

GW - 44

**GENERAL
CORRESPONDENCE**

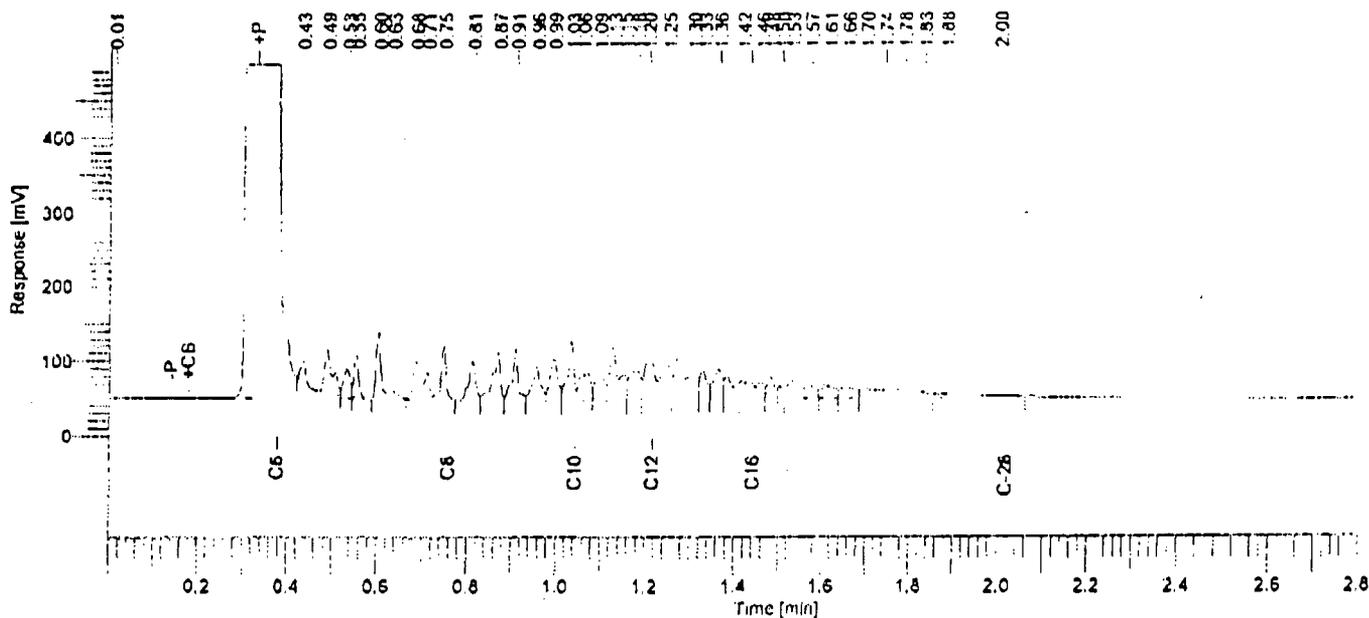
YEAR(S):
1999 - 1987

Software Version : 6.1.0.2.G07
 Operator : TurboChrom
 Sample Number : 039
 AutoSampler : BUILT-IN
 Instrument Name : GC8
 Instrument Serial # : None
 Delay Time : 0.00 min
 Sampling Rate : 25.0000 pts/s
 Volume Injected : 1.000000 ul
 Sample Amount : 1.0000
 Data Acquisition Time : 08/24/99 01:16:15 AM

Date : 08/24/99 09:13:01 AM
 Sample Name : 130456
 Study : QC02512
 Rack/Vial : 0/58
 Channel : A
 A/D mV Range : 1000
 End Time : 2.80 min
 Area Reject : 0.000000
 Dilution Factor : 200.00
 Cycle : 59

Raw Data File : T:\Data\GC8\JB6C039.raw
 Inst Method : T:\Method\TPHEZ from T:\Data\GC6\JB6C039.raw
 Proc Method : D:\Method\TX1006AR.mth
 Callb Method : D:\Method\TX1006AR.mth
 Sequence File : D:\Sequence\JB6B.ssq

Slop oil tank product



TX1005

Analytical Method: TX1005
 Reporting Units: mg/L
 Matrix: water

Component Name	Adjusted Amount	Raw Amount	Area [µV·s]
>C6-C7 AR	87209.5	436.0	167970.26
>C7-C8 AR	123899.1	619.3	238638.39
>C8-C10 AR	209196.2	1046.0	402923.16
>C10-C12 AR	199772.1	998.9	384771.86
>C12-C16 AR	203395.8	1017.0	391751.18
>C16-C21 AR	115290.2	578.5	222055.12
>C21-C35 AR	49345.1	248.7	95041.23
	988,106		1903149.19

Report stored in ASCII file: .TX0



TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9
1725 Ripley Avenue, Suite A

Lubbock, Texas 79424
El Paso, Texas 79972

800•378•1296
800•500•3443

806•794•1296
915•515•3443

FAX 806•794•1298
FAX 915•515•4944

E Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
GPM GAS CO.
Attention: Mel Driver
P. O. Box 50020
Midland, TX 79710-0020

Slop Oil Tank Product

August 25, 1999
Receiving Date: 08/21/99
Sample Type: Oil
Project No: NA
Project Location: Hobbs Emergency Slop Oil Tank

Prep Date: 08/23/99
Analysis Date: 08/23/99
Sampling Date: 08/16/99
Sample Condition: I & C
Sample Received by: JT
Project Name: Slop Oil Tank
Fingerprint

TA#: T130456
FIELD CODE: Hobbs Slop Oil

FINGERPRINT

CARBON CHAIN

HYDROCARBONS (mg/L)

C6 - C7	87,209
>C7 - C8	123,899
>C8 - C10	209,196
>C10 - C12	199,772
>C12 - C16	203,395
>C16 - C21	115,290
>C21 - C35	49,345

TOTAL 988,106

CV Avg.: 477
EA: 98
IA: 95
RPD: 8

CHEMIST: MF



Director, Dr. Blair Leftwich

8-25-99

DATE



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

May 26, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-869-965

Mr. Mel Driver
GPM Gas Corporation
4044 Penbrook
Odessa, Texas 79762

Re: **Inspection Report**
Hobbs Booster Station, GW-044
Hobbs, New Mexico

Dear Mr. Driver:

The New Mexico Oil Conservation Division (OCD) would like to thank you and Jimmy Green for your cooperation during the April 9, 1998 inspection of the GPM Gas Corporation (GPM) Hobbs Booster Station facility located in Hobbs, New Mexico. Comments from the inspection conducted are as follows:

1. **Process Area:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
Areas beneath compressor engines show signs of oil leaks and should be closely inspected for overflow or leakage of containment pads.
2. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

Slop oil tanks show signs of overflow with substantial hydrocarbon staining visible on the ground surface within the bermed area (see photo 1). Signs of overflow of the bermed enclosure are visible along the crest of the berm and outside the bermed area. Proposal for cleanup of the surface and determination of the vertical extent of impact will be forthcoming from GPM by September 1, 1998.

Mr. Mel Driver
May 26, 1998
Page 2

The slop oil collection tank and wastewater collection tank at the treater location show visible signs of overflow of the tanks and the bermed enclosure (see photos 2, 3, 4, 5, 6 and 7). The loading facility area has substantial visible signs of spillage and/or overflow of hydrocarbon fluids (see photos 4, 5, 6 and 7). Proposal for cleanup and correction of this area will be submitted to the OCD for review by September 1, 1998.

3. *Above Ground Saddle Tanks:* *Above ground saddle tanks must have pad and curb type of containment below them unless they contain alcohol or fluids which are gases at normal atmospheric pressure and temperature.*

The used motor oil saddle tank does have visible signs of petroleum within the pad and curb containment with visible signs of overflow onto the ground surface (see photo 8). Correction of this condition is required.

4. *Below Grade Tanks/Sumps:* *All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing and visual inspection of cleaned out tanks /or sumps or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.*

The former dry-well located near the straddle tanks containing oil storage and solvent contained visible signs of free petroleum on the surface below the metal cover (see photos 9 and 10). Delineation and correction of this impact will be required.

Used oil (?) underground tank does not appear to have leak detection and has some superficial hydrocarbon staining (see photo 13). An evaluation of the condition of the underground tank and surrounding soil conditions will be required.

5. *Housekeeping:* *All systems designed for spill collection/prevention should be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be maintained on site for a period of five years.*

Soil stockpiled near the treater area and in the emergency flare area will be characterized prior to disposal. A proposal for this cleanup will be submitted to the OCD for approval (see photos 7, 11 and 12).

Mr. Mel Driver
May 26, 1998
Page 3

6. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the appropriate OCD District Office.

Once again, thank you for your time during our recent visit to your facility, and for your commitment to operate in an environmentally conscience manner. The OCD will expect to receive GPM's workplan proposal about September 1, 1998, as discussed during the inspection. If you have any questions, please call me at (505) 827-7156.

Sincerely,

W. Jack Ford, C.P.G.
Geologist
Environmental Bureau
Oil Conservation Division

xc: OCD Hobbs Office

Z 357 869 965

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

Sent to <i>Mel Driver</i>	
Street & Number <i>GPM</i>	
Post Office, State, & ZIP Code <i>Odessa</i>	
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	<i>GLW-044</i>

PS Form 3800, April 1995

HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)



PHOTO NO. 1

DATE: 4/9/98



PHOTO NO. 2

DATE: 4/9/98

HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)

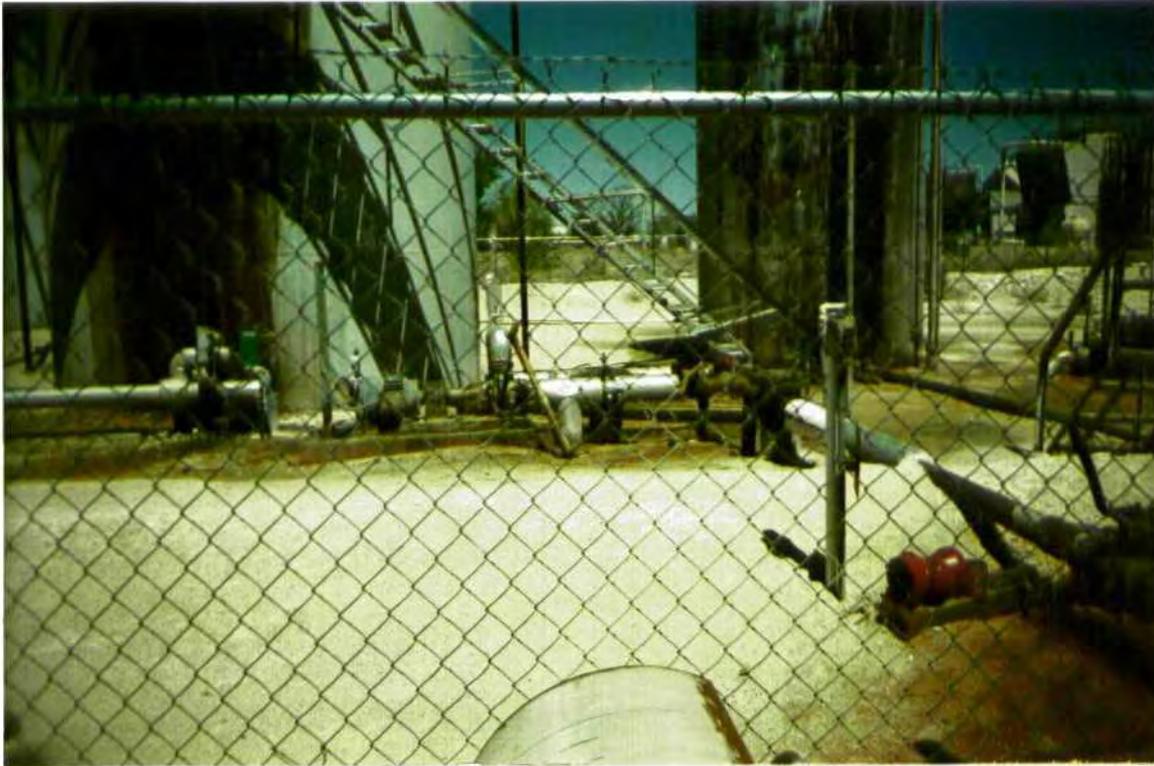


PHOTO NO. 3

DATE: 4/9/98



PHOTO NO. 4

DATE: 4/9/98

HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)



PHOTO NO. 5

DATE: 4/9/98



PHOTO NO. 6

DATE: 4/9/98

HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)



PHOTO NO. 7

DATE: 4/9/98



PHOTO NO. 8

DATE: 4/9/98

HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)



PHOTO NO. 9

DATE: 4/9/98



PHOTO NO. 10

DATE: 4/9/98

HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)



PHOTO NO. 11

DATE: 4/9/98



PHOTO NO. 12

DATE: 4/9/98

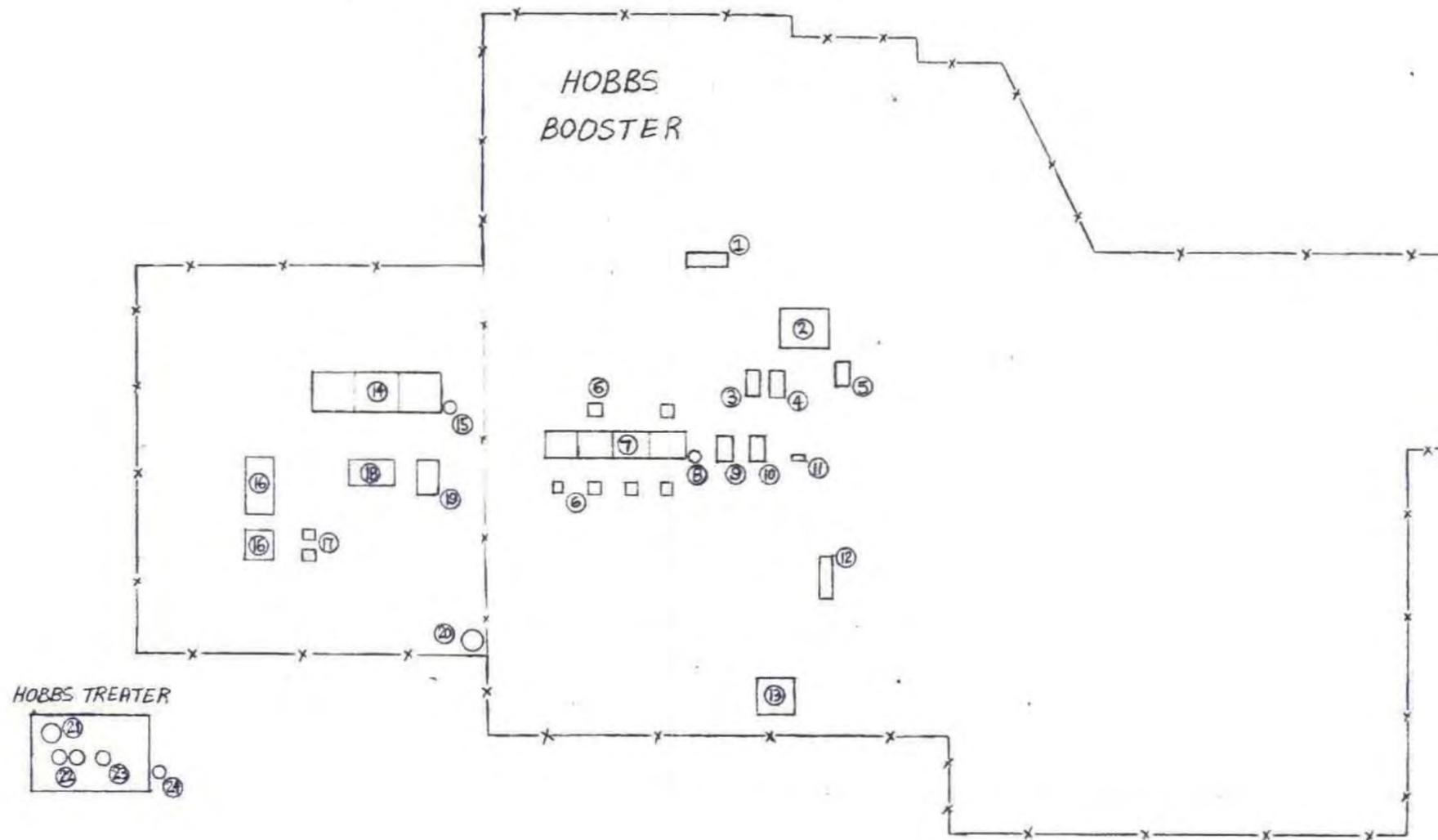
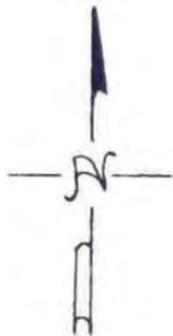
HOBBS BOOSTER STATION GW-044
(PHOTOS BY OCD)



PHOTO NO. 13

DATE: 4/9/98





- 1 RESERVE SLOP OIL STORAGE TANK
- 2 TOOL SHOP
- 3 PORTABLE 230 H.P. WHITE-SUPR.
- 4 PORTABLE 585 H.P. WHITE-SUPR.
- 5 PORTABLE 330 H.P. WHITE-SUPR.
- 6 AIR FIN JACKET WATER COOLERS
- 7 ENGINE ROOM (PHILLIPS SIDE)
- 8 ENGINE ROOM PAD DRAIN SUPP
- 9 PORTABLE 520 H.P. WAWKESHA
- 10 PORTABLE 520 H.P. WAWKESHA
- 11 PORTABLE ENGINE'S PAD DRAIN SUPP
- 12 SLOP OIL COLLECTION TANK
- 13 WARE HOUSE
- 14 ENGINE ROOM (EL PASO SIDE)
- 15 ENGINE ROOM PAD DRAIN SUPP
- 16 COOLING TOWER (S)
- 17 TURBINES
- 18 PUMP HOUSE
- 19 AIR-FIN COOLER
- 20 SLOP OIL COLLECTION TANK
- 21 OIL SALES TANK (1000 BBL.)
- 22 SLOP TANKS (500 BBL. EACH)
- 23 WASTEWATER STORAGE TANK (210)
- 24 HEATER TREATER
- 25 EMERGENCY FLARE

NO.	REVISION	BY	DATE				FOR BIDS	BARTLESVILLE, OKLAHOMA		AFE NO.
		CHKD	APP'D				FOR APPR			SCALE 0 100'
							FOR CONST			UNLESS OTHERWISE NOTED
							DRAWN M. FORD 5-11-87			DWG NO.
							CHECKED			SH NO.
			APP'D							

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/10/98

or cash received on _____ in the amount of \$ 690.00

from GPM

for Hobbs Booster GW-094

Submitted by: _____ Date: _____
(Facility Name) (OP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

THIS IS WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

WESTSTAR BANK
BARTLESVILLE OK
8000027004

GPM GAS CO
BARTLESVILLE, OKLAHOMA 74904
86-82/1031

02/10/98 [redacted] \$690.00

PAY TO THE ORDER OF EXACTLY *****\$690 DOLLARS AND 00 CENTS

NEW MEXICO ENVIRONMENTAL DEPT
WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE NM 87505

GPM GAS CO 51

E. J. [Signature]
Treasurer

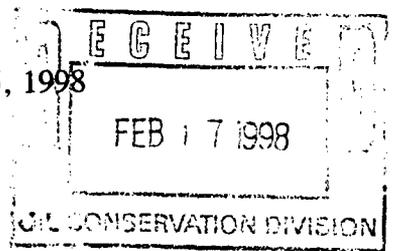




GPM GAS CORPORATION

4044 PENBROOK
ODESSA, TX 79762

February 5, 1998



Hobbs Booster Compressor Station
Discharge Plan GW-044
Discharge Plan Renewal

Mr. Roger Anderson
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

Pursuant to Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals, GPM Gas Services Company (GPM) is herewith submitting the required flat fee of six-hundred and ninety (\$690) dollars for Compressor Stations above 3,000 horsepower.

GPM has operated the Hobbs Booster Compressor station in accordance with the terms and conditions of Groundwater Discharge Plan GW-044. GPM has made no major changes to Hobbs Booster Compressor Station since the original discharge plan went into effect and would like to renew the discharge plan under the present terms of the existing permit.

Please do not hesitate to contact me at (915) 368-1142 should you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Mel P. Driver".

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

THIS IS WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

QPM GAS CO
BARTLESVILLE, OKLAHOMA 74004

86-82/1031

WESTSTAR BANK
BARTLESVILLE

OK

8000027604

02/10/98

\$698.00

PAY TO THE ORDER OF

EXACTLY *****\$698 DOLLARS AND 00 CENTS

NEW MEXICO ENVIRONMENTAL DEPT
WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE NM 87505

QPM GAS CO

51

Ex B. B. B. B. B.

Treasurer



The Santa Fe New Mexican

Since 1849. We Read You.

FEB 13 1998

N. M. E. M. N. R. D.

OIL CONSERVATION DIVISION

ATTN: SALLY MARTINEZ
2040 S. PACHECO
SANTA FE, NM 87505

AD NUMBER: 11473

ACCOUNT: 56659

LEGAL NO: 63033

P.O. #: 9819900257

177 LINES at \$ 70.80

Affidavits: 5.25

Tax: 4.75

Total: \$ 80.80

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(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-044) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Hobbs Booster Compressor Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels per day of process waste water is disposed of in the City of Hobbs Sewage Treatment System (POTW). Waste water from the treater operations will be disposed of in an OCD approved Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 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(s) 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 application(s), 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 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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN Under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of February 1998.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION

KATHLEEN A. GARLAND,
Acting Director
Legal #63033
Pub. Feb. 12, 1998.

