained soil adjacent to the ASTs. A consultant will conduct confirmation sampling after the areas of contamination have been addressed.

Please contact me if you have any questions concerning this information.

Thank you,  
Diane E. Kocis  
Sr. Environmental Specialist  
DCP Midstream  
(303) 605-2176



cc: John Admire  
Jon Bebbington  
Johnnie Bradford  
Joshua Epel  
Kelly Jamerson  
Greg Kardos  
Johnnie Lamb  
Ruth Lang  
Ronny Trammel  
Stephen Weathers

**Chavez, Carl J, EMNRD**

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, October 22, 2008 1:40 PM  
**To:** Kocis, Diane E  
**Cc:** 'Lang, Ruth M'; Price, Wayne, EMNRD  
**Subject:** Status of DCP facilities: Pardue Booster Station, Indian Hills Booster Station, former Avalon Gas Plant, Jackson Booster Station and Hobbs Booster Station

Diane:

Good afternoon. I am in receipt of your msg. below. Thank you. The procedure to empty product tanks that reach 50% seems prudent; however, may want to pursue automatic tank shut-off mechanisms on its product tanks to prevent overflows from occurring in the future. There is no guarantee that an employee of DCP will physically be present when tanks overflow at times. I know that the OCD had developed draft permits and sent DCP the following final discharge permits:

- 1) **DCP MIDSTREAM LP** (1/24/08) Hobbs Booster Compressor Station (GW-044) Draft Permit, Public Notice, Administrative Completeness; and
- 2) **DCP MIDSTREAM LP** (1/24/08) Pardue Compressor Station (GW-288) Draft Permit, Public Notice, Administrative Completeness

Please refer to the table below, which may help DCP to track submittals to the OCD. The OCD is concerned about GW-42 below as it is unclear when either path will trigger action by DCP? DCP needs to propose a date certain to approved by the OCD, which will determine when either action will be implemented.

**DCP Midstream LP Facility Status Table:**

24*	DCP MIDSTREAM, LP	Former Avalon	GP	Closure Plan	A		Chavez	DCP will submit a discharge permit closure plan and conduct cleanup of the areas identified during the site inspection.
42*	DCP MIDSTREAM, LP	Indian Hills Booster Station	GP	Stage 2 9/17/2008 CC	A		Chavez	Currently under OCD DP renewal review. If the tanks are sold, the remaining surface equipment will be removed and DCP will submit a facility closure plan. If the tanks cannot be sold, DCP will renew the discharge permit. In either case, DCP will remove and dispose of the soil associated with the "one area of surface contamination" identified by Leonard Lowe.
44*	DCP MIDSTREAM, LP	Hobbs Booster Station	CS	Stage 4. 3/12/2008 CC	A	12/23/2007	Chavez	Recently requested closure after achieving Stage 4. GW Monitoring in progress and can't close. DCP will submit signed DP with final fee.
144*	DCP MIDSTREAM, LP	Duke North (Westall)	CS	Stage 1. 1/31/2008 CC	A	08/19/2008	Chavez	OCD is awaiting application renewal w/ filing fee of \$100.
150	DCP MIDSTREAM, LP	Pure Gold 28 CS	CS	Stage 2 9/17/2008 CC	A	11/22/2008	Chavez	Currently under OCD review for DP renewal.
280	DCP MIDSTREAM, LP	Dike Carlsbad	CS	Stage 5. 10/08/2008 CC	A	06/10/2012	Chavez	Facility updated in OCD system. No further action needed.
288*	DCP MIDSTREAM, LP	Pardue CS	CS	Stage 4. 3/12/2008 CC	A	11/24/2007	Chavez	Recently requested closure after achieving Stage 4. DCP will submit signed DP w/ final fee.
n/a*	DCP MIDSTREAM, LP	Jackson Booster Station	CS	C-141 CA	A		Chavez	DCP will submit a new (final) C-141 next week after a review of the report prepared by the consultants who managed cleanup of the area identified in the C-141 regarding a release that occurred on May 23, 2008.

\* Awaiting submittal from DCP Midstream LP

Please contact me to discuss. Thank you.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Dept.  
 Oil Conservation Division, Environmental Bureau  
 1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
 Office: (505) 476-3491  
 Fax: (505) 476-3462  
 E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
 Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
 (Pollution Prevention Guidance is under "Publications")

10/22/2008

**From:** Kocis, Diane E [mailto:DEKocis@dcpmidstream.com]

**Sent:** Tuesday, October 21, 2008 6:08 PM

**To:** Chavez, Carl J, EMNRD

**Cc:** Lang, Ruth M; Bebbington, Jon D; Bradford, Johnnie; Lamb, Johnny F

**Subject:** Status of DCP facilities: Pardue Booster Station, Indian Hills Booster Station, former Avalon Gas Plant, Jackson Booster Station and Hobbs Booster Station

Mr. Chavez,

The email message below was returned to me last Friday, with an error stating that your mailbox was full so I am resending it. Please let me know if you have any questions or comments.

Thank you,

Diane E. Kocis

*Sr. Environmental Specialist*

DCP Midstream

303.605.2176 direct line

720.236.2285 cell

[DEKocis@dcpmidstream.com](mailto:DEKocis@dcpmidstream.com)

Mr Chavez,

This email is to provide you with an update of DCPs actions concerning the subject facilities. A DCP contractor began the cleanup of contaminated soil for the Pardue and Indian Hills facilities today (10-17-08). Cleanup of contaminated areas identified by Mr. Leonard Lowe during the August 26, 2008, inspections at the former Avalon Gas Plant facility and the Jackson Booster Station will begin on Thursday, October 23, 2008 (although cleanup has already been performed at Jackson as part of our response to the release of 05-23-08). Additionally, DCP has instituted a procedure to empty the product storage tanks at the 50% fill level.

- 1) **Pardue Booster Station (GW-288):** DCP will renew the discharge permit (at the least expensive permit level because this facility is currently inactive) and remove and dispose of the soil associated with the "one small area" of contamination identified by Leonard Lowe.
- 2) **Former Avalon Gas Plant (GW-024):** DCP will submit a discharge permit closure plan and conduct cleanup of the areas identified during the site inspection.
- 3) **Indian Hills Booster Station (GW-042):** DCP is currently negotiating the sale of the facility tanks. If the tanks are sold, the remaining surface equipment will be removed and DCP will submit a facility closure plan. If the tanks cannot be sold, DCP will renew the discharge permit. In either case, DCP will remove and dispose of the soil associated with the "one area of surface contamination" identified by Leonard Lowe.
- 4) **Jackson Booster Station:** DCP will submit a new (final) C-141 next week after a review of the report prepared by the consultants who managed cleanup of the area identified in the C-141 regarding a release that occurred on May 23, 2008.
- 5) **Hobbs Booster Station (GW-044):** DCP will renew the facility discharge permit. On-going remediation at the site precludes a facility closure plan. Per your email of 10/06/08, DCP will submit a signed discharge permit renewal.

