

GW - 33

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
1996-1989

MEMORANDUM OF MEETING OR CONVERSATION

CERT. MAIL NO. P-288-258-682

☐ Telephone ☒ Personal

Time 9:30 AM

Date 11-12-96

Originating Party

Other Parties

Mr. James Fleak - Western Gas  
Resources, Inc. (Returned Phone Call)

Pat Sanchez - OCD

Subject

San Juan River Natural Sweetening Plant.  
Discharge Plan GW-033 Renewal.

Discussion

- ① Closure Plan section 5.0 pg. 14 - Need a commitment for the entire facility regarding 20 NMAC. 6.2.3107.A.11 "A closure Plan..."
- ② Any Non-Exempt streams must be characterized prior to commingling for Hazardous Constituents/characteristics based on Constituents of Concern/process knowledge - in terms of RCRA subtitle C. (40 CFR 261)
- ③ The Lab waste also needs to be characterized in terms of RCRA subtitle C (40 CFR 261). Also, how is the lab waste stored/handled at the facility, and how is it disposed?

Conclusions or Agreements

④ Mr. Fleak will submit additional information which will address ①, ②, ③ as part of the discharge plan renewal.

Distribution File, Denny Faust.

Signed

*Robert W. Gandy*

P 288 258 682

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to West. Gas. Mr. Fleck	
Street & Number 6W-233 WEST GAS. REN. PWS	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

**Pat Sanchez**

---

**From:** Denny Foust  
**Sent:** Tuesday, November 12, 1996 7:51 AM  
**To:** Pat Sanchez  
**Subject:** WESTERN GAS RESOURCES SAN JUAN RIVER PLANT  
**Importance:** High

NOVEMBER 12, 1996

THIS SEEMS TO BE A SATISFACTORY DISCHARGE PLAN EXCEPT FOR SOME MORE DETAIL UNDER SPILL REPORTING, CANNOT HAUL EXCESS MIXED EFFLUENT TO A CLASS II WELL, AND ANOTHER PARAGRAPH UNDER CLOSURE COMMITTING TO CLOSE THE FACILITY AS PER RULES AND REGULATIONS.

## **NOTICE OF PUBLICATION**

### **STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following renewal application and discharge plan applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(GW-033) - Western Gas Resources, Inc., Mr. James Fleak, (303)-452-5603, 12200 N. Pecos Street, Denver, CO, 80234-3439, has submitted a Discharge Plan Renewal Application for their "San Juan River" Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Plant process waste water is discharged to a double lined surface evaporation pond, designed with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 4,500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

**(GW-271) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan" compressor station located in the SW/4 NW/4, Section 29, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 570 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

**(GW-272) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan B-8" compressor station located in the SE/4 SW/4, Section 33, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 410 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

**(GW-273) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Moore" compressor station located in the NE/4 SW/4, Section 9, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most**

likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 210 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

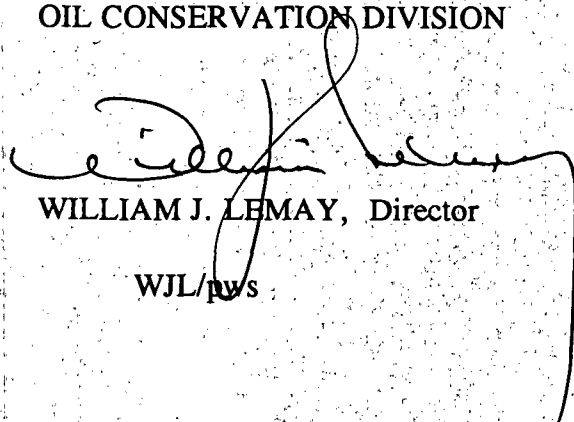
(GW-274) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Pritchard Straddle" compressor station located in the SW/4 SW/4, Section 1, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 40 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of November, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

WJL/pws

S E A L

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

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

Revised 12/1/

Submit Original  
Plus 1 Copy  
to Santa  
Fe  
1 Copy to appropriate  
District Office

6W-023

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,  
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS  
(Refer to the OCD Guidelines for assistance in completing the application)

☐ New

☒ Renewal

☐ Modification

1. Type: Gas Sweetening Plant/Sulfur Recovery
2. Operator: Western Gas Resources, Inc.  
Address: 12200 N. Pecos Street  
Contact Person: James Fleak Phone: (303) 452-5603
3. Location:        /4        /4 Section 1 Township 29 N Range 15 W  
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site. Western Gas Resources  
same as above
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.  
see discharge plan
6. Attach a description of all materials stored or used at the facility.  
see discharge plan
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. see discharge plan
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.  
see discharge plan
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.  
see discharge plan
10. Attach a routine inspection and maintenance plan to ensure permit compliance.  
see discharge plan
11. Attach a contingency plan for reporting and clean-up of spills or releases.  
see discharge plan
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.  
same as previous plan
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. Commitment to prepare plan as necessary only.  
No plans to close at this time.
14. CERTIFICATION

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

NAME: James E. Fleak, P.E. Title: Sr. Environmental Engineer  
Signature: James E. Fleak Date: 10/31/96

**6w-033**  
**RECEIVED**

NOV 07 1996

Environmental Bureau  
Oil Conservation Division

**DISCHARGE PLAN**  
**FOR THE**  
**SAN JUAN RIVER**  
**NATURAL GAS SWEETENING PLANT**  
**SAN JUAN COUNTY, NEW MEXICO**

Submitted to the New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division by

**Western Gas Resources, Inc.**

**October 1996**





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

September 3, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-606**

Mr. James Fleak, P.E.  
Sr. Environmental Engineer  
Western Gas Resources, Inc.  
12200 N. Pecos St.  
Denver, CO 80234-3439

**RE: Discharge Plan GW-033 Renewal  
San Juan River Gas Processing Plant  
San Juan County, New Mexico**

Dear Mr. Fleak:

On December 29, 1986, the groundwater discharge plan, GW-033, for the San Juan River Gas Processing Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). The plan was subsequently renewed on December 20, 1991. This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on December 29, 1996.**

On August 29, 1996 you were notified of the upcoming expiration by telephone from Pat Sanchez of my OCD Staff. If the discharge plan renewal is not received and approved by the OCD by December 29, 1996, your facility will be required to cease operations until the OCD receives and approves the discharge plan renewal.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

Mr. James Fleak, PE  
San Juan River Gas Plant  
September 3, 1996  
Page 2

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed.)


The discharge plan renewal application for the San Juan River Gas Processing Plant is subject to the WQCC Regulations 3114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat fee of \$1667.50 for gas processing plants.

The (50) dollar filing fee is to be submitted with discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

If you no longer have any actual or potential discharges a discharge plan is not needed, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Pat Sanchez at (505) 827-7156.

Sincerely,

  
Roger C. Anderson  
Environmental Bureau Chief

RCA/pws

xc: Mr. Denny Foust - Environmental Geologist.

P 288 258 606

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided. *62-733*  
Do not use for International Mail (See reverse)

Sent to <i>West Gas - Mr. Fleak</i>	
Street & Number <i>Renewal Letter</i>	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

OIL CONSERVATION DIVISION  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

August 22, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-176-012-175**

Ms. Shauna Doven  
Western Gas Resources, Inc.  
12200 N. Pecos St.  
Denver, Colorado 80234-3439

**Re: Discharge Plan (GW-33)**  
**San Juan River Gas Plant**  
**San Juan County, New Mexico**

Dear Ms. Doven:

The Oil Conservation Division (OCD) has received Western Gas Resources, Inc.'s (WGR) request dated July 25, 1995 requesting approval to spread activated alimina molecular sieve, generated at the above referenced facility, onto the ground and/or roads at the San Juan River Gas Plant.

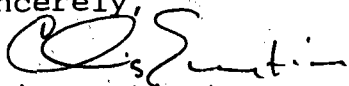
The request is hereby approved with the following conditions:

1. The molecular sieve cannot be discharged outside the boundaries of the above referenced facility proper.
2. The molecular sieve will be spread in lifts no more than 2".
3. The molecular sieve will not be allowed to enter any drainage, arroyos, streams or any water ways.

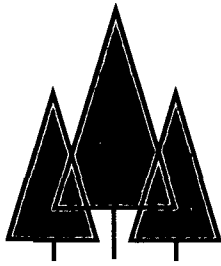
Please be advised this approval does not relieve Hadson of liability should their operation result in pollution of surface water, ground water or the environment. In addition, OCD approval does not relieve WGR of responsibility for compliance with other federal, state and/or local regulations.

If you have any questions call me at (505) 827-7153.

Sincerely,

  
Chris Eustice  
Environmental Geologist

cc: OCD Aztec Office



1995 JUL 24 PM 6 52

## Western Gas Resources, Inc.

July 21, 1995

Mr. Chris Eustice  
New Mexico Oil Conservation Division  
2040 South Pacheco Road  
Santa Fe, New Mexico 87505

Dear Mr. Eustice:

Western Gas Resource's (Western) hereby requests approval to spread molecular sieve on the roads at Western's San Juan River Plant outside of Kirtland, New Mexico.

Molecular sieve consists of activated alumina, a common fired clay material in pelletized form, which is used as a desiccating agent. While contained in a vessel, water wet natural gas permeates through this medium which strains the water from the gas. When the mole sieve material is water saturated, hot dry natural gas is recycled back through the material to strip the water away. This recycle procedure is also employed prior to opening the vessel for replacing the mole sieve which results in the removal of a dry powder.

Enclosed you will find an analysis that was performed on some molecular sieve at another Western location. As you can see the material is dry and has no hazardous characteristics.

Western would like to remove the molecular sieve within the next couple of weeks, as the vessel is going to be removed from the San Juan River Plant and utilized at a new facility in Wyoming. Thank you in advance for your consideration in this matter. If you have any questions or need further information, please contact me at (303)452-5603.

Sincerely,

Shauna Doven *SD*  
Environmental Specialist, Rocky Mountain Region

attachment:

cc: Ed Aabak  
Kent McEvers  
Lee Hinman  
Tony Marques  
Ken Choyce

ENVIRONMENTAL GULF STATES LABORATORIES, INC.  
4530 BARKSDALE BLVD  
BOSSIER CITY, LOUISIANA 71112

(318) 742-0166

FAX (318) 747-4981

CUST ID: 127

DATE: 10/19/94

REPORT: 10037-2

WESTERN GAS RESOURCES  
12200 N. PECOS STREET  
DENVER, CO 80234

SAMPLE: F LOCATION: WESTERN GAS RESOURCES  
DATE COLLECTED: 10/07/94  
TIME COLLECTED: 1251  
COLLECTED BY: SCE VOLATILES DATE: 2248 12/20/93  
CUSTODY SEAL YES: X MATRIX: SOLID

TCLP REPORT FORM

REPORT DATE: 10/20/94

UNIT OF MEASURE: ppm (mg/l)

PARAMETER	RESULTS	LIMITS	TIME/DATE ANALYSES	METHOD	TECH
METALS					
D004 Arsenic	<0.01	5.0	0935 10/18/94	7060	CSK
D005 Barium	<10.0	100.0	0935 10/14/94	7080	CSK
D006 Cadmium	<0.1	1.0	1210 10/14/94	7130	CSK
D007 Chromium	<0.1	5.0	0830 10/14/94	7191	CSK
D008 Lead	<1.0	5.0	1155 10/19/94	7421	CSK
D009 Mercury	<0.002	0.2	1725 10/19/94	7470	CSK
D010 Selenium	<0.01	1.0	0815 10/18/94	7740	CSK
D011 Silver	<1.0	5.0	1020 10/14/94	7760	CSK

Volatile Organic Compound Parameter	Tech: JFW Results	Method 8260 Detection Limit	Regulatory Level
D018 Benzene	<0.01	0.01	0.500
D019 Carbon Tetrachloride	<0.01	0.01	0.500
D021 Chlorobenzene	<0.01	0.01	100.0
D022 Chloroform	<0.01	0.01	6.000
D027 1,4 Dichlorobenzene	<0.01	0.01	7.500
D028 1,2 Dichloroethane	<0.01	0.01	0.500
D029 1,1 Dichloroethylene	<0.01	0.01	0.700
D035 Methyl Ethyl Ketone	<0.05	0.05	200.0
D039 Tetrachloroethylene	<0.01	0.01	0.700
D040 Trichloroethylene	<0.01	0.01	0.500
D043 Vinyl Chloride	<0.01	0.01	0.200

ENVIRONMENTAL GULF STATES LABORATORIES, INC.  
4530 BARKSDALE BLVD  
BOSSIER CITY, LOUISIANA 71112

(318) 742-0166

FAX (318) 747-4981

REPORT: 10037-2

SAMPLE: F

PAGE 2

D001 Ignitability >230°F  
Paint Filter <1.0

Extraction 1311: Time/Date Begun: 1645 10/10/94  
Time/Date Ended: 0930 10/11/94

Protocol : Extraction of TCLP leachate procedure is performed with Method 3520 from SW846. This is a liquid-liquid extraction using methylene chloride as the extracting solvent. 57 CFR 55114 (NOVEMBER 24, 1992).

Phillip L. Clancy, Ph.D.  
Technical Director

NA= NOT APPLICABLE  
ND= NONE DETECTED  
NC= NON CONTRACTED

278  
Environmental Gulf States Laboratories  
4530 Barksdale Blvd. Bossier City, LA. 71112  
(318) 742-0165 (800) 255-6110

CUSTOMER INFORMATION

Company:  
Address:

*Water Gas Resource*

Attn:

P.O. #:

E.G.S.L. #:

SAMPLER:

*SLF*

PROJECT NAME:

LOCATION:

E.G.S.L. #	SAMPLE DESCRIPTION	SAMPLING		COMPOSITE	METHOD PRESERVED	ANALYSIS REQUEST																									
		DATE	TIME			DUPLICATE	GRAB	DATE	TIME	AMOUNT COLLECTED	LIQUID	SOLID	SLUDGE	AIR	HCl	HNO3	H2SO4	ICE	OTHER	BTEX	TPH-GAS	TPH-DIESEL	TPH 418.1	TCLP:	METALS	VOA	SEMI-VOLATILES	PEST. / HERB.	R.C.I.	Ignitability	Paint Filter
		10/7																													
100371	D	10/7	1220						/						/																
100372	B	10/7	1212						/						/																
100373	C	10/7	1215						/						/																
100374	D	10/7	1225						/						/																
100375	E	10/7	1208						/						/																
100372	F (Mol. Sieve)	10/7	1251																		/	/	XXX					/	/		

REMARKS:

CUSTODY

RECORDED

REMOVED BY

*M.P. McLeod*

RECEIVED BY

*G. Elliott*

RECEIVED BY

*C. Elliott*

(E) BEGIN (E) END

DATE

*10/7/94*

TIME

*1252*

DATE

*10/7/94*

TIME

*1252*

DATE

*10/7/94*

TIME

*1820*



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

May 28, 1992

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-670-683-644**

Ms. Jennifer Fowler-Propst  
Field Supervisor  
U.S. Fish & Wildlife Service  
Suite D., 3530 Pan American Highway, NE  
Albuquerque, New Mexico 87107

**RE: Discharge Plan GW-33 Modification  
Western Gas Resources, Inc.  
San Juan River Gas Processing Plant**

*Fowler-Propst*  
Dear Ms. ~~Devon~~:

The Oil Conservation Division (OCD) has received your May 15, 1992 response to the notice of publication dated on or about April 17, 1992, regarding the GW-33 discharge plan modification for the San Juan River Gas Processing Plant. The modification was for the addition of a non-hazardous solid waste landfill site.

Western Gas Resources Inc. (WGR) has withdrawn their application for modification of the discharge plan. The attached letter dated May 18, 1992, confirms that WGR no longer wishes to construct a landfill at their San Juan River Gas Processing Plant.

If you have any questions please do not hesitate to call me at (505) 827-5884.

Sincerely,

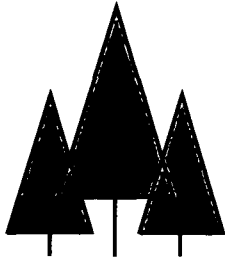
*Kathy M. Brown*

Kathy M. Brown  
Geologist

xc: Denny Foust, OCD Aztec Office



'92 MAY 26 AM 9 47



## Western Gas Resources, Inc.

May 18, 1992

Mr. Roger Anderson  
Environmental Engineer  
Oil Conservation Division  
P.O. Box 2088  
Land Office Building  
Santa Fe, NM 87504-2088

Dear Mr. Anderson:

Due to the requirements necessary to receive approval from the OCD to construct a landfill at Western's San Juan River Gas Plant, Western has opted to dispose of the cooling tower wood off-site. Therefore Western will not need a modification to our original Discharge Plan.

The waste profile for the wood has been approved for disposal at Farmington's Waste Management Facility. Western will continue to dispose of dry oil and amine filters at Waste Management's Facility.

If you have further questions or need more information, please contact me at (303)452-5603.

Sincerely,

Shauna Doven  
Environmental Engineer

cc: Kent McEvers - Plant Supervisor  
Gary Davis - V.P. Engineering/Environmental  
Deb Albert - Sr. Environmental Engineer



OIL CONSERVATION DIVISION  
RECEIVED

UNITED STATES '92 MAY 18 AM 8 53  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
Ecological Services  
Suite D, 3530 Pan American Highway, NE  
Albuquerque, New Mexico 87107

May 15, 1992

Mr. Roger Anderson  
Environmental Bureau  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

Dear Mr. Anderson:

This responds to the notice of publication dated on or about April 17, 1992, regarding the Oil Conservation Division discharge permit applications GW-33 and GW-54 on fish, shellfish, and wildlife resources in New Mexico.

The U.S. Fish and Wildlife Service (Service) has determined there are no wetlands or other environmentally sensitive habitats, plants, or animals that will be adversely affected by the issuance of the following discharge.

GW-54 Meridian Oil, Inc., Wingate Gas Processing Plant, Sections 16 and 17, T15N, R17W, McKinley County, New Mexico.

Regarding GW-33, San Juan River Gas Processing Plant, the Service has the following comments on the modification of a previously approved discharge permit which would allow the addition of a non-hazardous solid waste landfill site.

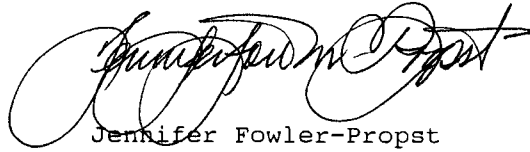
The San Juan River Gas Processing Plant is located in Section 1, T29N, R15W, San Juan County, New Mexico, and is proposing to add a non-hazardous landfill which will accept industrial solid waste from the gas plant. No liquids or hazardous wastes will be accepted at the site. The Service understands that the term "solid waste" encompasses many things including garbage, refuse, and sludges. The Service has received insufficient information regarding the type of solid waste to be stored in this landfill to make a decision at this time. We request that you send information regarding the type and nature of solid waste to be disposed of at the site, as well as the site's proximity to any surface waters or stream courses. We also request information regarding the facility's plans for the establishment of contractual requirements or other appropriate notification or inspection procedures to assure that hazardous wastes are not received at the site (per 40 CFR section 261.4).

Mr. Roger Anderson

2

If you have any questions concerning our comments, please contact Laurie S. Shomo at (505) 883-7877.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Fowler-Propst".

Jennifer Fowler-Propst  
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife  
Enhancement, Albuquerque, New Mexico.

AFFIDAVIT OF PUBLICATION

No. 29360

STATE OF NEW MEXICO,  
County of San Juan:

CHRISTINE HILL being duly  
sworn, says: "That she is the  
NATIONAL AD MANAGER of  
The Farmington Daily Times, a daily  
newspaper of general circulation  
published in English in Farmington ,  
said county and state, and that the  
hereto attached LEGAL NOTICE

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

First Publication THURSDAY, APRIL 23, 1992

Second Publication \_\_\_\_\_

Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

and the cost of publication was \$ 50.56

Christine Hill

Subscribed and sworn to before me  
this 30<sup>th</sup> day of  
APRIL, 1992 .

Connie Andrae  
Notary Public, San Juan County,  
New Mexico

My Comm expires: JULY 3, 1993

COPY OF PUBLICATI

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and modification have been submitted to the director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(CW-33) Western Gas Resources, Inc., Shauna Doven, Environmental Coordinator, 12200 N. Pecos Street, Suite 230, Denver, Colorado 80234-3439, has submitted a discharge plan modification application for the previously approved discharge plan for their San Juan River Gas Processing Plant which is located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. The modification proposes the addition of a non-hazardous landfill which will accept industrial solid waste from the gas plant facility. No liquids or hazardous wastes will be accepted at the site.

Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 15 to 110 feet with a total dissolved solids concentration of 17,500 mg/l. The discharge plan modification addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-54) - Meridian Oil, Inc., Michael J. Frampton, Senior Staff Environmental Representative, 3535 East 30th Street, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan application for their Wingate Gas Processing Plant which is located in Sections 16 and 17, Township 15 North, Range 17 West, NMPM, McKinley County, New Mexico. Approximately 82,000 gallons per day of waste water with a total dissolved solids concentration of approximately 3000 mg/l is discharged into two unlined evaporation ponds. Groundwater most likely to be affected by an accidental discharge, is at a depth ranging from 5 to 30 feet with a total dissolved solids concentration ranging from 480 mg/l to 1400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of April, 1992.

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

SEAL

Legal No 29360 published in the Farmington Daily Times, Farmington, New Mexico on Thursday, April 23, 1992.

# Affidavit of Publication

STATE OF NEW MEXICO

) SS

COUNTY OF MCKINLEY

VALERIE De La O being duly sworn upon oath, deposes and says:

As LEGAL CLERK of The Independent, a newspaper published in and having a general circulation in McKinley County, New Mexico and in the City of Gallup, New Mexico and having a general circulation in Cibola County, New Mexico and in the City of Grants, New Mexico and having a general circulation in Apache County, Arizona and in the City of St. Johns and in the City of Window Rock, Arizona therein: that this affiant makes this affidavit based upon personal knowledge of the facts herein sworn to. That the publication, a copy of which is hereto attached was published in said newspaper during the period and time of publication and said notice was published in the newspaper proper, and not in a supplement thereof,

for ONE TIME, the first publication being on the 24TH day of APRIL, 19 92 the second publication being on the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_ the third publication on the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

and the last publication being on the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_.

That such newspaper, in which such notice or advertisement was published, is now and has been at all times material hereto, duly qualified for such purpose, and to publish legal notices and advertisements within the meaning of Chapter 12, of the statutes of the State of New Mexico, 1941 compilation.

*Valerie De La O*  
Affiant.

Sworn and subscribed to before me this 24TH day of APRIL, A.D., 19 92.

*Diane Chavez*  
Notary Public

My commission expires  
JUNE 22, 1993

**LEGAL NOTICE**  
**SANTA FE, SANTA FE COUNTY**  
**NEW MEXICO**  
**NOTICE OF PUBLICATION**  
**STATE OF NEW MEXICO**  
**ENERGY, MINERALS AND NATURAL**  
**RESOURCES DEPARTMENT**  
**OIL CONSERVATION DIVISION**

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(GW-54) - Meridian Oil, Inc., Michael J. Frampton, Senior Staff Environmental Representative, 3535 East 30th Street, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan application for their Wingate Gas Processing Plant which is located in Sections 16 and 17, Township 15 North, Range 17 West, NMPM, McKinley County, New Mexico. Approximately 82,000 gallons per day of waste water with a total dissolved solids concentration of approximately 3900 mg/l is discharged into two unlined evaporation ponds. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 5 to 20 feet with a total dissolved solids concentration ranging from 480 mg/l to 1400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of April, 1992.

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

OIL CONSERVATION DIVISION  
RECEIVED

'92 APR 29 AM 8 51

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND  
NATURAL RESOURCES  
DEPARTMENT

OIL CONSERVATION DIVISION  
Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-33) Western Gas Resources, Inc., Shauna Doven, Environmental Coordinator, 12200 N. Pecos Street, Suite 230, Denver, Colorado 80234-3438, has submitted a discharge plan modification application for the previously approved discharge plan for their San Juan River Gas Processing Plant which is located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. The modification proposes the addition of a non-hazardous landfill which will accept industrial solid waste from the gas plant facility. No liquids or hazardous wastes will be accepted at the site. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 15 to 110 feet with a total dissolved solids concentration of 17,500 mg/l. The discharge plan modification addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on the 18th day of April, 1992.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
s/William J. LeMay, Director  
Journal: April 23, 1992

STATE OF NEW MEXICO  
County of Bernalillo

SS

OIL CONSERVATION DIVISION  
RECEIVED

92 APR 27 AM 9:13

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for.....1.....times, the first publication being on the.....23.....day  
of.....April....., 1992, and the subsequent consecutive  
publications on....., 1992.

Bernadette Ortiz

12-18-93

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this .....23..... day of.....April....., 1992.

PRICE.....\$ 31.12

Statement to come at end of month.

CLA-22-A (R-12/92)

ACCOUNT NUMBER.....C81184

## **NOTICE OF PUBLICATION**

### **STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and modification have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of April, 1992.

S E A L

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR



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

April 14, 1992

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-670-683-583**

Ms. Shauna Doven  
Environmental Engineer  
Western Gas Resources, Inc.  
12200 N. Pecos Street, Suite 230  
Denver, Colorado 80234-3439

**RE: Discharge Plan GW-33 Modification  
San Juan River Gas Processing Plant  
San Juan County, New Mexico**

Dear Ms. Doven:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced discharge plan modification application, dated March 22, 1992. The modification requests approval to construct a non-hazardous landfill at your San Juan River Gas Processing Plant. In order for the review process to continue the OCD requires the following information and/or commitments:

1. **Exact Location:**

Provide a plat showing the exact location of the proposed landfill in relation to the gas plant facility.

2. **Groundwater at the Site:**

Provide the OCD with the depth and quality of ground water directly beneath the site of the proposed landfill. Provide a lithologic log from the closest available well in the vicinity. Depending upon the depth and quality of the groundwater, the OCD may require a monitor well(s) down gradient from the proposed site.

3. Protection of Groundwater:

The OCD is charged with protection of all groundwater less than 10,000 mg/l total dissolved solids. Provide evidence ensuring that no contaminants will be leached from your landfill and move either laterally or vertically into protectable groundwater.

4. Other Wastes:

Western Gas states that they plan to dispose of cooling tower wood, dry filters, and activated alumina in the landfill. Are there any other plant type wastes that may potentially be disposed of at the landfill? Does Western Gas plan to dispose of any domestic or office type wastes at the proposed site?

5. Operational Requirements:

The OCD requires a commitment to the following operational procedures prior to approval of a landfill:

- a. No free liquids or solids with free liquids will be accepted at the site.
- b. Only solids that are exempt from RCRA Subtitle C or solids that are non-hazardous by TCLP testing will be accepted at the site.
- c. The facility will be fenced and locked. Access will be limited to ensure that only Western Gas San Juan River Plant wastes are disposed of at the site.
- d. The facility will be maintained so that loose items of solid waste will not blow out of the disposal pit or up around the fence.

6. Discharge Plan Fee:

The discharge plan modification application for the San Juan River Gas Processing Plant is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan modification will be assessed a fee equal to the filing fee plus one-half of the flat fee. The Director may waive the flat fee for discharge plan modifications which require little or no cost for investigation or issuance. The filing fee is fifty (50) dollars and is due upon receipt of this letter. A determination of whether the flat fee is required will be made at the time the discharge plan modification is approved/disapproved.

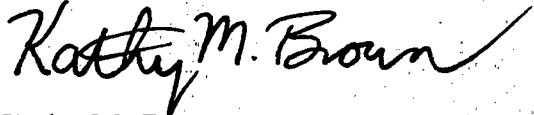
Ms. Shauna Doven

April 14, 1992

Page 3

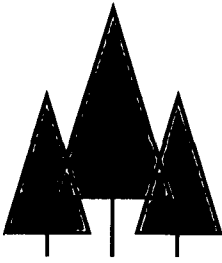
If you have any questions please do not hesitate to call me at (505) 827-5884.

Sincerely,

A handwritten signature in cursive script that reads "Kathy M. Brown". The signature is written in black ink and includes a long, sweeping horizontal stroke at the end.

Kathy M. Brown  
Geologist

xc: Denny Foust, OCD Aztec Office



OIL CONSERVATION DIVISION  
RECEIVED

'92 MAR 31 AM 8 31

## Western Gas Resources, Inc.

March 26, 1992

Mr. Roger Anderson  
Environmental Engineer  
Oil Conservation Division  
P.O. Box 2088  
Land Office Building  
Santa Fe, NM 87504-2088

Dear Mr. Anderson:

As you are aware liquids have been detected in the monitoring wells for the lined pond and the sumps at Western's San Juan River Gas Plant.

There is a total of seven monitoring wells at the plant. All seven have accumulated liquids in them within the last year. Analysis completed on monitoring well number one (for the lined pit) showed that the liquid in the monitoring well was not the same as was in the lined pit. The liquid in the well is probably rain water or water from a low-quality shallow aquifer.

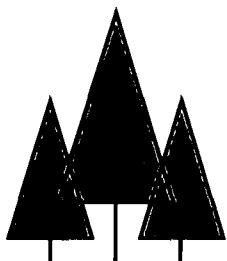
Western has developed a testing plan that should prove conclusively that the water in the wells is or is not from the sumps or the pit. On March 6, 1992 all of the monitoring wells were pumped out. Floriscim dye, a non-hazardous florescent dye, was added to the pit, and put into each of the sumps. As soon as liquid appears in any of the monitoring wells, Western will then analyze what is in the well for the dye.

We will update you when the first analysis is complete. If you have further questions or need more information, please contact me at (303)452-5603.

Sincerely,

Shauna Doven  
Environmental Engineer

cc: Kent McEvers - Plant Supervisor  
Gary Davis - V.P. Engineering/Environmental  
Dale Burford - V.P. Operations  
Deb Albert - Sr. Environmental Engineer  
Don Kronenberg - Esq.



RECEIVED

MAR 27 1992

OIL CONSERVATION DIV.  
SANTA FE

## Western Gas Resources, Inc.

March 22, 1992

Mr. Roger Anderson  
Environmental Engineer  
Oil Conservation Division  
P.O. Box 2088  
Land Office Building  
Santa Fe, NM 87504-2088

Dear Mr. Anderson:

As I have discussed with you on the phone, Western would like to amend our Discharge Plan for the San Juan River Plant. We would like to construct a landfill on our site to bury the wood from the recently dismantled cooling towers.

Western proposes to construct the landfill approximately 15' deep, 40' wide and 60' long, about 100 yards north of the boiler house. We would like to be able to discard dry oil filters, activated alumina (catalyst from the sulfur plant), dried amine and glycol filters, and the wood from the cooling towers in the landfill. Western will ensure that only non-hazardous and/or exempt wastes will be placed in the landfill, and will maintain appropriate analytical records for documentation.

The alumina and filters have been analyzed and each waste stream proven to be non-hazardous. The wood from the cooling towers has been analyzed by TCLP method for chromium and was found to be within the regulatory limits. Western understands that TCLP remains the regulatory analytical method and will continue to use this as the method of determination unless otherwise instructed by the Division.

The cooling towers were dismantled March 5, 1992. The wood is presently being stored on site north of the boiler house. The contractor that dismantled the towers will be in the area until the end of the month. It would save Western a great deal of money if we could begin construction of the landfill before the contractor leaves the area.

If you have any questions or need more information please don't hesitate to contact me at (303)452-5603.

Sincerely,

Shauna Doven  
Environmental Engineer

cc: Kent McEvers  
Gary Davis  
Deb Albert  
Dale Burford  
Don Barden

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

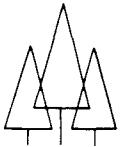
I hereby acknowledge receipt of check No. [REDACTED] dated 12/20/91  
or cash received on 12/26/91 in the amount of \$ 1717.50  
from Western Gas Resources, Inc.  
for San Juan River Gas Plant GW-33  
(Facility Name) (DP No.)  
Submitted by: Roger C. Anderson Date: 12/26/91  
Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Received in ASD by: Cecil R. [Signature] Date: 12/26/91

Filing Fee ☒ New Facility \_\_\_\_\_ Renewal ☒  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.67 Applicable FY 80

To be deposited in the Water Quality Management Fund.

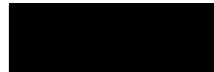
Full Payment ☒ or Annual Increment \_\_\_\_\_



Western Gas Resources, Inc.

12200 N. Pecos St., Suite 230  
Telephone: (303) 452-5603  
Denver, Colorado 80234

NCNB TEXAS NATIONAL BANK  
BROWNWOOD 519  
BROWNWOOD, TEXAS 76801



PAY THE SUM OF

DATE DEC 20, 1991

\*\*\*\*\* ONE THOUSAND SEVEN HUNDRED SEVENTEEN DOLLARS, 50 CENTS

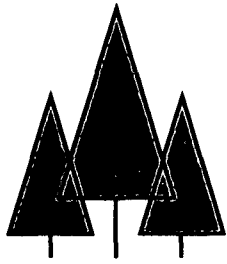
TO THE ORDER OF

AMOUNT \$ \*\*\*\*1,717.50

NEW MEXICO ENVIRONMENTAL DEPARTMENT  
WATER QUALITY MANAGEMENT  
OIL CONSERVATION DIVISION  
PO BOX 2088  
SANTA FE, NM 87504

45267

B.M. [Signature]



# Western Gas Resources, Inc.

November 20, 1991

Mr. Roger Anderson  
Environmental Engineer  
Oil Conservation Division  
P.O. Box 2088  
Land Office Building  
Santa Fe, NM 87504-2088

Dear Mr. Anderson:

Enclosed is a check to pay the filing fee and the flat fee for Discharge Plan GW-33 for Western's San Juan River Plant in San Juan County, New Mexico.

If you need more information, or have any questions, please call me at (303) 452-5603.

Sincerely,

Shauna Doven  
Environmental Coordinator

Enclosure

cc: Gary Davis - V.P. Engineering  
Debbie Albert - Environmental Engineer  
Kent McEvers - Plant Supervisor



## Western Gas Resources, Inc.

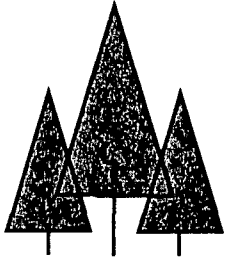
1220 N. Pecos St., Suite 230  
Phone: (303) 452-5603  
Denver, Colorado 80234

#110C

## NEW MEXICO ENVIRONMENTAL DEPARTMENT

100259

INVOICE NO INV DATE PAY #	DESCRIPTION	GROSS	DISCOUNT	NET AMT
11/91-FILE 11/21/91274613		1717.50	0.00	1717.50
	CHECK # 100259 TOTALS	1717.50	0.00	1717.50



OIL CONSERVATION DIVISION  
RECEIVED

'91 MAY 15 PM 1 27

## Western Gas Resources, Inc.

Debra Albert  
Environmental Engineer  
Western Gas Resources  
12200 Pecos St.  
Denver, CO. 80234

May 11, 1991

Jim Cooper, Sr.  
Special Waste Representative  
Waste Management of North America  
432 North 44th Street, Suite 424  
Phoenix, Arizona 85008

Mr. Cooper:

Western Gas Resources would like to begin disposing of amine and oil filters from the San Juan River Gas Plant at the Waste Management of Four Corners facility. Attached please find a special waste profile sheet for these filter. A complete waste screen has been completed, and the filters met no RCRA hazardous waste criteria and had no PCBs.

Upon your acceptance of this waste, I will submit a letter to the New Mexico OCD requesting their approval of the disposal plan. We would then like to begin placing the filters in the plant dumpsters.

Thank you, and please feel free to contact me with any questions you may have.

Sincerely,

*Debra Albert*  
Debra Albert

cc: Gary Davis, Engineering/Environmental Vice President  
Dale Burford, Operations Vice President  
Don Barden, South Central Area Manager  
Kent McEvers, SJRP Plant Supervisor  
Don Kronenberg, Attorney  
Roger Anderson, NM OCD



# Waste Management of North America GENERATOR'S SPECIAL WASTE PROFILE SHEET

TYPE B Waste

PLEASE PRINT IN INK OR TYPE

WMA 265801

Waste Profile Sheet Code

INSTRUCTIONS FOR COMPLETING THIS FORM ARE ATTACHED

(Shaded Areas For WMNA Use Only)

Renewal Date of Service Agreement:

WMNA Sales Rep#:

## A. WHERE IS THE WASTE GENERATED?

1. Generator Name: Western Gas Resources - San Juan River Gas Plant
2. Facility Address (site of waste generation): 2 miles north of Kirtland, NM. (T29N, R15W, N1/2 Sect. 1)
3. Generator City, State/Province: Kirtland, NM
4. Zip/Postal Code: 87417
5. Generator USEPA/Federal ID: N/A
6. Generator State/Province ID: N/A
7. Technical Contact: Debra Albert
8. Phone: (303) 452-5603

## B. WHERE ARE WASTE MANAGEMENT, INC. INVOICES SENT?

1. ☒ Generating Facility (A, above), or
2. Company Name: Western Gas Resources - San Juan River Plant
3. Phone: (505) 598-5601
4. Address: 99 Road 6500 (P.O. Box 70)
5. Generator City, State/Province: Kirtland, NM
6. Zip/Postal Code: 87417

## C. WASTE STREAM INFORMATION:

1. Name of Waste: Filters
  2. Process Generating Waste: Natural Gas Treatment
  3. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Sludge ☒ Bulk Solid ☐ Drum/Box ☐ Other
  4. Annual Amount/Units: Approximately 5,000 pounds
  5. Supplemental Information (see instructions):
  6. Is this a DOT hazardous material? ☒ No ☐ Yes (If so, complete 7, 8 & 9)
  7. Hazard Class/ID #: N/A
  8. Reportable Quantity/ Units (lb/kg): N/A
  9. Shipping Name: Not Regulated
- ☐ Check this box if additional information is attached.

## D. GENERATOR CERTIFICATION

By signing this profile sheet, the generator certifies that unless clearly stated above or in attachments:

1. This waste is not a "Hazardous Waste" as defined by USEPA or Canadian Federal regulation and/or the state/province.
2. This waste does not contain regulated quantities of PCB's (Polychlorinated Biphenyls).
3. This sheet and its attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.
4. The Contractor's Definition of Special Waste (Form WMNA 0038 AD) has been read, signed and attached.

5. Signature

6. Title

7. Name (Type or Print)

8. Date



# CONTRACTOR'S DEFINITION OF SPECIAL WASTE

265 801

WASTE PROFILE CODE

1. "Special Waste" means Type A or Type B Special wastes as defined below.

2. "Type A Special Waste" means any waste, from a commercial or industrial activity meeting any of the following descriptions.

- A containerized waste (e.g., a drum, portable tank, lugger box, roll-off box, pail, bulk tanker, etc.) listed in b.-g. below.
- A waste containing free liquids.
- A sludge waste.
- A waste from an industrial process.
- A waste from a pollution control process.
- Residue and debris from the cleanup of a spill of a chemical substance or commercial product or a waste listed in a.-e. or g.
- Contaminated residuals, or articles from the cleanup of a facility generating, storing, treating, recycling, or disposing of wastes listed in a.-f.

3. Incidental Amounts of Special Waste

The Contractor recognizes that many customers will produce some "Type B Special Waste," as defined below. Incidental quantities of "Type B Special Waste," do not require a Generator's Type B Special Waste Profile Sheet (Form WMNA-0089B) to be signed by the customer. However, the customer must identify the type and amount of Type B Special Wastes which will be provided to the Contractor in incidental amounts by completing the box in the lower right corner.