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 63033 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 12TH day of FEBRUARY 1998 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
12TH day of FEBRUARY A.D., 1998

Notary Laura E. Herbig
Commission Expires 11/23/99



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

July 26, 1993

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-228

Mr. Vince Bernard
GPM Gas Corporation
4044 Penbrook
Odessa, Texas 79762

**RE: Discharge Plan GW-44 Renewal
Hobbs Booster Station
Lea County, New Mexico**

Dear Mr. Bernard:

On December 23, 1987 the original groundwater discharge plan for the GPM Gas Corporation Hobbs Booster Station was approved by the Director of the Oil Conservation Division (OCD).

The letter, from the Director of the Oil Conservation Division (OCD) approving the renewal of the discharge plan, incorrectly stated that the original discharge plan was approved December 21, 1991. As stated above, this date should read December 23, 1987.

Please note this change for your file.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/6/98,
or cash received on _____ in the amount of \$ 50.00
from GPM

for Hobbs Booster GW-044

Submitted by: _____ Date: _____
(Facility Name) (DP No.)

Submitted to ASD by: R. Chisholm Date: 2/10/98

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____
(quantity)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.
Full Payment _____ or Annual Increment _____

GPM GAS CORPORATION		[redacted]
NEW MEXICO REGION PETTY CASH		
4044 PENBROOK 915-368-1188		88-8685/3163
ODESSA, TX 79762		<u>2-6</u> 19 <u>98</u>
Pay to the Order of <u>Pet Conservation Division</u>		\$ <u>50.00</u>
<u>Fifty</u> $\frac{00}{100}$		Dollars <input type="checkbox"/> Security features included. Details on back.
 Odessa Credit Union	4015 Penbrook • P. O. Box 12010 • Odessa, Texas • 79768-2010 (915) 367-8911 • 1-800-344-3416	
For <u>filing fee GW-044</u>	<u>Mercedes S. Perry</u> <small>MP</small>	
[redacted]		

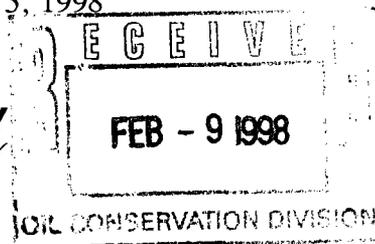


GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

February 5, 1998

Feb. 5



Hobbs Booster Compressor Station
Discharge Plan GW-044
Discharge Plan Renewal

FAXED

Mr. Roger Anderson
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

Pursuant to Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals, GPM Gas Services Company (GPM) is herewith submitting the required filing fee of fifty (\$50) dollars plus a flat fee of six-hundred and ninety (\$690) dollars for Compressor Stations above 3,000 horsepower.

GPM has operated the Hobbs Booster Compressor station in accordance with the terms and conditions of Groundwater Discharge Plan GW-044. GPM has made no major changes to Hobbs Booster Compressor Station since the original discharge plan went into effect and would like to renew the discharge plan under the present terms of the existing permit.

Any minor modification that has been made from the original modification will be submitted within 10 days of this application. The minor modifications will consist of the removal of the present Heater Treater along with plans for delineation of the extent of any horizontal and vertical contamination that may be present.

Please do not hesitate to contact me at (915) 368-1142 should you have any questions or require additional information.

Sincerely,

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

GW-044

GPM GAS CORPORATION
NEW MEXICO REGION PETTY CASH
4044 PENBROOK 915-368-1168
ODESSA, TX 79762

88-8685/3163

2-6 1998

Pay to the Order of Oil Conservation Division \$ 50⁰⁰

Fifty + 00/100 _____ Dollars Security features included. Details on back.

 **Odessa Credit Union**
4015 Penbrook • P. O. Box 12010 • Odessa, Texas • 79768-2010
(915) 367-8911 • 1-800-344-3416

For filing fee Mercedes S. Perry MP

© HARLAND

RECEIVED

FEB 09 1998

Environmental Bureau
Oil Conservation Division



February 9, 1998

Lovington Daily Leader
Attention: Advertising Manager
Post Office Box 1717
Lovington, New Mexico 88260

Re: Notice of Publication

Dear Sir/Madam:

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 payment.

Please publish the notice no later than February 16, 1998.

Sincerely,


Sally Martinez
Administrative Secretary

Attachment



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 9, 1998

The New Mexican
Attention: Betsy Perner
202 East Marcy
Santa Fe, New Mexico 87501

Re: Notice of Publication
PO # 98-199-00257

Dear Ms. Perner:

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.**
- 2. 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 payment.

Please publish the notice no later than Thursday, February 12, 1998.

Sincerely,


Sally Martinez
Administrative Secretary

Attachment

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(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-044) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Hobbs Booster Compressor Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels per day of process waste water is disposed of in the City of Hobbs Sewage Treatment System (POTW). Waste water from the treater operations will be disposed of in an OCD approved Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 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(s) 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 application(s), 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 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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of February 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



KATHLEEN A. GARLAND, Acting Director

S E A L

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(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-044) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Hobbs Booster Compressor Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels per day of process waste water is disposed of in the City of Hobbs Sewage Treatment System (POTW). Waste water from the treater operations will be disposed of in an OCD approved Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 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(s) 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 application(s), 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 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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of February 1998.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**



KATHLEEN A. GARLAND, Acting Director

S. E. A. L.

GPM GAS SERVICES COMPANY

4044 Penbrook
Odessa, TX 79762
(915) 368-1142
Fax: (915) 368-1163

FAX TRANSMISSION COVER SHEET

Date: 2/5/98

To: Roger Anderson

Company: NMOCID

Fax: 505-827-8177

Re: Hobbs Booster Discharge Plan Renewal

Sender: Mel Driver

YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET. IF
YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (915) 368-1061.

Roger, please find to follow the request
to continue our discharge plan under the present
plan since no modifications occurred that would
change the quality of the discharge.

Mel

February 5, 1998

**GPM GAS SERVICES COMPANY**
A DIVISION OF PHILLIPS PETROLEUM COMPANY4044 FENBROOK
ODESSA, TX 79762Hobbs Booster Compressor Station
Discharge Plan GW-044
Discharge Plan Renewal**FAXED**

Mr. Roger Anderson
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

Pursuant to Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals, GPM Gas Services Company (GPM) is herewith submitting the required filing fee of fifty (\$50) dollars plus a flat fee of six-hundred and ninety (\$690) dollars for Compressor Stations above 3,000 horsepower.

GPM has operated the Hobbs Booster Compressor station in accordance with the terms and conditions of Groundwater Discharge Plan GW-044. GPM has made no major changes to Hobbs Booster Compressor Station since the original discharge plan went into effect and would like to renew the discharge plan under the present terms of the existing permit.

Any minor modification that has been made from the original modification will be submitted within 10 days of this application. The minor modifications will consist of the removal of the present Heater Treater along with plans for delineation of the extent of any horizontal and vertical contamination that may be present.

Please do not hesitate to contact me at (915) 368-1142 should you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Mel P. Driver".

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

TO: Pat Sanchez
& pictures
7/23/97
JD

NMOCD INTER-OFFICE CORRESPONDENCE

TO: File of GPM Booster ST. GW-044
From: Wayne Price-Environmental Engineer
Date: July 1, 1997
Reference: Slop Oil Tank
Subject: Field Report of spill

Comments:

Visited the above referenced site. GPM called and indicated slop oil tank had ran over due to an control failure between the booster and Hobbs treater system.

Took pictures: 9am

GPM GW-044 7/1/97 9am By: W.Price-NMOCD Neg: 370428

Photo #1: Looking NW shows oil & condensate in berm area of slop oil tank and where it overtopped the berm and ran out.

Photo #2: Looking west, picture shows where oil flowed over the north berm.

Photo #3: Looking SW.

Photo #4: Looking west. Slop oil tank is one on left.

Photo #5. Looking NW.

Photo #6. Standing on west side of tanks, picture shows where oil flowed south-sw towards flare.

Photo #7. Looking East.

Photo #8. Looking East.

Photo #9. Near south fence, oil flowed south through equipment storage area.

Photo #10. Standing near equipment storage area, looking NE.

Photo #11 Picture taken from south access road south of the plant, looking north.

Photo #12. SAB, except looking south. Oil flowed toward flare.

Photo #13. Picture taken from south access road south of the plant, looking NE.

cc: GPM file
attachments-pictures — 13
file: gpmsoil7



#1 GPM

#370428

NMOCD INTER-OFFICE CORRESPONDENCE

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#2 GPM 370428

Photo #2: Looking west, picture shows where oil flowed over the north berm.



#3 EPM 370 #28

Photo #3: Looking SW.



#4 GPM 370 928

Hc13B5 Boosted
Slop oil tank

Photo #4: Looking west. Slop oil tank is one on left.



#5 GPM 370 428

Photo #5. Looking NW.



#6 EPM 370428

Photo #6. Standing on west side of tanks, picture shows where oil flowed south-sw towards flare.



#7 GPM 370 428

HOBBS - BURSTON

GLW-044

SLOP OIL TK

Photo #7. Looking East.



A 8 EPM 370428

Photo #8. Looking East.



H 9 GPM 370928

Photo #9. Near south fence, oil flowed south through equipment storage area.



A10 GPM

370 928

Photo #10. Standing near equipment storage area, looking NE.



11 EPM 370428

Photo #11 Picture taken from south access road south of the plant,
looking north.



H12 EPM 370428

Photo #12. SAB, except looking south. Oil flowed toward flare.



#13 GPM 970928

Photo #13. Picture taken from south access road south of the
plant, looking NE.

Pat Sanchez

From: Pat Sanchez
Sent: Monday, July 21, 1997 1:22 PM
To: Wayne Price
Cc: Chris Williams
Subject: RE: GPM Hobbs Booster GW-044
Importance: High

Mr. Price, I appreciate your clarification on where the release occurred, I had inadvertently confused this area with the Hobbs Treater. I called Mr. Driver with GPM at 1:10 PM MST to let him know that this area has been having several releases and that the OCD would require the following to both the Santa Fe and Hobbs OCD: Completed C-141, and a letter explaining what steps GPM would take in the future to mitigate the releases in this area, and to include the bottom hole sample analysis for the release area.

Thanks for your attention to this matter!

From: Wayne Price
Sent: Monday, July 21, 1997 12:32 PM
To: Pat Sanchez
Cc: Chris Williams
Subject: FW: GPM Hobbs Booster GW-044
Importance: High

Dear Pat,

Please note this spill was inside of the Hobbs Booster ST (slop oil tanks) not at the treater. I reviewed the DP inspection letter and did not see where we are asking them to investigate this area.

Recommendation: I recommend we have them investigate this area sometime in the near future.

Thanks!

From: Pat Sanchez
Sent: Monday, July 21, 1997 7:12 AM
To: Wayne Price
Cc: Chris Williams
Subject: RE: GPM Hobbs Booster GW-044
Importance: High

Mr. Price, as you may recall GPM is in the process of developing a closure plan for this treater - I will call Mr. Mel Driver with GPM and see what the status is - and let him you that there have been several releases. You may also call him at 915-368-1142. Thanks!

From: Wayne Price
Sent: Friday, July 18, 1997 3:37 PM
To: Pat Sanchez
Cc: Chris Williams
Subject: GPM Hobbs Booster GW-044
Importance: High

Dear Pat,

On July 1, 1997 GPM had another large spill from their slop oil tank inside the old plant area. This spill overtopped the berm and ran outside of the fence area toward the flare.

As of today GPM has scraped some soil up outside of the berm area. There still is some standing fluid and saturated soil inside of the berm area.

This makes two or three spills in this area and as of today GPM has not taken any action except some cosmetic work.

Recommendation: I recomenned that we have GPM submit a site investigation plan for this area.

I will send you my field report and pictures.

Thank You!



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

June 11, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-603

Mr. Scott Seeby
GPM Gas Corp.
4044 Penbrook
Odessa, Texas 79762

**RE: Discharge Plan GW-044 Renewal
Hobbs Booster Compressor Station
Lea County, New Mexico**

Dear Mr. Seeby:

On December 23, 1987, the groundwater discharge plan, GW-044, for the Hobbs Booster Compressor Station located in the NW/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD), the plan was subsequently renewed on March 17, 1993. 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 23, 1997.**

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. **If GPM submits an application for renewal at least 120 days before the discharge plan expires (on or before August 23, 1997), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to 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.

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. A copy of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid GPM in the permit renewal application. (A complete copy of the regulations is also available on www.emnrd.state.nm.us/ocd/)

Z 765 963 445



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Lovington Daily Leader	
Street and No.	
P.O. Box 1717	
Post Office	
Lovington, NM 88260	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

Mr. Scott Seeby
GPM, GW-044
6 Month Notice
June 11, 1997
Page 2

The discharge plan renewal application for the Hobbs Booster Compressor Station 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 six-hundred and ninety (\$690) dollars for Compressor Stations above 3,000 horsepower.

The fifty (\$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,

 per Roger C. Anderson.

Roger C. Anderson
Environmental Bureau Chief

RCA/pws

c: Hobbs OCD District Office

P 326 936 603

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

Sent to GPM - GW-044	
Street & Number 6 Mon. Rev. NatlCC.	
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



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 10, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-402

Mr. Scott Seebly
GPM Gas Corp.
4044 Penbrook
Odessa, Texas 79762

**RE: Renewal Inspection - Hobbs Treater Closure.
Discharge Plan GW-044
GPM Hobbs Booster - Compressor Station**

Dear Mr. Seebly:

The New Mexico Oil Conservation Division (OCD) on June 3, 1997 completed an inspection report as part of the permit renewal process for discharge plan GW-044. The OCD inadvertently forget to mention a discussion regarding the closure of the Hobbs Treater that is located on the GW-044 facility. Therefore, please include the closure plan for the Hobbs Treater along with the other responses as part of the GW-044 discharge plan renewal application. (See the report from OCD dated June 3, 1997 - photos 5,6, and 7.)

The closure plan must address the following requirements:

1. Any contamination must be properly delineated in terms of horizontal and vertical extent.

(Note: See 20 NMAC 6.2, Part 3, 3103 for appropriate constituents, also approved sampling and analytical methods must be used pursuant to 20 NMAC 6.2, Part 3, 3107.B)

2. Any wastes, demolition debris, and contaminated soil must be remediated and/or reused, recycled, disposed of in an OCD approved manner.

Since this permit will expire in December of 1997 GPM may address the above mentioned issues as part of the renewal for GW-044. If GPM any questions with regards to this inspection report feel free to contact me at (505)-827-7156.

Sincerely,


Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - OCD

c: OCD Hobbs District

PS Form 3800, April 1995

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	

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail. (See reverse)
Street & Number
Post Office, State, & ZIP Code
GPM-GW-044 - Seebly
Closure Plan for Hobbs Treater

P 410 431 402



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 3, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-397

Mr. Scott Seeby
GPM Gas Corp.
4044 Penbrook
Odessa, Texas 79762

RE: Renewal Inspection
Discharge Plan GW-044
GPM Hobbs Booster - Compressor Station

Dear Mr. Seeby:

The New Mexico Oil Conservation Division (OCD) has completed this inspection report as part of the permit renewal process for discharge plan GW-044. The following OCD staff members were present during the renewal inspection on Monday April 7, 1997 - Mr. Wayne Price and Mr. Patricio Sanchez. The purpose of this report is to provide GPM with the information that is needed to comply with the terms and conditions of GW-044 as this permit will expire on December December 23, 1997. However, it will be GPM's responsibility to comply with the terms and conditions of GW-044.

1. GPM will submit a plan to pressure test all below grade lines (waste water) to 3 psig above normal working pressure of the line - see OCD "Discharge Plan Guidelines, Revised 12-95" page 9. **The testing plan must be approved by the Santa Fe OCD office.** Any below grade sump (see phot no. 3) or tank that is found not to have integrity shall be reported to the Santa Fe OCD office with a proposed corrective action plan to repair the sump or below grade tank and identify possible contamination.
2. A work plan to investigate the hydrocarbon contamination at the facility vent area (see photo number 4) needs to be proposed by GPM. The plan shall address the nature and vertical as well as horizontal extent of possible contamination so that WQCC Groundwater Standards 20 NMAC 6.2.3103 will not be exceeded.
3. Any non-exempt waste(s) that are generated at the facility such as the "lube oil" contaminated soil and wash down water need to be properly characterized per 40 CFR Part 261. If the wastes are non-hazardous OCD will be the approving agency, if the wastes are hazardous then GPM must notify the NMED, HRMB at (505)-827-7156 for proper guidance in the collection, storage, and disposal of hazardous waste.

Mr. Scott Seeby
 GPM "GW-044"
 Inspection Report
 June 3, 1997
 Page 2

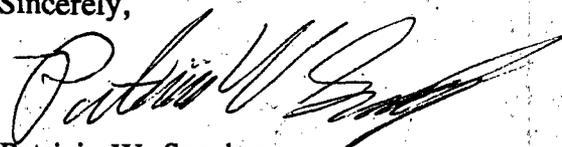
Note: Only Exploration and Production wastes that "Exempt from RCRA Subtitle C" may be disposed of in Class II UIC Salt Water Disposal wells.

4. Lube oil that appears to have pooled under the compressors (see photo no. 3) needs to be removed and recycled and/or disposed of properly. GPM should submit a workplan to investigate the integrity of the concrete pad on which the lube is contained for possible contamination of the vadose zone.
5. Since the facility is inactive GPM as part of the renewal process should consider a housekeeping plan at the facility to insure that inactive process tanks and lines do not pose future vadose zone and groundwater problems at the facility.

Since this permit will expire in December of 1997 GPM may address the above mentioned issues as part of the renewal for GW-044.

If GPM any questions with regards to this inspection report feel free to contact me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
 Petroleum Engineering Specialist
 Environmental Bureau - OCD

(Enclosure - Photographs taken on April 7 1997 by the OCD of "Hobbs Booster.")

c: OCD Hobbs District

PS Form 3800, April 1995	
US Postal Service Receipt for Certified Mail No Insurance Coverage Provided. Do not use for International Mail (See reverse)	P 410 431 392
Special Permit Number GW-044. DPIDS RPT.	Special Permit Number 1997.
Post Office Name, & 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	

GPM HOBBS BOOSTERGW-044
(PHOTOS BY OCD)