DCP will provide OCD with photo-documentation of the cleanup activities. Please contact me if you have any questions or comments concerning this information.

Thank you,

Diane E. Kocis

*Sr. Environmental Specialist*

DCP Midstream

303.605.2176 direct line

720.236.2285 cell

[DEKocis@dcpmidstream.com](mailto:DEKocis@dcpmidstream.com)

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

**Confidentiality Notice:** This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended

10/22/2008



**Chavez, Carl J, EMNRD**

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, October 02, 2008 4:54 PM  
**To:** 'Lang, Ruth M'; Lowe, Leonard, EMNRD  
**Cc:** Kocis, Diane E; Price, Wayne, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure & Other Facility Inspections Follow-up  
**Attachments:** GW-024 Rambo CS Inspection Photos 8-2008.pdf; GW-042 Indian Hills Inspection Photos.pdf; GW-044 Hobbs Booster inspection photos.pdf; GW-288 Pardue CS Inspection Photos.pdf; Jackson CS inspection photos.pdf

Ms. Lang:

Please find below the DCP facilities that were inspected in August of 2008. Below each facility I inserted a section on "OCD Status" (from prior OCD correspondence from Mr. Chavez), "DCP Status" (from prior DCP Midstream correspondence from Ms. Klein), and "OCD Inspector Lowe's Comments" from the inspections.

The OCD feels that some of the facilities listed below may be closed with the condition that inspection items are adequately addressed, final site cleanup activities are documented, and a final closure report is submitted to Carl Chavez for final site closure approval. Any facility under a monitoring program and/or ground water abatement process with the OCD cannot be closed.

Finally, the Jackson CS requires at a minimum significant corrective action that includes the inspection items listed by Mr. Lowe (see Jackson CS inspection write-up below). The OCD has yet to receive the final C-141 that outlines corrective actions taken to address the initial C-141 submitted, which precipitated the OCD's follow-up of the initial reported release. However, there appears to have been several tank overflow releases that were not reported that need to be addressed. The OCD would consider and may approve in lieu of a discharge permit application or compliance and enforcement case against DCP Midstream LP, a final C-141 form submittal (within 6 months of the date of this e-mail), which must include all corrective actions taken to restore the facility back to its original condition (see disclaimer below). There may be other options that DCP Midstream LP may wish to propose to the OCD? DCP Midstream LP needs to initiate communication with the OCD about any other options soon.

#### GW-24 Avalon Gas Plant

**OCD Status:** Rambo CS. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive.

According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

**DCP Status:** Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this facility. An approval letter, dated April 7, 2004, from the OCD was received by the company. DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004.

**OCD Inspector Lowe Comments** (see inspection attachments w/ photos):

Closure inspection recommendations: DCP Midstream wants to close the Avalon gas plant. This site also has the Rambo compressor station. There are no remaining items left from the gas plant other than the flare stack. Flare stack needs to be removed. There were references to a few pits pertaining to the plant but were all closed up. I could not see any remnants of any pits or ponds on site. The entire area where the plant used to be is being used as a welding area for tubing/piping. I could not verify any soil contamination verification due to working in process at the time. I think they did not want to permit this facility again because they have closed the plant. I do not think

they intended to permit the compressor station. I did inspect the Rambo compressor station.

Concerns: Two AST's had overflowed. The secondary containment still had residual contamination. A dead bird was noted in the secondary containment area. Improper storage of tanks. Questionable storage of used oil. Container for filter area was triple contained but still had discharge on the ground. Debris appears to be on site for longer then 180 days. Ground contamination around engines. Appears to have a crack in the cement containment around engine. Below ground tank has overflowed and contaminated the ground and left unattended. Standing fluids were observed in several secondary containment areas. Discharge on to the ground of black stuff near H2S treater.

Recommend they permit the compressor station. It looked pretty bad. At the time of inspection, the site is not ready to be closed due to the above and the flare stack remaining on site..

GW-42 Indian Hills Gas Plant (last permit 6/18/1997 Stage 1)

OCD Status: Indian Hills Gas Plant (GW-42): OCO records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

DCP Status: Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

Closure inspection recommendations:

1. Significant equipment remains on site, i.e., tanks and underground piping. Removal needed.
2. One area of small surface contamination was noticed from an unused AST that should be cleaned up.

At the time of inspection the site was not viewed to be closed due to the findings.

GW-44 Hobbs Booster Station (OCD has processed the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater Monitoring Results and Additional Site Characterization Activities at the Hobbs Booster Station: Hobbs, New Mexico  
Units C and D Section 4, T 19 S, R 38 E, NMPM

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

At the time of inspection, this facility was far from being closed due to the following:

- 1) Several remaining concrete skids/slabs that need to be removed. Several underground conduits need to be removed;
- 2) Waste on site are located directly on the ground, and
- 3) The facility is under a ground water monitoring program with further investigation and/or corrective action pending.

10/6/2008

All items stated above need to be removed and a facility under permit and ground water monitoring cannot be closed by the OCD..

GW-288 Pardue Compressor Station (OCD has process the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

At the time of inspection, this facility cannot be closed due to the following:

Closure inspection recommendations:

1. Some equipment remains on site that needs to be removed.
2. One small area of surface contamination was noticed and needs to be cleaned up.

At the time of inspection the site was not viewed to be closed due to the above findings.

Jackson CS Inspection:

OCD Status: Inspected due to a release on site and C-141 submittal as follow-up.

DCP Status: This facility does not have a permit.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

Two above-ground storage tanks (AST's) had overflowed and discharged from the secondary containment area on to the ground. Excavation was in progress at the time of inspection

Concern: Below grade tank (BGT) could not be inspected due to the leak detection access point (nut) that could not be removed. Facility workers did not know how to inspect such systems.  
The BGT overflowed.

Recommend that this facility apply for a permit.

The OCD would appreciate your responses for each facility listed above within 10 working days of receipt of this message. Thank you for coordinating the inspections. Please contact me if you have questions or we need to communicate on each site together. Thank you.

*Please be advised that NMOCD approval of any plan or corrective action does not relieve DCP Midstream LP of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve DCP Midstream LP of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

10/6/2008

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Lang, Ruth M [<mailto:RMLang@dcpmidstream.com>]  
**Sent:** Tuesday, August 05, 2008 3:58 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Kocis, Diane E; Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Mr. Lowe,  
I am sorry for not getting back to you sooner; I had been waiting on some information from our folks in Carlsbad.