4. "Type B Special Waste" means any waste from a commercial or industrial activity meeting the descriptions which follow:

- Friable asbestos waste from building demolition or cleaning;** wall board, wall spray coverings, pipe insulation, etc. Nonfriable asbestos is not a special waste unless it has been processed, handled or used in such a way that asbestos fibers may be freely released. Asbestos-bearing industrial process waste is a "Type A Special Waste."
- Commercial products or chemicals which are off-specification, outdated, unused or banned.** Out-dated or off-specification, uncontaminated food or beverage products in original consumer containers are not included in this category, however, containers which once held commercial products or chemicals are included unless the container is empty. A container is empty when:  
All wastes have been removed that can be removed using the practices commonly employed to remove materials from the type of container, e.g., pouring, pumping or aspirating, and an end has been removed (for containers in excess of 25 gallons), and no more than 1 inch (2.54 centimeters) of residue remains on the bottom of the container or inner liner, or no more than 3% by weight of the total capacity of the container remains in the container (containers  $\leq$  110 gallons), or no more than 0.3% by weight of the total capacity of the container remains in the container (containers  $>$  110 gallons.) Containers which once held **ACUTELY HAZARDOUS WASTES** must be triple rinsed with an appropriate solvent or cleaned by an equivalent method. Containers which once held substances regulated under the Federal Insecticide, Fungicide, and Rodenticide Act must be empty according to label instructions or triple rinsed.
- Untreated bio-medical waste - Any waste capable of inducing infection due to contamination with infectious agents from a bio-medical source including but not limited to a medical practitioner, hospital, medical clinic, nursing home, university medical laboratory, mortuary, taxidermist, veterinarian, veterinary hospital or animal testing laboratory.** Sharps from these sources must be rendered harmless or placed in needle puncture proof containers. Residue from incineration of infectious wastes is a "Type A Special Waste."
- Treated bio-medical wastes - Any wastes from a bio-medical source including but not limited to a hospital, medical clinic, nursing home, medical practitioner, mortuary, taxidermist, veterinarian hospital, animal testing laboratory, or university medical laboratory which has been autoclaved or otherwise heat treated or sterilized so that it is no longer capable of inducing infection.** Any sharps from these sources must be rendered harmless or placed in needle puncture proof containers.
- Liquids and sludges from septic tanks, food service grease traps, or washwater and wastewaters from commercial laundries, laundromats and car washes unless these wastes are managed at commercial or public treatment works.**
- Chemical-containing equipment removed from service.** Examples: filters, cathode ray tubes, lab equipment, acetylene tanks, fluorescent light tubes, etc.
- Waste produced from the demolition or dismantling of industrial process equipment or facilities contaminated with chemicals from the industrial process** Chemicals or wastes removed or drained from such equipment or facility are "Type A Special Wastes."

CUSTOMER ACKNOWLEDGES THAT HE HAS READ THE FOREGOING DEFINITION AND HAS IDENTIFIED THE TYPES AND AMOUNTS OF ANY TYPE B WASTE STREAMS PRODUCED IN INCIDENTAL AMOUNTS.

Western Gas Resources  
CUSTOMER

Alma Albert  
AUTHORIZED SIGNATURE

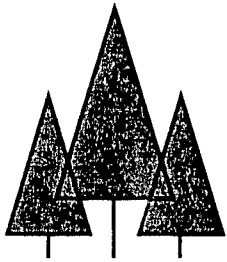
May 11, 1991  
DATE

INCIDENTAL WASTE TYPES AND AMOUNTS:

General Manager of WMNA Division concurs that the above amounts of "Type B Special Wastes" are incidental to the load.

Signature:

'91 MAY 15 AM 9 15



## Western Gas Resources, Inc.

Debra Albert  
Environmental Engineer  
Western Gas Resources  
12200 Pecos St.  
Denver, CO. 80234

May 11, 1991

Morris Young  
Envirotech  
5796 U.S. 64-3014  
Farmington, NM. 87401

Dear Mr. Young:

Attached please find analytical results from analysis performed on pipeline sludge material collected at Western Gas Resources' San Juan River Gas Plant. This waste is clearly exempt from RCRA Subtitle C hazardous waste requirements, as it is a natural gas waste from a gathering and production facility. As per Roger Anderson of the New Mexico OCD, it is acceptable to dispose of this material at your land treatment facility near Bloomfield. I understand that the cost of disposal is approximately \$18.00/drum.

Upon your acceptance of this material, I'll submit a letter to Mr. Anderson requesting his approval for this disposal plan. I would also like to visit your facility prior to shipment of the waste.

Thank you, and please feel free to contact me with any questions you may have.

Sincerely,

Debra Albert

cc: Gary Davis, Engineering/Environmental Vice President  
Dale Burford, Operations Vice President  
Don Barden, South Central Area Manager  
Arlyn Thorson, SJRP Field Supervisor  
Don Kronenberg, Attorney  
Roger Anderson, NM OCD

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303) 425-6021

MISCELLANEOUS ANALYSES


Date Received : 4/18/91      Client Project No. : SJRP Sampling  
Date Sampled : 4/16/91      Lab Project No. : 91-1132  
Date Prepared : 4/18-23/91      Methods : See Below  
Date Analyzed : 4/18-23/91


Evergreen Sample #	<u>X34147</u>	<u>X34148</u>	<u>X34149</u>	<u>X34150</u>	<u>X34151</u>
Client Sample #	<u>SJRP- 001</u>	<u>SJRP- W01</u>	<u>SJRP- P01</u>	<u>SJRP- S01</u>	<u>SJRP- C01</u>
Matrix	<u>Sludge</u>	<u>Waste Water</u>	<u>Waste Water</u>	<u>Solid</u>	<u>Soild</u>
pH <sup>(1)</sup>	<u>9.89</u>	<u>6.58</u>	<u>7.43</u>	<u>9.24</u>	<u>8.67</u>
Flashpoint <sup>(2)</sup> (°F @ 620 mm Hg )	<u>70<sup>(2a)</sup></u>	<u>NR</u>	<u>NR</u>	<u>380<sup>(2b)</sup></u>	<u>580<sup>(2b)</sup></u>
Oil & Grease <sup>(3)</sup> (mg/L)	<u>NR</u>	<u>1.40</u>	<u>12.5</u>	<u>NR</u>	<u>NR</u>
Bicarbonate mg/L <sup>(4)</sup>	<u>NR</u>	<u>188</u>	<u>3118</u>	<u>NR</u>	<u>NR</u>
Carbonate mg/L <sup>(4)</sup>	<u>NR</u>	<u>&lt;5.00</u>	<u>&lt;5.00</u>	<u>NR</u>	<u>NR</u>

NR = Not Requested

Methods:

- (1) EPA 150.1  
(2a) A.S.T.M. D 93 using Pensky-Martens closed cup apparatus  
(2b) A.S.T.M. D92 using Cleveland open cup apparatus  
(3) EPA 413.1  
(4) Standard Methods 403

  
Approved

  
Quality Assurance Officer

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303) 425-6021

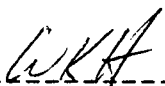
TCLP, METALS


Date Sampled : 04/16/91      Client Project : SJRP SAMPLING  
Date Received : 04/18/91      Lab Project # : 91-1132  
Date Prepared : 04/19/91      Method : 40CFR268, Appx. I  
Date Analyzed : 04/22-04/26/91      Basis : TCLP leachate

Lab Sample Number	Client Sample Number	Element	Matrix	Concentration	Units	TCLP Limits (mg/L)
X34147	SJRP-001	Arsenic	SLUDGE	0.03	mg/L	5
		Barium		0.8	mg/L	100
		Cadmium		0.02	mg/L	1
		Chromium		<0.1	mg/L	5
		Lead		<0.2	mg/L	5
		Mercury		<0.0002	mg/L	0.2
		Selenium		<0.05 *	mg/L	1
		Silver		<0.02	mg/L	5
X34150	SJRP-S01	Arsenic	SOIL	<0.01	mg/L	5
		Barium		1	mg/L	100
		Cadmium		<0.01	mg/L	1
		Chromium		<0.1	mg/L	5
		Lead		<0.2	mg/L	5
		Mercury		<0.0002	mg/L	0.2
		Selenium		<0.005	mg/L	1
		Silver		<0.02	mg/L	5
X34151	SJRP-C01	Arsenic	SOIL	<0.01	mg/L	5
		Barium		0.8	mg/L	100
		Cadmium		0.03	mg/L	1
		Chromium		0.3	mg/L	5
		Lead		<0.2	mg/L	5
		Mercury		<0.0002	mg/L	0.2
		Selenium		0.006	mg/L	1
		Silver		<0.02	mg/L	5

\* Selenium detection limit raised because the sample was diluted to lower matrix interference.

Note: Results are reported on the leachate from the TCLP extraction.

  
-----  
Approved

  
-----  
Quality Assurance Officer

ERGREEN ANALYTICAL, INC.  
4036 Youngfied Wheat Ridge CO 80033  
(303)425-6021

PCB Data Report

Client Sample #	: SJRP-001	Client Project #	: SJRP Sampling
Lab Sample #	: X34147	Lab Project #	: 91-1132
Date Sampled	: 04/16/91	Dilution Factor	: 76.531
Date Received	: 04/18/91	Method	: SCREEN
Date Extracted/Prepared	: 04/18/91	Matrix	: Soil
Date Analyzed	: 04/30/91	Lab File No.	: ecd3760
Percent Loss on Drying	: NA	Method Blank No.	: na
Level	: LOW		
pH	: NA		

Compound Name	Cas Number	Concentration ug/Kg	PQL* ug/Kg
Aroclor-1016	12674-11-2	U	6,100
Aroclor-1221	11104-28-2	U	6,100
Aroclor-1232	11141-16-5	U	6,100
Aroclor-1242	53469-21-9	U	6,100
Aroclor-1248	12672-29-6	U	6,100
Aroclor-1254	11097-69-1	U	12,000
Aroclor-1260	11096-82-5	U	12,000

This analysis is a GC/ECD method similar to EPA 8080 but using a smaller initial sample size, a less extensive calibration, and no alumina clean-up of the extract.

Surrogate Recovery;

DCB

103%

QUALIFIERS:

U = Compound analyzed for, but not detected.

J = Indicates an estimated value when the compound is detected, but is below the CLP Practical Quantitation Limit (PQL).

B = Compound found in blank and sample. Compare blank and sample data.

\* = Indicates the Practical Quantitation Limit (PQL).

NA = Not applicable or not available.

Approved: D. Blascam

mm  
Quality Assurance Officer



TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client Sample Number : SJRP-001 Lab Project No. : 91-1132  
Lab Sample Number : X34147 Client Project No. : SJRP SAMPLING  
Date Sampled : 04/16/91 Matrix : TCLP  
Date Received : 04/18/91

VOLATILE ORGANICS ANALYSIS DATA (METHOD 8260)

Date Extracted/Prepared : 04/23/91 Lab File No. : >V7819  
Date Analyzed : 05/01/91 Method Blank No. : TB042391  
Effective Dilution : 50.00

Compound Name	Cas Number	Conc. ug/L	PQL* ug/L
Benzene	71-43-2	7,700	250

Surrogate Recoveries:		QC Limits
1,2 Dichloroethane-d4	86%	(76-114)
Toluene-d8	94%	(88-110)
Bromofluorobenzene	100%	(86-115)

Qualifiers:

- U = Compound analyzed for, but not detected above reporting limits.  
J = Reporting limits are roughly the method detection limits for reagent water  
J = Indicates an estimated value when the compound is detected, but is below the EPA Practical Quantitation Limit (PQL).  
B = Compound found in blank and sample. Compare blank and sample data.  
E = Compound is detected at a concentration outside the calibration limits.  
\* = Practical Quantitation Limits listed in EPA SW846, Vol. 1B, Part II, pa. 8240-4. The minimum instrument detection limits are less than the numbers shown in this column.

Approved: \_\_\_\_\_

John D Parker

\_\_\_\_\_  
Quality Assurance Officer

**El Paso**  
Natural Gas Company

May 2, 1991

OIL CONSERVATION DIVISION  
RECEIVED

'91 MAY 6 AM 9 24

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-2600

*See: EPN G San Juan  
River Remediation*

David G. Boyer, Hydrogeologist  
Environmental Bureau Chief  
Oil Conservation Division  
Energy, Minerals & Natural Resources Dept.  
State of New Mexico  
Post Office Box 2088  
State Land Office Bldg.  
Santa Fe, New Mexico 87504

Re: San Juan River Plant Pond Closure Plan

Dear Mr. Boyer:

Enclosed please find two copies of our plan for closure of the flare pits and wastewater impoundments at San Juan River Plant in portions of Section 1, T-29-N, R-15-W and Section 36, T-30-N, R-15-W, San Juan County, New Mexico.

As you know, this is the culmination of a long series of studies. The objective has evolved from discharge of wastewater to the development of a method of closure to prevent leached salts from entering the San Juan River watershed. We believe the extent of these previous investigations have provided us with much more information than would ordinarily have been the case. We have been able to draw upon that knowledge to put together a plan that is exceptionally well-founded.

We have endeavored to include as much pertinent data as necessary in the closure plan to explain and justify the measures proposed. In order to expedite the process, we have been monitoring groundwater levels since last fall and have conducted sludge and soil sampling in accordance with the guidelines presented in the plan. We have scheduled further geotechnical testing and other measures aimed at implementing the plan as soon as possible. We hope to complete the soil work associated with the closure by the end of the summer.

If you have any questions or would like to schedule a meeting to discuss this plan, please call me any time at (915) 541-3531. Please be assured that we have every intention of continuing our long record of cooperation with the Division to achieve our mutual goals.

Sincerely,

*Thomas D. Hutchins*

Thomas D. Hutchins, Manager  
North Region Compliance Engineering



OIL CONSERVATION DIVISION  
RECEIVED

'91 SEP 25 AM 8 50

## Western Gas Resources, Inc.

September 23, 1991

Mr. Roger Anderson  
Environmental Engineer  
Oil Conservation Division  
P.O. Box 2088  
Land Office Building  
Santa Fe, NM 87504-2088

Dear Mr. Anderson:

Enclosed are three copies of the Discharge Plan for the San Juan River Natural Gas Processing Plant in San Juan County, New Mexico.

If you need more information, or have any questions, please call me at (303) 452-5603.

Sincerely,

Shauna Doven  
Environmental Coordinator

Enclosure

cc: Gary Davis - V.P. Engineering  
Debbie Albert - Environmental Engineer  
Kent McEvers - Plant Supervisor



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

August 6, 1991

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-756-666-893**

Ms. Debra Albert  
Western Gas Processing, Ltd.  
12200 North Pecos Street  
Suite 230  
Denver, Colorado 80234

**RE: Pigging Sludge Disposal**

Dear Ms. Albert:

The Oil Conservation Division (OCD) has reviewed your request, dated July 29, 1991, to dispose of pigging sludge at the Envirotech landfarm. The sludge is generated from the pigging of the gathering line feeding the San Juan River Gas Plant.

Based on the information provided in your request, you are authorized to dispose of the pigging sludge at the Envirotech Landfarm.

If you any questions, please contact me at 827-5884.

Sincerely,

A handwritten signature in cursive script, reading "Roger C. Anderson".

Roger C. Anderson  
Environmental Engineer

RCA/sl

cc: OCD Aztec Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

June 5, 1991

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-327-278-146**

Ms. Debra Albert  
Western Gas Processing, Ltd.  
12200 North Pecos Street  
Suite 230  
Denver, Colorado 80234

**RE: Discharge Plan GW-33  
San Juan River Plant**

Dear Ms. Albert:

The Oil Conservation Division (OCD) has reviewed your notification, dated May 11, 1991, of the discovery of fluids in the leak detection sump for the plant's evaporation pond.

The analyses provided do not present conclusive evidence that the fluid is not pond water. To determine if there is a leak in the primary liner the OCD is requiring the following:

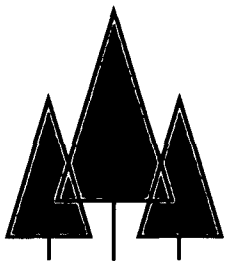
1. Begin pumping the fluids from the sump.
2. If fluids continue to discharge to the sump after completion of pumping, a sample will be obtained and analyzed for the same constituents provided in your notification.
3. If conclusive evidence of the source of the fluids is not obtained, repeat items one and two until the source can be identified.
4. If it is determined that the primary liner is leaking, the pond will be emptied to below the level of the leak and the liner repaired prior to being placed back in service.

If you any questions, please contact me at 827-5884.

Sincerely,

Roger C. Anderson  
Environmental Engineer

RCA/sl



OIL CONSERVATION DIVISION  
RECEIVED

'91 MAY 15 AM 9 14

## Western Gas Resources, Inc.

Debra Albert  
Environmental Engineer  
Western Gas Resources  
12200 Pecos St.  
Denver, CO. 80234

May 11, 1991

Roger Anderson  
New Mexico Oil Conservation Division  
Santa Fe Office  
P.P. Box 2088  
Santa Fe, NM. 87501

Mr. Anderson:

As previously reported, one monitoring well at the San Juan River Plant's evaporation pond was found containing water last month. Samples were taken from the well and the pond, and analyzed for several criteria to identify whether the water in the well was from the pond or was naturally occurring groundwater. The results are attached for your reference; the pond sample identification number is SJRP-P01, the well is SJRP-W01.

Upon review of the results, it appears that the water in the monitoring well is groundwater rather than pond water. This conclusion is based upon the cation/anion balance, which shows high concentrations of chloride and sodium in the pond water which are not present in the well water. A phosphate test was also completed, as we expected to find it in the pond water, and in the well water if it had come from the pond. As the attached results show, phosphate level of 49 ppm was found in the pond, and only .4 ppm in the well water.

If you concur with this conclusion, Western is proposing to sample the well and the pond annually (providing water remains in the well) to verify that the pond is not leaking, and to continue a visual inspection of the second monitoring well to verify that it is dry. Please call me when you've had a chance to review the data. Thank you.

Sincerely

*Debra Albert*  
Debra Albert

cc: Gary Davis, Engineering/Environmental Vice President  
Dale Burford, Operations Vice President  
Don Barden, South Central Area Manager  
Kent McEvers, San Juan River Plant Supervisor  
Roger Anderson, New Mexico OCD, Santa Fe Office  
Don Kronenberg, Attorney

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303)425-6021

Orthophosphate as PO<sub>4</sub>\*

Date Sampled : 4/16/91      Client Project No. : SJRP Sampling  
Date Received : 4/18/91      Lab Project No. : 91-1132  
Date Prepared : ---  
Date Analyzed : 5/3/91

<u>Evergreen</u> <u>Sample #</u>	<u>Client</u> <u>Sample #</u>	<u>Matrix</u>	<u>Orthophosphate</u> <u>as PO<sub>4</sub></u> mg/L
X34148	SJRP-W01	Water	0.40
X34149	SJRP-PO1	"	49

\* Analyses performed by Huffman laboratories, Inc., Golden, CO

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303) 425-6021

INORGANIC ANALYSIS DATA SHEET

Date Sampled : 04/16/91      Client Project : SJRP SAMPLING  
Date Received : 04/18/91      Lab Project # : 91-1132  
Date Prepared : 05/03/91      Method : 600/4-79-20  
Date Analyzed : 04/23-05/03/91      Basis : Dissolved

Lab Sample Number	Client Sample Number	Element	Matrix	Conc.	Units	Method Det. Limits
X34148	SJRP-W01	Calcium	WATER	200*	mg/L	0.1
		Magnesium	WATER	170	mg/L	0.001
		Potassium	WATER	110	mg/L	0.003
		Sodium	WATER	5,400*	mg/L	0.003
X34149	SJRP-P01	Calcium	WATER	840*	mg/L	0.1
		Magnesium	WATER	780	mg/L	0.001
		Potassium	WATER	99	mg/L	0.003
		Sodium	WATER	16,500*	mg/L	0.003

\* These elements were originally run between 4/18-23/91, and rerun on 5/3/91. The results from 5/3/91 are reported above. Compare these results to any you may have previously received. The results reported are final results.

*CKH*

Approved

*Mpm*

Quality Assurance Officer



EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303) 425-6021

MISCELLANEOUS ANALYSES

Date Received : 4/18/91      Client Project No. : SJRP Sampling  
Date Sampled : 4/16/91      Lab Project No. : 91-1132  
Date Prepared : 5/3/91      Methods : See Below  
Date Analyzed : 5/3/91

Evergreen Sample #	<u>X34147</u>	<u>X34148</u>	<u>X34149</u>	<u>X34150</u>	<u>X34151</u>
Client Sample #	<u>SJRP- 001</u>	<u>SJRP- W01</u>	<u>SJRP- P01</u>	<u>SJRP- S01</u>	<u>SJRP- C01</u>
Matrix	<u>Sludge</u>	<u>Waste Water</u>	<u>Waste Water</u>	<u>Solid</u>	<u>Solid</u>
Anions <sup>(1)</sup>					
Chloride (mg/L)	<u>NR</u>	<u>5270*</u>	<u>28,600 (2.9%)*</u>	<u>NR</u>	<u>NR</u>
Sulfate (mg/L)	<u>NR</u>	<u>335*</u>	<u>619*</u>	<u>NR</u>	<u>NR</u>
Ion Balance <sup>(2)</sup>					
Cation/Anion	<u>NR</u>	<u>169%</u>	<u>94%</u>	<u>NR</u>	<u>NR</u>
Anion/Cation	<u>NR</u>	<u>59%</u>	<u>107%</u>	<u>NR</u>	<u>NR</u>


NR = Not Requested

\* These analyses were originally run on 4/19/91, and rerun on 5/3/91. The results from 5/3/91 are reported above. Compare these results to any you may have previously received. The results reported above are the final results.