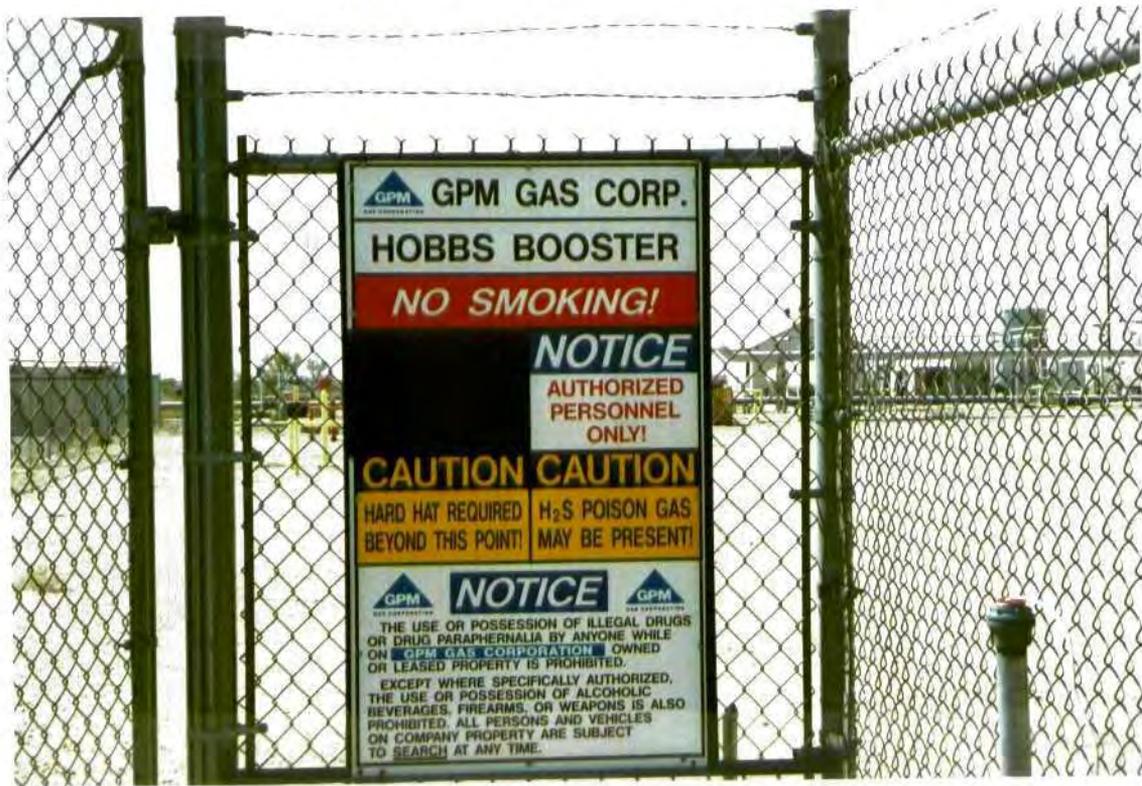


PHOTO NO. 1

DATE: 4/07 /97

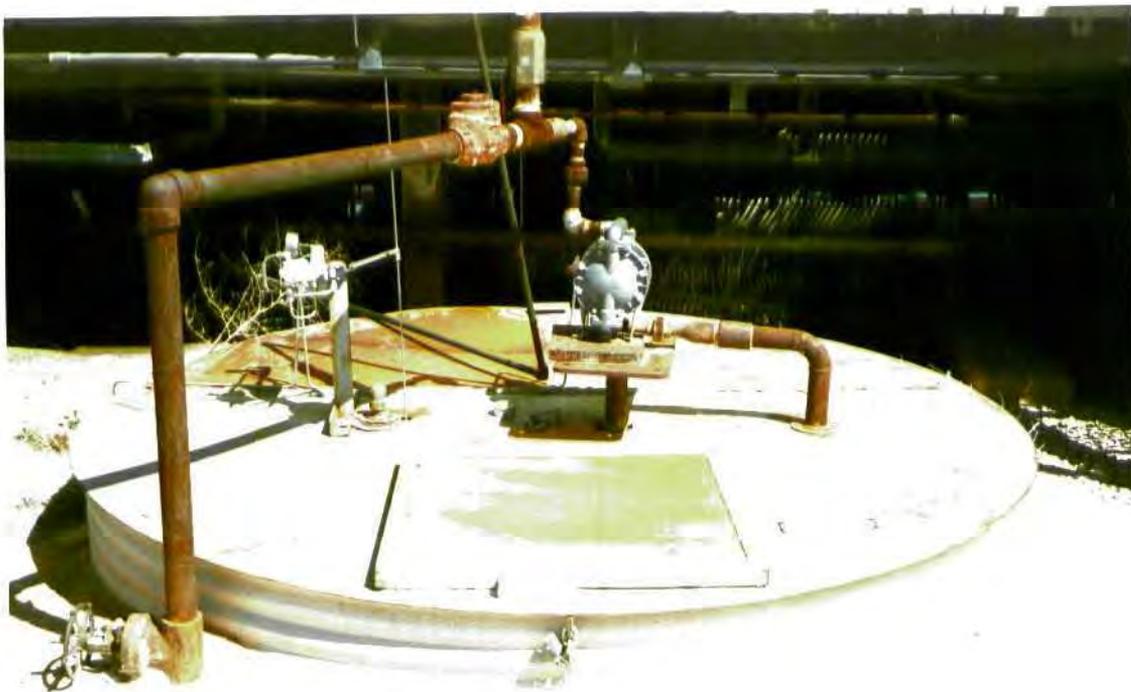


PHOTO NO. 2

DATE: 4/07 /97

GPM HOBBS BOOSTER GW-044
(PHOTOS BY OCD)



PHOTO NO. 3

DATE: 4/07 /97



PHOTO NO. 4

DATE: 4/07 /97

GPM HOBBS BOOSTER GW-044
(PHOTOS BY OCD)



PHOTO NO. 5

DATE: 4/07 /97



PHOTO NO. 6

DATE: 4/07 /97

GPM HOBBS BOOSTER GW-044
(PHOTOS BY OCD)



PHOTO NO. 7

DATE: 4/07 /97

RECEIVED

AUG 26 1996

Environmental Bureau
Oil Conservation Division

ATTENTION:

MR. PAT SANCHEZ

ENVIRONMENTAL BUREAU

SANTA FE

FROM:

WAYNE PRICE

HOBBS

cc - JERRY SOTO
 R. PRIZZANO
 GARY WILK
 PAT SANCHEZ

DISTRICT I
 P.O. Box 1980, Hobbs, NM 88241-1980
 DISTRICT II
 P.O. Drawer DD, Artesia, NM 88211-0719
 DISTRICT III
 1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
 Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
 P.O. Box 2088
 Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO
 APPROPRIATE DISTRICT
 OFFICE IN ACCORDANCE
 WITH RULE 116 PRINTED
 ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR GPM				ADDRESS			TELEPHONE 397-5720
REPORT OF	FIRE	BREAK X	SPILL	LEAK	BLOWOUT	OTHER*	
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER*
FACILITY NAME: HOBBS OIL TREATER - GW-044							
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage 1625 W MARLAND				SEC.	TWP.	RGE.	COUNTY
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK BEHIND PLANT EAST OF CORRAL IND.							
DATE AND HOUR OF OCCURRENCE 9:30 AM 8/20/96				DATE AND HOUR OF DISCOVERY SAME			
WAS IMMEDIATE NOTICE GIVEN?		YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT REQUIRED	IF YES, TO WHOM WAYNE PRICE - NMO-D		
BY WHOM J. GREEN				DATE AND HOUR			
TYPE OF FLUID LOST OILY WATER				QUANTITY OF LOSS ~ 1-5 BBL'S	VOLUME RECOVERED NONE		
DID ANY FLUIDS REACH A WATERCOURSE?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	QUANTITY			

RECEIVED

AUG 26 1996

Environmental Bureau
 Oil Conservation Division

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**

LINE LEAKING UNDER GROUND / FOUND 2 HOLE INVESTIGATING PRODUCE WATER LEAK!

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**

INSIDE DIKE AREA

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN <input checked="" type="checkbox"/>	OTHER*			
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY <input checked="" type="checkbox"/>	WET	DRY	SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED _____ PRINTED NAME AND TITLE **WAYNE PRICE** DATE **8/20/96**

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY

CC. CITY WORK
 PAZ SAUVEDRA
 KAREN SHARP

DISTRICT I
 P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico
 Energy, Minerals and Natural Resources Department

SUBMIT 2 COPIES TO
 APPROPRIATE DISTRICT
 OFFICE IN ACCORDANCE
 WITH RULE 116 PRINTED
 ON BACK SIDE OF FORM

DISTRICT II
 P.O. Drawer DD, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION

2040 South Pacheco
 Santa Fe, New Mexico 87505

DISTRICT III
 1000 Rio Brazos Rd, Aztec, NM 87410

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

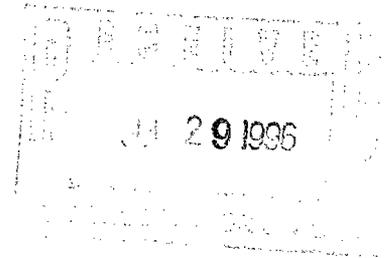
OPERATOR <i>YPM</i>					ADDRESS			TELEPHONE #	
REPORT OF	FIRE	BREAK	SPILL	LEAK	BLOWOUT	OTHER*			
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER*		
FACILITY NAME: <i>Hobbs Oil Treater</i>									
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage					SEC.	TWP.	RGE.	COUNTY	
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK <i>1625W. Marland</i>									
DATE AND HOUR OF OCCURRENCE				DATE AND HOUR OF DISCOVERY					
WAS IMMEDIATE NOTICE GIVEN?		YES	NO	NOT RE-QUIRED	IF YES, TO WHOM				
BY WHOM					DATE AND HOUR				
TYPE OF FLUID LOST					QUANTITY OF LOSS		VOLUME RE-COVERED		
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO	QUANTITY					
IF YES, DESCRIBE FULLY									
LEAK INSPECTION									
INSP. BY		<i>WAYNE PRICE</i>							
INSP. DATE		<i>8/20/96</i>							
CLEANUP SATISFACTION		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO							
REMARKS <i>VERTICAL EXTENT WILL BE CATERING LATER!</i>									
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**									
<i>Line parted - connection</i>									
<i>Water from Heater Treater</i>									
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**									
<i>all inside property @ just behind plant</i>									
<div style="float: right; border: 1px solid black; padding: 5px;"> RECEIVED AUG 26 1996 Environmental Bureau Conservation Division </div>									
DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*					
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW		
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**									
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF									
SIGNED			PRINTED NAME AND TITLE				DATE		

*SPECIFY

**ATTACH ADDITIONAL SHEETS IF NECESSARY



July 24, 1996



Soil Disposal
Hobbs, New Mexico
Phillips Pipe Line Company

Pat Sanchez
Oil Conservation Division
2040 S Pacheco
Santa Fe, NM 87505

Dear Mr. Sanchez:

To follow up with our conversation today, Phillips Pipe Line Company disposed of the soil stockpiled as a result of the approximate 50 barrel release of crude oil/condensate. The soil was taken to Phillips Pipe Line Company's Gaines, Texas facility and used as fill dirt under authorization from the Texas Railroad Commission. Phillips Pipe Line has fulfilled its obligations to remove the contamination as a result of the release.

If you have further questions regarding the soil disposal, please contact me at 918/661-3557.

Sincerely,

Quentin C. Mendenhall
Staff Environmental Engineer
3 B11 Adams Building

QCM:ms

Xci Wayne Price

RECEIVED

AUG 05 1996

Environmental Bureau
Oil Conservation Division



PHONE (815) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2328 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

RECEIVED
 MAY 08 1996

ANALYTICAL RESULTS FOR
GPM GAS CORP
ATTN: SCOTT SEEBY
4044 PENBROOK
ODESSA, TX 79762
FAX TO: 915-368-1170

Receiving Date: 12/19/95
 Reporting Date: 12/29/95
 Project Number: NOT GIVEN
 Project Name: HOBBS TREATER SPILL
 Project Location: HOBBS TREATER, HOBBS, NM
 Revised Report Date: 05/08/96

Sampling Date: 12/19/95
 Sample Type: SOIL
 Sample Condition: INTACT
 Sample Received By: MG
 Analyzed By: WL

TOTAL METALS

LAB NUMBER	SAMPLE ID	Fe (ppm)	Cr (ppm)	Ni (ppm)	Al (ppm)	Pb (ppm)	Cu (ppm)
ANALYSIS DATE:		12/22/95	12/22/95	12/21/95	12/27/95	12/21/95	12/22/95
H2343-1	CONT. SOIL PILES	8954	30.9	6.8	9628.2	283.0	20.7
H2343-2	S. OF TREATER	8406	11.4	10.3	9608.2	1580.2	18.3
Quality Control		1.01	1.02	1.04	1.05	1.04	0.99
True Value QC		1.00	1.00	1.00	1.00	1.00	1.00
% Accuracy		101	102	104	105	104	99
Relative Percent Difference		1.8	7.8	3.7	1.5	6.4	0.8
METHODS: EPA 600/4-79-020		200.7	200.7	200.7	200.7	200.7	200.7

		Ag (ppm)	B (ppm)	Mo (ppm)	Zn (ppm)	Ba (ppm)
ANALYSIS DATE:		12/21/96	12/27/96	12/22/96	12/22/96	12/22/96
H2343-1	CONT. SOIL PILES	<2.5	16.5	<2.5	115.0	1804.0
H2343-2	S. OF TREATER	<2.5	31.1	<2.5	58.1	3195.7
Quality Control		0.99	1.11	1.01	1.00	1.07
True Value QC		1.00	1.00	1.00	1.00	1.00
% Accuracy		99	111	101	100	107
Relative Percent Difference		3.8	0	1.2	0.3	6.7
METHODS: EPA 600/4-79-020		200.7	200.7	200.7	200.7	200.7

Wei Li
 Wei Li, Chemist

5-8-96
 Date

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 1

MR. PAT SANCHEZ	From: SCOTT SEEBY
Co. OGD	Co. GPM
Dept. ENGINEERING	Phone # (915) 368-1142
Fax # (505) 827-8177	Fax # (915) 368-1170

PLEASE NOTE: Liability and Damage
 All claims, including those for negligence
 services, in excess of shall be
 limited to the amount paid by client for analyses.
 thirty (30) days after completion of the applicable
 loss of profits incurred by client, its subsidiaries,
 of the above-stated reasons or otherwise.

limited to the amount paid by client for analyses.
 thirty (30) days after completion of the applicable
 loss of profits incurred by client, its subsidiaries,
 of the above-stated reasons or otherwise.

Pat Sanchez

From: Wayne Price
Sent: Wednesday, April 17, 1996 1:52 PM
To: Pat Sanchez
Cc: Jerry Sexton; Roger Anderson
Subject: GPM Hobbs Treater & Booster spills

Dear Pat,

On 4/15/96 of this week I witnessed Scott Seeby take a composite sample of the spill area located at the Hobbs Treater that you and I visited the other day.

Please note there has been another spill located inside of the Compressor Station fence (call Hobbs Booster) generated from the "Slop Oil" tank. The area outside of the berm has been scraped up and placed on concrete and covered with plastic. This material is located just north of the old comp. bldg. The area inside of the berm, which is visually contaminated with hydrocarbon stains has not been remediated as of yet. The verbal report indicated it filled up the berm and ran over.

The Hobbs Treater which is located SE of the plant also has signs of another spill inside of the berm area, but not overflowing. Scott surmised that when they had the Hobbs Booster upset it also affected the Hobbs treater system outside of the fence. The spill at the Booster was reported, the one at the Treater was not.

Scott indicated he thinks the problem is an internal GPM/Phillips one of "who is suppose to report what". The transportation group is responsible for the operations of the Treater and GPM is responsible for the Booster.

Scott Seeby indicated he would start excavation on both systems and would coordinate the final disposal and remediation closure on both systems with you since both systems are covered on the Hobbs Compressor Plant Discharge Plan.

cc: hard copies:
Scott Seeby-GPM
Gary Wink-NMOCD Hobbs
Buddy Hill-NMOCD Hobbs
Karen Sharp-Spill report file

MEMORANDUM OF MEETING OR CONVERSATION

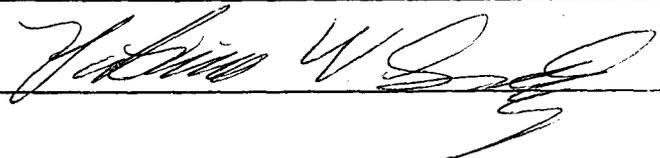
<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 10:30 AM	Date 3-12-96
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<u>Originating Party</u>	<u>Other Parties</u>
Scott Seeby - GPM	Pat Sanchez - OCS
- Returned my earlier call	
<u>Subject</u> Hobbs Booster - spill clean-up.	

Discussion Asked Scott to submit QA/QC on Analysis sent by PPL (Quentin Mandenball) on Feb. 12, 96. Scott will obtain from the Lab - will be Hobbs tomorrow. also will sample spill for TPH/BTEX. Also will try to find out about backgrounds sample on soils.

Conclusions or Agreements
Scott Seeby to sample soils for TPH/BTEX and dispose. Also to take bottomhole samples to determine if further action is needed at the site.

Distribution File

Signed 



February 12, 1996

Hobbs Treater Spill
Soil Samples

RECEIVED
OIL CONSERVATION DIVISION
FEB 16 1996

P.W. Sanchez
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Mr. Sanchez:

As we discussed last week, attached are the sample results taken from the soil pile associated with the release at the GPM Hobbs Treater Station. Also attached are background soil samples taken away from the Treater area. You will notice that most of the samples are below background.

As discussed, Phillips Pipe Line Company will manage the final disposition of the soil if required. Any correspondence or questions concerning the soil pile should be addressed to me. Otherwise continue to contact Scott Seeby with GPM for other matters concerning this facility.

If you have further questions, please contact me at 918/661-3557.

Sincerely,

Quentin C. Mendenhall
Staff Environmental Engineer
3-B11 Adams Building

cc: S.J. Seeby GPM

RECEIVED

FEB 16 1996

Environmental Bureau
Oil Conservation Division



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

METALS ANALYSIS REPORT

Company: GPM
 Address: 4044 Penbrook
 City, State: Odessa, Texas 79762
 Project Name: Hobbs Treater Spill
 Location: Hobbs Treater Hobbs, NM
 Sampled by: S.S.
 Sample Type: soil

Date: 12/29/95
 Lab #: H2344

Date: 12/19/95
 Sample Condition: intact

Sample ID: #1 contaminated soil piles
 #2 South of Treater

<u>PARAMETER</u>	<u>RESULT 1</u>	<u>RESULT 2</u>	<u>UNITS</u>
Iron	6954	8406	mg/kg
Chromium	30.9	11.4	mg/kg
Nickel	6.8	10.3	mg/kg
Aluminum	9628.2	9606.2	mg/kg
Lead	283.0	1580.2	mg/kg
Copper	20.7	18.3	mg/kg
Silver	<2.5	<2.5	mg/kg
Boron	16.5	31.1	mg/kg
Molybdenum	<2.5	<2.5	mg/kg
Zinc	115.0	56.1	mg/kg
Barium	1804.0	3145.7	mg/kg

METHODS: -EPA 200.7


 Mitch Irvin

1/2/96
 Date

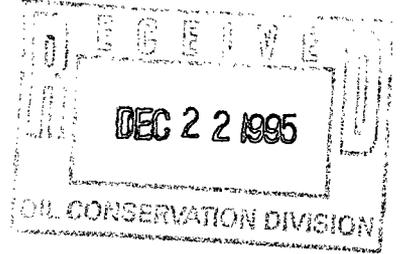
PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

December 18, 1995



GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762



Hobbs Treater Station
Spill Notification

J. T. Sexton, Supervisor and Oil & Gas Inspector
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Commission
P. O. Box 1980
Hobbs, New Mexico 88240

RECEIVED

JAN 2 1996

Environmental Bureau
Oil Conservation Division

Dear Mr. Sexton:

Rule 116, Provision 2., of the State of New Mexico Oil Conservation Division (OCD) Rules and Regulations, requires GPM Gas Corporation (GPM) to notify the OCD immediately of a spill of 25 barrels or more of crude oil or condensate. Rule 116, Provision 2., also requires a written report be submitted to the OCD within 10 days of the spill.

In compliance with Rule 116, Provision 2, GPM hereby makes written notification to the OCD of a 50 barrel condensate spill at GPM's Hobbs Treater Station on December 14, 1995. A detailed report of the spill is attached.

If you have any questions or require additional information, please do not hesitate to contact me at (915) 368-1142. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Seeby".

Scott Seeby
Environmental Engineer
New Mexico Region

SJS/act

ATTACHMENT

cc: Mr. Pat Sanchez, Petroleum Engineer, Oil Conservation Division
2040 S. Pacheco, Santa Fe, NM 87505

**NEW MEXICO OIL CONSERVATION COMMISSION
NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWOUTS**

NAME OF OPERATOR GPM Gas Corporation					ADDRESS 4044 Penbrook Odessa, Texas 79762			
REPORT OF:	FIRE	BREAK	SPILL X	LEAK	BLOWOUT	OTHER*		
TYPE OF FACILITY:	DRLG WELL	PROD WELL	TANK BTTY	PIPELINE	GASO PLNT	OIL RFY	OTHER* Central Treater	
NAME OF FACILITY GPM Gas Corporation - Hobbs Treater Station								
LOCATION OF FACILITY (QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTIO Approx. 1625 W. Marland, Hobbs, NM.					SEC 4	TWP 18S	RGE 38E	COUNTY Lea
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK Hobbs Treater Station is adjacent to GPM's Hobbs Booster. Hobbs Booster is located at approx.1625 W. Marland.								
DATE AND HOUR OF OCCURENCE 12/14/95 Between approx. 1:30 pm & 3:00 pm, MST				DATE AND HOUR OF DISCOVERY 12/14/95 Approx. 3:10 pm, MST				
WAS IMMEDIATE NOTICE GIVEN?	YES X	NO	NOT REQ'D	IF YES, TO WHOM? Mr. Gary Wink, Field Inspector, OCD				
BY WHOM?	Mr. T. Canfield, Asset Manager, GPM Mr. S. Seebly, Environmental. Engineer, GPM			DATE AND HOUR 12/14/95 Approx. 5:30 pm, MST				
TYPE OF FLUID LOST Gathering System Liquids (Condensate)				QUANTITY OF LOSS Approx. 50 BBLs		VOLUME RECOVERED Approx. 15 BBLs		
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO X	QUANTITY N.A.					
IF YES, DESCRIBE FULLY: N.A.								
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN:**								
Spill is believed to have resulted from truck driver not closing loading valves after delivering gathering system liquids (condensate) to Hobbs Treater Station's 500 BBL slop oil tank. Hobbs Booster operator discovered spill and closed valves.								
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN:**								
AREA AFFECTED: Gathering system liquids (condensate) drained away from Treater Station's load line to the south approx. 30 feet , then diverted east and west approx. 75 feet in each direction along the natural terrain. Width of spill was approx. 10 feet with three pools approx. three inches deep and approx. 20 feet in diameter.								
CLEANUP ACTION TAKEN: Vacuumed approx. 15 BBLs from ground and placed in slop oil tank. * Removed contaminated soil from ground and stockpiled for future remediation. Performed subsurface investigation by digging four foot deep hole and found hydrocarbon stained soil. Will most likely address hydrocarbon stained soil upon closure of facility.								
DESCRIPTION OF AREA		FARMING	GRAZING	URBAN	OTHER* Industrial			
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY X	ROCKY	WET	DRY X	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**								
Temperature: Approx 50 degrees, Wind direction: South at 10 mph, No precipitation.								
* Please find attached compressor engine lube oil analysis.								
THEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF								
SIGNED	<i>Scott J. Seebly</i>			TITLE Environmental Engineer		DATE 12/18/95		
*SPECIFY	**ATTACH ADDITIONAL SHEETS IF NECESSARY							

STAN SHAVER/GPM GROUP
1425 WEST HIGHLAND
HOUSTON TX 77040-6426

P.O. BOX 105261
ATLANTA, GEORGIA 30348

Normal ON 17-JUL-95



UNIT I.D.: 168317
COMPONENT: ENGINE
COMP. REF. NO.: J18284
P.O./REF. NO.: GPM GROUP

WORKSITE	UNIT MANUFACTURER	OL TYPE
COMPONENT TYPE	COMPONENT MANUFACTURER AND MODEL	PHILLIPS ECLIPSE F 3048
NATURAL GAS FUELED	CATERPILLAR 8398	COMPONENT SERIAL NUMBER

MAINTENANCE RECOMMENDATIONS FOR LAB NO. 2204 Reported on 24-SEP-95

ANALYSIS INDICATES COMPONENT & LUBRICANT CONDITIONS ARE ACCEPTABLE. RESAMPLE at the next scheduled interval. Data provided indicates oil and filter were changed at sampling.