The proposed date is fine and I am planning on meeting you on August 26<sup>th</sup> and I am keeping August 27<sup>th</sup> open if needed. I propose that we meet on August 26<sup>th</sup> at 8:00 am at DCP's Carlsbad office, which is located at:  
2010 East Orchard Lane  
Carlsbad, NM 88220  
Carlsbad Office Phone 505-234-6400  
(See attachment for map)

Diane Kocis will accompany me. She is taking over supporting our New Mexico operations from Liz Klein, who was recently promoted to manager of another group at DCP.

I will have maps and driving directions to each of the sites and when we meet we can determine in which order you would like to see them. My contact information is provided below. I am looking forward to August 26<sup>th</sup> and please contact me if you have any additional questions.

Respectfully,  
Ruth Lang, P.G.  
DCP Midstream, LP  
Manager of Water Waste and Remediation Programs  
303-605-1713 (direct office)  
303-619-4995 (cell)  
303-605-1957 (fax)

[rmlang@dcpmidstream.com](mailto:rmlang@dcpmidstream.com)

---

**From:** Lowe, Leonard, EMNRD [<mailto:Leonard.Lowe@state.nm.us>]  
**Sent:** Tuesday, August 05, 2008 2:18 PM  
**To:** Lang, Ruth M  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Ruth,

I have not heard from you to confirm the below stated dates for these closure inspections. Please let me know if they work with you or not. When and where shall I meet you?

10/6/2008

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, July 29, 2008 7:59 AM  
**To:** 'Lang, Ruth M'  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Ruth,

Let's plan for an August 26<sup>th</sup> time frame and maybe August 27<sup>th</sup> if we don't finish in one day.

I'm going to assume these inspections will be brief being that they are closure inspections. It all depends on what I see out there.

Where is your office located? Where shall I meet you? What time?

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Lang, Ruth M [<mailto:RMLang@dcpmidstream.com>]  
**Sent:** Monday, July 28, 2008 7:59 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Mr. Lowe,

I am sorry I was in a meeting when you called today. I am available for these inspections on August 19, 20, 21, 26, 27, or 28<sup>th</sup>. I hope one of these dates will be convenient for you. How long do you think you will need to spend at each site? I would like to put together a preliminary schedule and route to reach these four locations.

For your lodging arrangements - 3 of the facilities are within 10-15 miles of Carlsbad and last facility is in the Hobbs area.

Thank you,

**Ruth M. Lang, P.G.**

**DCP Mfidstream, LP**

Manager of Water Waste and Remediation  
EHS - Environmental Protection Department  
303-605-1713 office  
303-619-4995 cell  
303-605-1957 fax

10/6/2008

**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Monday, July 28, 2008 11:58 AM  
**To:** Lang, Ruth M  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** DCP Midstream LP. Closure Inspection

Ms. Ruth Lang,

Good morning.

When are you able to perform these inspections of these 'closing' facilities? Let me know what dates you have planned and will reply to those dates.

Are these locations closer to Hobbs, Carlsbad or Artesia? This will aid me in planning my lodging.

I will be in the office the rest of today, Monday July 28<sup>th</sup> and will be here Tuesday morning, July 29<sup>th</sup>. I will be out of the office the rest of the week to return late Friday afternoon, August 1<sup>st</sup>.

llowe

---

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this

10/6/2008

message. -- This email has been scanned by the Sybari - Antigen Email System.

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

OCD Inspection: DCM Midstream Avalon G.P./Rambo C.S., GW - 024

Inspector(s): Leonard Lowe

Company Rep: Ruth Lang, Diane Kocis, Johnnie Bradford

Date: 08.26.08

Time: 11:30 – 12:50

Page 1



Photo 1: Two AST's with secondary containment.



Photo 2: discharge within the secondary containment area

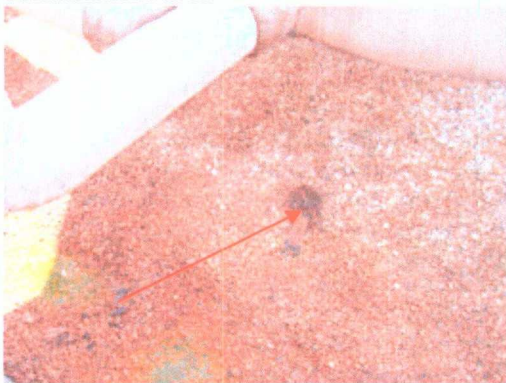


Photo 3: Free liquids still present in secondary containment. Dead fowl.



Photo 4: Free liquids in secondary containment.



Photo 5: Upside down empty barrel.



Photo 6: Barrel located directly on the ground missing its bung.





Photo 7: Used oil filter holding area.



Photo 8: Inside of used oil filter holding area.

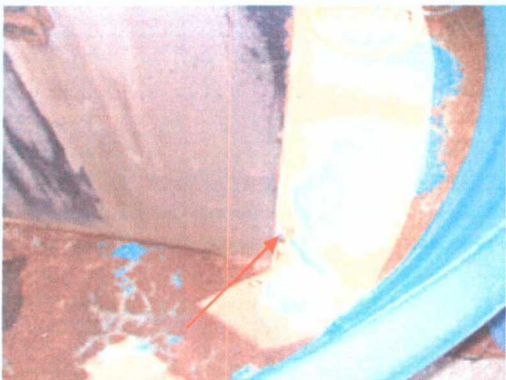


Photo 9: Arrow shows the used oil filter secondary containment plug.



Photo 10: Third containment barrier for used filter holding area missing its bung, with discharge on to the ground.



Photo 11: Avalon gas plant's flare stack located on the south side yard.



Photo 12: Debris and waste located in a bin.



Photo 13: Soil staining south of compressor location.



Photo 14: Ground contaminated around compressor



Photo 15: A secondary containment area with cracks and presence of leaks.



Photo 16: Gravel soiled around compressor.





Photo 17: BGT with discharge around its area.



Photo 20: Fluids are present in leak detection system.



Photo 18: Flange resting over port above BGT. Pressurized, flow of "air".



Photo 19: Leak detection being removed using a tool.



Photo 21: BGT fluids appears to have been discharged from riser.



Photo 22: Secondary containment holding fluids.



Photo 25: Sulfur unit with discharge on to ground.



Photo 23: Another secondary containment full of fluids.



Photo 24: Another secondary container holding fluids.



Photo 26: Sulfur unit with discharge on ground.





Photo 27: Discharge on ground from sulfur unit, allowed to drain.