<sup>(1)</sup> EPA Method 300.0

<sup>(2)</sup> The original ion balances for sample # X34148 were 150% (Cation/Anion) and 67% (Anion/Cation). The ion balances for the rerun results footnoted herein and on the Cation report form are shown above.

  
Approved

  
Quality Assurance Officer

1132t1.5

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303)425-6021

Purgeable Aromatic Report

Client Sample #	: SJRP-P01	Client Project #	: SJRP Sampling
Lab Sample #	: X34149	Lab Project #	: 91-1132
Date Sampled	: 04/16/91	Dilution Factor	: 1.000
Date Received	: 04/18/91	Method	: 602
Date Extracted/Prepared	: 04/25/91	Matrix	: Water
Date Analyzed	: 04/25/91	Lab File No.	: PID8269
Percent Loss on Drying	: NA	Method Blank No.	: MB04/25/91
Methanol extract?	: No		

Compound Name	Cas Number	Concentration ug/L	MDL* ug/L
Benzene	71-43-2	56	0.4
Toluene	108-88-3	18 B	0.4
Ethyl Benzene	100-41-4	5.5	0.4
Total Xylenes	1330-20-7	8.2	0.4**
Chlorobenzene	108-90-7	U(1)	0.4
1,2-Dichlorobenzene	95-50-1	U(1)	0.6
1,3-Dichlorobenzene	541-73-1	U(1)	0.6
1,4-Dichlorobenzene	106-46-7	U(1)	0.8

\*\* This is Evergreen's estimated MDL value for a single xylene peak.  
(1) The absence of Chloro, and Dichlorobenzenes is confirmed by run  
Hall7269.

Surrogate Recoveries;  
cis-1,2-Dichloroethene

125%

QUALIFIERS:

U = Compound analyzed for, but not detected.  
B = Compound found in blank and sample. Compare blank and sample data.  
\* = The Method Detection Limit. See 40 CFR Ch.1, Pt.136, App. A,  
Meth. 602, Table 1 and pa. 12.1.  
NA = Not applicable or not available.

Approved: D. Blaschke

MPM  
Quality Assurance Officer

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303)425-6021

Purgeable Aromatic Report

Client Sample #	: SJRP-W01	Client Project #	: SJRP Sampling
Lab Sample #	: X34148	Lab Project #	: 91-1132
Date Sampled	: 04/16/91	Dilution Factor	: 1.000
Date Received	: 04/18/91	Method	: 602
Date Extracted/Prepared	: 04/25/91	Matrix	: Water
Date Analyzed	: 04/25/91	Lab File No.	: PID8268
Percent Loss on Drying	: NA	Method Blank No.	: MB04/25/91
Methanol extract?	: No		

Compound Name	Cas Number	Concentration ug/L	MDL* ug/L
Benzene	71-43-2	U	0.4
Toluene	108-88-3	U	0.4
Ethyl Benzene	100-41-4	U	0.4
Total Xylenes	1330-20-7	1.8	0.4**
Chlorobenzene	108-90-7	U(1)	0.4
1,2-Dichlorobenzene	95-50-1	U(1)	0.6
1,3-Dichlorobenzene	541-73-1	U(1)	0.6
1,4-Dichlorobenzene	106-46-7	U(1)	0.8

\*\* This is Evergreen's estimated MDL value for a single xylene peak.  
(1) Absence of chloro, and Dichlorobenzenes is confirmed by run Hall7268.

Surrogate Recoveries;  
cis-1,2-Dichloroethene

129%

QUALIFIERS:

U = Compound analyzed for, but not detected.  
B = Compound found in blank and sample. Compare blank and sample data.  
\* = The Method Detection Limit. See 40 CFR Ch.1, Pt.136, App. A,  
Meth. 602, Table 1 and pa. 12.1.  
NA = Not applicable or not available.

Approved: D. Blaszyk

MM  
Quality Assurance Officer

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield, Wheat Ridge, CO 80033

Method 601-Purgeable Halocarbons

Sample No. : SJRP-W01  
Lab Sample No. : X34148  
Date Received : 04/18/91  
Date Analyzed : 04/25/91

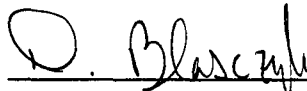
Client Project No. : SJRP Sampling  
Lab Project No. : 91-1132  
Dilution Factor : 1  
Matrix : WATER

Compound	CAS No.	Conc. ug/L	MDL ug/L
Bromodichloromethane	75-27-4	U	0.10
Bromoform	75-25-2	U	0.20
Bromomethane	74-83-9	U	1.18
Carbon Tetrachloride	56-23-5	U	0.12
Chlorobenzene	108-90-7	U	0.25
Chloroethane	75-00-3	U	0.52
2-Chloroethylvinyl ether	100-75-8	U	0.13
Chloroform	67-66-3	U	0.05
Chloromethane	74-87-3	U	0.08
Dibromochloromethane	124-48-1	U	0.09
1,2-Dichlorobenzene	95-50-1	U	0.15
1,3-Dichlorobenzene	541-73-1	U	0.32
1,4-Dichlorobenzene	106-46-7	U	0.24
Dichlorodifluoromethane	75-71-8	U	1.81
1,1-Dichloroethane	75-34-3	U	0.07
1,2-Dichloroethane	107-06-2	U	0.03
1,1-Dichloroethene	75-35-4	U	0.13
t-1,2-Dichloroethene	156-60-5	U	0.10
1,2-Dichloropropane	78-87-5	U	0.04
c-1,3-Dichloropropene	10061-01-5	U	0.34
t-1,3-Dichloropropene	10061-02-6	U	0.10
Methylene Chloride	75-09-2	U	0.25
1,1,2,2-Tetrachloroethane	79-34-5	U	0.03
Tetrachloroethene	127-18-4	U	0.03
1,1,1-Trichloroethane	71-55-6	U	0.03
1,1,2-Trichloroethane	79-00-5	U	0.02
Trichloroethene	79-01-6	U	0.03
Trichlorofluoromethane	75-69-4	U	-
Vinyl Chloride	75-01-4	U	0.18

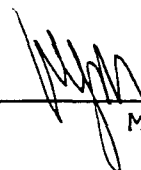
Surrogate Recovery (c-1,2 Dichloroethene): 89% Note: Compound may be in sample.

U=none detected B=also found in blank

Approved



QAO



M601X34148.FMT::DATA

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield, Wheat Ridge, CO 80033

Method 601-Purgeable Halocarbons

Sample No. : SJRP-P01  
Lab Sample No. : X34149  
Date Received : 04/18/91  
Date Analyzed : 04/25/91

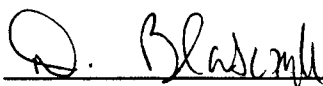
Client Project No. : SJRP Sampling  
Lab Project No. : 91-1132  
Dilution Factor : 1  
Matrix : WATER

Compound	CAS No.	Conc. ug/L	MDL ug/L
Bromodichloromethane	75-27-4	U	0.10
Bromoform	75-25-2	U	0.20
Bromomethane	74-83-9	U	1.18
Carbon Tetrachloride	56-23-5	U	0.12
Chlorobenzene	108-90-7	U	0.25
Chloroethane	75-00-3	U	0.52
2-Chloroethylvinyl ether	100-75-8	U	0.13
Chloroform	67-66-3	U	0.05
Chloromethane	74-87-3	U	0.08
Dibromochloromethane	124-48-1	U	0.09
1,2-Dichlorobenzene	95-50-1	U	0.15
1,3-Dichlorobenzene	541-73-1	U	0.32
1,4-Dichlorobenzene	106-46-7	U	0.24
Dichlorodifluoromethane	75-71-8	U	1.81
1,1-Dichloroethane	75-34-3	U	0.07
1,2-Dichloroethane	107-06-2	U	0.03
1,1-Dichloroethene	75-35-4	U	0.13
t-1,2-Dichloroethene	156-60-5	U	0.10
1,2-Dichloropropane	78-87-5	U	0.04
c-1,3-Dichloropropene	10061-01-5	U	0.34
t-1,3-Dichloropropene	10061-02-6	U	0.10
Methylene Chloride	75-09-2	U	0.25
1,1,2,2-Tetrachloroethane	79-34-5	U	0.03
Tetrachloroethene	127-18-4	U	0.03
1,1,1-Trichloroethane	71-55-6	U	0.03
1,1,2-Trichloroethane	79-00-5	U	0.02
Trichloroethene	79-01-6	U	0.03
Trichlorofluoromethane	75-69-4	U	-
Vinyl Chloride	75-01-4	U	0.18

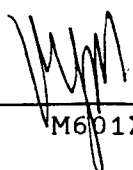
Surrogate Recovery (c-1,2 Dichloroethene): 83% Note: Compound may be in sample.

U=none detected B=also found in blank

Approved



QAO



M601X34149.FMT::DATA



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

November 18, 1991

BRUCE KING  
GOVERNOR

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

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-756-903-907**

Ms. Shauna Doven  
Western Gas Resources, Inc.  
12200 Pecos Street, Suite 230  
Denver, Colorado 80234

**RE: Fee for Discharge Plan GW-33  
San Juan River Natural Gas Processing Plant  
San Juan County, New Mexico**

Dear Ms. Doven:

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3-114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund." Enclosed is a copy of WQCC Rule 3-114 effective as of August 18, 1991.

The Oil Conservation Division (OCD) received your discharge plan renewal application for the Western Gas Resources, Inc. San Juan River Gas Plant on September 19, 1991, which is after the effective date of the WQCC Regulation 3-114. The discharge plan renewal application for the San Juan River Gas Plant is therefore subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee plus one-half of either the flat fee or discharge fee.

The filing fee is fifty (50) dollars for each discharge plan renewal application. The \$50 filing fee is due immediately and is nonrefundable.

The remainder of the "total fee" for gas processing plants falls under the "flat fee" category and is one-half of the flat fee (\$3335) or one-thousand, six-hundred and sixty dollars and fifty cents (\$1667.50). The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval.

Ms. Shauna Doven  
November 18, 1991  
Page 2

Please make all checks out to the **NMED - Water Quality Management** and send to the OCD Santa Fe Office. If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,



Roger C. Anderson  
Environmental Engineer

Enclosure

xc: OCD Aztec District Office

AFFIDAVIT OF PUBLICATION

No. 28425

STATE OF NEW MEXICO,  
County of San Juan:

CHRISTINE HILL being duly  
sworn, says: "That she is the  
NATIONAL AD MANAGER of  
The Farmington Daily Times, a daily  
newspaper of general circulation  
published in English in Farmington,  
said county and state, and that the  
hereto attached LEGAL NOTICE

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

First Publication WEDNESDAY, OCTOBER 9, 1991

Second Publication \_\_\_\_\_

Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

and that payment therefore in the  
amount of \$ 35.99 has been made.

Christine Hill

Subscribed and sworn to before me  
this 15th day of  
OCTOBER, 1991.

Connie Andrae  
Notary Public, San Juan County,  
New Mexico

My Comm expires: JULY 3, 1993

COPY OF PUBLICATI

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERAL AND NATURAL  
RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico  
Water Quality Control Commission Regulations, the  
following discharge plan renewal application has been  
submitted to the Director of the Oil Conservation  
Division, State Land Office Building, P. O. Box 2088  
Santa Fe, New Mexico 87504-2088, Telephone  
(505)827-5800:

(GW-33)-Western Gas Resources, Inc. Shaun  
Doven Environmental Coordinator, 12200 N.  
Pecos Street, Suite 230, Denver, Colorado  
80234-3439, has submitted a renewal application  
for the previously approved discharge plan for their  
San Juan River Gas Processing Plant located in  
Section 1, Township 29 North, Range 15 West  
NMPM, San Juan County, New Mexico. Approx-  
imately 1650 gallons per day of process waste water  
is discharged to synthetically double lined pond  
equipped with leak detection. Groundwater most  
likely to be affected by an accidental discharge is at  
a depth ranging from 15 feet to 110 feet with a total  
dissolved solids concentration of 17500 mg/l. The  
discharge plan addresses how spills, leaks, and  
other accidental discharges to the surface will be  
managed.

Any interested person may obtain further infor-  
mation from the Oil Conservation Division and may  
submit written comments to the Director of the O  
Conservation Division at the address given above. The  
discharge plan application may be viewed at the above  
address between 8:00 a.m. and 5:00 p.m., Monday  
through Friday. Prior to ruling on any proposed dis-  
charge plan or its modification, the Director of the O  
Conservation Division shall allow at least thirty (30)  
days after the date of publication of this notice durin  
which comments may be submitted to him and public  
hearing may be requested by any interested person.  
Requests for public hearing shall set forth the reason  
why a hearing should be held. A hearing will be held  
if the Director determines there is significant public  
interest.

If no public hearing is held, the Director will approve  
or disapprove the proposed plan based on information  
available. If a public hearing is held, the Director will  
approve or disapprove the proposed plan based on  
information in the plan and information submitted at  
the hearing.

GIVEN under the Seal of New Mexico Oil Conserva-  
tion Commission at Santa Fe, New Mexico, on this 2nd  
day of October, 1991.

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

SEAL

Legal Notice 28425 published in the Farmington Dai-  
ly Times, Farmington, New Mexico on Wednesday, Octo-  
ber 9, 1991.



STATE OF NEW MEXICO  
County of Bernalillo

ss

OIL CONSERVATION DIVISION  
RECEIVED

OCT 15 AM 9 18

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for.....1.....times, the first publication being on the.....10.....day

of.....Oct....., 1991, and the subsequent consecutive

publications on....., 1991.

*Thomas J. Smithson*

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this .....10..... day of.....Oct....., 1991.

PRICE.....\$ 23.13.....

Statement to come at end of month.

ACCOUNT NUMBER.....C 81184.....

CLA-22-A (R-12/91)

OFFICIAL SEAL  
*Bernadette Ortiz*  
BERNADETTE ORTIZ  
NOTARY PUBLIC-NEW MEXICO  
WITH SECRETARY OF STATE  
Expires 12-18-93

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND  
NATURAL RESOURCES  
DEPARTMENT  
OIL CONSERVATION DIVISION  
Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088. Telephone (505) 827-5800; (505) 827-5801.  
(GW-33) - Western Gas Resources, Inc., Shauna Doven Environmental Coordinator, 12200 N. Paseo Street, Suite 230, Denver, Colorado 80234-3438, has submitted a renewal application for the previously approved discharge plan for their San Juan River Gas Processing Plant located in Section 11, Township 28 North, Range 18 West, NMPM, San Juan County, New Mexico. Approximately 1800 gallons per day of process waste water is discharged to a synthetically double lined pond equipped with leak detection. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 15 feet to 110 feet with a total dissolved solids concentration of 17500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.  
Any interested person may obtain further information from the Oil Conservation Discharge Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.  
If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.  
GIVEN under the Seal of New Mexico Oil Conservation Commission Santa Fe, New Mexico, on this 2nd day of October, 1991.

**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

**(GW-33) - Western Gas Resources, Inc., Shauna Doven Environmental Coordinator, 12200 N. Pecos Street, Suite 230, Denver, Colorado 80234-3439, has submitted a renewal application for the previously approved discharge plan for their San Juan River Gas Processing Plant is located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Approximately 1650 gallons per day of process waste water is discharged to a synthetically double linen pond equipped with leak detection. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 15 feet to 110 feet with a total dissolved solids concentration of 17500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 aa.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2th day of October, 1991.

S E A L

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director



BRUCE KING  
GOVERNOR

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

September 30, 1991

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-327-278-258**

Mr. Thomas D. Hutchins, Manager  
North Region Compliance Engineering  
El Paso Natural Gas Company  
P.O. Box 1492  
El Paso, TX 79978

**RE: EPNG SAN JUAN RIVER PLANT:  
POND AND PIT CLOSURE PLAN  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Hutchins:

On June 25, 1991, David Boyer and William Olson of the New Mexico Oil Conservation Division (OCD) met with you to discuss the April 1991 "FINAL CLOSURE PLAN FOR WASTEWATER IMPOUNDMENTS AND FLARE PITS AT EL PASO NATURAL GAS COMPANY'S SAN JUAN RIVER PLANT". The discussion focused on the need to update ground water and soil/sludge information from selected piezometers and monitor wells so that at the completion of work ground water will be protected and EPNG will have minimum future liability for past activities. During the meeting OCD stated that before approval could be given for the proposed work, the additional updated information needed to be provided for our evaluation. The requested analytical analyses and answers to a number of questions asked during the June meeting were provided in your letter of August 30, 1991.

The OCD has reviewed the information provided in your August 30 letter, and meeting notes taken by Mr. Olson and Mr. Henry Van of your office, and finds that additional information and/or commitments from EPNG are necessary before the Plan can receive OCD approval:

1. The pump-back system is to be kept in operation as an "active" unit during the closure process (p.24). What decision has been reached regarding disposal of this water? Will the pump-back system be kept operational or in working order for the duration of the proposed five-year cover system monitoring as a back-up measure (p.28)?
2. Will pond 1 be dewatered prior to the start of closure? If so, how?

3. OCD has concerns regarding the effectiveness of the two-layer cover system proposed for the salt impacted area. Additional information must be provided to demonstrate that the system can work as designed. Specifically, the following questions must be adequately answered:
  - a. Are borrow soils #1 and #3 sufficiently coarse to prevent wicking from the substrate to these soils?
  - b. Are the textural differences between borrow soil #2 (proposed for the top layer) and soils #1 and #3 (lower layer) sufficient to discourage downward movement of the limited rainfall moisture expected at this locality?
  - c. What effect will compaction by earthmoving equipment have on the ability of the cover system to perform as designed?
4. Show specifically on the site map the proposed locations for the borrow soils. Is enough soil available in the selected areas to complete the cover system? How will the borrow soil areas be closed and returned to grade so that additional erosion problems are not created?
5. A high level of benzene (7,400 ppb) and elevated values of other volatile aromatic hydrocarbons were detected in well P-10. Prepare an additional work element to provide adequate investigation and remediation of petroleum hydrocarbons at this location.
6. A high level of total Kjeldahl nitrogen (120 ppm) was detected in well M-4. Over time and distance this species can change to nitrate-nitrogen and threaten domestic water supplies. Prepare an additional work element to provide adequate investigation, delineation and remediation (if necessary) of the various nitrogen species in the vicinity of this location.
7. Sufficiently high levels of benzene and other aromatics were found at the North Flare Pit to require additional vertical and horizontal sampling by EPNG. Provide additional specifics on the proposed investigation and remediation procedures necessary to properly close both this pit and the South Flare Pit.

Mr. Thomas D. Hutchins

September 30, 1991

Page 3

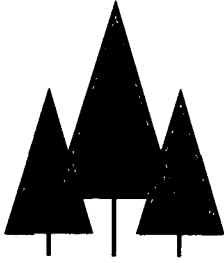
If you have any questions regarding the material or information requested in this letter, please call Bill Olson at (505) 827-5885 after October 21. Before providing a specific response to the items addressed in this letter, an additional meeting to discuss this matter could be scheduled if desired by EPNG to speed up resolution of these issues so that physical closure can begin.

Sincerely,

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

Roger Anderson, Acting Chief  
Environmental Bureau

cc: OCD Aztec Office



OIL CONSERVATION DIVISION  
RECEIVED

91 DEC 2 AM 10 16

## Western Gas Resources, Inc.

Debra Albert  
Environmental Engineer  
Western Gas Resources  
12200 Pecos St.  
Denver, CO. 80234

November 13, 1991

Roger Anderson  
New Mexico Oil Conservation Division  
Santa Fe Office  
P.O. Box 2088  
Santa Fe, NM. 87501

Mr. Anderson:

Western Gas Resources (Western) periodically generates spent catalyst at the Roswell Gas Treatment Facility. This catalyst is a carbon-based material with sulfur molecules which react with the arsenic in natural gas to remove it. The spent catalyst contains the base carbon material with approximately 1% sulfur and 1% arsenic. A Material Safety Data Sheet and a copy of the laboratory analysis are attached for your review.