EVAL ID: 0 2531	SPECTROCHEMICAL ANALYSIS IN PARTS PER MILLION BY WEIGHT																				SAMPLE DRAWN		
	LAB NO	IRON	CHROMIUM	NICKEL	ALUMINUM	LEAD	COPPER	ZN	SILVER	TITANIUM	SILICON	BROMINE	SODIUM	POTASSIUM	MAGNESIUM	PHOSPHORUS	ZINC	CALCIUM	BARIUM	MANGANESE		ANTHRACENE	MOLIBDENUM
4212	2	(1)	1	1	(1)	2	(1)	0.1	(1)	2	3	7	(10)	(5)	385	440	1541	(10)	15	(30)	(1)		
3072	3	(1)	2	2	2	2	(1)	(1)	(1)	4	6	5	16	(5)	364	443	1426	(10)	16	(30)	(1)		
2480	4	(1)	1	1	1	4	(1)	(1)	(1)	3	3	11	16	(5)	410	441	1476	(10)	20	(30)	(1)		
5434	4	(1)	1	(1)	1	2	(1)	(1)	(1)	4	3	9	(10)	(5)	377	416	1540	(10)	20	(30)	(1)		
3380	3	(1)	(1)	2	1	3	(1)	(1)	(1)	3	7	7	24	(5)	372	392	1315	(10)	10	(30)	(1)		
2204	5	(1)	(1)	2	(1)	4	(1)	(1)	(1)	4	4	5	(10)	(5)	372	405	1354	(10)	32	(30)	(1)		17-JUL-95

SAMPLE INFORMATION				PHYSICAL TEST RESULTS								
LAB NO.	MI/HR UNIT	MI/HR OIL	OIL ADD	FUEL ABS	ABS	VTR.	GLYCOL	VIS CS	SAE			
				SOOT OXID	NITR	XVOL	TEST	100°C	GRADE			
4212		740.0		(.1)	4	2	(.05) Negative	14.2	40			
3072				(.1)	4	2	(.05) Negative	14.3	40			
2480				(.1)	5	4	0.11 Negative	14.0	40			
5434				(.1)	5	3	0.32 Negative	14.9	40			
3380				(.1)	3	3	(.05) Negative	15.2	40			
2204					4	2	(.05) Negative	14.3	40			

UNDERLINED FIGURES INDICATE ABNORMAL VALUES. MAINTENANCE THAT MAY BE REQUIRED IS INDICATED ABOVE UNDER MAINTENANCE RECOMMENDATIONS.
N/A - TEST NOT PERFORMED
ACCURACY OF RECOMMENDATIONS IS DEPENDENT ON REPRESENTATIVE SAMPLE AND COMPLETE.

FOR LEGEND AND EXPLANATION OF PHYSICAL PROPERTIES TESTS PLEASE SEE REVERSE SIDE

FORM NO. 8037-B 1/94

Post-It® Fax Note 7671

Date	# of pages
To: SEEBY	From: SHAVER
Co./Dept.	Co.
Phone #	Phone #
Fax #	Fax #

MEMORANDUM OF MEETING OR CONVERSATION

Telephone

Personal

Time 10:30 AM

Date 12-18-95

Originating Party

Other Parties

Scott Seoby - GDM

Pat Sanchez - OGD

Subject

Hobbs GW-44 Spill

Discussion

- (1) Exempt - Run TPH, BTEX, Benzene and Total metals based on Lube.
- (2) Verify vertical extent (i.e. < 100 ppm TPH) run 5 point composite on the soil for metals, + establish back ground on metals, run confirmation on the soil to assure TPH of 100 ppm has been attained.
- (3) Scott will get with Wayne.
- (4) Scott will evaluate historical contamination as part of the closure plan for the facility. (Facility to be closed in two months) Need to look at field visit for the site & Lee Plant. (on Jan. 2, call Scott to set up times.) Scott will Fax us the report today.

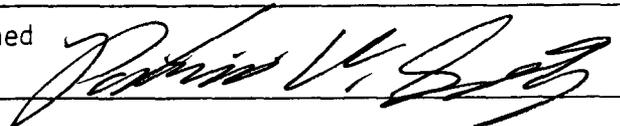
Conclusions or Agreements

(Facility to be closed in two months) Need to look at field visit for the site & Lee Plant. (on Jan. 2, call Scott to set up times.) Scott will Fax us the report today.

Distribution

File.

Signed



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 7:56 AM	Date 12-18-95
<u>Originating Party</u>		<u>Other Parties</u>
Wayne Price & Gary Wink. - OOD		Pat Sanchez - OOD
Returned my earlier 7:36 AM call.		
<u>Subject</u> GPM GW-044 Spill at COP for drip condensate.		

Discussion

(1) Question did the spill come from the storage tank prior to Heater Treater or product tank after the Heater Treater?

- In the discussion I had Friday the spill came out of the Condensate Storage tank prior to the Heater Treater.

- Wayne and Gary may have got a different story - Gary is going out to the spill site again to determine which tank it came from.

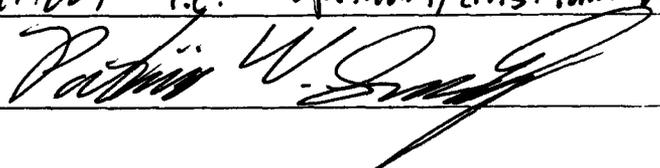
- If the spill came out of the "product" tank downstream of the Heater Treater it is Non-exempt.

Conclusions or Agreements

(1) GPM (Scott Seaby to Fax a report discussing the spill -) Note: Gary called back at 9:14 AM - occurred before Heater Treater ^{exempt}

(2) Gary Wink to go to the field to check out tank arrangement and exact spill location - i.e. upstream/downstream of the Heater Treater.

Distribution File

Signed 

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 4:55pm	Date 12-15-95
<u>Originating Party</u>		<u>Other Parties</u>	
Scott Scoby - GDM & Operations People.		Pat Sanchez - OCD	
<u>Subject</u> Spill at Gw-44			

Discussion

Operators said spill occurred when Transport was off-loading "drip" liquids to the Heater Treater. Therefore it appears this to be an exempt spill - however if commingled with Lube oils does the "Crude" "Water" mixture remain exempt - T.B. determined on Monday.

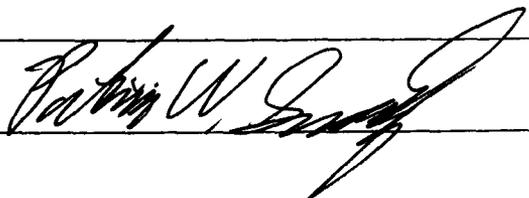
Also, must run totals on metals to assure leachable metals will not cause groundwater to be impacted.

Conclusions or Agreements

Scott will Fax us a report on Monday so that we can discuss with RCA.
Time: 5:10 pm.

Distribution File

Signed



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 3:30 till 4:40 pm	Date 12-15-95
---	---------------------------	---------------

<u>Originating Party</u>	<u>Other Parties</u>
Pat Sanchez - OCD Return call to 915-366-8440	Scott Seebly - GPM

Subject Spill at GPM Hobbs compressor station - GW-44

Discussion Scott sees the main points as (Per our discussion)

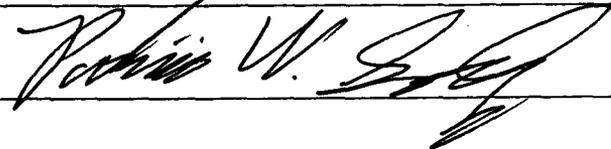
- ① Exempt/Non-exempt - Custody Transfer
- ② Metals (even if Non-exempt) that are leachable that could impact the groundwater.
- ③ Old contamination - old spills under current spill.

I told Scott I did not believe this to be an exempt spill per RCRA regs. I said because non-exempt he would have to run TCLP. (He can use a 5 point composite sample.)

Conclusions or Agreements

Scott will call back (4:40 pm) in 10 minutes or at 4:50 pm. He wants to talk more with his field person.

Distribution File.

Signed 

(Note: See Attachment from the CFR.)

impact on any small entities affected. Moreover, due to the nature of the federal-state relationship under the CAA, preparation of a regulatory flexibility analysis would constitute Federal inquiry into the economic reasonableness of state action. The CAA forbids EPA to base its actions concerning SIPs on such grounds. *Union Electric Co. v. U.S.E.P.A.*, 427 U.S. 246, 256-66 (S. Ct. 1976); 42 U.S.C. 7410(a)(2).

This action has been classified as a Table 3 action by the Regional Administrator under the procedures published in the *Federal Register* on January 19, 1989 (54 FR 2214-2225). On January 6, 1989, the Office of Management and Budget waived Table 2 and Table 3 SIP revisions (54 FR 2222) from the requirements of section 3 of Executive Order 12291 for a period of two years. EPA has submitted a request for a permanent waiver for Table 2 and Table 3 SIP revisions. OMB has agreed to continue the temporary waiver until such time as it rules on EPA's request.

List of Subjects in 40 CFR Part 52

Air pollution control, Hydrocarbons, Incorporation by reference, Intergovernmental relations, Ozone, Reporting and recordkeeping requirements.

Dated: February 12, 1993.

John C. Wise,

Acting Regional Administrator.

Part 52, chapter I, title 40 of the Code of Federal Regulations is amended as follows:

PART 52—[AMENDED]

1. The authority citation for part 52 continues to read as follows:

Authority: 42 U.S.C. 7401-7671q.

Subpart F—California

2. Section 52.220 is amended by adding paragraph (c)(187)(i)(A)(2) to read as follows:

§ 52.220 Identification of plan.

* * * * *

(c) * * *

(187) * * *

(i) * * *

(A) * * *

(2) Rule 460.2, adopted on September 19, 1992.

[FR Doc. 93-8454 Filed 3-19-93; 8:45 am]

BILLING CODE 6560-60-M

40 CFR Part 261

[FRL-4606-6]

Clarification of the Regulatory Determination for Wastes From the Exploration, Development and Production of Crude Oil, Natural Gas and Geothermal Energy

AGENCY: Environmental Protection Agency.

ACTION: Clarification.

SUMMARY: This document provides additional clarification of the Resource Conservation and Recovery Act (RCRA) *Regulatory Determination for Oil and Gas and Geothermal Exploration, Development and Production Wastes* dated June 29, 1988 (53 FR 25446; July 6, 1988). This document clarifies the regulatory status of wastes generated by the crude oil reclamation industry, service companies, gas plants and feeder pipelines, and crude oil pipelines. Since this document only further clarifies the status of these wastes under the RCRA Subtitle C hazardous waste exemption discussed in EPA's 1988 *Regulatory Determination*, and does not alter the scope of the current exemption in any way, comments are not being solicited by the Agency on this notice.

FOR FURTHER INFORMATION CONTACT: For general information on the scope of the RCRA Subtitle C exemption for wastes from the exploration, development and production of crude oil, natural gas and geothermal energy, contact the RCRA/Superfund hotline at (800) 424-9346 (toll free) or (703) 412-9810. For technical information, contact Mike Fitzpatrick, U.S. Environmental Protection Agency OS-323W, 401 M Street, SW., Washington, DC 20460; phone (703) 308-8411.

SUPPLEMENTARY INFORMATION:

Table of Contents

- I. Introduction
- II. Clarification of the Scope of the Oil and Gas Exemption
 - A. Crude Oil Reclamation Industry
 - B. Service Companies
 - C. Crude Oil Pipelines
 - D. Gas Plants and Feeder Pipelines
- III. Administrative Procedures Act Requirements
- IV. EPA RCRA Docket

I. Introduction

In the *Solid Waste Disposal Act Amendments of 1980* (Pub. L. 94-580), Congress amended the *Resource Conservation and Recovery Act (RCRA)* to add sections 3001 (b)(2)(A), and 8002(m). Section 3001(b)(2)(A) exempted drilling fluids, produced waters, and other wastes associated with

exploration, development, and production of crude oil, natural gas and geothermal energy from regulation as hazardous wastes. Section 8002(m) required the Administrator to complete a Report to Congress on these wastes and provide an opportunity for public comment. The Administrator was also required by section 3001 (b)(2)(A) to make a determination no later than six months after completing the Report to Congress as to whether hazardous waste regulations under RCRA Subtitle C were warranted for these wastes.

EPA's Report to Congress was transmitted to Congress on December 28, 1987. In the process of preparing the Report to Congress, the Agency found it necessary to define the scope of the exemption for the purpose of determining which wastes were considered "wastes from the exploration, development or production of crude oil, natural gas or geothermal energy." Based upon statutory language and legislative history, the Report to Congress identified several criteria used in making such a determination. In particular, for a waste to be exempt from regulation as hazardous waste under RCRA Subtitle C, it must be associated with operations to locate or remove oil or gas from the ground or to remove impurities from such substances and it must be intrinsic to and uniquely associated with oil and gas exploration, development or production operations (commonly referred to simply as exploration and production or E&P); the waste must not be generated by transportation or manufacturing operations.

Transportation of oil and gas can be for short or long distances. For crude oil, "transportation" is defined in the Report to Congress and the subsequent *Regulatory Determination* as beginning after transfer of legal custody of the oil from the producer to a carrier (i.e., pipeline or trucking concern) for transport to a refinery or, in the absence of custody transfer, after the initial separation of the oil and water at the primary field site. For natural gas, "transportation" is defined as beginning after dehydration and purification at a gas plant, but prior to transport to market. To accurately determine the scope of the exemption, the reader is referred to the December 28, 1987, Report to Congress, *Management of Wastes from the Exploration, Development, and Production of Crude Oil, Natural Gas, and Geothermal Energy* (NTIS # PB88-146212) for the specific application of the criteria.

The Agency's *Regulatory Determination* was published in the *Federal Register* on July 6, 1988 (53 FR

MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal

Time 10:45 AM

Date 12-15-95

Originating Party

Other Parties

Wayne Price - OCD

Pat Sanchez - OCD

Subject Hobbs Plant (GPM GW-44) spill at oil sales facility.

Discussion (1) Spill occurred while being loaded to a transport truck - custody transfer therefore looks to have occurred, therefore non-exempt.

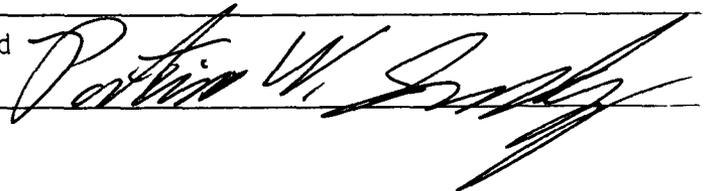
(2) Depth To Groundwater 50' TDS @ 500 mg/L - need to clean up to 100 ppm TPH and run TCLP. Also, since commingled with Lube oil leachable metals a concern as far as WRCC 3103 A & B - in other words a Totals must be ran for metals and it must be shown the Groundwater standards will not be exceeded.

Conclusions or Agreements

Wait for GPM to get back with us - they will from what we know so far have to treat as a Non-exempt spill.

Distribution File, Wayne Price.

Signed





GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

June 15, 1993

Oil Conservation Division
RECEIVED

'93 JUN 23 AM 9 50

Discharge Plan GW-44
Hobbs Booster Station
Compliance Schedule

William J. LeMay, Director
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Dear Mr. LeMay:

Pursuant to your letter of March 17, 1993, approving the renewal of our Hobbs Booster Station groundwater discharge plan (GW-44), GPM Gas Corporation (GPM) herein submits a schedule of compliance as directed by the discharge plan requirements attachment of your approval letter.

1. **Payment of Discharge Plan Fees:**
Complete. The \$50 filing fee and the \$690 flat fee were submitted to your office by GPM in a letter dated March 30, 1993.
2. **Drum Storage:**
Complete. All drums are now stored on pad and curb type containment.
3. **Sump Inspection:**
Complete. Any future plans to install new sumps or below-grade facilities will be approved by the OCD prior to installation and will incorporate leak detection in their design. All leak detection sumps for below grade facilities are currently being inspected on a monthly basis.
4. **On Grade Tanks:**
The 210 bbl anti-freeze storage tank presently located south of the portable compressors will be relocated and bermed to contain one and one-third the capacity of the tank within the berm. Target completion date for this project is October 1, 1993.
5. **Above Grade Tanks:**
Five of the eight existing above grade tanks (saddle tanks) requiring pad and curb type containment will be fitted with steel catchments by August 1, 1993. They are identified as follows:

William J. LeMay
Discharge Plan GW-44
Hobbs Booster Station
Compliance Schedule
June 15, 1993

- Overhead solvent tank located east of the portable compressors.
- Overhead lube oil storage tank located south of the portable compressors.
- Horizontal soap tank located south of the Clark compressor building.
- Overhead solvent tank located northwest of the Cooper compressor building.
- Betz 35K cooling tower chemical storage tank located south of the cooling towers.

The remaining three above grade tanks will require concrete slab and curb type containment. They are identified as follows:

- KG-49 corrosion inhibitor storage tank located at the east pipe lane by the booster discharge meter.
- RLX lube oil storage tank located east of the portable compressors.
- Vertical anti-freeze mix tank located south of the portable compressors.

Target completion date for these three tanks is May 1, 1994.

Please contact me at (915) 368-1085 should you have any questions regarding this schedule of compliance, or if any of the above information does not meet with your approval. Thank you.

Sincerely,



Vincent B. Bernard
Safety & Environmental Supervisor
New Mexico Region

/sm

cc: Jerry Sexton - OCD Hobbs Office



GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

OIL CONSERVATION DIVISION
RECEIVED

1993 APR 2 AM 8 49

March 30, 1993

Discharge Plan GW-44 Fee
Hobbs Booster Station

William J. LeMay, Director
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Dear Mr. LeMay:

Pursuant to New Mexico Water Quality Control Commission (WQCC) Regulation 3-114, discharge plan fees, GPM Gas Corporation submits to the Oil Conservation Division the renewal fee for the Hobbs Booster Station Discharge Plan (GW-44), as approved in your letter of March 17, 1993.

Please find enclosed a check payable to **NMED-Water Quality Management** in the amount of seven hundred and forty (740) dollars. This includes the filing fee of fifty (50) dollars, plus the flat fee of six hundred and ninety (690) dollars, based on the type of facility and associated horsepower.

Please contact me at (915) 368-1085 should you have any questions regarding this issue. Thank you.

Sincerely,

Vincent B. Bernard
Safety & Environmental Supervisor
New Mexico Region

cc: Jerry Sexton, OCD Hobbs Office

**ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH**

I hereby acknowledge receipt of check No. [REDACTED] dated 3/26/93
 or cash received on 4/5/93 in the amount of \$ 740.00
 from GPM Gas Corporation
 for Hobbs Compressor Station GW-44

Submitted by: _____ Date: _____
(Facility Name) (DP No.)

Submitted to ASD by: Kathleen Brown Date: 4/5/93

Received in ASD by: Chas G. Mastey Date: 4/5/93

Filing Fee New Facility _____ Renewal

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

FIELD CHECK



GPM GAS CORPORATION

BARTLESVILLE, OKLAHOMA 74004

86-82
1031

GROUP/STAFF	LOCATION	DATE	CHECK NO.	AMOUNT
NMR (JR1786)	Odessa, Texas	March 26, 1993	[REDACTED]	\$740.00

Seven Hundred Forty and no/100----- DOLLARS

PAY TO ORDER OF NMED - Water Quality Management
P.O. Box 2088; State Land Ofc. Bldg.
Santa Fe, NM 87504

VOID IF IN EXCESS OF \$1,000.00
 GPM GAS CORPORATION D-51

Chas G. Mastey

 J53 AGENT

WESTSTAR BANK, n.a. BARTLESVILLE, OKLAHOMA
 BARTLESVILLE, OK 74003



AFFIDAVIT OF PUBLICATION

No. 31237

STATE OF NEW MEXICO,
County of San Juan:

KIT OWENS being duly sworn, says: "That she is the ADVERTISING DIRECTOR 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 qualified 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 10, 1993

Second Publication _____

Third Publication _____

Fourth Publication _____

and the cost of publication was \$ 55.64



Subscribed and sworn to before me this 16th day of FEBRUARY, 1993.