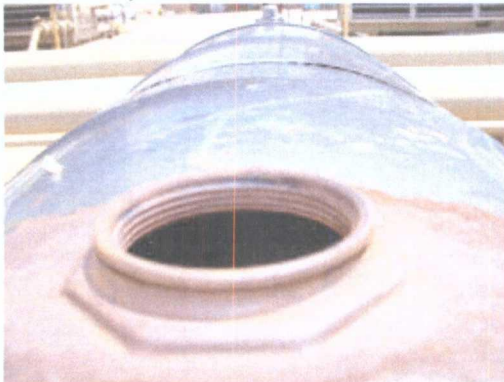


Photo 28: Saddle tank missing bung, two of three tanks missing lid.

**GW - 24**

**GENERAL  
CORRESPONDENCE**

**2008 - Present**

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, October 02, 2008 4:54 PM  
**To:** 'Lang, Ruth M'; Lowe, Leonard, EMNRD  
**Cc:** Kocis, Diane E; Price, Wayne, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure & Other Facility Inspections Follow-up  
**Attachments:** GW-024 Rambo CS Inspection Photos 8-2008.pdf; GW-042 Indian Hills Inspection Photos.pdf; GW-044 Hobbs Booster inspection photos.pdf; GW-288 Pardue CS Inspection Photos.pdf; Jackson CS inspection photos.pdf

Ms. Lang:

Please find below the DCP facilities that were inspected in August of 2008. Below each facility I inserted a section on "OCD Status" (from prior OCD correspondence from Mr. Chavez), "DCP Status" (from prior DCP Midstream correspondence from Ms. Klein), and "OCD Inspector Lowe's Comments" from the inspections.

The OCD feels that some of the facilities listed below may be closed with the condition that inspection items are adequately addressed, final site cleanup activities are documented, and a final closure report is submitted to Carl Chavez for final site closure approval. Any facility under a monitoring program and/or ground water abatement process with the OCD cannot be closed.

Finally, the Jackson CS requires at a minimum significant corrective action that includes the inspection items listed by Mr. Lowe (see Jackson CS inspection write-up below). The OCD has yet to receive the final C-141 that outlines corrective actions taken to address the initial C-141 submitted, which precipitated the OCD's follow-up of the initial reported release. However, there appears to have been several tank overflow releases that were not reported that need to be addressed. The OCD would consider and may approve in lieu of a discharge permit application or compliance and enforcement case against DCP Midstream LP, a final C-141 form submittal (within 6 months of the date of this e-mail), which must include all corrective actions taken to restore the facility back to its original condition (see disclaimer below). There may be other options that DCP Midstream LP may wish to propose to the OCD? DCP Midstream LP needs to initiate communication with the OCD about any other options soon.

#### GW-24 Avalon Gas Plant

**OCD Status:** Rambo CS. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive.

According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

**DCP Status:** Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this

facility. An approval letter, dated April 7, 2004, from the OCD was received by the company.

DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004.

**OCD Inspector Lowe Comments** (see inspection attachments w/ photos):

Closure inspection recommendations: DCP Midstream wants to close the Avalon gas plant. This site also has the Rambo compressor station. There are no remaining items left from the gas plant other than the flare stack. Flare stack needs to be removed. There were references to a few pits pertaining to the plant but were all closed up. I could not see any remnants of any pits or ponds on site. The entire area where the plant used to be is being used as a welding area for tubing/piping. I could not verify any soil contamination verification due to working in process at the time. I think they did not want to permit this facility again because they have closed the plant. I do not think

10/3/2008

they intended to permit the compressor station. I did inspect the Rambo compressor station.

Concerns: Two AST's had overflowed. The secondary containment still had residual contamination. A dead bird was noted in the secondary containment area. Improper storage of tanks. Questionable storage of used oil. Container for filter area was triple contained but still had discharge on the ground. Debris appears to be on site for longer then 180 days. Ground contamination around engines. Appears to have a crack in the cement containment around engine. Below ground tank has overflowed and contaminated the ground and left unattended. Standing fluids were observed in several secondary containment areas. Discharge on to the ground of black stuff near H2S treater.

Recommend they permit the compressor station. It looked pretty bad. At the time of inspection, the site is not ready to be closed due to the above and the flare stack remaining on site..

GW-42 Indian Hills Gas Plant (last permit 6/18/1997 Stage 1)

OCD Status: Indian Hills Gas Plant (GW-42): OCO records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

DCP Status: Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

Closure inspection recommendations:

1. Significant equipment remains on site, i.e., tanks and underground piping. Removal needed.
2. One area of small surface contamination was noticed from an unused AST that should be cleaned up.

At the time of inspection the site was not viewed to be closed due to the findings.

GW-44 Hobbs Booster Station (OCD has processed the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater Monitoring Results and Additional Site Characterization Activities at the Hobbs Booster Station: Hobbs, New Mexico  
Units C and D Section 4, T 19 5, R 38 E, NMPM

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

At the time of inspection, this facility was far from being closed due to the following:

- 1) Several remaining concrete skids/slabs that need to be removed. Several underground conduits need to be removed;
- 2) Waste on site are located directly on the ground, and
- 3) The facility is under a ground water monitoring program with further investigation and/or corrective action pending.

10/3/2008



All items stated above need to be removed and a facility under permit and ground water monitoring cannot be closed by the OCD..

GW-288 Pardue Compressor Station (OCD has process the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

At the time of inspection, this facility cannot be closed due to the following:

Closure inspection recommendations:

1. Some equipment remains on site that needs to be removed.
2. One small area of surface contamination was noticed and needs to be cleaned up.

At the time of inspection the site was not viewed to be closed due to the above findings.

Jackson CS Inspection:

OCD Status: Inspected due to a release on site and C-141 submittal as follow-up.

DCP Status: This facility does not have a permit.

OCD Inspector Lowe Comments (see inspection attachments w/ photos):

Two above-ground storage tanks (AST's) had overflowed and discharged from the secondary containment area on to the ground. Excavation was in progress at the time of inspection

Concern: Below grade tank (BGT) could not be inspected due to the leak detection access point (nut) that could not be removed. Facility workers did not know how to inspect such systems.  
The BGT overflowed.

Recommend that this facility apply for a permit.

The OCD would appreciate your responses for each facility listed above within 10 working days of receipt of this message. Thank you for coordinating the inspections. Please contact me if you have questions or we need to communicate on each site together. Thank you.

*Please be advised that NMOCD approval of any plan or corrective action does not relieve DCP Midstream LP of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve DCP Midstream LP of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

10/3/2008

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Lang, Ruth M [<mailto:RMLang@dcpmidstream.com>]  
**Sent:** Tuesday, August 05, 2008 3:58 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Kocis, Diane E; Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Mr. Lowe,  
I am sorry for not getting back to you sooner; I had been waiting on some information from our folks in Carlsbad.