In the past this material has been recycled and used for trace element supplements to fertilizer. Western is now planning to treat this material as a waste rather than a recycled material, and dispose of it through USPCI. It will either be landfilled at USPCI's Lone Mountain Facility, or incinerated by USPCI.

Western's intent is to be in compliance with all requirements and regulations applicable to generation and disposal of this material. It is currently stored in a safe and prudent manner, and we are arranging for disposal as soon as possible. We believe this meets the requirements for wastes included in the RCRA Subtitle C exemptions for natural gas processing materials from a gathering and production system.

We are seeking your approval of the plan to dispose of the waste with USPCI for landfilling or incineration. Please feel free to contact me at (303) 452-5603 with any questions or comments you may have.

Sincerely,

*Debra Albert*  
Debra Albert

cc: Gary Davis, Engineering/Environmental Vice President  
Dale Burford, Operations Vice President  
Jack Bates, Midkiff Supervisor  
Bruce Portz, Sr. Project Engineer  
Don Kronenberg, Esq.

11/8/91  
1052 am  
WHA

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303) 425-6021

TCLP, METALS

Date Sampled : 11/4/91  
Date Received : 11/5/91  
Date Prepared : 11/7/91  
Date Analyzed : 11/8/91  
Client Project No.: Arsenic Catalyst  
Lab Project No. : 91-3789  
Method : 40 CFR 261.24  
Matrix : Solid

Units: mg/L

Client Sample #	1				
Evergreen Sample #	V44880				TCLP LIMITS
As	640				5.0
Ba	0.4				100.0
Cd	20				1.0
Cr	<0.014				5.0
Pb	<0.03				5.0
Hg	(out)				0.2
Se	<0.15				1.0
Ag	<0.04				5.0

to: Shuena Doren  
Western Star Res.  
3/9 11/8 11AM

NOTE: Results are reported on the leachate from the TCLP extraction.

from: Carl Smith  
Will fax Hg and PCB later today

Approved

Quality Assurance Officer

EVERGREEN ANALYTICAL, INC.  
4036 Youngfied Wheat Ridge CO 80033  
(303)425-6021

PCB Data Report

Client Sample #	: 1	Client Project #	: Arsenic Cat.
Lab Sample #	: X44880	Lab Project #	: 91-3789
Date Sampled	: 11/04/91	Dilution Factor	: 7.463
Date Received	: 11/05/91	Method	: SCREEN
Date Extracted/Prepared	: 11/06/91	Matrix	: Solid
Date Analyzed	: 11/08/91	Lab File No.	: ECD1133
Percent Loss on Drying	: NA	Method Blank No.	: NA
Level	: LOW		
pH	: NA		

Compound Name	Cas	Concentration ug/Kg	PQL* ug/Kg
Aroclor-1016		U	600
Aroclor-1221		U	600
Aroclor-1232		U	600
Aroclor-1242		U	600
Aroclor-1248	12	U	600
Aroclor-1254	110	U	1,200
Aroclor-1260	1109	U	1,200

ARSENIC CATALYST

This analysis is a GC/ECD method similar to EPA 8080 but using a smaller initial sample size, a less extensive calibration, and no alumina clean-up of the extract.

Surrogate Recovery;

DCB

35%

TCMX

13%

QUALIFIERS:

U = Compound analyzed for, but not detected.

J = Indicates an estimated value when the compound is detected, but is below the CLP Practical Quantitation Limit (PQL).

B = Compound found in blank and sample. Compare blank and sample data.

\* = Indicates the Practical Quantitation Limit (PQL).

NA = Not applicable or not available.

Approved: \_\_\_\_\_

\_\_\_\_\_  
Quality Assurance Officer

Post-It brand fax transmittal memo 7571		# of pages > 1
To: Shaura Over	From: Carl Monte	
Co: Western Fax	Co: 11/8	
Dept:	Phone #: 1720	
Fax #: 252-8520	Fax #:	



NOV-08-1991 10:55 FROM EVERGREEN ANALYTICAL INC. TO 00205528  
EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303)425-6021

TCLP Benzene Data Report

Client Sample #	: 1	Client Project #	: Arsenic
Lab Sample #	: X44880		: Catalyst
Date Sampled	: 11/04/91	Lab Project #	: 91-3789
Date Received	: 11/05/91	Dilution Factor	: 10.000
Date Extracted/Prepared	: 11/07/91	Method	: 8020
Date Analyzed	: 11/07/91	Matrix	: Water
Percent Loss on Drying	: NA	Lab File No.	: PID5196
Methanol extract?	: No	Method Blank No.	: MB11/07/91

Compound Name	Cas Number	Concentration	PQL*
		ug/L	ug/L
Benzene	71-43-2	270	40

Surrogate Recoveries;  
a,a,a-Trifluorotoluene 102%

QUALIFIERS:

- U = Compound analyzed for, but not detected.
- J = Indicates an estimated value when the compound is detected, but is below the CLP Practical Quantitation Limit (PQL).
- B = Compound found in blank and sample. Compare blank and sample data
- \* = The Practical Quantitation Limit is equal to the dilution factor multiplied by ten times the Method Detection Limit as determined by EPA SW846, Vol. 1B, Part II, pa. 8000-14.
- NA = Not applicable or not available.

Approved: Dan Weiss

\_\_\_\_\_  
Quality Assurance Officer

forms\btex.pln

EVERGREEN ANALYTICAL, INC.  
4036 Youngfield St. Wheat Ridge, CO 80033  
(303) 425-6021

RCRA CHARACTERISTICS

Date Sampled	: 11/4/91	Client Project No.	: Arsenic Catalyst
Date Received	: 11/5/91	Lab Project No.	: 91-3789
Date Prepared	: 11/6/91	Matrix	: Soil
Date Analyzed	: 11/6/91	Methods	: See Below

Evergreen					
Sample #	X44880				
Client					
Sample #	1				
Flashpoint <sup>(1)</sup>					
(°F @ 620 mm Hg)	51				
pH <sup>(2)</sup>	5.66				

Methods:

- (1) EPA Method 1010 using Pensky-Martens closed cup apparatus  
(4) EPA Method 150.1

  
Approved

Quality Assurance Officer

378941.21

**United Catalysts Inc.**Girdler, CCI and  
Houdry CatalystsP.O. Box 32370  
Louisville, KY 40232 USA  
Telephone: 502-634-7200  
Telex: 204190, 204239  
Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**C8-7-01**

---

**SECTION I PRODUCT IDENTIFICATION**

---

**Trade Name and Synonyms:** C8-7-01**Chemical Family:** Heterogeneous Catalyst**Formula:** C+CuO

---

**SECTION II HAZARDOUS INGREDIENTS**

---

**Hazardous Components in the Solid Mixture**

<u>COMPONENT</u>	<u>CAS No.</u>	<u>%</u>	<u>OSHA/PEL</u>	<u>ACGIH/TLV</u>
Carbon (Activated)	7440-44-0	85-95	10.0 mg/m <sup>3</sup>	10.0 mg/m <sup>3</sup>
Copper oxide	1317-38-0	5-15	1.0 mg/m <sup>3</sup>	1.0 mg/m <sup>3</sup>

**Caution!!** Wet activated carbon removes oxygen from air causing a severe hazard to workers inside carbon vessels and enclosed or confined spaces. Before entering such an area, sampling and work procedures for low oxygen levels should be taken to insure ample oxygen availability, observing all local, state, and federal regulations.

---

**SECTION III PHYSICAL DATA**

---

**Appearance and Odor:** Black granules. No odor.**Melting Point:** Greater than 3550°C, greater than 6400°F.**Solubility in Water:** Insoluble.**Bulk Density:** 38 lbs./cu. ft.**Percent Volatile by Weight at 1000°F:** Less than 5%.

**United Catalysts Inc.**Girdler, CCI and  
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Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**C8-7-01**

---

**SECTION IV FIRE EXPLOSION DATA**

---

**Fire and Explosion Hazard**

Combustible solid; may be ignited by heat, sparks, or flames. May burn rapidly with flare-burning effect.

**Flammable Limits:**

275°F in air.

**Firefighting Media**

Dry chemical, water spray, or foam.

For larger fires, use water spray fog or foam.

**Firefighting**

Combustible solids, liquids or gases: Cool containers that are exposed to flames with water from the side until well after fire is out. For massive fire in enclosed area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of the tank due to fire.

---

**SECTION V HEALTH HAZARD DATA**

---

Health hazards may arise from inhalation, ingestion, and/or contact with the skin and/or eyes.

Activated carbon may cause irritation of the eyes, mucous membranes, and lungs; conjunctivitis; epithelial hyperplasia of the cornea; and eczematous inflammation of the eyes. Ingestion of large quantities may cause stomach and alimentary tract irritation. In the form of dust, activated carbon may contain small amounts of irritating and possibly toxic impurities.

Excessive inhalation of copper dusts may produce irritation to the upper respiratory tract and may cause temporary or permanent damage to the lungs. Sublimed copper oxide may be responsible for a form of metal fume fever. Ingestion of large quantities may result in damage to the liver, pancreas, kidney, or nervous system. Prolonged or repeated contact with the skin may result in irritation and possible dermatitis in sensitive individuals. Contact with eye tissue may result in irritation and/or conjunctivitis.

**United Catalysts Inc.**Girdler, CCI and  
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Louisville, KY 40232 USA  
Telephone: 502-634-7200  
Telec 204190, 204239  
Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**CS-7-01****First Aid (Inhalation)**

Remove to fresh air immediately. If breathing has stopped, give artificial respiration. Keep affected person warm and at rest. Get medical attention immediately.

**First Aid (Ingestion)**

If large amounts have been ingested, give emetics to cause vomiting. Stomach siphon may be applied as well. Milk and fatty acids should be avoided. Get medical attention immediately.

**First Aid (Eyes)**

Wash eyes immediately and carefully for 30 minutes with running water, lifting upper and lower eyelids occasionally. Get prompt medical attention.

**First Aid (Skin)**

To avoid repeated or prolonged contact with this chemical, use good hygienic practices. Wash with soap and a large amount of water. Get medical attention if irritation or inflammation develops.

---

**SECTION VI REACTIVITY DATA**

---

**Reactivity**

Is stable under normal temperatures and pressures in sealed containers. Hazardous polymerization will not occur. Finely divided particles may result in fire or explosion. Carbon is combustible when exposed to heat.

---

**SECTION VII SPILL OR LEAK PROCEDURES**

---

Notify safety personnel of spills or leaks. Clean-up personnel need protection against inhalation of dusts or fumes. Eye protection is required. Vacuuming and/or wet methods of cleanup are preferred. Place in appropriate containers for disposal, keeping airborne particulates at a minimum.

**Disposal**

Consult applicable local, state, and federal regulations to select the method of disposal. Recover metal components by reprocessing whenever possible.

**United Catalysts Inc.**Girdler, CCI and  
Houdry CatalystsP.O. Box 32370  
Louisville, KY 40232 USA  
Telephone: 502-634-7200  
Telex: 204190, 204239  
Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET  
C8-7-01**

---

**SECTION VIII SPECIAL PROTECTION INFORMATION**

---

**Respiratory Protection**

Provide a NIOSH/MSHA jointly approved respirator in the absence of proper environmental control. Contact your safety equipment supplier for proper mask type.

**Ventilation**

Provide general and/or local exhaust ventilation to keep exposures below the TLV. Ventilation used must be designed to prevent spots of dust accumulation or recycling of dusts.

**Protective Clothing**

Wear protective clothing, including long sleeves and gloves, to prevent repeated or prolonged skin contact.

**Eye Protection**

Chemical splash goggles designed in compliance with OSHA regulations are recommended. Consult your safety equipment supplier.

---

**SECTION IX REGULATORY INFORMATION**

---

This product contains substances which appear on lists of the indicated act or agency.

XX American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances in the Work Environment

   California Proposition 65

   Clean Air Act 40 CFR 61

XX Clean Water Act 40 CFR 116

XX Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) 40 CFR 302

   International Agency for Research on Cancer (IARC) Monographs on the Evaluation of Carcinogenic Risks to Humans Volumes 1-42.

   NTP Annual Report on Carcinogens

XX Occupational Safety and Health Administration (OSHA) 29 CFR 1910

**United Catalysts Inc.**Girdler, CCI and  
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Louisville, KY 40232 USA  
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Telex: 204190, 204239  
Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**C8-7-01**

- Resource Conservation and Recovery Act (RCRA) 40 CFR 261  
Subpart C
- XX Superfund Amendments and Reauthorization Act of 1986 (SARA)  
Title III Section 313 40 CFR 372
- XX Toxic Substances Control Act (TSCA) 40 CFR 700

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**SECTION X BIBLIOGRAPHY**

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Clinical Toxicology of Commercial Products, Fifth Edition, Gosselin,  
Smith, Hodge, Williams and Wilkins, Baltimore, 1984.

Dangerous Properties of Industrial Materials, Sax, N. Irving, ed.,  
Van Nostrand Reinhold Company, New York, 7th Edition, 1989.

IARC Monographs on the Evaluation of Carcinogenic Risks to Humans,  
Overall Evaluations of Carcinogenicity: An Updating of IARC  
Monographs, Volumes 1-42, Lyon: World Health Organization,  
International Agency for Research on Cancer, 1987.

IARC Monographs on the Evaluation of Carcinogenic Risks to Humans:  
Silica and Some Silicates, Volume 42, Lyon, World Health  
Organization, International Agency for Research on Cancer, 1987.

Kentucky Occupational Safety and Health Standards for General  
Industry, 29 CFR Part 910 as adopted by 803 KAR 2:020 with  
Amendments as of July 31, 1986, Promulgated by Occupational Safety  
and Health Administration, U.S. Department of Labor, Kentucky  
Occupational Safety and Health Program, Kentucky Labor Cabinet,  
Commerce Clearing House, Inc., Chicago 1986.

Occupational Diseases, A Guide to their Recognition, U. S.  
Department of Health, Education, and Welfare, Public Health  
Service, Center for Disease Control, NIOSH, Revised Edition, June  
1977.

Patty's Industrial Hygiene and Toxicology, Clayton, G.D., Clayton,  
F.E., eds., John Wiley and Sons, New York, 3rd Edition, Volume 2,  
A-C, 1981.

TLVs<sup>3</sup> Threshold Limit Values and Biological Exposure Indices for  
1988-1989, American Conference of Governmental Industrial  
Hygienists, Cincinnati, OH, 1988.

MSDS's from Suppliers of Raw Materials.

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Louisville, KY 40232 USA  
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Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET  
C8-7-01**

---

**SECTION XI**

---

The information presented herein is believed to be accurate but is not warranted. Recipients are advised to confirm in advance that the information is current and applicable to meet their circumstances.

\* No Information Available

Doc. 256



**United Catalysts Inc.**Girdler, CCI and  
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Louisville, KY 40232 USA  
Telephone: 502-634-7200  
Telex: 204190, 204239  
Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**C8-6-01****First Aid (Inhalation)**

Remove to fresh air immediately. If breathing has stopped, give artificial respiration. Keep affected person warm and at rest. Get medical attention immediately.

**First Aid (Ingestion)**

If large amounts have been ingested, give emetics to cause vomiting. Stomach siphon may be applied as well. Milk and fatty acids should be avoided. Get medical attention immediately.

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Wash eyes immediately and carefully for 30 minutes with running water, lifting upper and lower eyelids occasionally. Get prompt medical attention.

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---

**SECTION VI REACTIVITY DATA**

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**Reactivity**

Is stable under normal temperatures and pressures in sealed containers. Hazardous polymerization will not occur. Finely divided particles may result in fire or explosion. Carbon is combustible when exposed to heat.

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**SECTION VII SPILL OR LEAK PROCEDURES**

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**Disposal**

Consult applicable local, state, and federal regulations to select the method of disposal. Recover metal components by reprocessing whenever possible.

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**SECTION VIII SPECIAL PROTECTION INFORMATION**

---

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**Ventilation**

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**Protective Clothing**

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**Eye Protection**

Chemical splash goggles designed in compliance with OSHA regulations are recommended. Consult your safety equipment supplier.

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Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET  
C8-6-01**

---

**SECTION XI**

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The information presented herein is believed to be accurate but is not warranted. Recipients are advised to confirm in advance that the information is current and applicable to meet their circumstances.

\* No Information Available

Doc. 78

**United Catalysts Inc.**Girdler, CCI and  
Houdry CatalystsP.O. Box 32370  
Louisville, KY 40232 USA  
Telephone: 502-634-7200  
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Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**C8-6-01**

---

**SECTION I PRODUCT IDENTIFICATION**

---

**Trade Name and Synonyms:** C8-6-01**Chemical Family:** Heterogeneous Catalyst**Formula:** C+CuO

---

**SECTION II HAZARDOUS INGREDIENTS**

---

**Hazardous Components in the Solid Mixture**

<u>COMPONENT</u>	<u>CAS No.</u>	<u>%</u>	<u>OSHA/PEL</u>	<u>ACGIH/TLV</u>
Carbon (Activated)	7440-44-0	85-95	10.0 mg/m <sup>3</sup>	10.0 mg/m <sup>3</sup>
Copper oxide	1317-38-0	5-15	1.0 mg/m <sup>3</sup>	1.0 mg/m <sup>3</sup>

**Caution!!** Wet activated carbon removes oxygen from air causing a severe hazard to workers inside carbon vessels and enclosed or confined spaces. Before entering such an area, sampling and work procedures for low oxygen levels should be taken to insure ample oxygen availability, observing all local, state, and federal regulations.

---

**SECTION III PHYSICAL DATA**

---

**Appearance and Odor:** Black granules. No odor.**Melting Point:** Greater than 3550°C, greater than 6400°F.**Solubility in Water:** Insoluble.**Bulk Density:** 36 lbs./cu. ft.**Percent Volatile by Weight at 1000°F:** Less than 10%.

**United Catalysts Inc.**Girdler, CCI and  
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Fax: 502-637-3732**MATERIAL SAFETY DATA SHEET**  
**C8-6-01**

---

**SECTION IV FIRE EXPLOSION DATA**

---

**Fire and Explosion Hazard**

Combustible solid; may be ignited by heat, sparks, or flames. May burn rapidly with flare-burning effect.

**Flammable Limits:**

275°F in air.

**Firefighting Media**

Dry chemical, water spray, or foam.

For larger fires, use water spray fog or foam.

**Firefighting**

Combustible solids, liquids or gases: Cool containers that are exposed to flames with water from the side until well after fire is out. For massive fire in enclosed area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of the tank due to fire.

---

**SECTION V HEALTH HAZARD DATA**

---

Health hazards may arise from inhalation, ingestion, and/or contact with the skin and/or eyes.

Activated carbon may cause irritation of the eyes, mucous membranes, and lungs; conjunctivitis; epithelial hyperplasia of the cornea; and eczematous inflammation of the eyes. Ingestion of large quantities may cause stomach and alimentary tract irritation. In the form of dust, activated carbon may contain small amounts of irritating and possibly toxic impurities.

Excessive inhalation of copper dusts may produce irritation to the upper respiratory tract and may cause temporary or permanent damage to the lungs. Sublimed copper oxide may be responsible for a form of metal fume fever. Ingestion of large quantities may result in damage to the liver, pancreas, kidney, or nervous system. Prolonged or repeated contact with the skin may result in irritation and possible dermatitis in sensitive individuals. Contact with eye tissue may result in irritation and/or conjunctivitis.



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

OIL CONSERVATION DIVISION



December 4, 1991

BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

MATTHEW BACA  
DEPUTY SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-690-155-038**

Ms. Debra Albert  
Western Gas Resources  
12200 Pecos St.  
Denver, Colorado 80234

Re: Spent Catalyst Disposal  
Roswell Gas Treatment Facility

Dear Ms. Albert:

The Oil Conservation Division (OCD) has received your request, dated November 13, 1991, to transport and dispose of the arsenic removal catalyst from the Roswell Gas Treatment Facility to the USPCI Lone Mountain Facility. The waste catalyst is exempt from RCRA Subtitle C Regulation, however, it will be transported and disposed of in a manner consistent with "Hazardous Waste" requirements.

Based on the information provided in your request, disposal of the spent catalyst at the USPCI facility is approved.

If you have any questions, please call me at (505) 827-5812.