Ginny Beck
Notary Public, San Juan County,
New Mexico

My Comm expires: April 2, 1996

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 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-115) - Halliburton Services, Matt D. Ratliff, 1015 Bois D'Arc, P.O. Drawer 1431, Duncan, Oklahoma, 73536-0100, has submitted a discharge plan application for their Artesia Service Facility located in Section 28, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 1300 gallons per day of waste water is collected in the truck washrack and floor sump and discharged into the City of Artesia Sewage Treatment System (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 25 feet with a total dissolved solids concentration ranging from 1200 mg/l to 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-131) Petrolite Corporation, E.E. Schooling, 369 Marshall Avenue, St. Louis, Missouri, 63119-1897, has submitted a discharge plan application for their Farmington Service Facility located in Section 3, Township 29 North, Range 11, West, NMPM, San Juan County, New Mexico. There are no planned discharge at the facility. Groundwater most likely to be affected by an accidental discharges is at a depth in excess of 180 feet with a total dissolved solids concentration ranging from 2000 mg/l to 4000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-44) GPM Gas Corporation, Scott Seeby, Environmental Analyst, 4044 Penbrook, Odessa, Texas 79762, has submitted a discharge plan renewal application for their Hobbs Booster Station which is located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 388 barrels per day of process waste water is disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of in an OCD approved Class II disposal well. Groundwater most likely to be impacted is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 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. 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 29th day of January, 1993.

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

SEAL

Legal No. 31237 published in the Farmington Daily Times, Farmington, New Mexico on Wednesday, February 10, 1993.

Affidavit of Publication

No. 14210

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication February 10, 1993

Second Publication _____

Third Publication _____

Fourth Publication _____

Gary D. Scott
Subscribed and sworn to before me this 15th day of February 19 93

Barbara Ann Beens
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Public

LEGAL NOTICE

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 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-115) - Haliburton Services, Matt D. Ratliff, 1015 Bois D'Arc, P.O. Drawer 1431, Duncan, Oklahoma, 73536-0100, has submitted a discharge plan application for their Artesia Service Facility located in Section 28, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 1300 gallons per day of waste water is collected in the truck wash-rack and floor sump and discharged into the City of Artesia Sewage Treatment System (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 25 feet with a total dissolved solids concentration ranging from 1200 mg/l to 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-131) Petrolite Corporation, E.E. Schooling, 369 Marshall Avenue, St. Louis, Missouri, 63119-1897, has submitted a discharge plan application for their Farmington Service Facility located in Section 3, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. There are no planned discharges at the facility. Groundwa-

ter discharge at a depth in excess of 1 feet with a total dissolved solids concentration ranging from 2000 mg/l to 40 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed (GW-44) GPM Gas Corporation, Scott Seeby, Environmental Analyst, 40 Penbrook, Odessa, Texas 79762, has submitted a discharge plan renewal application for their Hobbs Boos Station which is located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 38 barrels per day of process waste water is disposed of the City of Hobbs sewer system. Waste water from the treatment operations will be disposed of in an OCD approved Class II disposal well. Groundwater most likely to be impacted is at a depth of approximately 50 feet with a total dissolved solids concentration of

approximately 500 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. 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 a 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 29th day of January, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY,
Director

SEAL
Published in the Artesia Daily Press, Artesia, N.M. February 10, 1993.

Legal 14210

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled
Notice Of Publication

~~and XXXXXXXX~~ ~~XXXXXX~~
..... ~~XXXXXXXXXX~~
~~On XXXXX~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~on XXXXXXXX~~ ~~for~~ one (1) day ~~consecutive weeks~~ beginning with the issue of February 9, 19 93 and ending with the issue of February 9, 19 93

And that the cost of publishing said notice is the sum of \$ 40.50

which sum has been (Paid) ~~XXXXXX~~ as Court Costs
Joyce Clemens
Subscribed and sworn to before me this 10th day of February, 19 93
Mrs. Jean Series
Notary Public, Lea County, New Mexico
My Commission Expires Sept. 28, 19 94

LEGAL NOTICE 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 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-115) - Halliburton Services, Matt D. Ratliff, 1015 Bois D'Arc, P.O. Drawer 1431, Duncan, Oklahoma, 73536-0100, has submitted a discharge plan application for their Artesia Service Facility located in Section 28, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 1300 gallons per day of waste water is collected in the truck washrack and floor sump and discharged into the City of Artesia Sewage Treatment System (POTW). Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 25 feet with a total dissolved solids concentration ranging from 1200 mg/l to 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-131) Petrolite Corporation, E.E. Schooling, 369 Marshall Avenue, St. Louis, Missouri, 63119-1897, has submitted a discharge plan application for their Farmington Service Facility located in Section 3, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. There are no planned discharges at the facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 180 feet with a total dissolved solids concentration ranging from 2000 mg/l to 4000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-44) GPM Gas Corporation, Scott Seeby, Environmental Analyst, 4044 Penbrook, Odessa, Texas

79762, has submitted a discharge plan renewal application for their Hobbs Booster Station which is located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels per day of process waste water is disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of in an OCD approved Class II disposal well. Groundwater most likely to be impacted is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 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. 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 29th day of January, 1993.

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

Published in the Lovington Daily Leader February 9, 1993.

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 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:

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(GW-44) GPM Gas Corporation, Scott Seeby, Environmental Analyst, 4044 Penbrook, Odessa, Texas 79762, has submitted a discharge plan renewal application for their Hobbs Booster Station which is located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels per day of process waste water is disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of in an OCD approved Class II disposal well. Groundwater most likely to be impacted is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 mg/l.



OIL CONSERVATION DIVISION
GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

'93 FEB 4 AM 8:44
4044 Penbrook
Odessa, TX 79762

January 29, 1993

Discharge Plan Renewal
Discharge Plan GW-44
Hobbs Booster Station
Lea County, New Mexico

William J. Le May
Director, State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

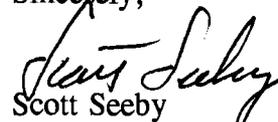
Dear Mr. Le May:

Pursuant to Section 3-109.G.4, New Mexico Water Quality Control Commission Regulations, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) requests renewal of Groundwater Discharge Plan GW-44, Hobbs Booster Station. Hobbs Booster Station is located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico.

In accordance with New Mexico Water Quality Control Regulations, discharges remain consistent with the terms and conditions of Groundwater Discharge Plan GW-44. Additionally, no significant change in discharge water quality or volume has occurred due to facility expansion, production increase, or process modification.

Your time and energy in renewing Groundwater Discharge Plan GW-44, Hobbs Booster Station, is greatly appreciated. Please contact me at (915) 368-1142 should you have any questions regarding this submittal.

Sincerely,


Scott Seeby
Environmental Analyst
New Mexico Region

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

STATE OF NEW MEXICO
County of Bernalillo

ss

OIL CONSERVATION DIVISION
RECEIVED

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan 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:
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(GW-44) GPM Gas Corporation, Scott Seaby, Environmental Analyst, 4044 Penbrook, Odessa, Texas 79702, has submitted a discharge plan renewal application for their Hobbs Booster Station which is located in the NE/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lee County, New Mexico. Approximately 388 barrels per day of process waste water is disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of in an OCD approved lease disposal well. Groundwater most likely to be impacted is at depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 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. 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 23th day of January, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Journal: February 10, 1993

Dianne Berglund being duly sworn declares and says that she is National Advertising Sales Supervisor of the **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,

8 52
33 FEB 15 1993

for times, the first publication being on the day
of February 1993, and the subsequent consecutive
publications on 1993.

Dianne Berglund

OFFICIAL SEAL
Bernadette O'Neil
12-18-93

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 Feb, 1993.

PRICE 833.71

Statement to come at end of month.

CLA-22-A (R-1/93)

ACCOUNT NUMBER C 81184



RECEIVED
FEB - 10 8 59 AM

**UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107**

February 8, 1993

Permit #GW93006

Mr. William J. Lemay
Director, State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on February 4, 1993, regarding the Oil Conservation Division (OCD) discharge permits GW-115, GW-131, and GW-44, on fish, shellfish, and wildlife resources in New Mexico.

The Service has determined there are no wetlands or other environmentally sensitive habitats, plants, or animals that will be adversely affected by the following discharges.

GW-115 Halliburton Services, Artesia Service Facility located in Section 28, T17S, R26E, NMPM, Eddy County, New Mexico. Approximately 1,300 gallons per day of waste water is collected in the truck washrack and floor sump and discharged to the City of Artesia Sewage Treatment System.

GW-131 Petrolite Corporation, Farmington Service Facility to be located in Section 3, T29N, R11W, NMPM, San Juan County, New Mexico. No discharge is planned for this new facility to be built, but a spill and leak prevention plan was submitted.

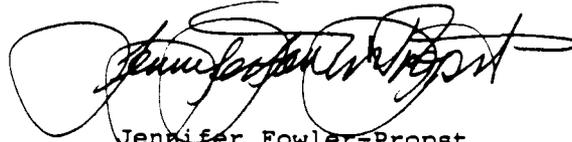
GW-44 GPM Gas Corporation, Hobbs Booster Station located in the NW/4 of Section 4, T19S, R38E, NMPM, Lea County, New Mexico. Approximately 386 barrels per day of process waste water is disposed in the City of Hobbs sewer system and waste water from the treater operations disposed of in an OCD approved Class II disposal well.

Mr. William J. Lemay

2

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Fowler-Propst", written in a cursive style with a large loop at the end.

Jennifer Fowler-Propst
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife
Enhancement, Albuquerque, New Mexico

OIL CONSERVATION DIVISION
RECEIVED

'92 OCT 5 PM 9 58



September 28, 1992

INTER-OFFICE CORRESPONDENCE SUBJECT:

New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

Gentlemen:

Effective October 31, 1992, at 11:59 p.m., the responsibility, coverage, and liability for the following permits will be transferred from GPM Gas Corporation to a new Delaware corporation using the same name, GPM Gas Corporation. The present permit holder (GPM Gas Corporation) will change its name to avoid any confusion.

<u>Facility</u>	<u>Permit Description</u>	<u>Permit Number</u>
Artesia Gas Plant	Discharge	GW-23
Eunice Gas Plant	Discharge	GW-16
Hobbs Booster	Discharge	GW-44
Lee Gas Plant	Discharge	GW-2

Please reflect this change in your records. If you need further information, please contact Mr. Steve Godby at 713/297-5971.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. J. Panatier".

M. J. Panatier
Sr. Vice President
Chief Operating Officer
1300 Post Oak Blvd.
Houston, TX 77056

I acknowledge receipt of the above notice.

A handwritten signature in cursive script, appearing to read "D. W. Casselberry".

D. W. Casselberry
Promoter
new GPM Gas Corporation



PHILLIPS PETROLEUM COMPANY
BARTLESVILLE, OKLAHOMA 74004 918 661-6600

LEGAL

RECEIVED

JAN 31 1992

OIL CONSERVATION DIV.
SANTA FE

January 30, 1992

New Mexico Oil Conservation Division
State Land Office Building
Attn: Roger Anderson
310 Old Santa Fe Trail
Santa Fe, NM 87504

Gentlemen:

By agreement dated December 27, 1991 John Scott, Vice President, Quality, Environment, and Safety, Phillips Petroleum Company, and Robert Koch, promoter for the transferee, informed you of the transfer of certain permits, to wit:

Artesia Gas Plant	Permit No. GW-23
Eunice Gas Plant	Permit No. GW-16
Hobbs Booster	Permit No. GW-44
Lee Gas Plant	Permit No. GW-2

from Phillips Petroleum Company to "Phillips Gas Company". However, Phillips Gas Company, the permit transferee, will immediately change its name to "Phillips 66 Natural Gas Company."

Therefore, please have your records reflect that the above permits are to be held by Phillips 66 Natural Gas Company as of February 1, 1992.

Very truly yours,

Michael C. Wofford
Attorney

MCW:klk
/158



PHILLIPS PETROLEUM COMPANY

RECEIVED

JAN 31 1992

OIL CONSERVATION DIV.
SANTA FE

December 27, 1991

Robert C. Koch
Promoter
Phillips Gas Company

Effective 11:59 p.m., January 31, 1992, the responsibility, coverage, and liability for the permits listed in the attachment will be transferred from Phillips Petroleum Company to Phillips Gas Company, a corporation being created pursuant to Delaware law.

Please reflect this change in your records. Please contact M. C. Wofford at 918-661-6500 if you need further information.

Very truly yours,

PHILLIPS PETROLEUM COMPANY

John Scott
Vice President
Quality, Environment, and Safety

JS:MCW:tr
Attachment: GW Permit List

I acknowledge receipt of the above notice.

Robert C. Koch
Promoter
Phillips Gas Company

xc: New Mexico Oil Conservation Division
State Land Office Building
Attention: Roger Anderson
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

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

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MATTHEW BACA
DEPUTY SECRETARY

December 3, 1991

CERTIFIED MAIL
RETURN RECEIPT NO. P-756-903-913

Mr. L. L. Frantz
Agent, Permian Basin Region
Phillips 66 Natural Gas Company
4001 Penbrook
Odessa, Texas 79762

**RE: Discharge Plan GW-44 Renewal
Hobbs Booster Station
Lea County, New Mexico**

Dear Mr. Frantz:

On December 23, 1991, the ground water discharge plan, GW-44 for the Phillips Hobbs Booster Station located in the NW/4 of Section 4, Township 19 South, Range 12 West, NMPM, Lea 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 21, 199~~X~~2.

If your facility continues to have potential or actual 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 intend 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 the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants. These guidelines are presently being

VILLAGRA BUILDING - 408 Galisteo

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

Mr. L. L. Frantz
December 3, 1991
Page 2

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 me at (505) 827-5812.

Sincerely,



Roger C. Anderson
Acting Environmental Bureau Chief

RCA/kmb

Enclosure

xc: Chris Eustice - OCD Hobbs Office

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

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

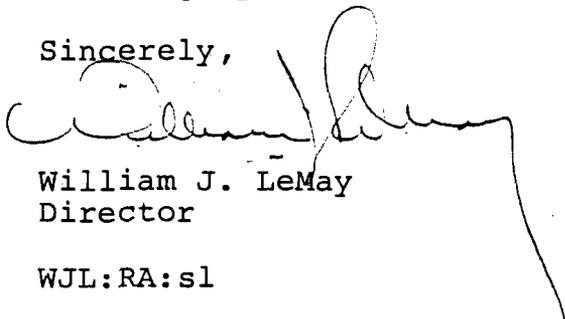
Please note that Section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C, you are required to notify the Director of any facility expansion, production increase, or process modification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

Pursuant to Section 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire December 21, 1992 and you should submit an application for renewal in ample time before that date.

It should be noted that in the future, all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval or renewal.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

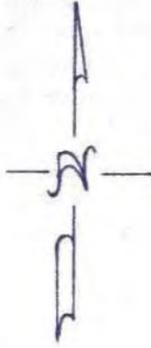
Sincerely,



William J. LeMay
Director

WJL:RA:sl

cc: OCD-Hobbs



MAIN ENGINE ROOM SLAB

X
1
S=.37
D=.13

X
2
S=4.82
D=1.49

X
3
S=8.11
D=6.59

X
4
S=4.05
D=2.73

X
5
S=1.71
D=4.89

X
6
S=.73
D=1.05

X
7
S=3.69
D=1.20

X
8
S=3.36
D=.65

X
9
S=1.58
D=.73

X
10
S=.77
D=.47

X
11
S=1.33
D=.45

X
12
S=.35
D=.15

X
13
S=.43
D=.36

X
14
S=.92
D=.17

X
15
S=.99
D=.14

NO POINT
ROADWAY

X
16
S=.32
D=.09

X
17
S=.59
D=.16

X
18
S=.19
D=.18

X
19
S=1.20
D=.45

X
20
S=.53
D=.16

X
21
S=.58
D=.17

X
22
S=.59
D=.15

X
23
S=.39
D=.17

X
24
S=.67
D=.15

NOTE: SOIL SAMPLING RESULTS ARE
EXPRESSED IN OIL & GREASE
PERCENTAGE BY WEIGHT
S DENOTES SHALLOW SAMPLE
(0-9 INCHES TOTAL DEPTH)
D DENOTES DEEP SAMPLE
(9-18 INCHES TOTAL DEPTH)

NO.	REVISION	BY	DATE	FOR BIDS	PHILLIPS PETROLEUM COMPANY BARTLESVILLE, OKLAHOMA	JA NO.	FILE CODE
		CHKD	APP'D				
				FOR CONST	HOBBS BOOSTER SOIL SAMPLING LOCATIONS & RESULTS	DWG NO.	
				DRAWN M. FORD 3-30-88		SH NO.	
				CHECKED			
				APP'D			



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS, 79762
4001 PENBROOK

APR 11 1988

April 6, 1988

Discharge Plan GW-44
Soil Sampling Results
Hobbs Booster Station

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 453

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

Attached please find copies of the oil and grease content analyses for soil samples collected at our Hobbs Booster Station. Soil samples were collected from the area south of the main engine room in order to determine the extent and depth of oil contamination. A plot plan detailing the sample locations, which includes the sampling results, is also attached.

The soil analyses show the greatest oil and grease content is within 30 feet of the main engine room slab (sample points 1-10). Oil and grease content was substantially lower (less than 1%) in the soil samples collected from 60 - 120 feet from the slab (sample points 11 and 19 being the exception). It should also be noted the oil and grease content generally decreased greatly with depth. It is felt this marked decrease is due to the presence of caliche, acting as a barrier layer, at an average depth of 10" in all of the bore holes. Caliche was present from 10" to the total depth of 18".

As you are aware, we will be installing a drain system by year's end to catch runoff fluids from the engine room slab. The major area of soil contamination (area within thirty feet of the slab) will be cleaned-up during excavation needed to install the drain system. Because of the very low oil and grease content in the soil samples collected greater than 30 feet from the slab, it is felt no further clean-up of the area should be needed.

Questions regarding this information should be directed to Mike Ford of this office at (915) 367-1316.

Very truly yours,

L. L. Frantz
Agent, Permian Basin Region

LLF:MDF
HDP1

Attachment



SOUTHWESTERN LABORATORIES

119904

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

1703 W. Industrial Avenue [915 - 683-3348] • P.O. Box 2150 • Midland, Texas 79701

File No. 6705900

Report No. 22278

Report Date 3-3-88

Report of tests on: Soil

Date Received 2-19-88

Client: Phillips 66 Natural Gas Company

Delivered By M. Ford

Identification: Hobbs Booster, Shallow (0 to 9 ins.) Samples

<u>Sample No.</u>	<u>Oil & Grease, % by wt.</u>	<u>Sample No.</u>	<u>Oil & Grease % by wt.</u>
1	0.37	13	0.43
2	4.82	14	0.92
3	8.11	15	0.99
4	4.05	16	0.32
5	1.71	17	0.59
6	0.73	18	0.19
7	3.69	19	1.20
8	3.36	20	0.53
9	1.58	21	0.58
10	0.77	22	0.59
11	1.33	23	0.39
12	0.35	24	0.67

EPA SW-846/3540

Technician: LLC

Copies Phillips 66 Natural Gas Co.
ATTN: Mike Ford

SOUTHWESTERN LABORATORIES

Larry M. Bunch



SOUTHWESTERN LABORATORIES

119904

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

1703 W. Industrial Avenue [915 - 683-3348] • P.O. Box 2150 • Midland, Texas 79701

File No. 6705900

Report No. 22278

Report Date 3-3-88

Report of tests on: Soil

Date Received 2-19-88

Client: Phillips 66 Natural Gas Company

Delivered By M. Ford

Identification: Hobbs Booster, Deep (9 to 18 ins.) Samples

<u>Sample No.</u>	<u>Oil & Grease, % by wt.</u>	<u>Sample No.</u>	<u>Oil & Grease % by wt.</u>
1	0.13	13	0.36
2	1.49	14	0.17
3	6.59	15	0.14
4	2.73	16	0.09
5	4.89	17	0.16
6	1.05	18	0.18
7	1.20	19	0.45
8	0.65	20	0.16
9	0.73	21	0.17
10	0.47	22	0.15
11	0.45	23	0.17
12	0.15	24	0.15

EPA SW-846/3540

Technician: LLC

Copies Phillips 66 Natural Gas Co.
ATTN: Mike Ford

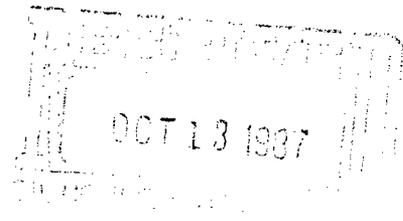
SOUTHWESTERN LABORATORIES

Larry M. Burch



**UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE**

Ecological Services
Suite D, 3530 Pan American Highway NE
Albuquerque, New Mexico 87107



October 9, 1987

William J. Lemay, Director
State of New Mexico Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Dear Mr. Lemay:

This letter concerns the Notice of Publication of discharge plans for the Navajo Refining Company, Petro-Thermo Corporation, Phillips 66 Natural Gas Company and El Paso Natural Gas Company. The Navajo Refining Company facility is located in the SE 1/4 of Section 1, E 1/2 of Section 8, W 1/2 of Section 9 and N 1/2 of Section 12, T17S, R26E, (NMPM), Eddy County, New Mexico. The Petro-Thermo Corporation facility is located in the SW1/4 NW1/4, Section 28, T18S, R38E, (NMPM), Lea County, New Mexico. The Phillips 66 Natural Gas Company is located in the NW 1/4 of Section 4 T19S, R38E, (NMPM), Lea County, New Mexico and the El Paso Natural Gas Company is located in Section 1, T29N, R15W, (NMPM), San Juan County, New Mexico. The Discharge plans address the means by which spills, leaks and other discharges to ground water at the plant sites and the pond areas will be managed.