The proposed date is fine and I am planning on meeting you on August 26<sup>th</sup> and I am keeping August 27<sup>th</sup> open if needed. I propose that we meet on August 26<sup>th</sup> at 8:00 am at DCP's Carlsbad office, which is located at:  
2010 East Orchard Lane  
Carlsbad, NM 88220  
Carlsbad Office Phone 505-234-6400  
(See attachment for map)

Diane Kocis will accompany me. She is taking over supporting our New Mexico operations from Liz Klein, who was recently promoted to manager of another group at DCP.

I will have maps and driving directions to each of the sites and when we meet we can determine in which order you would like to see them. My contact information is provided below. I am looking forward to August 26<sup>th</sup> and please contact me if you have any additional questions.

Respectfully,  
Ruth Lang, P.G.  
DCP Midstream, LP  
Manager of Water Waste and Remediation Programs  
303-605-1713 (direct office)  
303-619-4995 (cell)  
303-605-1957 (fax)

[rmlang@dcpmidstream.com](mailto:rmlang@dcpmidstream.com)

---

**From:** Lowe, Leonard, EMNRD [<mailto:Leonard.Lowe@state.nm.us>]  
**Sent:** Tuesday, August 05, 2008 2:18 PM  
**To:** Lang, Ruth M  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Ruth,

I have not heard from you to confirm the below stated dates for these closure inspections. Please let me know if they work with you or not. When and where shall I meet you?

10/3/2008

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, July 29, 2008 7:59 AM  
**To:** 'Lang, Ruth M'  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Ruth,

Let's plan for an August 26<sup>th</sup> time frame and maybe August 27<sup>th</sup> if we don't finish in one day.

I'm going to assume these inspections will be brief being that they are closure inspections. It all depends on what I see out there.

Where is your office located? Where shall I meet you? What time?

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Lang, Ruth M [<mailto:RMLang@dcpmidstream.com>]  
**Sent:** Monday, July 28, 2008 7:59 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** RE: DCP Midstream LP. Closure Inspection

Mr. Lowe,

I am sorry I was in a meeting when you called today. I am available for these inspections on August 19, 20, 21, 26, 27, or 28<sup>th</sup>. I hope one of these dates will be convenient for you. How long do you think you will need to spend at each site? I would like to put together a preliminary schedule and route to reach these four locations.

For your lodging arrangements - 3 of the facilities are within 10-15 miles of Carlsbad and last facility is in the Hobbs area.

Thank you,

**Ruth M. Lang, P.G.**

**DCP Mfidstream, LP**

Manager of Water Waste and Remediation  
EHS - Environmental Protection Department  
303-605-1713 office  
303-619-4995 cell  
303-605-1957 fax

---

10/3/2008

**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Monday, July 28, 2008 11:58 AM  
**To:** Lang, Ruth M  
**Cc:** Chavez, Carl J, EMNRD  
**Subject:** DCP Midstream LP. Closure Inspection

Ms. Ruth Lang,

Good morning.

When are you able to perform these inspections of these 'closing' facilities? Let me know what dates you have planned and will reply to those dates.

Are these locations closer to Hobbs, Carlsbad or Artesia? This will aid me in planning my lodging.

I will be in the office the rest of today, Monday July 28<sup>th</sup> and will be here Tuesday morning, July 29<sup>th</sup>. I will be out of the office the rest of the week to return late Friday afternoon, August 1<sup>st</sup>.

llowe

**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](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

---

This inbound email has been scanned by the MessageLabs Email Security System.

---

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this

10/3/2008

message. -- This email has been scanned by the Sybari - Antigen Email System.

---

This inbound email has been scanned by the MessageLabs Email Security System.

---



Photo 1: Two AST's with secondary containment.



Photo 2: discharge within the secondary containment area



Photo 3: Free liquids still present in secondary containment. Dead fowl.



Photo 4: Free liquids in secondary containment.



Photo 5: Upside down empty barrel.

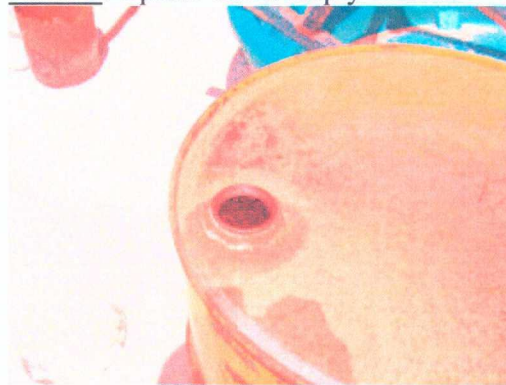


Photo 6: Barrel located directly on the ground missing its bung.





Photo 7: Used oil filter holding area.

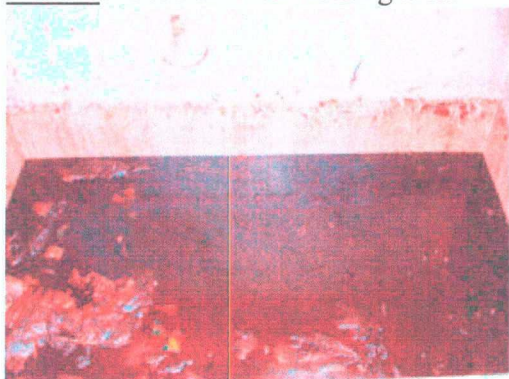


Photo 8: Inside of used oil filter holding area.



Photo 9: Arrow shows the used oil filter secondary containment plug.

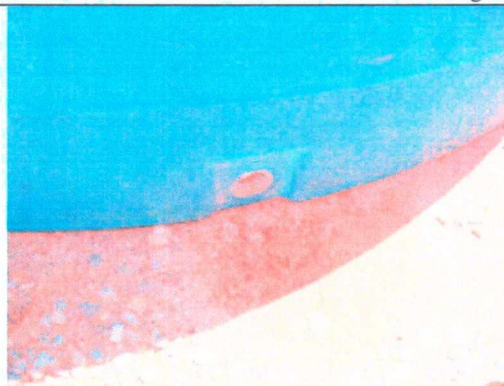


Photo 10: Third containment barrier for used filter holding area missing its bung, with discharge on to the ground.



Photo 11: Avalon gas plant's flare stack located on the south side yard.



Photo 12: Debris and waste located in a bin.



Photo 13: Soil staining south of compressor location.



Photo 14: Ground contaminated around compressor



Photo 15: A secondary containment area with cracks and presence of leaks.



Photo 16: Gravel soiled around compressor.





Photo 17: BGT with discharge around its area.



Photo 20: Fluids are present in leak detection system.



Photo 18: Flange resting over port above BGT. Pressurized, flow of "air".



Photo 19: Leak detection being removed using a tool.