Sincerely:

Roger C. Anderson  
Environmental Engineer  
Acting Bureau Chief

xc: OCD Artesia Office  
Chris Eustice - OCD Hobbs

**VILLAGRA BUILDING - 408 Gallisteo**

Forestry and Resources Conservation Division  
P.O. Box 1948 87504-1948  
827-5830

Park and Recreation Division  
P.O. Box 1147 87504-1147  
827-7465

**2040 South Pacheco**

Office of the Secretary  
827-5950

Administrative Services  
827-5925

Energy Conservation & Management  
827-5900

Mining and Minerals  
827-5970

**LAND OFFICE BUILDING - 310 Old Santa Fe Trail**

Oil Conservation Division  
P.O. Box 2088 87504-2088  
827-5800



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

December 11, 1990

**Certified Mail**  
**Return Receipt No. P-327-278-014**

Mr. Gary W. Davis, Vice President  
Western Gas Processors, Ltd.  
12200 North Pecos Street  
Denver, Colorado 80234

RE: Discharge Plan GW-33  
San Juan River Gas Plant  
San Juan County, New Mexico

Dear Mr. Davis:

On December 29, 1986, the ground water discharge plan, GW-33 for the Western Gas Processor's San Juan Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on December 29, 1991.

If your facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intent to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application.

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.



Please note that all gas plants, refineries and compressor stations in excess of 25 years of age will be required to submit plans for, or the results of, an underground drainline testing program as a requirement for discharge plan renewal.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5884.

Sincerely,

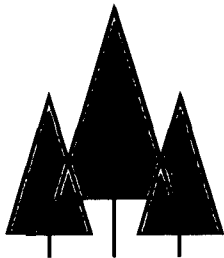
A handwritten signature in black ink, reading "David G. Boyer". The signature is written in a cursive style with a large, looping initial "D".

David G. Boyer, Hydrogeologist  
Environmental Bureau Chief

DGB/si

Enclosure

cc: OCD Aztec Office



OIL CONSERVATION DIVISION  
RECEIVED

'90 AUG 10 AM 8 45

# Western Gas Processors, Ltd.

*Western Gas Resources, Inc. — The General Partner*

August 6, 1990

New Mexico Oil Conservation Division  
Attn: Mr. Roger Anderson  
P.O. Box 2088  
State Land Office Building  
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

RE: Pigging Sludge Disposal  
Discharge Plan GW-33, San Juan Plant

On May 23, 1990, Western's proposed disposal of San Juan pigging sludge via the regulated cement kiln fuels program was approved by the OCD. Western's contractor later expressed some reservations about Chemical Handling's manifesting procedures. Following their advice, Western agreed to instead ship the sludge to USPCI's facility in Utah. On July 23, OCD approval for that disposal site was granted.

I have conducted my own review of Chemical Handling's procedures, have visited their facility, and have reviewed documentation received by them from the Colorado Health Department. I have no reservations about the adequacy of Chemical Handling's compliance status. I also prefer their method because the sludge is recycled as a fuel rather than landfilled.

For these reasons, Western now intends to dispose of the sludge as originally proposed and approved. Records of dates and volumes will be maintained at the plant site, as requested by the OCD. Thank you.

Sincerely,

Tracy Altman  
Environmental Engineer



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

July 23, 1990

GARREY CARRUTHERS  
GOVERNOR

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

CERTIFIED MAIL  
RETURN RECEIPT NO. P 918-402-332

Ms. Tracy Altman  
Environmental Engineer  
Western Gas Resources, Inc.  
12200 North Pecos Street  
Suite 230  
Denver, CO 80234-3439

Re: **Pigging Sludge Disposal, Discharge Plan GW-33,  
San Juan River Plant**

Dear Ms. Altman:

The Oil Conservation Division (OCD) has received your request dated July 10, 1990, to change the approved facility for disposal of pipeline pigging sludge from Chemical Handling Corporation of Bloomfield, Colorado to USPCI in Grassy Mountain, Utah.

The request is hereby approved. Records are to be kept at the San Juan Plant for the dates and volumes of sludge that is shipped to USPCI.

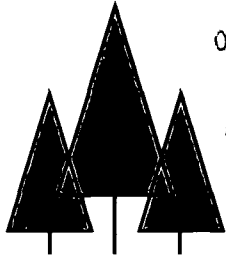
If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely,

DAVID G. BOYER, Hydrogeologist  
Environmental Bureau Chief

DB/dp

cc: Aztec Office



OIL CONSERVATION DIVISION  
RECEIVED

'90 JUL 16 AM 8 57

# Western Gas Processors, Ltd.

*Western Gas Resources, Inc. — The General Partner*

July 10, 1990

New Mexico Oil Conservation Division  
Attn: Mr. Roger Anderson  
P.O. Box 2088  
State Land Office Building  
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

RE: Pigging Sludge Disposal  
Discharge Plan GW-33, San Juan River Plant

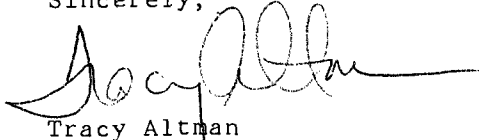
Western received your approval to dispose of pigging sludge generated at the San Juan River Plant through the Chemical Handling Corporation (CHC) of Broomfield, CO on May 23, 1990. As final preparations were made for packaging and shipment of the sludge, Western's contractor, the Rinchem Company of Albuquerque, became concerned about CHC's proposed manifesting procedures. Apparently the sludge was to be handled differently from what was originally understood. Rather than assume the risk of improper manifesting, Western chose to locate another disposal site.

Obtaining sludge acceptance from a disposal facility has been a difficult and time-consuming process. Rinchem, on Western's behalf, has attempted to obtain acceptance from five facilities in five states. The process has been so difficult because the sludge has low BTU content and contains some ignitable sulfides, making it a relatively undesirable waste.

USPCI, in Grassy Mountain, Utah, has agreed to accept the sludge for disposal. The sludge will not threaten the environment, because it will be solidified with an inert material prior to disposal. USPCI is recognized as one of the leaders in solid waste handling and disposal. They share Western's goals of protecting the environment and obeying all environmental regulations.

Western respectfully requests that the OCD approve this proposed disposal method. Please do not hesitate to contact me if you require additional information. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tracy Altman', with a long horizontal flourish extending to the right.

Tracy Altman  
Environmental Engineer

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

**May 23, 1990**

**Ms. Tracy Altman  
Environmental Engineer  
WESTERN GAS RESOURCES, INC.  
12200 North Pecos Street  
Suite 230  
Denver, Colorado 80234-3439**

**RE: Pigging Sludge Disposal  
Discharge Plan GW-33  
San Juan River Plant**

**Dear Ms. Altman:**

The Oil Conservation Division (OCD) has received your proposal to dispose of pipeline pigging sludge thru Chemical Handling Corporation of Bloomfield, Colorado. Chemical Handling will blend the sludge for use in their regulated cement kiln fuels program.

The recycling of a waste for a beneficial use is the preferred disposal method, therefore your proposal is approved. Records are to be kept at the San Juan Plant for the dates and volumes of sludge that is shipped to Chemical Handling.

If you have any questions, please do not hesitate to call me at (505) 827-5884.

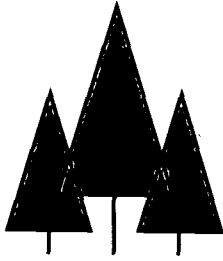
Sincerely,



**Roger C. Anderson  
Environmental Engineer**

**RCA/si**

**cc: OCD Aztec Office**



# Western Gas Resources, Inc.

RECEIVED  
DIVISION  
'90 MAY 21 AM 9 52

May 15, 1990

New Mexico Oil Conservation Division  
Attn: Mr. Roger Anderson  
Environmental Engineer  
P.O. Box 2088  
State Land Office Building  
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

RE: San Juan River Plant  
San Juan County, New Mexico

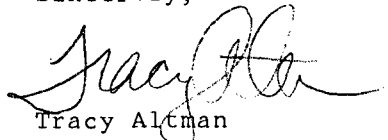
As reported in our recent discharge plan modification application, pipeline pigging sludge is recovered at the San Juan facility. The sludge is accumulated in a fiberglass tank until sufficient quantities are present to allow economic disposal. Western has contracted with the Rinchem Co. of Albuquerque to identify an appropriate disposal method for the sludge.

The technique that we believe is the most environmentally sound and economically feasible is utilization of the sludge as an alternate fuel source. Chemical Handling Corporation of Broomfield, Colorado has profiled the sludge and agreed to blend it for use in their regulated cement kiln fuels program. The sludge would be loaded into 55-gallon drums by Rinchem technicians and transported to the Broomfield facility. A copy of Chemical Handling's description of services is attached.

Page 2  
Roger Anderson

Western respectfully requests the approval of the Oil Conservation Division for this disposal method. Please do not hesitate to contact me if you require additional information. Thank you.

Sincerely,



Tracy Altman  
Environmental Engineer

attach.





## CHEMICAL HANDLING CORPORATION

11811 UPHAM BROOMFIELD, COLORADO 80020

The proper and economical disposal of hazardous waste, particularly waste that creates a danger to health or our environmental quality, is of vital concern to us at Chemical Handling Corporation. Our staff of chemists, engineers, and environmental specialists are constantly working to offer you reliable disposal methods.

Chemical Handling Corporation's business has three divisions to serve you:

Recycling of chlorinated and fluorinated waste for re-use

Shredding and blending of solids

Efficient blending of flammable materials for use as alternate fuel source

We specialize, also, in the blending of sludges and solid waste for fuels program incineration. This service is a viable cost effective alternative to total incineration for the many materials that have a value as a fuels source.

---

CHEMICAL HANDLING SERVICES.

FORMS OF WASTE ACCEPTED

- Bulk Liquid
- Containerized Liquids
- Containerized Sludges and Solids

TYPES OF WASTE ACCEPTED

- Acids
- Caustics
- Paints
- Paint Solids
- Ink Solvents
- Halogenated and Non-Halogenated
- Organic Still Bottoms

ON-SITE PROCESS

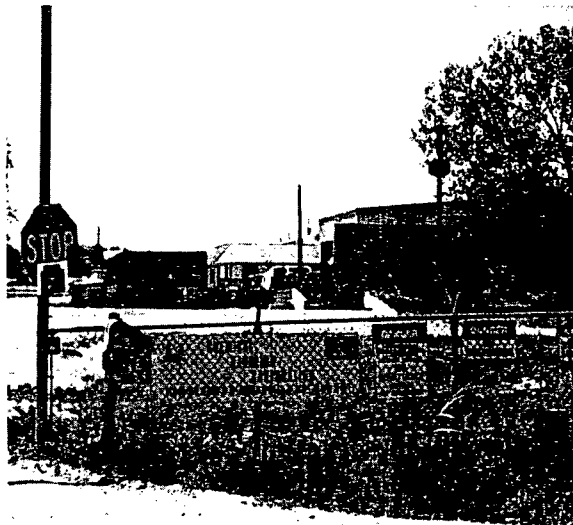
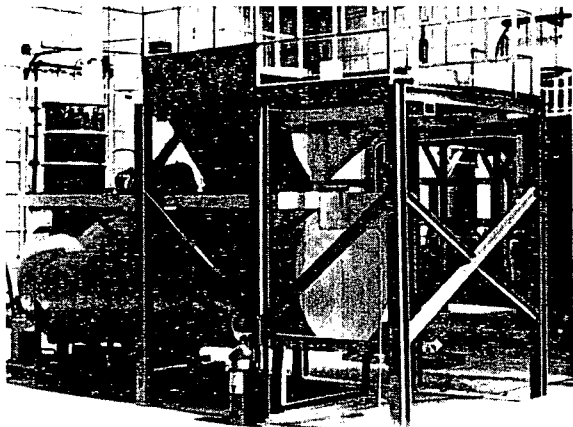
- Solvent Blending
- Sludge and Solid Blending
- Solvent Distillation

ACCESS


Company Owned Truck Fleet

APPROVAL TIME

3 Working Days with Waste Profile and Representative Sample



For More Information on the Services of  
Chemical Handling Corporation  
call or write:

 **Chemical Handling Corporation**  
P.O. Box 1044  
Broomfield, CO 80038  
(303) 460-1000  
1-800-347-9797  
FAX (303) 460-9430

<p><b>Chemical Handling Corporation</b></p> <p>EPA ID #COD 982 581 050</p> <p><b>Certificate of Destruction</b></p> <p>Chemical Handling Corporation has disposed of the waste generated by _____ as identified in Hazardous Waste Manifest # _____ in our Supplemental Fuels program and certifies the destruction on the ____ day of _____, 19 ____.</p> <p>Chemical Handling Corporation Vice President</p>
--

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

May 21, 1990

CERTIFIED MAIL  
RETURN RECEIPT NO. P-918-402-253

Mr. Gary W. Davis, Vice President  
WESTERN GAS PROCESSORS, LTD.  
12200 North Pecos Street  
Suite 230  
Denver, Colorado 80234

RE: Discharge Plan GW-33 Modification  
San Juan River Gas Plant  
San Juan County, New Mexico

Dear Mr. Davis:

Your requested modification of the previously approved ground water discharge plan, GW-33, for the Weston Gas Processors, Ltd., San Juan River Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico is hereby approved. The modification consists of the application dated January 31, 1990, and materials dated May 14, 1990 submitted as supplements to the application. The discharge plan (GW-33) was approved December 29, 1986 and will expire December 29, 1991. The modification combined the contact and noncontact wastewater into one discharge plan.

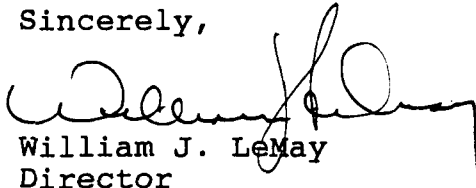
The application for modification was submitted pursuant to WQCC Regulations 3-107.C and is approved pursuant to WQCC Regulation 3-109. Please be advised that the approval of this modification does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

There will be no routine monitoring or reporting requirements other than those mentioned in the plan and modification.

Mr. Gary W. Davis  
May 21, 1990  
Page -2-

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants.

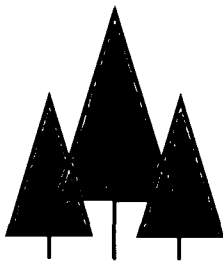
Sincerely,



William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Aztec District Office



NEW MEXICO OIL CONSERVATION DIVISION  
RECEIVED

'90 MAY 16 AM 8 41

## Western Gas Resources, Inc.

May 14, 1990

New Mexico Oil Conservation Division  
Attn: Mr. Roger Anderson  
Environmental Engineer  
P.O. Box 2088  
State Land Office Building  
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

RE: Discharge Plan GW-33  
San Juan River Plant  
San Juan County, New Mexico

This letter is in response to your comments and requests for information regarding the discharge plan modification application for the Western Gas Processors (WGP) San Juan River Plant.

1. Prior to disposal of pigging sludge, OCD approval will be obtained.
2. Solids from the evaporation plate will be disposed in the Waste Management of Four Corners landfill at Crouch Mesa, or some other permitted industrial landfill. Prior OCD approval of the disposal method will be obtained.
3. Used filter cartridges will be drained and taken to a permitted industrial landfill. Again, prior approval of the OCD will be obtained.
4. The evaporation pond leak detection system will be inspected monthly. The fluids will be analyzed annually for WQCC 1-301 parameters and major anions and cations.
5. The discharges to the unlined ponds will cease as soon as the fresh water pond is drained. The only discharge to these ponds currently is the pumped-back seepage from the fresh water pond. El Paso Natural Gas (EPNG) will be responsible for closure of the unlined ponds.

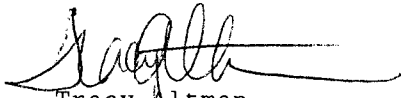
Page 2  
Roger Anderson

6. The flare pits are no longer in use. EPNG will be responsible for closure of these pits. Ken Beasley of EPNG will provide the OCD a completion timetable for the closure.

7. EPNG will also be responsible for the closure plan for the fresh water pond.

Please contact me if you have additional questions or require additional information regarding the discharge plan modification. Thank you.

Sincerely,



Tracy Altman  
Environmental Engineer

cc: Gary Davis - WGP  
Kent McEvers - WGP  
Ken Beasley - EPNG

*Ken Beasley concurred 5/21/90 3:05 PM*

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 1542

Date 5/2/90

Originating Party

Other Parties

Tracy Altman - Western Gas Processors

Bill Olson - OCD

Subject

Western Gas San Juan Plant

Discussion

They are replacing a hydrocarbon skimming tank in the sulfur recovery area with a tank which is either saddle mounted or on legs.  
She wants to know if tank needs berming.

Conclusions or Agreements

Tank does not need berming, at  $\frac{1}{3}$  greater than volume of tank but does need concrete pad and curb at points of potential spills to provide containment

Distribution

file

Signed

Bill Olson

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

May 2, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-918-402-238**

Mr. Gary W. Davis, Vice President  
WESTERN GAS PROCESSORS, LTD.  
12200 North Pecos Street  
Suite 230  
Denver, Colorado 80234

RE: Discharge Plan GW-33  
San Juan River Plant  
San Juan County, New Mexico

Dear Mr. Davis:

The Oil Conservation Division (OCD) is in the process of reviewing your discharge plan modification application dated January 31, 1990. The application proposes combining the non-contact wastewater plan (GW-39) with the previously approved contact wastewater plan (GW-33). Based on the information contained in your application and information contained in your November 9, 1989 letter, the San Juan River Plant will operate under Discharge Plan GW-33. Discharge plan GW-39 is hereby cancelled.

In order for the review of the modification to GW-33 to continue a number of items need to be clarified. The following comments and requests for information are based on information contained in your application and observations made during an OCD site inspection on April 11, 1990.

1. Section IV.A., Pigging Sludge, states pigging sludges currently stored in a fiberglass tank will be transported to an approved incineration facility or, as an alternative, disposed of in an approved landfill. The method and location of disposal of this waste must have prior OCD approval.
2. Section IV.B., Evaporation Solids, states solids from the evaporation plate will be buried on site. Prior approval from the OCD will be required for the disposal of this waste. Information required for approval will be:
  - a. Location of site.
  - b. Composition of waste.
  - c. Maintenance of site to preclude runoff or leaching of wastes.



3. Section IV.C., Used Filter Cartridges, states used filters will be drained and disposed of in a local landfill or an on site landfill. If a local landfill is used, approval from the Environmental Improvement Division (EID) must be obtained prior to disposal. If an on site facility is used, the requirements of 2 above will be required.
4. In the closure section of the application, you state the evaporation pond will be inspected quarterly. A commitment, dated December 17, 1986, in the original discharge plan requires the inspection of the disposal pond leak detection system monthly and includes a contingency plan. This commitment will remain in force. This section also states the pond fluids will be analyzed annually for WQCC 1-301 parameters. Major cations and anions should be analyzed for also.
5. Have all discharges to the unlined ponds been stopped? If so, when did they cease? If there are still waste discharges to the unlined ponds, what streams are routed there and when will they be rerouted.
6. What is the status of the flare pits? Are they still in use? Submit a closure plan with a completion timetable for the unlined flare pits.
7. The fresh water pond is leaking and moving water and salts off site north to the stock pond in Section 36. These additional fluids and salt are commingling with contaminants previously discharged through seepage by EPNG in their water disposal ponds. EPNG has ceased these discharges, has commenced drying the ponds and will soon submit a plan for stabilizing materials in those ponds and in the Section 36 stock pond. Discharges from your pond will further add contaminants, and cause movement of both fluids and salt contaminants from the stock pond into Stevens Arroyo, a tributary of the San Juan River. Such discharges may be actionable under either state WQCC regulations or under the Federal Clean Water Act. The latter also includes Colorado River salinity controls. What action is Western Gas Processors proposing to prevent movement of water and salts off your property into Section 36?

If you have any questions, please contact me at (505) 827-5884.