We have reviewed the discharge permits and find that there are no issues of concern to resources under our jurisdiction. Therefore, we have no objection to the discharge plans.

Thank you for the opportunity to comment on the discharge plans. If you have any additional information please contact Tom O'Brien at (505) 883-7877 or FTS 474-7877.

Sincerely yours,

John C. Peterson
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Health and Environment Department, Environmental
Improvement Division, Santa Fe, New Mexico
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife
Enhancement, Albuquerque, New Mexico

Affidavit of Publication

No. 12112

STATE OF NEW MEXICO,
County of Eddy;

Gary D. Scott, being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of

the State of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication October 2, 1987

Second Publication

Third Publication

Fourth Publication

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

Subscribed and sworn to before me this 6th day of October, 1987.

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1991

Copy of Public

LEGAL NOTICE

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 plans and discharge plan modification have been submitted for approval 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-28) Navajo Refining Company, David Griffin, Environmental Affairs Superintendent, P.O. Drawer 159, Artesia, New Mexico 88210, has submitted for approval a ground water discharge plan for its refining facility located in the SE/4 Section 1, E/2 Section 8, W/2 Section 9 and N/2 Section 12, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 405,200 gallons per day of refinery waste water will be processed through an oil/water separator and a newly con-

structed waste water treatment plant prior to disposal in 85 acres of evaporation ponds located 1/2 miles east of the refinery adjacent to the Pecos River. The refinery effluent has a total dissolved solids content of 2000 to 4000 mg/l. Ground water most likely to be affected by any discharge at the surface in the refinery area is at a depth of about 15 feet and has a total dissolved solids concentration of approximately 2500 mg/l, and in the pond area ground water is at a depth of 5 to 10 feet and has a total dissolved solids content ranging between 6,000 and 27,000 mg/l. The discharge plan addresses how spills, leaks and other discharges to ground water at the plant site and the pond area will be managed.

(GW-43) Petro-Thermo Corporation, Robert W. Abbott, Manager of Operations, P.O. Box 2069, Hobbs, New Mexico 88241-2069, has submitted for approval a ground water discharge plan for its proposed trucking facility located in the SW/4 NW/4, Section 28, Township 18 South, Range 38 East, (NMPM), Lea County, New Mexico. Approximately 500 gallons per day of residual tank truck (produced water and brines) fluids and wash water will be generated and disposal of in an OCD approved Class II disposal well. The discharge plan addresses how spills, leaks and other accidental discharges to ground water will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 500 mg/l.

(GW-44) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas 79762, has submitted for approval a ground water discharge plan for its Hobbs Booster Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels of cooling tower blow-down will be disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of into an OCD approved contract Class II disposal well. The discharge plan addresses how spills, leaks and other accidental discharges to ground water will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 mg/l.

(GW-33) El Paso Natural Gas Company, San Juan Gas Processing Plant, John Craig, Vice President, P.O. Box 4990, Farmington, New Mexico 87499, has submitted an application for modification of its previously approved discharge plan for the contact process waste water at its facility located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. El Paso Natural Gas Company proposes to dispose an additional 6480 gallons per day of waste water with a total dissolved solids concentration of approximately 12,000 mg/l in their double-lined waste water evaporation pond equipped with leak detection. The 6480 gallons per day of waste water will be generated at the softener and de-alkalizer regeneration units and will be in addition to the 5280 gallons per day of waste water approved in the original discharge plan. The dimensions of the pond will be adjusted accordingly to allow for the increase in volumes. The pond will most likely to be affected by any discharge to the surface is at a

depth ranging from 15 feet to 110 feet, with a total dissolved solids concentration of 17,500 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 a 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 the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of September, 1987. To be published on or before September 25, 1987.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
(seal) WILLIAM J. LEMAY
Published in the Artesia Daily Press, Artesia, N.M., Oct. 2, 1987. Legal No. 12112.

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, _____

Mark C. Keeling

of the Hobbs Daily News-Sun, a daily newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period

of _____

One weeks.

Beginning with the issue dated

October 1, 19 87

and ending with the issue dated

October 1, 19 87

Business Manager

Sworn and subscribed to before

me this 1 day of

October, 19 87

Vera Murphy
Notary Public.

My Commission expires _____

Nov. 14, 19 88
(Seal)

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

RECEIVED
OCT 23 1987

RECEIVED
GROUND-WATER/HAZARDOUS WASTE
BUREAU
OCT 28 1987
OIL CONSERVATION DIVISION
SANTA FE

LEGAL NOTICE
October 1, 1987
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 plans and discharge plan modification have been submitted for approval 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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(GW-43) Petro-Thermo Corporation, Robert W. Abbott, Manager of Operations, P.O. Box 2049, Hobbs, New Mexico 88249 has submitted for approval a

ground water discharge plan for its proposed trucking facility located in the SW/4 NW/4, Section 28, Township 19 South, Range 39 East, (NMPM), Lea County, New Mexico. Approximately 500 gallons per day of residual tank truck (produced water and brines) fluids and wash water will be generated and disposed of in an OCD approved Class II disposal well. The discharge plan addresses how spills, leaks and other accidental discharges to ground water will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 500 mg/l.

(GW-44) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas 79762, has submitted for approval a ground water discharge plan for its Hobbs Booster Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels of cooling tower blowdown will be disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of into an OCD approved contract Class II disposal well. The discharge plan addresses how spills, leaks and other accidental discharges to ground water will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 mg/l.

(GW-33) El Paso Natural Gas Company, San Juan Gas Processing Plant, John Craig, Vice President, P.O. Box 4990, Farmington, New Mexico, 87499, has submitted an application for modification of its previously approved discharge plan for the contact process waste water at its facility located in Section 1, Township 19 South, Range 39 East, NMPM, Lea County, New Mexico.

Juan County, New Mexico, El Paso Natural Gas Company proposes to dispose an additional 6480 gallons per day of waste water with a total dissolved solids concentration of approximately 12000 mg/l in their double-lined waste water evaporation pond equipped with leak detection. The 6480 gallons per day of waste water will be generated at the softener and de-alkalyzer regeneration units and will be in addition to the 4000 gallons per day of waste water approved in the original discharge plan. The dimensions of the pond will be adjusted accordingly to allow for the increased volumes. The ground water most likely to be affected by any discharge to the surface is at a depth ranging from 15 feet to 110 feet, with a total dissolved solids concentration of 17,500 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 a 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 submitted at the hearing.

GIVEN under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of September, 1987. To be published on or before September 25, 1987.

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION
WILLIAM J.
LEWAY,
Director
(Seal)

October 16, 1987

Page 2

4. Also in your response to question #4 you stated the contamination around the engine room was less than a foot deep. An investigation into the extent of this contamination is required and a cleanup plan must be submitted for approval prior to starting cleanup.

If you have any questions, please do not hesitate to call me at (505) 827-5885.

Sincerely,



Roger C. Anderson
Environmental Engineer

cc: CCD Hobbs
Mike Ford - Phillips

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 23, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. L. Frantz, Agent
Permian Basin Region
Phillips 66 Natural Gas Co.
4001 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-44
Hobbs Booster Station
Lea County, New Mexico

Dear Mr. Frantz:

The ground water discharge plan (GW-44) for the Phillips Hobbs Booster Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico is hereby approved with the following provisions:

1. Results of the annual integrity tests of the slop oil tank and engine room sump, committed to in your December 9, 1987 letter, will be reported to the OCD. These tests will be conducted on or before April 1 each year beginning in 1988. The April 1 date was agreed to in a phone conversation with Mr. Mike Ford, Environmental Analyst, Phillips 66 Natural Gas Company, on December 21, 1987.
2. Any below grade tanks that are replaced will have a leak detection system incorporated in their design. The design must be approved by the OCD prior to installation. Leak detection is required of all below grade tanks to intercept any potential contaminants that may leak from the tank before they reach ground water. This condition was agreed to in a phone conversation with Mr. Mike Ford on December 21, 1987.

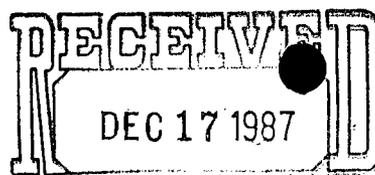
The approved discharge plan consists of the plan dated May 28, 1987 and materials dated September 8, 1987 and December 9, 1987, submitted as supplements to the discharge plan.



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK



OIL CONSERVATION DIVISION
SANTA FE

December 9, 1987

Discharge Plan GW-44
Hobbs Booster Station

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 185

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This is to provide information you requested in order to continue your review of the discharge plan submitted for our Hobbs Booster Station. Your specific comments to our letter of 9/8/87 with our responses follows.

Comment #1 - Phillips' proposed procedure to test the slop oil tank by isolating it, filling it with water to a point above grade and monitoring the liquid level is not adequate. An alternative method of integrity testing, such as the DOT method for testing tank trucks, is requested.

Response - Phillips will conduct an annual integrity test of the slop oil tank using the following method:

1. Isolate the tank.
2. Install a 6' riser pipe on top of the tank.
3. Fill the tank and riser pipe with water.
4. Monitor fluid level in the riser pipe for a 12 hour period. If fluid level remains the same over the twelve hour period, tank integrity has been proven.

Comment #2 - Phillips has stated the sump located adjacent to the main engine room is not equipped with a leak detection system. A method of periodically testing this sump for integrity is requested.

Response - Phillips will conduct an annual integrity test of the engine room sump tank using the slop oil tank integrity test method outlined above.

Comment #3 - Phillips has proposed to install a curbing/drain system around the engine room pad. A schedule for completion of the curbing/drain system is requested.

Response - Phillips will have the new curbing/drain system installed by January 1, 1989.

Comment #4 - Phillips stated the contamination around the engine room appeared to be less than a foot deep. An investigation into the extent of this contamination is required and a cleanup plan must be submitted for approval prior to starting cleanup.

Response - Phillips will obtain soil samples of the area south of the engine room to determine extent and depth of the contamination. The soil samples will be analyzed for their oil and grease content using the "Soxhlet Extraction Method" outlined in E.P.A.'s SW-846 Publication, Method 3540. A schematic detailing sampling location and depth will be submitted to the O.C.D. with the test results. This work will be completed by March 1, 1988. A cleanup plan will be discussed with your office after review of the test results.

Questions regarding this information should be directed to Mike Ford of this office at (915) 367-1316.

Very truly yours,



L. L. Frantz
Agent, Permian Basin Region

MDF
HDP1



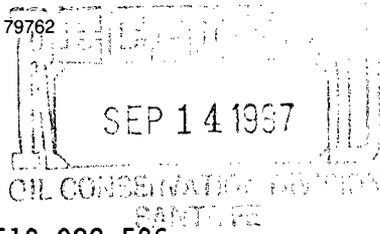
PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK

September 8, 1987

Discharge Plan GW-44
Hobbs Booster Station



CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 526

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This is to provide information you requested in order to continue your review of the discharge plan submitted for our Hobbs Booster Station. The specific questions you asked with our responses follows.

Question #1 - Section III.A. paragraph 1 states spent oil is transferred to a partially buried slop oil tank (#12, attachment 1). What is the age of this tank? Does it have a method for leak detection for below grade leaks? If not, how do you propose to test the tank for integrity and monitor for detection of potential future leaks?

Response - The partially buried slop oil tank is approximately fifteen years old and does not have a leak detection system. We propose to test the tank's integrity by isolating it, filling it with water to a point above grade and monitoring the liquid level over a twenty-four hour period. This test would be conducted on an annual basis.

Question #2 - Section III.A. paragraph 2 states atmospheric drains catch leaking oil and drain to a below grade sump (#8, attachment 1). Where are the drains located? Does the sump have leak detection?

Response - The atmospheric drains consist of angle iron attached to each of the engine blocks approximately two feet above ground level. Drain fluids from the collection system are piped to the below grade sump (< 500 gallons capacity) located at the southeast corner of the main engine room. This sump does not have leak detection.

Question #3 - Section III.B. states waste oils are processed at the treater (#24, attachment 1). Is there any sludge created by the treater? If so, what is it's disposition?

Response - Sludge is periodically created by treater operations. The sludge is removed and disposed of by AA Oilfield Service of Hobbs, New Mexico.

Question #4 - Is there a concrete pad under the entire engine room? If so is it completely curbed? What actions do you propose to contain oil leaks from the engine room? What actions do you propose to undertake to remove the standing oil under and around the engine room? How deep is the hydrocarbon contamination? What remedial actions do you propose for the past hydrocarbon seepage?

Response - A concrete pad exists under the entire engine room. The pad is not curbed. We propose to install curbing equipped with a drain system around the pad to contain leaks from the engine room. The system will be similar in construction and operation to the engine pad drain system recently installed at Lee Plant. The main area of hydrocarbon contamination is adjacent to the engine pad on the south side. The contamination appears to be less than a foot deep. The area under and around the engine room will be cleaned up.

Question #5 - During the January 27, 1987 inspection water was observed ponding adjacent to the cooling tower. What is your proposal to contain and prevent seepage of these liquids?

Response - The water observed ponding adjacent to the cooling tower was caused by a leaking water transfer line. The line has been repaired correcting the problem.

Questions regarding this information should be directed to Mike Ford of this office at (915) 367-1316.

Very truly yours,



L. L. Frantz
Agent, Permian Basin Region

MDF
HDP1



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

GARREY CARRUTHERS
GOVERNOR

October 16, 1987

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

Certified Mail
Return Receipt Requested

Mr. L. L. Frantz, Agent
Permian Basin Region
Phillips 66 Natural Gas Co.
4001 Penbrock
Odessa, Texas 79762

Re: Discharge plan GW-44
Hobbs Ecoster Station
Lea County, New Mexico

Dear Mr. Frantz:

The CCD has received the additional information we requested in our July 14, 1987 letter. A number of items still need to be clarified and committed to prior to final review and approval.

1. In your response to question #1 was a proposal to test the slop oil tank by isolating it, filling it with water to a point above grade, and monitoring the liquid level. This method of testing does not appear to be a positive method. There is the potential for waste fluids to fill the tank above the test fluid level, thereby exerting a greater pressure on the tank than during the test. An alternate method of testing is one similar to the DOT method for testing truck tanks. The procedure is to isolate the tank, install a riser pipe to approximately six (6) feet above the tank, and fill the tank with water to the top of the riser. This would exert approximately 3 psi hydrostatic pressure on the tank. A decrease of the fluid level in the pipe would indicate the tank does not have integrity. If a method similar to this is not appropriate or acceptable, please propose an alternate positive pressure test method.
2. Your response to question #2 states the sump does not have leak detection. A method of periodically testing this sump for integrity must be included in the discharge plan.
3. On question #4 you propose to install curbing around the engine room pad. Submit a schedule for completion for inclusion in the discharge plan.

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 plans and discharge plan modification have been submitted for approval 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-28) Navajo Refining Company, David Griffin, Environmental Affairs Superintendent, P. O. Drawer 159, Artesia, New Mexico 88210, has submitted for approval a ground water discharge plan for its refining facility located in the SE/4 Section 1, E/2 Section 8, W/2 Section 9 and N/2 Section 12, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 405,200 gallons per day of refinery waste water will be processed through an oil/water separator and a newly constructed waste water treatment plant prior to disposal in 85 acres of evaporation ponds located three miles east of the refinery adjacent to the Pecos River. The refinery effluent has a total dissolved solids content of 2000 to 4000 mg/l. Ground water most likely to be affected by any discharge at the surface in the refinery area is at a depth of about 15 feet and has a total dissolved solids concentration of approximately 2500 mg/l, and in the pond area ground water is at a depth of 5 to 10 feet and has a total dissolved solids content ranging between 6,000 and 27,000 mg/l. The discharge plan addresses how spills, leaks and other discharges to ground water at the plant site and the pond area will be managed.

(GW-43) Petro-Thermo Corporation, Robert W. Abbott, Manager of Operations, P. O. Box 2069, Hobbs, New Mexico 88241-2069, has submitted for approval a ground water discharge plan for its proposed trucking facility located in the SW/4 NW/4, Section 28, Township 18 South, Range 38 East, (NMPM), Lea County, New Mexico. Approximately 500 gallons per day of residual tank truck (produced water and brines) fluids and wash water will be generated and disposed of in an OCD approved Class II disposal well. The discharge plan addresses how spills, leaks and other accidental discharges to ground water will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 65 feet with a

total dissolved solids concentration of approximately 500 mg/l.

(GW-44) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas 79762, has submitted for approval a ground water discharge plan for its Hobbs Booster Station located in the NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 386 barrels of cooling tower blowdown will be disposed of in the City of Hobbs sewer system. Waste water from the treater operations will be disposed of into an OCD approved contract Class II disposal well. The discharge plan addresses how spills, leaks and other accidental discharges to ground water will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 500 mg/l.

(GW-33) El Paso Natural Gas Company, San Juan Gas Processing Plant, John Craig, Vice President, P. O. Box 4990, Farmington, New Mexico, 87499, has submitted an application for modification of its previously approved discharge plan for the contact process waste water at its facility located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. El Paso Natural Gas Company proposes to dispose an additional 6480 gallons per day of waste water with a total dissolved solids concentration of approximately 12000 mg/l in their double-lined waste water evaporation pond equipped with leak detection. The 6480 gallons per day of waste water will be generated at the softener and de-alkalyzer regeneration units and will be in addition to the 4000 gallons per day of waste water approved in the original discharge plan. The dimensions of the pond will be adjusted accordingly to allow for the increased volumes. The ground water most likely to be affected by any discharge to the surface is at a depth ranging from 15 feet to 110 feet, with a total dissolved solids concentration of 17,500 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 a 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 the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of September, 1987. To be published on or before September 25, 1987.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNORPOST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

July 14, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael D. Ford
Environmental Analyst
Phillips 66 Natural Gas Company
4001 Penbrook
Odessa, TX 79762

RE: Discharge plan GW-44
Hobbs Booster Station
Lea County, New Mexico

Dear Mr. Ford:

The Oil Conservation Division has received and is in the process of reviewing the above referenced discharge plan application. The application was received June 1, 1987.

Based on the inspection conducted on January 27, 1987 and analysis of the application, additional information is necessary for the review to continue. Please submit the following clarifications and additional information.

- 1) Section III.A. paragraph 1 states spent oil is transferred to a partially buried slop oil tank (#12 attachment 1). What is the age of this tank? Does it have a method for leak detection for below grade leaks? If not, how do you propose to test the tank for integrity, and monitor for detection of potential future leaks?
- 2) Section III.A. paragraph 2 states atmospheric drains catch leaking oil and drain to a below grade sump (#8 and #15, attachment 1). Where are the drains located? Does the sump have leak detection.?
- 3) Section III.B. states waste oils are processed at the treater (#24, attachment 1). Is there any sludge created by the treater? If so what is its disposition?



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK

JUN - 1 1987
11:15 AM
MAIL ROOM

May 28, 1987

Discharge Plan
Hobbs Booster

CERTIFIED MAIL
RETURN RECEIPT NO. P 140 239 518

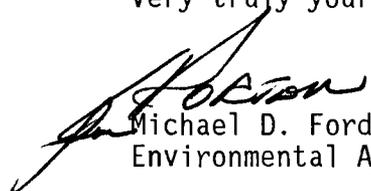
Mr. David Boyer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Boyer:

In accordance with the Water Quality Regulations and your recent request, Phillips 66 Natural Gas Company submits the attached Discharge Plan for our Hobbs Booster, Lea County, New Mexico.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,



Michael D. Ford
Environmental Analyst

MDF
HDP1

Attachments

DISCHARGE PLAN
PHILLIPS 66 NATURAL GAS COMPANY
HOBBS BOOSTER
1625 WEST MARLAND, HOBBS
SECTION 4, TOWNSHIP 19 SOUTH, RANGE 38 EAST, LEA COUNTY

I. GENERAL PROCESS DESCRIPTION

Hobbs Booster's basic function is to compress natural gas from a field inlet pressure of 5 psig to a discharge pressure of 750 psig for delivery to our Eunice Gasoline Plant. The compressors used at the booster are powered by a total of 12,321 horsepower. The layout of the booster, including the compressor engines and associated equipment, is shown in Attachment 1.

II. PLANT WATER SYSTEMS

A. Raw Water

Water used at the booster for cooling tower make-up, engine jacket water make-up and drinking water purposes is supplied by the city of Hobbs.

B. Cooling Tower System

The cooling tower system is comprised of two open recirculating cooling towers referred to as the north and south cooling towers (Attachment 1, #16). The towers are used to cool engine jacket water and the gas stream being compressed. The north cooling tower, larger of the two, has a recirculation rate of 1500 gpm with an approximate raw water make-up rate of 22.5 gpm. The south cooling tower has a recirculation rate of 750 gpm with an approximate raw water make-up rate of 7.5 gpm. The raw water in both towers is recirculated until the impurities in the water are concentrated to three times their inlet concentrations, producing approximately 386 bbls./day of wastewater. This wastewater is piped directly to the city of Hobbs sewer system. The following chemicals are being added to the cooling towers for scale, corrosion and biological treatment:

Chemical

Continental Anti-Pol 640
Continental Hydrochem D-300
Continental Toxene 35
Continental Toxene 37

Material safety data sheets for these chemicals are found in Attachment 2.