Photo 21: BGT fluids appears to have been discharged from riser.

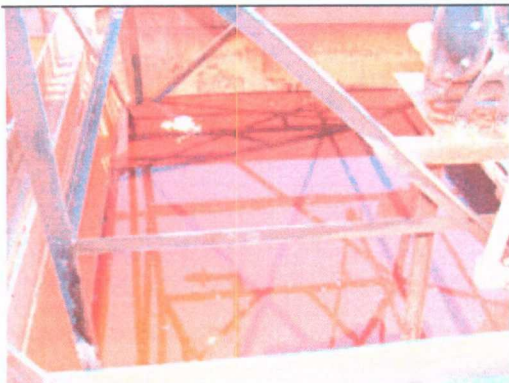


Photo 22: Secondary containment holding fluids.



Photo 23: Another secondary containment full of fluids.



Photo 24: Another secondary container holding fluids.



Photo 25: Sulfur unit with discharge on to ground.



Photo 26: Sulfur unit with discharge on ground.





Photo 27: Discharge on ground from sulfur unit, allowed to drain.



Photo 28: Saddle tank missing bung, two of three tanks missing lid.

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, July 11, 2008 8:56 AM  
**To:** 'Klein, Elisabeth Anne'  
**Cc:** Price, Wayne, EMNRD; Lowe, Leonard, EMNRD  
**Subject:** DCP Midstream LP. Closure of Facilities

Elisabeth:

The OCD requests to visit the discharge permit facilities listed below that DCP Midstream, LP. has are inactive or expressed an interest in closing. The OCD would like to schedule a date for the facility visits in August of 2008. The OCD would prefer to meet with a company representative and then visit the facilities.

GW-24 Avalon Gas Plant

OCD Status: Rambo CS. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive.

According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

DCP Status: Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this facility. An approval letter, dated April 7, 2004, from the OCD was received by the company. DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004.

GW-42 Indian Hills Gas Plant (last permit 6/18/1997 Stage 1)

OCD Status: Indian Hills Gas Plant (GW-42): OCO records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

DCP Status: Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

GW-44 Hobbs Booster Station (OCD has processed the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCO will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater

7/11/2008

Monitoring Results and Additional Site Characterization Activities at the  
Hobbs Booster Station: Hobbs, New Mexico  
Units C and D Section 4, T 19 S, R 38 E, NMPM

GW-288 Pardue Compressor Station (OCD has process the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

Please contact me. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

7/11/2008

Monitoring Results and Additional Site Characterization Activities at the  
Hobbs Booster Station: Hobbs, New Mexico  
Units C and D Section 4, T 19 5, R 38 E, NMPM

GW-288 Pardue Compressor Station (OCD has process the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

Please contact me. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

7/11/2008

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, July 11, 2008 8:56 AM  
**To:** 'Klein, Elisabeth Anne'  
**Cc:** Price, Wayne, EMNRD; Lowe, Leonard, EMNRD  
**Subject:** DCP Midstream LP. Closure of Facilities

Elisabeth:

The OCD requests to visit the discharge permit facilities listed below that DCP Midstream, LP. has are inactive or expressed an interest in closing. The OCD would like to schedule a date for the facility visits in August of 2008. The OCD would prefer to meet with a company representative and then visit the facilities.

#### GW-24 Avalon Gas Plant

OCD Status: Rambo CS. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive.

According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

DCP Status: Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this facility. An approval letter, dated April 7, 2004, from the OCD was received by the company. DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004.

#### GW-42 Indian Hills Gas Plant (last permit 6/18/1997 Stage 1)

OCD Status: Indian Hills Gas Plant (GW-42): OCO records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

DCP Status: Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

#### GW-44 Hobbs Booster Station (OCD has processed the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCO will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater

7/11/2008



February 12, 2008

RECEIVED

2008 FEB 21 PM 2 30

DCP Midstream  
370 17th Street, Suite 2500  
Denver, CO 80202  
303-595-3331

Mr. Carl J. Chavez  
Environmental Bureau  
Oil Conservation Division  
NM Energy, Minerals & Natural Resources Dept.  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

Re: Response to January 22, 2008 Email From Carl Chavez

Dear Mr. Chavez:

Below are DCP Midstream, LP's (DCP) responses to the questions outlined in your email, dated January 22, 2008 concerning the status of discharge permits for various DCP facilities. The email message responded to a DCP letter dated January 31, 2007. As reference a copy of your email and the DCP letter are in Attachment 1.

1) *Pure Gold "28" CS (GW-150): The permit expired on 11/22/2003 and is still active. Our records reflect a draft permit was issued to ConocoPhillips (COP) on January 23, 2004, but the final permit was never signed and returned to OCD with the \$1,700 flat fee. Please find attached a copy of the permit (COP), please sign and return the final permit with the \$1,700 to OCD. We apologize for the changes; however, considering the situation, it is the most expedient means of resolving the discharge plan for the facility.*

**Response:** The permit has been sent to the Asset Manager for his signature and will be sent, along with a check for \$1,700.00, to the Oil Conservation Division upon receipt of the signed copy.

2) *Rambo C.S. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive. According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.*

**Response:** A closure plan for pits at the Rambo Compressor Station (GW-24) was submitted as you stated. The pits were remediated, per OCD's approval and instructions, and the site was dismantled. DCP understands that the approved pit closures documents constituted the final closure plan and no further action is required.

3) *Apex C.S. (GW-163): Currently in litigation.*

**Response:** Agreed

4) *Hobbs Gas Plant (GW-175): Currently in litigation.*

**Response:** Agreed.

5) *Eunice Gas Plant (GW-16): According to OCD records GW-009 and GW-016 were merged into GW-16. The permit expires 4/25/2009 and is active. No action needed at this time.*

**Response:** Noted.





6) CP-1 C.S. (GW-139): The permit was closed.

**Response:** Agreed.

7) Indian Hills Gas Plant (GW-42): OCD records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

**Response:** As explained in our January 31, 2007 letter, the Indian Hills Gas Plant (GW-42) was dismantled and only a meter facility and pig launcher exist on site. DCP notified the OCD on December 10, 2001 regarding the status of the site.

#### **Miscellaneous Discharge Plans:**

1) Lee C.S. (GW-227): The permit expired on 12/28/2005 and is listed as inactive. Also, our records show LG&E Hadson Gillespie/Feagan C.S. for the facility name. According to an OCD e-mail msg. dated 12/21/2006, and DCP correspondence dated 12/28/2006, the facility was going to remain inactive and a closure plan was to be submitted to permanently close the facility. Upon receipt of the closure plan information and verification that no contamination exists at the facility, and some photos to display what the site currently looks like, the OCD was going to consider closure of the facility. The OCD requests to know the status of operations at the facility?