Sincerely,



Roger C. Anderson  
Environmental Engineer

RCA/sl

cc: OCD Aztec District Office  
K. Beasley, EPNG

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time

0830

Date

4/20/90

Originating Party

Other Parties

Tracy Altman  
Western Gas Processors

Bill Olson - OCD

Subject

San Juan Basin Vulnerable Area

Discussion

She requested that a copy of the R-7940 and  
R-7940 A OCD Orders be sent to her at

12200 N. Pecos

Suite 230

Denver, CO 80234

Conclusions or Agreements

I will send out immediately

Distribution

file

Signed

Bill Olson

AFFIDAVIT OF PUBLICATION

No. 24828

STATE OF NEW MEXICO,  
County of San Juan:

BETTY SHIPP being duly  
sworn, says: "That she is the  
NATIONAL AD MANAGER of  
The Farmington Daily Times, a daily  
newspaper of general circulation  
published in English in Farmington,  
said county and state, and that the  
hereto attached LEGAL NOTICE

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

First Publication WEDNESDAY, FEBRUARY 28, 1990

Second Publication \_\_\_\_\_

Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

and that payment therefore in the  
amount of \$ 39.31 has been made.

*Betty Shipp*

Subscribed and sworn to before me  
this 28TH day of  
FEBRUARY, 1990.

*J. Shorler*

Notary Public, San Juan County,  
New Mexico

My Comm expires: June 23, 1990

COPY OF PUBLICATI

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES  
DEPARTMENT  
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan modification has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088. Telephone (505) 827-5800:

(GW-33) Western Gas Processors, Ltd., San Juan Gas Processing Plant, Gary W. Davis, Vice President, 12200 North Pecos Street, Suite 230, Denver, Colorado 80234, has submitted a discharge plan modification application for its facility located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Approximately 1440 gallons per day of process wastewater will be discharged to a previously approved double lined evaporation pond equipped with leak detection. An additional 360 gallons per day of cooling tower blowdown will be discharged to a concrete lined evaporation plate. The modification will allow Western Gas Processors to implement a waste-reduction program and incorporate disposal of wastewater that does not come in contact with hydrocarbons (non-contact) in the previously approved contact wastewater discharge plan. The wastewater has a total dissolved solids concentration of approximately 1750 sm/l. Ground water most likely to be affected by any discharge to the surface is at a depth of 70 feet with an average total dissolved solids concentration of approximately 4500 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on the 21st day of February, 1990. To be published on or before March 2, 1990.

SEAL

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
William J. Lemay, Director

Legal No. 24828 published in the Farmington Daily Times, Farmington, New Mexico on Wednesday, February 28, 1990.

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND  
NATURAL RESOURCES  
DEPARTMENT

OIL CONSERVATION DIVISION

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February, 1990. To be published on or before March 2, 1990.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
William J. LeMay  
Director  
Journal, February 28, 1990

SILVER DIVISION  
RECEIVED

STATE OF NEW MEXICO  
County of Bernalillo

ss

'90 FEB 29 AM 9 23

Thomas J. Smithson, being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for ..... 1 ..... times, the first publication being on the ..... 28 ..... day  
of ..... Feb ..... 1990, and the subsequent consecutive  
publications on ..... 1990.

Sworn and subscribed to before me, a Notary Public in  
and for the County of Bernalillo and State of New  
Mexico, this ..... 28 ..... day of ..... Feb ..... 1990.

PRICE ..... \$ 26.21

Statement to come at end of month.

ACCOUNT NUMBER ..... C81184

OFFICIAL SEAL

Bernadette Ortiz

BERNADETTE ORTIZ

Notary Public - New Mexico

Commission Expires 12-18-93

EDJ-15 (R-12/89)



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

February 26, 1990

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-918-402-182**

Mr. Gary W. Davis, Vice President  
WESTERN GAS PROCESSORS, LTD.  
12200 North Pecos Street  
Suite 230  
Denver, Colorado 80234

**RE: Discharge Plan GW-33 Modification  
San Juan River Gas Plant  
San Juan County, New Mexico**

Dear Mr. Davis:

The Oil Conservation Division (OCD) has received and is in the process of reviewing your application, dated January 1990, for the modification of the above referenced Discharge Plan. The modification will incorporate the noncontact waste streams in the previously approved Discharge Plan GW-33.

An integral part of the review process is a site inspection. In order for the review of your proposed modification to continue a site visit will be scheduled to familiarize the OCD staff with the process changes you have instituted. I will be contacting you in the next few weeks to schedule this visit.

Public notice of your proposed modification has been issued and will be published on or before March 2, 1990.

If you have any questions, please call me at (505) 827-5884.

Sincerely,

Roger C. Anderson  
Environmental Engineer

RCA/si

cc: Aztec District Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

February 23, 1990

ALBUQUERQUE JOURNAL  
717 Silver Southwest  
Albuquerque, New Mexico 87102

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

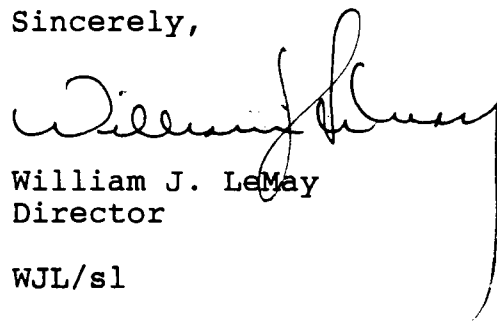
Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit in duplicate.
2. Statement of cost (also in duplicate).
3. CERTIFIED invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving proper payment.

Please publish the notice not later than Friday, March 2, 1990.

Sincerely,

  
William J. LeMay  
Director

WJL/sl

Attachment

P-106 675 458

RECEIPT FOR CERTIFIED MAIL  
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <i>Albuquerque Journal</i>		P.O. State and ZIP Code	
Street and No. <i>717 Silver SW</i>			
Postage	\$	Certified Fee	
Special Delivery Fee		Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered		Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees		\$	
Postmark or Date			

**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO**

**ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**

**OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan modification has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

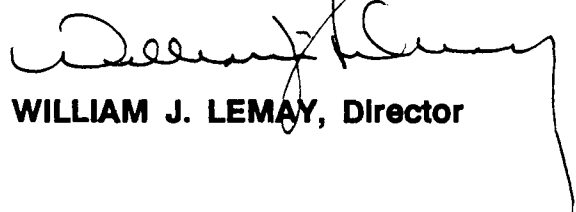
(GW-33) Western Gas Processors, Ltd., San Juan Gas Processing Plant, Gary W. Davis, Vice President, 12200 North Pecos Street, Suite 230, Denver, Colorado 80234, has submitted a discharge plan modification application for its facility located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Approximately 1440 gallons per day of process wastewater will be discharged to a previously approved double lined evaporation pond equipped with leak detection. An additional 360 gallons per day of cooling tower blowdown will be discharged to a concrete lined evaporation plate. The modification will allow Western Gas Processors to implement a waste-reduction program and incorporate disposal of wastewater that does not come in contact with hydrocarbons (non-contact) in the previously approved contact wastewater discharge plan. The wastewater has a total dissolved solids concentration of approximately 1750 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of 70 feet with an average total dissolved solids concentration of approximately 4500 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February, 1990. To be published on or before March 2, 1990.

**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**

  
**WILLIAM J. LEMAY, Director**

**S E A L**



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

February 23, 1990

FARMINGTON DAILY TIMES  
P. O. Box 450  
Farmington, New Mexico 87401

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit in duplicate.
2. Statement of cost (also in duplicate).
3. CERTIFIED invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving proper payment.

Please publish the notice not later than Friday, March 2, 1990.

Sincerely,

William J. LeMay  
Director

WJL/sl

Attachment

P 918 402 484

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Street and No.		P.O., State and ZIP Code		Postage	Certified Fee	Special Delivery Fee	Restricted Delivery Fee	Return Receipt showing to whom and Date Delivered	Return Receipt showing to whom, Date, and Address of Delivery	TOTAL Postage and Fees	Postmark or Date
Farmington Daily Times				\$						\$	



**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO**

**ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**

**OIL CONSERVATION DIVISION**

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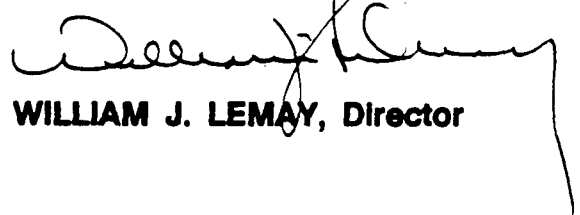
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**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**

  
**WILLIAM J. LEMAY, Director**

**S E A L**

**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO**

**ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**

**OIL CONSERVATION DIVISION**

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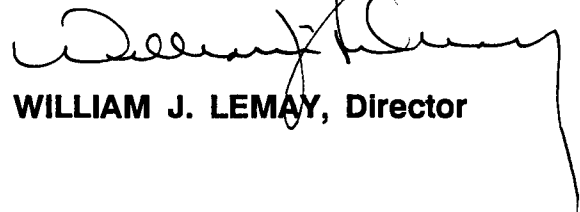
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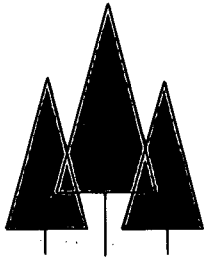
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**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**

  
**WILLIAM J. LEMAY, Director**

**S E A L**



OIL CONSERVATION DIVISION  
RECEIVED

'88 FEB 2 AM 9 30

**Western Gas Processors, Ltd.**  
*Western Gas Resources, Inc. — The General Partner*

January 31, 1990

Mr. David G. Boyer  
State of New Mexico  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Dear Mr. Boyer:

Re: Amendment to San Juan River Plant  
Discharge Plan

Enclosed for your review is the proposed amendment to the San Juan River Plant discharge plan. Contained in the report are Western Gas Processors' proposed methods to ensure compliance with New Mexico Water Quality Control Commission regulations. Three copies are enclosed.

Western respectfully requests approval of the amended discharge plan. Information requests should be directed to Tracy Altman, Western's Environmental Affairs Engineer, at (303) 452-5603.

Sincerely,

Gary W. Davis  
Vice President of Engineering

GWD:ta

Enclosure

OIL CONSERVATION DIVISION  
RECEIVED

'80 FEB 2 AM 9 30

Amendment to  
Contact Water  
Discharge Plan

for the  
SAN JUAN RIVER PLANT

San Juan County,  
New Mexico

Submitted by Western Gas Processors, Ltd.

January, 1990

## TABLE OF CONTENTS

### AFFIRMATION

I. EXECUTIVE SUMMARY .....	1
II. GENERAL INFORMATION .....	2
III. AMENDMENT TO DISCHARGE PLAN .....	3
IV. DISCHARGE PLAN FOR NON-AQUEOUS WASTES .....	7
CLOSURE .....	8

Affirmation:

"I hereby certify that I am familiar with the information contained in and submitted with this application, and that such information is true, accurate, and complete to the best of my knowledge and belief."

Gary W Davis  
Signature

Jan 31, 1990  
Date

Gary W Davis  
Western Representative

VP- Engineering  
Title

## I. EXECUTIVE SUMMARY

Western Gas Processors, Ltd., 12200 N. Pecos St., Suite 230, Denver, Colorado, 80234, submits this amendment to the previously approved contact wastewater discharge plan for the San Juan River Natural Gas Processing Plant in San Juan County, New Mexico. This amendment combines plans for both contact and non-contact water, referencing the plan already approved, NMOCD No. GW-33. In accordance with that previously approved plan, contact water is discharged into a lined evaporation pond at volumes of approximately 0.5 gallons/minute (262,800 gallons per year). The pond has a leakage-detection/leachate-collection system as per the original plan, which was submitted by the previous plant operator, El Paso Natural Gas Company. Plan GW-33 was approved by the NMOCD on December 29, 1986, with modifications approved April 7 and December 1, 1987. Western Gas assumed operation of the plant on August 1, 1989; El Paso and Western have signed a definitive sales agreement for the plant that is awaiting FERC approval. Until that time, El Paso continues to be the owner of record.

Prior to Western's modifications of processes at the San Juan River Plant, non-contact wastewater was produced at a rate in excess of 8,000,000 gallons per year. Because this stream is now considerably smaller, Western proposes to commingle the contact and non-contact wastewater streams for discharge to, and subsequent evaporation from, the lined pond. This would be the primary wastewater management plan. As a supplementary disposal method, Western proposes to evaporate approximately half the non-contact wastewater on a steel plate during warm months. Discharge rates to the plate would be approximately 0.5 gallons/minute for half the year, totalling 131,400 gallons annually. Rates of non-contact wastewater discharge to the pond are expected to be 0.5 gallons per minute (262,800 gallons annually), making the total annual discharge to the pond 525,600 gallons. The specifics of the discharge plan are presented in Part III.

The recent modifications at the San Juan Plant have had a positive environmental impact. The reduction of waste volumes has resulted in significant water conservation: annual wastewater discharge is expected to be less than 700,000 gallons. The discharge of the non-contact wastewater into the lined impoundment, rather than onto the land, will make accidental groundwater contamination highly unlikely. Additionally, the leakage-detection/leachate-collection system will continue to monitor the integrity of the pond to ensure that no releases to groundwater occur.

Western is continuing to study various alternatives with regard to the disposal of other wastes at the San Juan facility. Those wastes, and the disposal options for them, are discussed in Part IV.

## II. GENERAL INFORMATION

### A. Name of Discharger/Legally Responsible Party:

Gary W. Davis  
Vice President of Engineering  
Western Gas Processors, Ltd.  
12200 N. Pecos St., Suite 230  
Denver, CO 80234  
(303) 452-5603

### B. Local Representative:

Kent McEvers  
San Juan River Plant Manager  
P.O. Box 70  
Kirtland, NM 87417  
(505) 598-5601

Please direct questions and a copy of all correspondence to:

Tracy Altman  
Western Gas Processors, Ltd.  
12200 N. Pecos St., Suite 230  
Denver, CO 80234

### C. Location of Discharges:

The San Juan River Plant is located in Section 1, Township 29 North, Range 15 West, San Juan County, New Mexico, approximately 8 miles west of Farmington and 1.7 miles north of Kirtland, New Mexico. Highway 550 and County Road 61 provide access to the plant. Refer to the original discharge plan for a location map.

The land to the north and west of the plant site is publicly owned. Approximately thirty private owners have tracts to the south and east of the plant.

### D. San Juan River Plant Operations:

Current activities at the San Juan River Plant include natural gas sweetening, compression, dehydration, and sulfur recovery, plus operation of peripheral utilities. These utilities include boilers and cooling water systems.



Low-pressure sour gas streams from the Barker Dome field and the Aneth plant are combined; this stream is then compressed and passed through an amine treating unit for the removal of carbon dioxide and hydrogen sulfide. All of the hydrogen sulfide is sent to a sulfur recovery unit that produces elemental liquid sulfur as a commercial by-product. Gasoline plant operations have ceased at the San Juan River Plant and the equipment is scheduled to be removed from the facility.

### III. AMENDED DISCHARGE PLAN:

#### A. General Description of Waste Streams

##### 1. Effluent sources of contact water:

###### a. Dehydration unit regeneration

Periodic regeneration of dehydration units generates contact wastewater.

###### b. Plant processes

Operation of various plant processes produces contact wastewater.

##### 2. Effluent sources of non-contact water:

###### a. Boiler blowdown

Two boilers at the San Juan River Plant produce steam for the amine unit and other process requirements. Boiler blowdown is required to reduce TDS. This stream is sent to the cooling tower.

###### b. Cooling tower blowdown

An evaporative cooling tower is used for general cooling in utilities and process units. Much of the water is recycled, but some blowdown is required to preclude exceeding operating limits for TDS, phosphates, and hardness. Virtually all non-contact effluent produced at the San Juan facility is sent through the cooling tower prior to entering the non-contact waste stream.

##### 3. Wastewater Characteristics

The calculated value for TDS in the final waste stream discharged to the lined pond is 1,750 mg/l. This is a weighted average.

## B. Discharge Plan

Western proposes a wastewater management system that involves no discharge to surface or groundwater:

### 1. Discharge of contact water:

Contact water will continue to be discharged to and evaporated from the lined pond per the approved plan. Rates have been reduced to approximately 0.5 gallons per minute, which corresponds to an annual volume of 262,800 gallons.

### 2. Discharge of non-contact water:

Non-contact wastewater is to be commingled with contact water and discharged to the lined evaporation pond that is the current disposal unit for contact water. During winter months, non-contact wastewater is generated at a rate of approximately 0.5 gallons/minute. Thus, the discharge rate to the pond will be 1.0 gallons per minute total: 0.5 gallons per minute each of non-contact and contact water.

Non-contact water is produced at rates of approximately 1.0 gallons per minute during warm months. As a supplementary disposal method, it is proposed that 50% (0.5 gallons/minute) of this non-contact wastewater be evaporated from a steel plate during the summer. The TDS of the wastewater to the plate would average 2,800 mg/l. The specifications for the plate are listed below. In the event that sufficient quantities of non-contact water do not evaporate from the plate, a larger portion of the stream could be directed to the evaporation pond, or a second plate could be constructed.

Annual discharge to the evaporation pond is predicted to be 262,800 gallons each of non-contact and contact wastewater, for a total of 525,600 gallons. Discharge of non-contact water to the evaporation plate is expected to total 131,400 gallons annually. Thus, modified operations at the San Juan Plant are expected to produce a total of only 657,000 gallons of wastewater per year.

The San Juan River Plant has been successfully operated as a no-surface discharge facility for several months, under temporary permission granted by the NMOCD to discharge non-contact wastewater without a fully approved discharge plan. Operational history obtained over the past six months indicates that the evaporation pond, operating in conjunction with the plate, has adequate capacity to fully manage the plant's wastewater. Throughout this autumn a portion of the pond bottom was exposed. Western's expected total discharge of wastewater to the plate and pond combined is only 85% of the flow volume for which the pond alone was designed. Hence, Western expects that evaporation will proceed at rates sufficient to preclude the pond from filling, even during the wettest months.

### 3. Proposed Facilities:

The proposed wastewater management system consists of the following components:

#### a. Lined Evaporation Pond:

Contact and non-contact wastewater streams are to be combined and passed through two oily water separators prior to discharge into the pond. Use of the separators will enhance oil recovery and promote evaporation by preventing an oil film from forming on the surface of the wastewater in the pond, although oil recovery in very small quantities is expected. Removal of trace hydrocarbons also will alleviate the possibility of damage to bird life.

This impoundment, with leak-detection and leachate collection, located immediately south of the plant facility, was constructed per the amended plans submitted by El Paso October 14, 1987. The pond was designed for an annual flow of 770,000 gallons, which is 46% more than Western's projected discharge volume to the pond.

#### b. Evaporation Plate:

The plate, located just east of the cooling tower, will provide supplementary evaporation during warm months. Only cooling tower blowdown (non-contact water) will be discharged to it. The discharge rate to the plate is expected to be 0.5 gallons/minute.

The evaporation plate has the following specifications:

Material: Carbon steel, seal-welded to prevent leakage  
Perimeter: 10' x 25'  
Height: 18" above ground level

Non-contact wastewater is sprayed through nozzles over the plate. Surrounding the plate is a 4' splash guard welded at a 45-degree angle to the plate, preventing any surface disposal of wastewater. In the event that the inlet rate is too high, overflow is directed to an open-top containment vessel configured with a float mechanism that is, in effect, controlled by the evaporation rate. The float provides a means of controlling the cooling tower blowdown wastewater rate to the plate.

Five fans assist evaporation by blowing across the plate. Use of these fans significantly increases the evaporation rate. Western constructed the plate during the summer/fall of 1989 and

tested it with excellent results. A non-contact wastewater stream flowing at an average of 0.5 gallons per minute (the expected operating condition of the plate) was fully evaporated.

The evaporation rate for the plate (with fans) was calculated empirically, given the fact that a wastewater stream of 0.5 gallons/minute does evaporate completely:

131,400 gal/yr x 1 cubic ft/7.48 gal =  
17,567 cubic ft/yr evaporated

Surface area of plate = 250 square ft

17,567 cubic ft/250 sq ft =  
70 feet per year evaporation  
(with fans)

#### Maintenance:

Plant personnel will inspect the plate weekly to ensure its integrity. Solids will eventually accumulate on the plate, requiring that they be removed with a shovel. The disposal method for these solids is discussed in Part IV.

#### C. Contingency Plans:

In the event that the volumes in the pond increase to near capacity, Western intends to haul the wastewater to an approved well for disposal. Before any removal of water takes place, Western will contact the NMOCD and will specify which disposal well will be utilized. It is always Western's intention to work closely with the NMOCD in the management of waste disposal, and Western is willing to make every reasonable effort to avoid unplanned releases to the environment.