C. Engine Cooling Systems

A mixture of an ethylene-glycol based anti-freeze (Attachment 3) and water is used as coolant in the jacket water systems for the engines on "Phillips side" of the booster. A mixture of Continental Chromine Sodium, a chromium based compound (Attachment 4), and water is used as coolant in the jacket water system for the engines on the old "El Paso side" of the booster. Both cooling systems are closed systems each having their own jacket water pumps, storage tanks and air fin coolers.

The jacket water storage tanks for both engine cooling systems are above ground vertical vessels constructed of steel. Coolant from the engines is pressured to the respective storage tank when an engine is being worked on. The coolant is pressured back to the engine when the work is completed.

III. PLANT DRAIN SYSTEMS

A. Engine Oil Drain Systems

Lube oil in all of the booster engines is changed by draining the "spent" oil charge from an engine into barrels and then replacing with a "fresh" charge. The spent lube oil is transferred into a partially buried slop oil collection tank constructed of externally coated steel (#12, Attachment 1). Liquids from this tank are then pumped to the oil treater (#24, Attachment 1) for processing.

Atmospheric drains, designed to catch leaking oil from the engines, are in place around the two main engine rooms and the portable engines. The drain from the "Phillips side" main engine room is tied into a below ground sump constructed of externally coated steel (#8, Attachment 1). The drains from the portable engines on the "Phillips side" are tied into a separate below ground sump (#11, Attachment 1) also constructed of externally coated steel. Liquids from both sumps are pumped into the slop oil collection tank.

The atmospheric drain around the main engine room on the old "El Paso" side of the booster is tied into a below ground sump located at the east end of the engine room (#15, Attachment 1). The sump is constructed of externally coated steel. Liquids from this sump are pumped into a buried slop oil collection tank (#20, Attachment 1) constructed of concrete. Liquids from this tank are pumped to the oil treater for processing.

B. Final Disposal System

The waste liquids from the two slop oil collection tanks are processed at the treater (#24, Attachment 1). The treater is operated and configured in the same manner as a standard oil production lease heater-treater. Oil produced from the treater is transferred into a crude oil sales line. Wastewater generated by treater operations is disposed of into Rice Engineering's injection well disposal system. An analysis of a grab sample of this wastewater is found in Attachment 5.

The treater also processes slop oil hauled in from the other Phillips boosters and gasoline plants located in southeastern New Mexico. An above ground steel tank, located at the north end of the booster site (#1, Attachment 1), provides additional storage capacity for the slop oil trucked into the treater for processing.

IV. SOLID WASTE DISPOSAL

The small amount of solid waste generated at the booster is collected by the city of Hobbs as part of their normal city refuse collection and disposal system.

V. SPILL/LEAK PREVENTION AND HOUSEKEEPING PROCEDURES

The booster's underground vessels and piping are visually inspected and/or pressure tested prior to being put in service. The vessels and lines are externally and/or internally coated to ensure against corrosion. This equipment is checked continuously by operators who are on duty 24 hours per day. Any leaks would be detected by the operators and corrected. Operators are required to notify the booster superintendent of any leak. If the leak is significant, the booster superintendent will notify the Oil Conservation Division in accordance with Rule 116.

VI. MISCELLANEOUS INFORMATION

A. Sanitary Wastes

Sanitary wastes from the booster are handled by the city of Hobbs sewer system.

B. Flooding Potential

None.

VII. 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.

Michael D. Ford
(Signature)

5/29/87
(Date)

Michael D. Ford
(Name)

Environmental Analyst
(Title)



New Mexico Health and Environment Department
 SCIENTIFIC LABORATORY DIVISION
 700 Camino de Salud NE
 Albuquerque, NM 87106 — (505) 841-2555

**HEAVY METALS
 GENERAL WATER CHEMISTRY
 and NITROGEN ANALYSIS**

DATE RECEIVED 2 5 87	LAB NO. KCP-53	USER CODE <input type="checkbox"/> 59300 <input type="checkbox"/> 59600 <input checked="" type="checkbox"/> OTHER: 82235
Collection DATE 87/01/27	SITE INFORMATION	Sample location PHILLIPS HOBBS
Collection TIME 1330	Collected by — Person/Agency BAILEY/ANDERSON	Collection site description COOLING TOWER

SEND FINAL REPORT TO

ENVIRONMENTAL BUREAU
 NM OIL CONSERVATION DIVISION
 State Land Office Bldg, PO Box 2088
 Santa Fe, NM 87504-2088

Attn: David Boyer

Phone: 827-5812

SAMPLING CONDITIONS

<input type="checkbox"/> Bailed	<input type="checkbox"/> Pump	Water level	Discharge	Sample type GRAB
<input checked="" type="checkbox"/> Dipped	<input type="checkbox"/> Tap			
pH (00400)	Conductivity (Uncorrected) 1400 μ mho	Water Temp. (00010) 17 °C	Conductivity at 25°C (00094) μ mho	
Field comments				

SAMPLE FIELD TREATMENT — Check proper boxes

No. of samples submitted	<input type="checkbox"/> NF: Whole sample (Non-filtered)	<input checked="" type="checkbox"/> F: Filtered in field with 0.45 μ membrane filter	<input type="checkbox"/> A: 2 ml H ₂ SO ₄ /L added
<input type="checkbox"/> NA: No acid added	<input type="checkbox"/> Other-specify:	<input type="checkbox"/> A: 5ml conc. HNO ₃ added	<input checked="" type="checkbox"/> A: 4ml fuming HNO ₃ added

ANALYTICAL RESULTS from SAMPLES

NF, NA	Units	Date analyzed	F, NA	Units	Date analyzed
<input checked="" type="checkbox"/> Conductivity (Corrected) 25°C (00095)	μ mho		<input type="checkbox"/> Calcium (00915)	mg/l	
<input type="checkbox"/> Total non-filterable residue (suspended) (00530)	mg/l		<input type="checkbox"/> Magnesium (00925)	mg/l	
<input checked="" type="checkbox"/> Other: ICAP			<input type="checkbox"/> Sodium (00930)	mg/l	
<input type="checkbox"/> Other:			<input type="checkbox"/> Potassium (00935)	mg/l	
<input type="checkbox"/> Other:			<input type="checkbox"/> Bicarbonate (00440)	mg/l	
			<input type="checkbox"/> Chloride (00940)	mg/l	
			<input type="checkbox"/> Sulfate (00945)	mg/l	
			<input type="checkbox"/> Total filterable residue (dissolved) (70300)	mg/l	
			<input type="checkbox"/> Other:		
NF, A-H₂SO₄			F, A-H₂SO₄		
<input type="checkbox"/> Nitrate-N +, Nitrate-N total (00630)	mg/l		<input type="checkbox"/> Nitrate-N +, Nitrate-N dissolved (00631)	mg/l	
<input type="checkbox"/> Ammonia-N total (00610)	mg/l		<input type="checkbox"/> Ammonia-N dissolved (00608)	mg/l	
<input type="checkbox"/> Total Kjeldahl-N ()	mg/l		<input type="checkbox"/> Total Kjeldahl-N ()	mg/l	
<input type="checkbox"/> Chemical oxygen demand (00340)	mg/l		<input type="checkbox"/> Other:		
<input type="checkbox"/> Total organic carbon ()	mg/l				
<input type="checkbox"/> Other:			Analyst	Date Reported 2 9 87	Reviewed by <i>Jim Ashby</i>
<input type="checkbox"/> Other:			Laboratory remarks		

SLD 726 (12/84)

FOR OCD USE -- Date Owner Notified _____ Phone or letter? _____ Initials _____



MATERIAL SAFETY DATA SHEET

("ESSENTIALLY SIMILAR" TO FORM OSHA-20)

WHERE APPLICABLE, THIS PRODUCT HAS BEEN REPORTED FOR THE EPA'S CHEMICAL SUBSTANCE INVENTORY.

SECTION I - IDENTIFICATION OF PRODUCT

MANUFACTURER'S NAME Phillips Petroleum Company	EMERGENCY TELEPHONE NUMBER	DURING BUSINESS HOURS (918) 661-3885
ADDRESS (NUMBER, STREET, CITY, STATE & ZIP CODE) BARTLESVILLE, OK 74004		OUTSIDE BUSINESS HOURS (918) 661-8118
TRADE NAME Antifreeze	CHEMICAL NAME Ethylene glycol + other glycols	CAS NUMBER N.A.
CHEMICAL FAMILY Glycols	CHEMICAL FORMULA Mixture	
DOT CLASSIFICATION None		

SECTION II - HAZARDOUS COMPONENTS OF MIXTURES

INGREDIENTS	% BY WT.	THRESHOLD LIMIT VALUE (UNITS)
Ethylene Glycol	90	(approx.)
other glycols	10	(approx.)
Inhibitors and dye	2	(approx.)

SECTION III - TYPICAL PHYSICAL DATA

APPEARANCE AND ODOR Colored liquid.	SPECIFIC GRAVITY 60°F/60°F 1.11-1.14
BOILING POINT (°F) 330	PERCENT VOLATILE (BY VOLUME) Nil
VAPOR PRESSURE Very Low	EVAPORATION RATE (butyl acetate = 1) < 1
VAPOR DENSITY (AIR) > 1.0	SOLUBILITY IN WATER Complete

SECTION IV - FIRE AND EXPLOSION - HAZARD DATA

FLASH POINT (METHOD) 250°F (Cleveland Open Cup)	FLAMMABLE LIMITS (% BY VOLUME) (For Ethylene Glycol)	LeL 3.2	UeL
FIRE EXTINGUISHING MEDIA Water fog, CO, dry chemical, foam.			
SPECIAL FIRE FIGHTING PROCEDURES			
UNUSUAL FIRE AND EXPLOSION HAZARDS			

NO GUARANTY IS MADE AS TO THE ACCURACY OF ANY DATA OR STATEMENT CONTAINED HEREIN, WHILE THIS MATERIAL IS FURNISHED IN GOOD FAITH, NO WARRANTY EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS OR OTHERWISE IS MADE. THIS MATERIAL IS OFFERED ONLY FOR YOUR CONSIDERATION, INVESTIGATION AND VERIFICATION AND PHILLIPS, INCLUDING ITS DIVISIONS, AFFILIATES AND SUBSIDIARIES, SHALL IN ANY EVENT BE LIABLE FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES IN CONNECTION WITH ITS PUBLICATION. LIKEWISE, NO STATEMENT MADE HEREIN SHALL BE CONSTRUED AS A PERMISSION OR RECOMMENDATION FOR THE USE OF ANY PRODUCT IN A MANNER THAT MIGHT INFRINGE EXISTING PATENTS.

N.A. - Not Applicable

(SEE REVERSE SIDE)

FORM 10912-N 1-79

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE:

1977 ACGIH TLV is 100 ppm. For mists, 10mg/m³ for ethylene glycol.

EFFECTS OF OVEREXPOSURE:

EMERGENCY AND FIRST AID PROCEDURES:

If contact with eye, irrigate with water. If swallowed induce vomiting and see a physician. If contact with skin, wash with soap and water. If inhaled to the point that ill effects occur, remove to fresh air and see a physician.

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID:
	STABLE	X	

INCOMPATIBILITY (MATERIALS TO AVOID FOR PURPOSES OF TRANSPORT, HANDLING AND STORAGE ONLY): Oxidizing materials.

HAZARDOUS DECOMPOSITION PRODUCTS:

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID:
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Use proper protective equipment. Salvage if possible. Protect from ignition. Otherwise flush with water or soak up in absorbent. Add absorbent and shovel into drums. Large amounts may be pumped into containers. Keep out of water sources and sewers.

WASTE DISPOSAL (INSURE CONFORMITY WITH LOCAL DISPOSAL REGULATIONS):

Burn according to local, state and federal regulations or salvage.

SECTION VIII - PERSONAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: None normally needed. For levels up to 1% in air for 1/2 hour or less

VENTILATION	LOCAL EXHAUST	SPECIAL a full face mask, plus an organic vapor canister.	OTHER
	MECHANICAL (GENERAL)		

PROTECTIVE GLOVES: **EYE PROTECTION:** Goggles if splashes could occur

OTHER PROTECTIVE EQUIPMENT:

SECTION IX - HANDLING AND STORAGE PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Provide means of controlling leaks and spills. Protect from ignition.

OTHER PRECAUTIONS:

Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760

Telephone No. (915) 337-4681

CHROMINE SODIUM

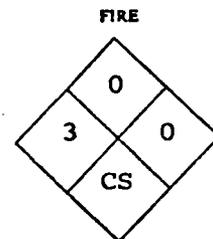
QUICK IDENTIFIER

NFPA Designation 704

HAZARD RATING

4 - EXTREME
3 - HIGH
2 - MODERATE
1 - SLIGHT
0 - INSIGNIFICANT

HEALTH



REACTIVITY

CS-Carcinogen Suspect SPECIFIC HAZARD

MATERIAL SAFETY DATA SHEET

SECTION 1 - IDENTITY

Common Name: (used on label)
(Trade Name & Synonyms)

CHROMINE SODIUM

Chemical Name

Organic Sodium Chromate

Formula Proprietary

Chemical Family

Chromate

Cas No.

Blend

SECTION 2 - HAZARDOUS INGREDIENTS

Hazardous Component(s)

%

Threshold Limit Value (units)

Sodium Chromate

Conf.

0.05 mg/m³

Oral - Human LDLO - 50 Units

Dermal -Guinea Pig LDLO - 206 Units

SECTION 3 - PHYSICAL & CHEMICAL CHARACTERISTICS (Fire & Explosive Data)

Boiling Point

212 ° F

Specific Gravity (H₂O = 1)

1.4

Vapor Pressure (mm Hg) (212°) 760

Percent Volatile by Volume (%)

60 %

Vapor Density (Air = 1)

NA

Evaporation Rate (_____ = 1) 1

Solubility in Water

100%

Reactivity in Water

NA

Appearance and Odor

Light Amber - odorless

Flash Point

None

COC

Flammable Limits in Air % by Volume

NA

Extinguisher Media

NA

Auto-Ignition Temperature

NA

Special Fire Fighting Procedures

NA

Lower Upper

Unusual Fire and Explosion Hazards

NA

SECTION 4 - PHYSICAL HAZARDS

Stability

STABLE

UNSTABLE

CONDITIONS TO AVOID

NA

INCOMPATIBILITY (MATERIALS TO AVOID)

Amines or strong reducing agents

HAZARDOUS DECOMPOSITION PRODUCTS

NA

Hazardous Polymerization

CONDITIONS TO AVOID

Keep away from reducing agents

MAY OCCUR

WILL NOT OCCUR

SECTION 5 - HEALTH HAZARD

Threshold Limit Value **0.05 mg/m³** Source (ACGIH)

Signs and Symptoms of Exposure

- 1. Acute
Overexposure **Skin ulcers, dermatitis**
- 2. Chronic
Overexposure **Potential carcinogen**

Medical Conditions Generally Aggravated by Exposure **UN**

Chemical Listed as Carcinogen or Potential Carcinogen **Certain chromium compounds have demonstrated to be carcinogenic on the basis of epidemiological investigation** National Toxicology Program Yes No I.A.R.C. Monographs Yes No OSHA Yes No
 OSHA Permissible Exposure Limit **0.05 mg/m³ in water soluble form Cn⁶⁺** ACGIH Threshold Limit Value **0.05 mg/m³** in **water soluble form Cn⁶⁺** Other Exposure Limit Used **NA**

Emergency and First Aid Procedures

- 1. Inhalation **Avoid breathing dust, remove to fresh air.**
- 2. Eyes **Flush with water for 15 minutes**
- 3. Skin **Wash off with water, remove contaminated clothing**
- 4. Ingestion **Do Not induce vomiting, give plenty of liquids, water or milk, call physician. Never give anything by mouth to an unconscious person**

SECTION 6 - SPECIAL PROTECTION INFORMATION

Respiratory Protection (Specify Type) **NA**

Ventilation	Local Exhaust	NA	Mechanical (General)	NA	Special	NA	Other	NA
-------------	---------------	-----------	----------------------	-----------	---------	-----------	-------	-----------

Protective Gloves **Rubber gloves** Eye Protection **Safety Glasses**

Other Protective Clothing or Equipment **NA**

SECTION 7 - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be Taken in Handling and Storage **Prevent prolonged skin contact**

Steps to be Taken in Case Material is Released or Spilled **Takeup with absorbent and seal in drums**

Waste Disposal Methods **Dispose of according to State and Federal Regulations.**

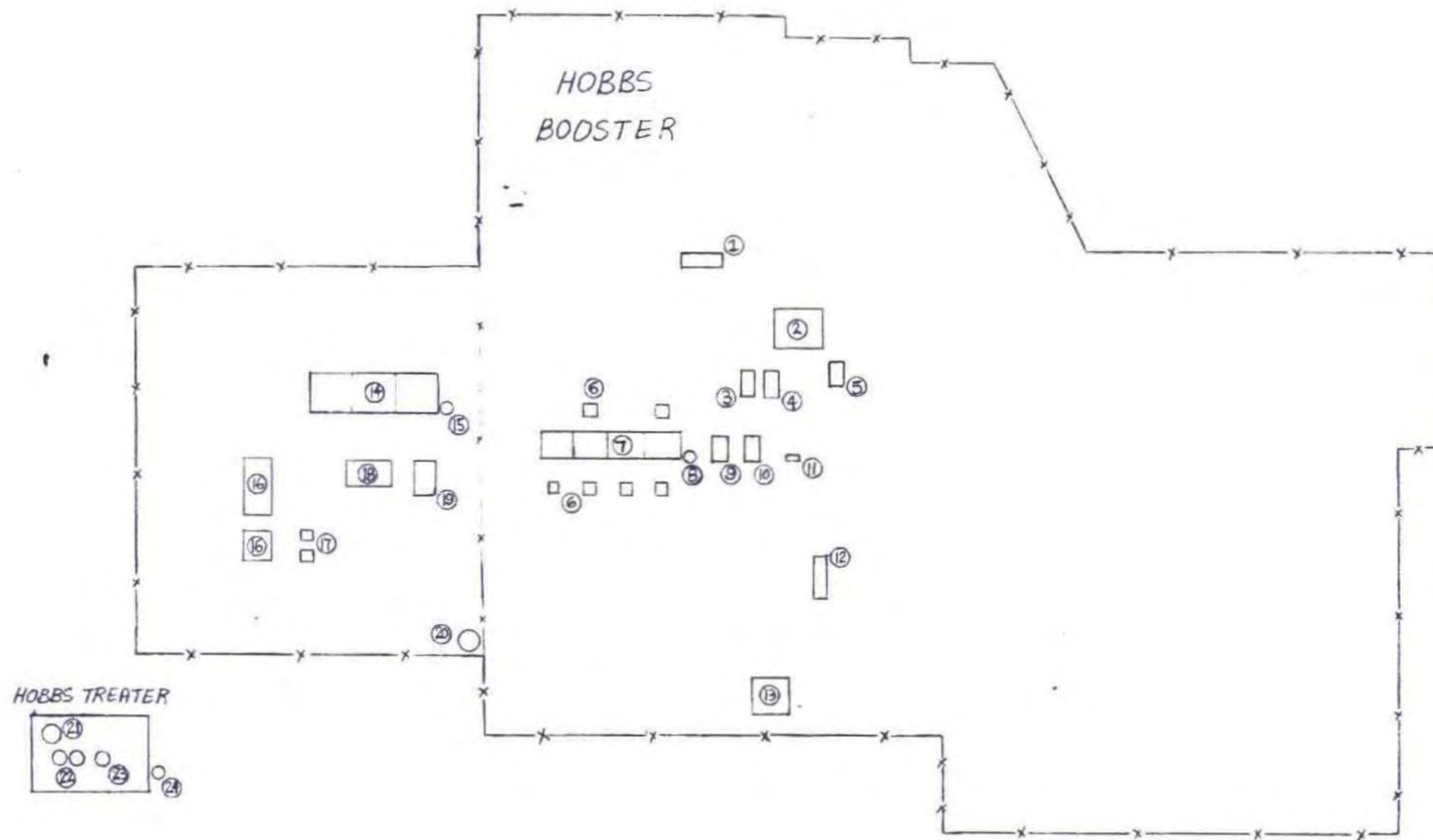
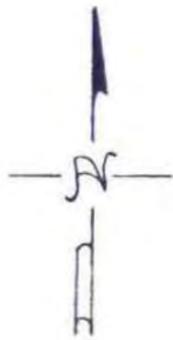
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Date Issued: **11/15/85**

Abbreviations Used
 NA Not Applicable
 ND Not Determined
 UN Unknown

Continental Products of Texas

Prepared by **Eric Klim**
Eric Klim



- 1 RESERVE SLOP OIL STORAGE TANK
- 2 TOOL SHOP
- 3 PORTABLE 330 H.P. WHITE-SUPR.
- 4 PORTABLE 585 H.P. WHITE-SUPR.
- 5 PORTABLE 330 H.P. WHITE-SUPR.
- 6 AIR FIN JACKET WATER COOLERS
- 7 ENGINE ROOM (PHILLIPS SIDE)
- 8 ENGINE ROOM PAD DRAIN SUMP
- 9 PORTABLE 520 H.P. WAWKESHA
- 10 PORTABLE 520 H.P. WAWKESHA
- 11 PORTABLE ENGINE'S PAD DRAIN SUMP
- 12 SLOP OIL COLLECTION TANK
- 13 WARE HOUSE
- 14 ENGINE ROOM (EL PASO SIDE)
- 15 ENGINE ROOM PAD DRAIN SUMP
- 16 COOLING TOWER (S)
- 17 TURBINES
- 18 PUMP HOUSE
- 19 AIR FIN COOLER
- 20 SLOP OIL COLLECTION TANK
- 21 OIL SALES TANK (1000 BBL.)
- 22 SLOP TANKS (500 BBL. EACH)
- 23 WASTEWATER STORAGE TANK (210)
- 24 HEATER TREATER
- 25 EMERGENCY FLARE

NO.	REVISION	BY	DATE				FOR BIDS	BARTLESVILLE, OKLAHOMA		AFE NO.
		CHKD	APP'D				FOR APPR			SCALE 0 100'
							FOR CONST			UNLESS OTHERWISE NOTED
							DRAWN M. FORD 5-11-87			DWG NO.
							CHECKED			SH NO.
			APP'D							

Page 2

Mr. Michael D. Ford

- 4) During the OCD inspection of January 27, 1987 oil and sludges were observed under the engine room (#7, your attachment 1) and on the ground around the engine room. Black stained soil was also observed approximately two feet below the surface at an excavation point adjacent to the engine room. Is there a concrete pad under the entire engine room? If so is it completely curbed? What actions do you propose to contain oil leaks from the engine room? What actions do you propose to undertake to remove the standing oil under and around the engine room? How deep is the hydrocarbon contamination? What remedial actions do you propose for the past hydrocarbon seepage?