**Response:** On February 6, 2007, Ruth Lang, Manager Water/Waste, DCP forwarded to you and Mr. Wayne Price an email message from Steve Weathers, Remediation Group, DCP, dated February 5, 2007. The email from Mr. Weathers confirmed the conversation of February 1, 2007 between Mr. Weathers and Mr. Wayne Price, during which Mr. Price gave verbal approval to the Lee Compressor Station Closure Work Plan. The Plan was dated and submitted to the OCD on September 5, 2006. A copy of the email is in Attachment 2.

Additionally, you stated that the following submitted plans were determined to be administratively complete: Hobbs Booster Station (GW-44), Magnum Compressor Station (GW-127), Carrasco Compressor Station (GW-137) and Pardue Compressor Station (GW-288). Based on your statement, DCP has published public notices for these facilities in accordance with Paragraph (2) of Subsection C of 20.6.2.3108 NMAC, in local papers. DCP will forward you affidavits of publication when received from the newspapers.

Please let me know if you have any other questions regarding these issues.

Sincerely,  
DCP MIDSTREAM, LP

A handwritten signature in black ink, appearing to read "Elisabeth Klein".

Elisabeth Klein  
Principal Environmental Specialist

cc:

Mr. Wayne Price, OCD



## ATTACHMENT 1



**DCP Midstream**  
370 17th Street, Suite 2500  
Denver, CO 80202  
303-595-3331

January 31, 2007

**UPS**

**PRIORITY OVERNIGHT** (Tracking Number IZ F46 915 22 1005 083 4)

Mr. Wayne Price  
New Mexico Energy, Minerals  
& Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Subject: Renewal of Expired Discharge Plans as Requested by Mr. Carl Chavez

Dear Mr. Price:

On December 15, 2006 DCP MIDSTREAM LP (formerly Duke Energy Field Services LP) received an email from Mr. Carl Chavez, Oil Conservation Division (OCD) stating that the discharge permits for the following 16 facilities had expired and that they must be renewed: Pure Gold 28 Compressor Station (GW-150), Antelope Ridge Gas Plant (GW-162), Malaga Compressor Station (GW-167), Cotton Draw Compressor Station (GW-311), Hat Mesa Compressor Station (GW-316), Boot Leg Compressor Station (GW-176), Lee Compressor Station (GW-227), Feagen Booster Station (GW-168), Maljamar Compressor Station (GW-177), Wonton Compressor Station (GW-178), Avalon Gas Plant (GW-24), Apex Compressor Station (GW-163), Hobbs Gas Plant (GW-175), Eunice Gas Plant (GW-16), CP-1 Compressor Station (GW-139) and Indian Hills Gas Plant (GW-42). As DCP MIDSTREAM LP has discussed previously, the company has not renewed these permits because none of the facilities listed actually discharge effluent or leachate so that they may move directly or indirectly into ground water, requiring a discharge permit under 20.6.2.3104 NMAC and because it does not believe that the New Mexico Water Quality Act, NMSA 1978, §§74-6-1 to 17, and the regulations adopted under that act are applicable to compressor stations.

However, as discussed below, DCP MIDSTREAM LP agrees to submit renewal applications for most of the listed facilities and provide information for the other facilities to demonstrate that the facilities are closed and no longer capable of discharging or have current discharge plans.

DCP MIDSTREAM LP is not submitting renewal applications for Hobbs Gas Plant or Apex Compressor Station because the obligation to obtain discharge permits for these facilities is currently in litigation. DCP MIDSTREAM LP is willing to discuss the measures being implemented by DCP MIDSTREAM LP to assure that discharges do not occur and that ground water is protected at these facilities. Additionally, on September 22, 2006, DCP Midstream LP discussed with you, Daniel Sanchez and Carl Chavez, the company's development of best management practices (BMPs) for facilities listed in the consent orders and you indicated that it would be discussed within the agency. DCP Midstream LP has not heard anything regarding our suggestions; however, we are ready to proceed ahead with working on the BMPs this year. We would like to schedule a meeting with you, as previously requested, to discuss moving ahead with implementing the BMPs with you.

#### **Permit Renewals To Be Submitted**

DCP MIDSTREAM LP agrees to submit discharge permit renewal applications for the following facilities by March 1, 2007: Antelope Ridge Gas Plant (GW-162), Malaga Compressor Station (GW-167), Cotton Draw Compressor Station (GW-311), Hat Mesa Compressor Station (GW-316), Boot Leg Compressor Station (GW-176), Maljamar Compressor Station (GW-177) and Wonton Compressor Station (GW-178). In addition, DCP MIDSTREAM LP will submit renewal applications for the Lee Compressor Station (GW-227) and Feagen Booster Station (GW-168) even though closure plans have been submitted to the OCD for these facilities.



**Permit Renewals That Will Not Be Submitted**

DCP MIDSTREAM LP will not submit permit renewals for the remaining seven (7) facilities referred to in the December 15, 2006 email.

1. Pure Gold "28" Compressor Station (GW-150) - A renewal application for this facility was previously submitted and received by the OCD in 2003. Copies of this documentation are in Attachment 1.
2. Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this facility. An approval letter, dated April 7, 2004, from the OCD was received by the company. DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004. Copies of this documentation are in Attachment 2.
3. Apex Compressor Station (GW-163) - DCP MIDSTREAM LP's obligation to obtain a discharge permit for this facility is currently in litigation; so, no renewal application will be submitted.
4. Hobbs Gas Plant (GW-175) - DCP MIDSTREAM LP's obligation to obtain a discharge permit for this facility is currently in litigation; so, no renewal permit will be submitted.
5. Eunice Gas Plant (GW-16) - DCP MIDSTREAM LP has an effective discharge permit for this facility, which does not expire until April 25, 2009. Therefore, no renewal application is required at this time. A copy of this discharge permit is in Attachment 3.
6. CP-1 Compressor Station (GW-139) - This facility was dismantled and only a meter run exists on the site. The OCD sent a closure letter to the company on October 15, 2003. A copy of the closure letter is in Attachment 4.
7. Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

By agreeing to submit the renewal applications and the application filing fees, DCP MIDSTREAM LP is not waiving its position that no discharge permits are required for these facilities.

If you have any questions concerning DCP MIDSTREAM LP's position or the information outlined above, please contact me at (303) 605-1713. Please send all correspondence regarding these renewals to my attention at 370 17<sup>th</sup> Street, Suite 2500, Denver, CO 80202.