As stated above, the evaporation plate will be used as a supplementary evaporative surface during warm months. The plate has been tested successfully at the proposed flow rates. Western's contingency plans, should the plate become overloaded, will be to implement one or more of the following:

(1) discharge a larger fraction of the cooling tower effluent to the pond, (2) construct another evaporation plate, or (3) circulate heated air beneath the plate and up through the wastewater spray.

#### IV. DISCHARGE OF NON-AQUEOUS WASTES

Additional wastes generated by operation of the San Juan River Plant are identified below, along with a summary of Western's disposal plans for each.

##### A. Pigging Sludge:

Sludge from the Aneth pig receiver is currently stored in an above-ground, open-top, fiberglass tank of 2,300-gallon capacity. If possible, Western intends to obtain permits to haul the waste to an approved incineration facility. An alternative waste management method is disposal in an approved landfill. The Rinchem Company, Inc., has profiled the sludge, and is assisting Western in locating an appropriate disposal facility. Western plans to store the sludge in the fiberglass tank until adequate quantities are collected to allow economical disposal. The sludge is generated at low rates: approximately 90 gallons per month.

##### B. Evaporator Solids:

Evaporator solids will be removed from the evaporation plate and buried on site in accordance with all applicable solid waste regulations.

##### C. Used Filter Cartridges:

No waste filter cartridges are currently being generated, but a modified operation will create a need for a disposal plan for cartridges in the near future. Western plans to allow discarded cartridges to drain and then dry in an open-top fiberglass tank. Drained fluid will be returned to the process. Subsequently, the dried cartridges will be either bagged and transported to an approved local landfill for disposal, or buried in a landfill on site. If the latter method is used, the landfill will be properly maintained under all applicable regulations in the state of New Mexico.

##### D. Used Oil:

Used oil will be stored in above-ground, bermed, steel tanks with one-third excess capacity until sufficient quantities are collected for economical disposal. The oil will then be sold or hauled away; there will be no on-site disposal.

#### E. Miscellaneous Solid Wastes

Lumber, paper products, and shipping materials will be transported to the local landfill for disposal.

#### CLOSURE

All discharge facilities are visually inspected by plant personnel on a regular basis. Quarterly, and following major storms, the evaporation pond will be inspected. Samples of wastewater will be obtained annually and analyzed for all WQCC 3-103 parameters except radioactive species. Any records related to pond integrity or waste characterization will be retained by Western for at least five years.

It is the intent of Western Gas Processors to operate the San Juan River Plant in an environmentally safe manner. In the unlikely event of an unplanned release to the environment, the NMOCD will be notified immediately.



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

November 20, 1989

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-106-675-220**

Mr. Gary W. Davis  
WESTERN GAS PROCESSORS, LTD.  
10701 Melody Drive  
Suite 609  
Denver, Colorado 80234-4123

**RE: Discharge Plan GW-39**  
**San Juan Plant**  
**San Juan County, New Mexico**

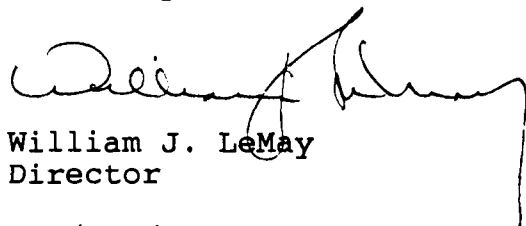
Dear Mr. Davis:

The Oil Conservation Division (OCD) has received your request, dated November 9, 1989, for an extension to March 1, 1990 to submit a non-contact wastewater discharge plan.

Pursuant to Section 3-106.A. of the Water Quality Control Commission (WQCC) Regulations, and for good cause shown, an extension of time for the submittal for a discharge plan application for the non-contact waste water to March 1, 1990 and to discharge without an approved discharge plan to June 1, 1990 is hereby approved. This extension will allow Western to submit a formal discharge plan or to submit an amendment to the previously approved contact wastewater discharge plan (GW-33) to include the management of noncontact wastewater and other associated wastes.

If you have any questions, please contact David Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5812.

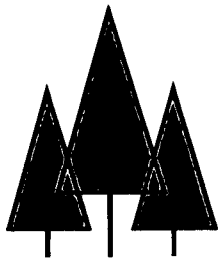
Sincerely,



William J. LeMay  
Director

WJL/RCA/sl

cc: Aztec District Office



OIL CONSERVATION DIVISION  
RECEIVED

'89 NOV 13 AM 10 28

# Western Gas Processors, Ltd.

*WGP Company — The General Partner*

November 9, 1989

Oil Conservation Division  
State of New Mexico  
P.O. Box 2088  
Land Office Building  
Santa Fe, NM 87504-2088

ATTENTION: Mr. David Boyer

Gentlemen:

RE: San Juan River Plant-Farmington, New Mexico

As we discussed during our phone conversation on November 7, 1989 Western Gas has been successful in converting the San Juan River Plant to a "zero discharge" operation with regard to the Contact and Non-Contact water. The lined and permitted evaporation pond is capable of holding and evaporating all waste water produced during normal operation, and any normal precipitation load which would be expected for this area. The unlined ponds to the north of the process area are out of service and are continuing to dry out.

Western is continuing to study its options with regard to other wastes generated by the operation. The following is a summary of wastes and the options for disposal that Western believes will prove to be the most viable and environmentally compatible:

PIGGING SLUDGE: Western has contracted with Rinchem Company, Inc. to profile the waste and recommend methods of disposal. If possible, Western intends to get permits to haul the waste to an incineration facility and have the waste incinerated. The waste is currently contained in an above ground, open top fiberglass tank. Western would continue to utilize this tank to store the sludge until sufficient quantities are collected to allow economical shipment and incineration.



SPENT CATALYST, MOLECULAR SIEVE, EVAPORATOR SOLIDS: Western proposes to retain this waste on site in an open pit. The pit will be diked to minimize the amount of precipitation that could get to the pit. No waste currently exists, but will be generated by future operation.

USED FILTER CARTRIDGES: Cartridges will be drained and allowed to dry in an open top fiberglass tank. Dry cartridges will be retained on site in an open pit next to, but not integral with the catalyst pit. Drained fluid will be returned to the process, or hauled off site to a properly permitted disposal facility. No waste currently exists or is being generated, but will be generated by modified operation.

USED OIL: To be determined. Oil is currently stored on site in above ground steel tanks.

OTHER: Lumber, paper products, shipping material, etc. will be disposed of in the local landfill.

Realizing that the preparation of a formal discharge plan for the San Juan River Plant, coupled with other environmental concerns was no longer within the capability of Western Gas, Western proceeded to try to hire an Environmental Affairs Engineer to take over responsibility for this work. Western started on this project in early August anticipating that the position would be filled by mid-October, allowing ample time for the preparation of the Discharge Plan by December 1st. This schedule proved to be optimistic, but as of November 7th Western has hired Ms. Tracy Altman to fill this position. Ms. Altman is completing coarse work for her Masters Degree and will not be available for regular active employment with Western until January 2, 1989.

Ms. Altman will be assigned the responsibility of preparing a formal submittal to amend the currently approved Contact Water Discharge Plan to include NonContact Water, Pigging Sludge and the other wastes discussed above. It is reasonable to expect that she would be able to submit the plan by March 1, 1990. If Western and the NMOCD work together during the preparation of the plan, it would be reasonable to expect that the plan could be approved by June 1st. By following this schedule, Western can do the work to amend the plan "in house" rather than hiring a consultant. The experience gained will be important to Western in future projects. In addition, the amendment to the approved plan can be prepared in such a manner to allow inclusion of all wastes, rather than just the noncontact water.

Oil Conservation Division  
State of New Mexico  
November 9, 1989  
Page 3

Since the operation is not currently discharging any wastes to the environment, Western respectfully requests an extension to operate without a fully approved discharge plan until June 1, 1990 subject to Western submitting the plan amendment by March 1, 1990.

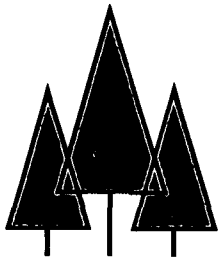
I apologize for the delay in completing this work and appreciate your cooperation in this matter.

Sincerely,



Gary W. Davis  
Vice President of Engineering

cc: Tracy Altman, WGP  
Gary Brom, WGP  
Kent McEvers, WGP



# Western Gas Processors, Ltd.

*WGP Company — The General Partner*

October 4, 1989

**RECEIVED**

**OCT 10 1989**

**OIL CONSERVATION DIV.  
SANTA FE**

Oil Conservation Division  
State of New Mexico  
P.O. Box 2088  
Land Office Building  
Santa FE, NM 87504-2088

ATTENTION: David Boyer

Gentlemen:

RE: San Juan River Plant - Farmington, New Mexico

The purpose of this letter is to update the New Mexico OCD of actions taken by Western Gas Processors at the San Juan River Gas Plant. We have implemented the following actions with the following results:

- ACTIONS:
1. The steaming load has been reduced from about 50,000 lb/hr to 25,000 lb/hr.
  2. The condensate line from Public Service Co. of New Mexico San Juan River Power Plant to our gas plant is in operation.
  3. The boiler feedwater evaporator has been taken out of service.
  4. All boiler blowdown water, west plant surface precipitation water and non-contact water is being pumped into the south cooling tower basin.
  5. North cooling tower is out of service.
  6. South cooling tower blowdown goes either to the lined contact water pond via the oily water separator or to the evaporator plate where it is evaporated to a solid.

7. The water softening equipment has been shut down.
8. The raw water usage in the plant has been reduced.
9. The raw water filtering equipment load has been drastically reduced.
10. Cooling tower treatment has been changed to accommodate non-contact water.

- RESULTS:
1. As of September 18, 1989 during normal operation, no water goes to the north unlined ponds except east plant precipitation of which there has been none or very little.
  2. The water level in the north unlined ponds is dropping dramatically.
  3. The lined pond was cleaned to remove any oily surface material.
  4. The level in the 200 ft. X 200 ft. lined pond has dropped to the point where 5-10% of the bottom liner is exposed. The lined pond is almost empty.

CONCLUSIONS:

1. Western Gas Processors is at zero waste water discharge at present.
2. Western Gas Processors can maintain zero waste water discharge with the exception of precipitation in the east plant area. The east plant area is the location of the cooling towers and the compressor building.
3. Western Gas Processors will use only the PNM condensate line, lined waste water pond and plate evaporator to maintain zero water discharge during normal operation.

Oil Conservation Division  
State of New Mexico  
October 4, 1989  
Page 3

SUMMATION:

Western Gas Processors will continue to collect data and actively pursue solutions to any water leaving the plant site.

Western Gas Processors is beginning to work on incorporating a non-contact water plan into the El Paso Contact Water Plan.

Sincerely,

A handwritten signature in cursive script that reads "Gary W. Davis".

Gary W. Davis  
Vice President of Engineering

GWD:jl

cc: Gary Brom  
Ken Beasley, El Paso



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

September 26, 1989

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-106-675-120**

Mr. Gary W. Davis  
Western Gas Processors, Ltd.  
19701 Melody Drive  
Suite 609  
Denver, Colorado 80234-4123

RE: Discharge Plans GW-33 and GW-39  
San Juan River Plant  
Santa Juan County, New Mexico

Dear Mr. Davis:

The Oil Conservation Division (OCD) has received your letter, dated August 31, 1989 notifying us of the change of operator for the above referenced plant from El Paso Natural Gas Company to Western Gas Processors, Ltd., and your request for an extension to December 1, 1989 to submit a non-contact water discharge plan.

Pursuant to Section 3-111 of the Water Quality Control Commission (WQCC) Regulations and your notification, effective August 1, 1989, responsibility for compliance of the terms and conditions of the approved Discharge Plan GW-33, contact waste water plan, San Juan Gas Plant, San Juan County, New Mexico, is hereby transferred from El Paso Natural Gas Company to Western Gas Processors, Ltd.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the director of any facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants.

Discharge plan GW-33 was approved December 29, 1986 and will expire December 29, 1991.

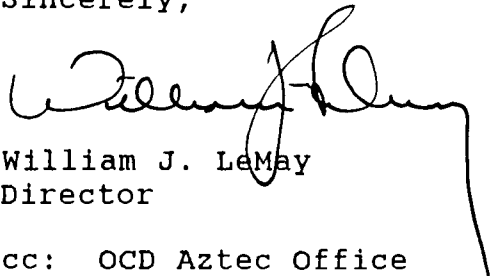
Pursuant to Section 3-111 of the WQCC Regulations, the responsibility for submission of the non-contact waste water discharge plan, GW-39, for the San Juan Gas Plant, San Juan County, New Mexico is hereby transferred from El Paso Natural Gas Company to Western Gas Processors, Ltd. effective August 1, 1989.

Mr. Gary Davis  
September 26, 1989  
Page -2-

Pursuant to section 3-106.A. of the WQCC Regulations, and for good cause shown, an extension for the submittal of a discharge plan application for the non-contact waste water to December 1, 1989 and to discharge without an approved discharge plan to April 1, 1990 is hereby approved. This extension will allow Western to investigate and implement process modifications to minimize waste water generated.

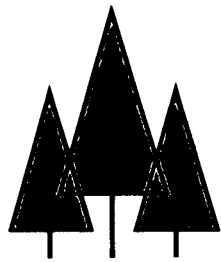
If you have any questions, please contact Dave Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5884.

Sincerely,



William J. LeMay  
Director

cc: OCD Aztec Office  
K. Beasley, EPNG  
H. Van, EPNG



# Western Gas Processors, Ltd.

*WGP Company — The General Partner*

August 31, 1989

Mr. David G. Boyer, Hydrogeologist  
Environmental Bureau Chief  
Energy and Minerals Department  
Oil Conservation Division  
310 Old Santa Fe Trail 206  
Santa Fe, New Mexico 87501-2088

RE: Discharge Plan for San Juan River Plant, Non-Contact Water

Dear Mr. Boyer:

As discussed in our meeting on August 29, 1989, Western Gas Processors, Ltd. (Western) has taken over operation of the San Juan River Gas Plant from El Paso Natural Gas (El Paso) as of August 1, 1989. Final agreements are in place for Western to purchase the plant from El Paso subject to certain FERC regulations.

In a letter dated March 8, 1989 Western and El Paso requested an extension to allow operation of the San Juan River Plant without an approved non-contact water discharge plan until December 15, 1989 contingent upon the submittal of a discharge plan by September 15, 1989. This request was based on the assumption that Western would begin operation by May 1st when in actuality Western assumed operation on August 1st. Due to the delay in transfer of operations, Western respectfully requests an extension to discharge non-contact water at the San Juan River Plant without an approved discharge plan until April 1, 1990 contingent on the submittal of an amended contact water discharge plan, which incorporates the non-contact water, by December 1, 1989.

As we discussed, the objective of the extension is to allow Western to proceed forward with process modifications to allow minimization of non-contact water production, which will minimize handling and disposal problems. Western is confident that the Plant can be brought to zero discharge for both contact and non-contact water by implementing the changes and utilizing the lined and permitted pond at the plant site for final evaporation.



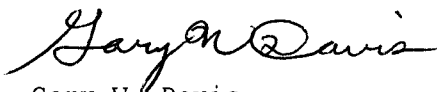
Mr. David G. Boyer, Hydrogeologist  
August 31, 1989  
Page Two

The following list summarizes the operations and status of the work at the plant:

1. The pump-back system which collects seepage from the waste and raw water ponds continues to operate to prevent overflow into Stephens Arroyo.
2. The "B" cooling tower has been taken out of service.
3. Western has executed an agreement with The Public Service Company of New Mexico to purchase water condensate with less than 10 ppm total dissolved solids.
4. Western is proceeding with the installation of a pipeline from the power plant to the gas plant to deliver the water condensate.
5. The electric power generators at the San Juan Plant are out of service. Total steam load has been reduced from 150,000 lb/hr to less than 50,000 lb/hr.
6. As soon as water condensate is available at the San Juan Plant, the water treating system and evaporator will be taken out of service further reducing the steam load.
7. Several other small process changes are in progress to further reduce steam usage and waste water generation.

Western respectfully requests your consideration of the extension petition. Technical questions can be directed to Gary Brom or Gary Davis at (303) 452-5603.

Sincerely,



Gary W. Davis  
Vice President of Engineering

cc: K.E. Beasley, El Paso  
Gary Brom, Western  
Don Bardon, Western  
Kent McEvers, Western

RECEIVED  
SEP - 7 1989  
OIL CONSERVATION DIV.  
SANTA FE

# SAN JUAN RIVER PLANT DISCHARGE PLAN

@ OCD offices

## PURPOSE OF THE MEETING

- Get briefed on what is happening
- Transfer of the D.P.
- And where Western Gas is going

MW		gals/mol
16.04	C <sub>1</sub>	6.4
30.07	C <sub>2</sub>	10.12
44.10	C <sub>3</sub>	10.42
58.12	iC <sub>4</sub>	12.38
58.12	nC <sub>4</sub>	11.93
72.15	iC <sub>5</sub>	13.85
72.15	nC <sub>5</sub>	13.71
86.18	iC <sub>6</sub>	15.50
86.18	C <sub>6</sub>	15.57
100.21	iC <sub>7</sub>	17.2
100.21	C <sub>7</sub>	17.46
114.23	C <sub>8</sub>	19.39
28.05	C <sub>2</sub>	9.64
42.08	C <sub>3</sub>	9.67

- 1st of Aug. Western Gas took over
- Non Contact

no BBD (Boiler not working)

↓  
Go makeup C.T.

↓ -- will use an evaporator

Contact H<sub>2</sub>O

→ To contact pond

- Pumpback remains intact
- Drinking water will be procured from the city
- Discontinued to use the <sup>boiler plant</sup> septic tank leaching field, its effluent now is discharged to the ceiling tower then to the lime pond.
- Dec 15, '89 is the deadline for the revised D.P. in two to three wks they plan not to discharge to the north ponds.
- Western Gas has been keeping informed OCD and OCD agrees
- The water treater will be taken out of service and noncontact left will go to either an evaporator or the contact pond.

MW	MISC.	gals/mol
32.00	O <sub>2</sub>	3.37
28.01	CO	4.19
44.01	CO <sub>2</sub>	6.38
64.06	SO <sub>2</sub>	5.50
34.08	H <sub>2</sub> S	5.17
28.01	N <sub>2</sub>	4.16
2.02	H <sub>2</sub>	3.38

# SAN JUAN RIVER PLANT DISCH. PLAN

MW		gals/mol
16.04	C <sub>1</sub>	6.4
30.07	C <sub>2</sub>	10.12
44.10	C <sub>3</sub>	10.42
58.12	iC <sub>4</sub>	12.38
58.12	nC <sub>4</sub>	11.93
72.15	iC <sub>5</sub>	13.85
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100.21	C <sub>7</sub>	17.46
114.23	C <sub>8</sub>	19.39
28.05	C <sub>2</sub> <sup>2</sup>	9.64
42.08	C <sub>3</sub> <sup>2</sup>	9.67

W	MISC.	gals/mol
00	O <sub>2</sub>	3.37
01	CO	4.19
01	CO <sub>2</sub>	6.38
06	SO <sub>2</sub>	5.50
08	H <sub>2</sub> S	5.17
01	N <sub>2</sub>	4.16
02	H <sub>2</sub>	3.38

- New Deadline for the discharge plan  
Dec. 1 for submittal  
April 1 to discharge without a plan.  
because this will be the date
- By July 1, 1990 there will be a fee  
for discharge plan.
- Closure Plan Status
  - EPNG is preparing an expanded  
sampling program to fine tune  
the closure plan.
  - OCS would like to be kept informed.
- Western Gas will request the extension  
if El Paso management agrees.
- By Sept. 15 Western Gas will submit the  
letter requesting the extension.



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 10:30

Date 7/31/89

Originating Party

Other Parties

Gary Brom Western Gas  
(303) 452-5603

David Boyd O&G

Subject

EPNG - San Juan River Plant

Discussion

Said Western Gas will take over plant midnight tonight. Have already started modifications on non-contact wastewater - plan to go to zero discharge. Will use only contact pond at end of mods. ✓

Conclusions or Agreements

Told him to send letter notifying of change and schedule a meeting with us to discuss non-contact plan.

Probably to occur in late August (8/28 week)

Distribution

EPNG S.J. R. Plant  
File

Signed

David H. Boyd