Sincerely,  
**DCP MIDSTREAM LP**  
(Formerly Duke Energy Field Services, LP)

Ruth M. Lang  
Manager of Water & Waste Programs

Enclosures

cc: Mr. Carl Chavez, OCD

## Klein, Elisabeth A

---

**From:** Chavez, Carl J, EMNRD [CarlJ.Chavez@state.nm.us]  
**Sent:** Tuesday, January 22, 2008 4:53 PM  
**To:** Klein, Elisabeth A  
**Cc:** Price, Wayne, EMNRD  
**Subject:** FW: DCP Midstream, LP Status of Discharge Plans (Active, Inactive & Closed) & Other Miscellaneous Discharge Plans  
**Attachments:** GW-150 DP.tif

Elisabeth:

Re: DCP Midstream LP Letter of January 31, 2007 Renewal of Expired Discharge Plans as Requested by Carl Chavez & Other DPs currently being processed

Hi. Please find below the status of the DPs, etc. that were included in the above referenced letter.

- 1) Pure Gold "28" CS (GW-150): The permit expired on 11/22/2003 and is still active. Our records reflect a draft permit was issued to ConocoPhillips (COP) on January 23, 2004, but the final permit was never signed and returned to OCD with the \$1,700 flat fee. Please find attached a copy of the permit (COP), please sign and return the final permit with the \$1,700 to OCD. We apologize for the changes; however, considering the situation, it is the most expedient means of resolving the discharge plan for the facility.
- 2) Rambo C.S. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive. According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.
- 3) Apex C.S. (GW-163): Currently in litigation.
- 4) Hobbs Gas Plant (GW-175) currently in litigation.
- 5) Eunice Gas Plant (GW-16): According to OCD records GW-009 and GW-016 were merged into GW-16. The permit expires 4/25/2009 and is active. No action needed at this time.
- 6) CP-1 C.S. (GW-139): The permit was closed.
- 7) Indian Hills Gas Plant (GW-42): OCD records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

### Discharge Plan Renewals processed tomorrow are:

- 1) Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.
- 2) Magnum C.S. (GW-127): OCD records indicate that the facility is active with an expiration date of 2/3/2008. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow.
- 3) Carrasco C.S. (GW-137): OCD records indicate that the facility is active with an expiration date of 4/28/2008. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow.

2/13/2008

4) Pardue C.S. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

**DCP Midstream, LP Discharge Plans awaiting final signature of discharge plan with \$1,700 final fee:**

1) Northeast Carlsbad C.S. (GW-280)

**Miscellaneous Discharge Plans:**

1) Lee C.S. (GW-227): The permit expired on 12/28/2005 and is listed as inactive. Also, our records show LG&E Hadson Gillespie/Feagan C.S. for the facility name. According to an OCD e-mail msg. dated 12/21/2006, and DPC correspondence dated 12/28/2006, the facility was going to remain inactive and a closure plan was to be submitted to permanently close the facility. Upon receipt of the closure plan info. and verification that no contamination exists at the facility, and some photos to display what the site currently looks like, the OCD was going to consider closure of the facility. The OCD requests to know the status of operations at the facility?

Please provide me with an update on each of the above items and contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Chavez, Carl J, EMNRD

**Sent:** Thursday, January 17, 2008 2:27 PM

**To:** 'Klein, Elisabeth A'

**Subject:** Northeast Carlsbad Compressor Station (GW-280) Signed Discharge Plan w/ \$1,700.00 Renewal Fee

Ms. Klein:

Good afternoon. I am now working on DCP Midstream L.P. applications, etc.

NMOCD records show that we never received the final signed DP for GW-280 (NE Carlsbad C.S.) with the \$1,700.00 renewal fee. NMOCD mailed a letter with the attached final discharge plan for DCP Midstream L.P.'s signature and remittance w/ final payment; however, we did not receive it. Please locate the final discharge plan that was dated June 13, 2007, sign it, and remit it to me with the final \$1,700.00 renewal fee so we may update our records and finalize the permit at this facility.

I have been in receipt of DCP Midstream L.P. Discharge Plans (GWs-24, 44, 127, 137, 150, and 288). I am planning to process them by next Wednesday, January 23, 2008. I will let you know if I need anything based on my review.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462

2/13/2008



## ATTACHMENT 2

## Klein, Elisabeth A

**From:** Lang, Ruth M  
**Sent:** Tuesday, February 06, 2007 2:33 PM  
**To:** wayne.price@state.nm.us  
**Cc:** carlj.chavez@state.nm.us; Klein, Elisabeth A; Ward, Lynn C; Weathers, Stephen W  
**Subject:** FW: DCP Lee Compressor Station (GW-227) and DCP Feagen Booster Station (GW-168)  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Mr. Price:

DCP Midstream would like to update our letter dated January 31, 2007, regarding renewal of expired discharge plans, to reflect the discussions that you had recently with Mr. Stephen Weathers of DCP Midstream's Remediation Group. As such we will not be submitting discharge plan renewals for Lee Compressor Station (GW-227), based on your discussions on February 1, 2007, or for the Feagen Booster Station (GW-168) due to the fact that this facility has an approved closure plan and is inactive.

Please let us know if you have any questions. Thank you.

Sincerely,

**Ruth M. Lang, P.G.**

Manager of Water/Waste Permitting and Programs  
EHS/Environmental Protection Department  
DCP Midstream, LP (formerly DEFS)  
303-605-1713 office  
303-619-4995 cell  
303-605-1957 fax

Attention: Effective 1/1/07 new company name is DCP Midstream LP and new email address is [rmlang@dcpmidstream.com](mailto:rmlang@dcpmidstream.com)

---

**From:** Weathers, Stephen W  
**Sent:** Monday, February 05, 2007 9:53 AM  
**To:** Wayne.Price@state.nm.us  
**Cc:** Chavez, Carl J, EMNRD; Klein, Elisabeth A; Ward, Lynn C; Lang, Ruth M  
**Subject:** DCP Lee Compressor Station (GW-227)

Mr. Price

This email is a follow up on our Lee Compressor Station (GW-227) discussion in the Feb. 1, 2007 meeting. Based on our conversation, DCP Midstream, LP (DCP) has been given verbal approval on the Lee Compressor Station Closure Workplan dated September 5, 2006. As always, DCP will provide you and the district office with a 48 hour notification before DCP or contractor complete any of the closure activities at the site. Also in the discussions, it is my understanding that DCP will not be required to renew the Lee Compressor Station (GW-227) Discharge Plan since the site is not active. I appreciate you working with DCP on this site with regards too the discharge plan renewal.

If you have any questions please give me a call.

Thanks again.

Stephen Weathers  
Sr. Environmental Specialist  
DCP Midstream

2/13/2008



303-605-1718 (Office)  
303-619-3042 (Cell)

Effective 1/1/07 my email address has changed to [swweathers@dcpmidstream.com](mailto:swweathers@dcpmidstream.com)

2/13/2008