- 5) During the January 27, 1987 inspection water was observed ponding adjacent to the cooling tower. What is your proposal to contain and prevent seepage of these liquids?

If you have any questions please do not hesitate to call me at (505) 827-5885.

Sincerely,



Roger C. Anderson
Environmental Engineer

cc: OCD - Hobbs



New Mexico Health and Environment Department
 SCIENTIFIC LABORATORY DIVISION
 700 Camino de Salud NE
 Albuquerque, NM 87106 — (505) 841-2555

**GENERAL WATER CHEMISTRY
 and NITROGEN ANALYSIS**

DATE RECEIVED 2 5 87 LAB NO. WC-336 USER CODE 59300 59600 OTHER: 82235

Collection DATE 87 01 27 SITE INFORMATION Sample location PHILLIPS HOBBS

Collection TIME 1330 Collection site description COOLING TOWER

Collected by — Person/Agency BAILEY/ANDERSON /OCD

ENVIRONMENTAL BUREAU
 NM OIL CONSERVATION DIVISION
 State Land Office Bldg, PO Box 2088
 Santa Fe, NM 87504-2088

SEND FINAL REPORT TO
 Attn: David Boyer
 Phone: 827-5812

SAMPLING CONDITIONS

Bailed Pump Water level Discharge Sample type GRAB
 Dipped Tap

pH (00400) _____ Conductivity (Uncorrected) 1400 μ mho Water Temp. (00010) 17 $^{\circ}$ C Conductivity at 25 $^{\circ}$ C (00094) _____ μ mho

Field comments _____

SAMPLE FIELD TREATMENT — Check proper boxes

No. of samples submitted _____ NF: Whole sample (Non-filtered) F: Filtered in field with 0.45 μ m membrane filter A: 2 ml H₂SO₄/L added
 NA: No acid added Other-specify: _____ A: 5ml conc. HNO₃ added A: 4ml fuming HNO₃ added

ANALYTICAL RESULTS from SAMPLES

NF, NA	Units	Date analyzed	F, NA	Units	Date analyzed
<input type="checkbox"/> Conductivity (Corrected) 25 $^{\circ}$ C (00095)	μ mho	_____	<input checked="" type="checkbox"/> Calcium (00915)	<u>160</u> mg/l	<u>2-27</u>
<input type="checkbox"/> Total non-filterable residue (suspended) (00530)	mg/l	_____	<input checked="" type="checkbox"/> Magnesium (00925)	<u>23.2</u> mg/l	<u>2-27</u>
<input type="checkbox"/> Other: _____	_____	_____	<input checked="" type="checkbox"/> Sodium (00930)	<u>85.1</u> mg/l	<u>2-9</u>
<input type="checkbox"/> Other: _____	_____	_____	<input checked="" type="checkbox"/> Potassium (00935)	<u>3.57</u> mg/l	<u>2-9</u>
<input type="checkbox"/> Other: _____	_____	_____	<input checked="" type="checkbox"/> Bicarbonate (00440)	<u>9.8</u> mg/l	<u>2/10</u>
			<input checked="" type="checkbox"/> Chloride (00940)	<u>159</u> mg/l	<u>2/19</u>
			<input checked="" type="checkbox"/> Sulfate (00945)	<u>200</u> mg/l	<u>2/17</u>
			<input checked="" type="checkbox"/> Total filterable residue (dissolved) (70300)	<u>1154</u> mg/l	<u>2/12</u>
			<input checked="" type="checkbox"/> Other: <u>CO₃</u>	<u>0</u>	<u>2/10</u>

NF, A-H ₂ SO ₄	Units	Date analyzed	F, A-H ₂ SO ₄	Units	Date analyzed
<input type="checkbox"/> Nitrate-N ⁺ , Nitrate-N total (00630)	mg/l	_____	<input type="checkbox"/> Nitrate-N ⁺ , Nitrate-N dissolved (00631)	mg/l	_____
<input type="checkbox"/> Ammonia-N total (00610)	mg/l	_____	<input type="checkbox"/> Ammonia-N dissolved (00608)	mg/l	_____
<input type="checkbox"/> Total Kjeldahl-N ()	mg/l	_____	<input type="checkbox"/> Total Kjeldahl-N ()	mg/l	_____
<input type="checkbox"/> Chemical oxygen demand (00340)	mg/l	_____	<input type="checkbox"/> Other: _____	_____	_____
<input type="checkbox"/> Total organic carbon ()	mg/l	_____			
<input type="checkbox"/> Other: _____	_____	_____			
<input type="checkbox"/> Other: _____	_____	_____			

Analyst _____ Date Reported 2 23 87 Reviewed by CD

Laboratory remarks _____



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119904

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

1703 W. Industrial Avenue [915 - 683-3348] • P.O. Box 2150 • Midland, Texas 79701

File No. 3355796

Report No. 39081

Report Date 5-26-87

Date Received 5-6-87

Delivered By M. Ford

Report of tests on: Water

Client: Phillips 66 Natural Gas Company

Identification: Hobbs Treater Discharge

mg/L

Calcium -----	464
Magnesium -----	204
Sodium -----	4450
Potassium -----	80
Carbonate -----	None
Bicarbonate -----	649
Sulfate -----	1078
Chloride -----	7623
Total Dissolved Solids @ 180° C -----	15370
Total Hardness (as Ca CO ₃) -----	2000
pH -----	7.68

Standard Method, 16th Edition

Technician: LYN, GMB

Copies 3 cc Phillips 66 Natural Gas Co.

ATTN: Neal Porter

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Report Date 5-27-87

Date Received 5-6-87

Delivered By M. Ford

Report of tests on: Water

Client: Phillips 66 Natural Gas Company

Identification: Hobbs Treater Discharge

EPA METHOD 601, Purgeable Halocarbons

	<u>PPM</u>
Bromodichloromethane -----	ND
Bromoform -----	ND
Carbon Tetrachloride -----	ND
Chlorobenzene -----	ND
Dibromochloromethane -----	ND
1,2-Dichlorobenzene -----	ND
1,3-Dichlorobenzene -----	ND
1,4-Dichlorobenzene -----	ND
1,1-Dichloroethane -----	ND
1,2-Dichloroethane -----	ND
1,1-Dichloroethene -----	ND
trans-1,2-Dichloroethene -----	ND
1,2-Dichloropropane -----	ND
cis-1,2-Dichloropropene -----	ND
trans-1,2-Dichloropropene -----	ND
Methylene Chloride -----	ND
1,1,2,2-Tetrachloroethane -----	ND
Tetrachloroethene -----	ND
1,1,1-Trichloroethane -----	ND
1,1,2-Trichloroethane -----	ND
Trichloroethene -----	ND
2-Chloroethylvinylether -----	ND
Chloroform -----	ND

ND designates "None detected, less than 0.05 ppm"

Technician: REL

Copies 3 cc Phillips 66 Natural Gas Co.
ATTN: Neal Porter

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File No. 3355796

Report No. 39081

Report Date 5-27-87

Date Received 5-6-87

Delivered By M. Ford

Report of tests on: **Water**
Client: **Phillips 66 Natural Gas Company**
Identification: **Hobbs Treater Discharge**

EPA METHOD 602, Purgeable Aromatics

	<u>PPM</u>
Benzene -----	17.1
Chlorobenzene ----- *	0.1
1,2-Dichlorobenzene ----- *	0.1
1,3-Dichlorobenzene ----- *	0.1
1,4-Dichlorobenzene ----- *	0.1
Ethylbenzene -----	4.3
Toluene -----	14.8
Xylenes -----	10.6

* Denotes "less than"

Technician: REL

Copies 3 cc Phillips 66 Natural Gas Co.
ATTN: Neal Porter

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Continental Products of Texas

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Telephone No. (915) 337-4681

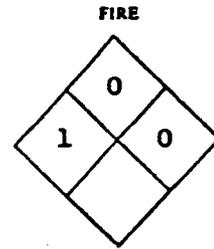
QUICK IDENTIFIER

NFPA Designation 704

HAZARD RATING

4 = EXTREME
3 = HIGH
2 = MODERATE
1 = SLIGHT
0 = INSIGNIFICANT

HEALTH



SPECIFIC HAZARD

MATERIAL SAFETY DATA SHEET

SECTION 1 - IDENTITY -

Common Name: (used on label)
(Trade Name & Synonyms) **Antipol 640**

Chemical Name **Zinc Sulfate** Formula **Proprietary**

Chemical Family **Metal organic combination**

Cas No. **Proprietary**

SECTION 2 - HAZARDOUS INGREDIENTS

Hazardous Component(s)	%	Threshold Limit Value (units)
Not determined to be hazardous		

SECTION 3 - PHYSICAL & CHEMICAL CHARACTERISTICS (Fire & Explosive Data)

Boiling Point	Not volatile	Specific Gravity (H ₂ O = 1)	NA	Vapor Pressure (mm Hg)	NA
Percent Volatile by Volume (%)	Not volatile	Vapor Density (Air = 1)	NA	Evaporation Rate (_____ = 1)	NA
Solubility in Water	100%	Reactivity in Water	NA	(ACGIH)	
Appearance and Odor	White powder				
Flash Point	Not volatile	Flammable Limits in Air % by Volume	NA	Extinguisher Media	Use media
Special Fire Fighting Procedures	None	Lower	Upper		Auto-Ignition Temperature
Unusual Fire and Explosion Hazards	None			proper to the primary cause of fire.	

SECTION 4 - PHYSICAL HAZARDS

Stability STABLE UNSTABLE CONDITIONS TO AVOID

INCOMPATIBILITY (MATERIALS TO AVOID) None

HAZARDOUS DECOMPOSITION PRODUCTS

Hazardous Polymerization CONDITIONS TO AVOID None

WILL OCCUR WILL NOT OCCUR

SECTION 5 - HEALTH HAZARD

Threshold
Limit Value NA

Signs and Symptoms of Exposure

- 1. Acute Overexposure Causes irritation to eyes, skin, nose and throat.
- 2. Chronic Overexposure None

Medical Conditions Generally Aggravated by Exposure None

Chemical Listed as Carcinogen or Potential Carcinogen shown in animals (HTHCC) National Toxicology Program Yes No I.A.R.C. Monographs Yes No OSHA Yes No

OSHA Permissible Exposure Limit Unknown ACGIH Threshold Limit Value ThV/TWA Total 10 mg/m³ Other Exposure Limit Used None

Emergency and First Aid Procedures

- 1. Inhalation Remove to fresh air. Dust exposure possible, mucous irritation possible.
- 2. Eyes Flush with water for 15 minutes, if irritation persists get medical attention.
- 3. Skin Flush with water. Get medical attention if irritation persists.
- 4. Ingestion Get medical attention. DO NOT induce vomiting in an unconscious person.

SECTION 6 - SPECIAL PROTECTION INFORMATION

Respiratory Protection (Specify Type) Dust mask

Ventilation	General	Local Exhaust	yes	Mechanical (General)	yes	Special	none	Other	none
Protective Gloves	Rubber	Eye Protection	Goggles						
Other Protective Clothing or Equipment	Rubber apron								

SECTION 7 - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be Taken in Handling and Storage none

Steps to be Taken in Case Material is Released or Spilled Avoid dusting, flush spill area with water.

Waste Disposal Methods None hazardous, industrial waste, dispose of according to State and Federal regulations.

NO WARRANTY, EXPRESS OF IMPLIED OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE IS MADE. BUYER ASSUMES ALL RISK OF USE, STORAGE AND HANDLING, CONTINENTAL PRODUCTS OF TEXAS SHALL NOT BE LIABLE FOR ANY INCIDENTAL OR CONSEQUENTIAL DAMAGES ARISING DIRECTLY OR INDIRECTLY IN CONNECTION WITH THE PURCHASE, USE, STORAGE OR HANDLING OF THIS PRODUCT.

Date Issued: 11-7-85, R5/30/86

Abbreviations Used
NA Not Applicable
ND Not Determined
UN Unknown

Continental Products of Texas

Prepared by Eric Klim
Eric Klim

Continental Products of Texas

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Telephone No. (915) 337-4681

HYDROCHEM D-300

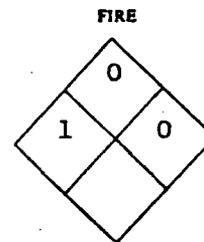
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HAZARD RATING

4 = EXTREME
3 = HIGH
2 = MODERATE
1 = SLIGHT
0 = INSIGNIFICANT

HEALTH

SPECIFIC
HAZARD

MATERIAL SAFETY DATA SHEET

SECTION 1 - IDENTITY

Common Name: (used on label)

(Trade Name & Synonyms)

HYDROCHEM D-300

Chemical Name Sodium Acrylamine Formula Proprietary

Chemical Family Acrylic Polymer

Cas No. Proprietary

SECTION 2 - HAZARDOUS INGREDIENTS

Hazardous Component(s)	%	Threshold Limit Value (units)
Not determined to be hazardous		

Not determined to be hazardous

SECTION 3 - PHYSICAL & CHEMICAL CHARACTERISTICS (Fire & Explosive Data)

Boiling Point	215	Specific Gravity (H ₂ O = 1)	1.1	Vapor Pressure (mm Hg)	260 (275°F)
Percent Volatile by Volume (%)	75%	Vapor Density (Air = 1)	1	Evaporation Rate (_____ = 1)	1
Solubility in Water	100%	Reactivity in Water			
Appearance and Odor	Light amber, odorless				
Flash Point	none	Flammable Limits in Air % by Volume		Extinguisher Media	Water, CO ₂ Dry chemical
Special Fire Fighting Procedures	none	Lower	Upper		Auto-Ignition Temperature
Unusual Fire and Explosion Hazards	none				

SECTION 4 - PHYSICAL HAZARDS

Stability		CONDITIONS TO AVOID	none
STABLE	<input checked="" type="checkbox"/>	UNSTABLE	<input type="checkbox"/>

INCOMPATIBILITY (MATERIALS TO AVOID)

HAZARDOUS DECOMPOSITION PRODUCTS

Hazardous Polymerization		CONDITIONS TO AVOID	none
--------------------------	--	---------------------	------

MAY OCCUR WILL NOT OCCUR

SECTION 5 - HEALTH HAZARD

Threshold Limit Value NA

Signs and Symptoms of Exposure

1. Acute Overexposure May cause irritation:

2. Chronic Overexposure NA

Medical Conditions Generally Aggravated by Exposure NA

Chemical Listed as Carcinogen or Potential Carcinogen UN

National Toxicology Program Yes No

I.A.R.C. Monographs Yes No

OSHA Yes No

OSHA Permissible Exposure Limit NA

ACGIH Threshold Limit Value NA

Other Exposure Limit Used NA

Emergency and First Aid Procedures

1. Inhalation Remove to fresh air

2. Eyes Flush eyes with plenty of water

3. Skin Wash skin with water

4. Ingestion Induce vomiting, call doctor

SECTION 6 - SPECIAL PROTECTION INFORMATION

Respiratory Protection (Specify Type) NA

Ventilation Local Exhaust yes Mechanical (General) yes Special Other

Protective Gloves Rubber gloves Eye Protection Safety goggles

Other Protective Clothing or Equipment none

SECTION 7 - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be Taken in Handling and Storage none

Steps to be Taken in Case Material is Released or Spilled Wash area with water

Waste Disposal Methods Dispose of according to State and Federal Regulations.

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Date Issued: 10/20/85

Continental Products of Texas

Abbreviations Used NA Not Applicable ND Not Determined UN Unknown

Prepared by Eric Klim

TOXSENE 35

ALGICIDE

Controls Slime in Recirculating Water
Cooling Towers and Systems

ACTIVE INGREDIENTS:

Alkyl (C ₁₂ , 61%; C ₁₄ , 23%; C ₁₆ , 11%; C ₈ & C ₁₀ , 2.5%; C ₁₈ , 2.5%) dimethyl benzyl ammonium chloride	9.0%
Tributyltin neodecanoate	5.0%
Alkyl (C ₁₄ , 58%; C ₁₆ , 28%; C ₁₂ , 14%) dimethyl benzyl ammonium chloride	4.5%
Alkyl (C ₁₄ , 90%; C ₁₆ , 5%; C ₁₂ , 5%) dimethyl ethyl ammonium bromide	1.5%
INERT INGREDIENTS:	80.0%
TOTAL INGREDIENTS	100.0%

FOR INDUSTRIAL AND COMMERCIAL USE ONLY

KEEP OUT OF REACH OF CHILDREN DANGER

(See other precautions and practical treatment on side panel.)

Manufactured for

Continental Products of Texas
Odessa, Texas

EPA Reg. No. 5185-168-12471

EPA Est. No. 14805-TX-1

Net Contents: 450 lbs

TOXSENE 35 Algicide is a product formulated to provide control of the growth of algae and slime in recirculating water cooling systems and evaporative condensers. It is excellent for use in cooling water for thermal processing and pasteurizing operations in dairies, breweries, soft drink and food canning plants.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TOXSENE 35 Algicide may be metered, pumped, gravity fed or poured from a suitable container into the treatment system. Centrifugal injection, piston or diaphragm pumps are satisfactory. Algicide feed pumps, meters and feed lines may be stainless steel, neoprene, glass, plastic or unpigmented fiberglass.

RECIRCULATING WATER COOLING SYSTEM: If heavy growths are present, clean the system before initial treatment. If growth is absent or just noticeable, proceed with the initial dose. Add all treatments directly to the sump.

Initial Dose: When the system is fouled, apply a dose of 4 fluid ounces per 100 gallons of water in the system. Repeat daily until control is achieved.

Subsequent Dose: When algae control is evident, add 2 fluid ounces per 100 gallons water in the system every 7 days (weekly), or as needed to maintain control. Badly fouled systems may be manually or chemically cleaned before treatment is begun.

Continuous Feeding: This product may be continuously fed into open recirculating cooling systems. The feed rate into the make-up water is calculated from the operational cycles of concentration of the tower as follows:

$\frac{2}{\text{Cycles of Concentration}}$	= oz.	TOXSENE 35 required per 100 gallons of make-up water
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This feed should achieve and maintain the recommended 2 oz/100 gallon treatment level in the recirculating water.

STORAGE AND DISPOSAL

Store only in tightly closed, original container in a secure area inaccessible to children. Do Not contaminate water, food, or feed by storage or disposal.

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the hazardous waste representative at the nearest EPA Regional Office for guidance.

METAL CONTAINERS: Triple rinse. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

PLASTIC CONTAINERS: Triple rinse. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: KEEP OUT OF REACH OF CHILDREN. Corrosive. Causes eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Avoid contamination of food.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not discharge treated effluent into lakes, streams, ponds, or public water unless in accordance with a NPDES permit. For guidance contact your Regional Office of the EPA.

Do not allow water that contains this pesticide to come in contact with grass or plants. Do not use in drinking water or in swimming pools. Do not apply in marine or estuarine oil fields.

STATEMENT OF PRACTICAL TREATMENT: In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes. For eyes, call a physician. Remove and wash contaminated clothing before reuse.

If swallowed, drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

ANALYSES PERFORMED

LAB. No.: OR- 143

THIS PAGE FOR LABORATORY RESULTS ONLY

This sample was tested using the analytical screening method(s) checked below:

PURGEABLE SCREENS

- (753) Aliphatic Purgeables (1-3 Carbons)
- (754) Aromatic & Halogenated Purgeables
- (765) Mass Spectrometer Purgeables
- (766) Trihalomethanes
- Other Specific Compounds or Classes
- _____
- _____
- _____
- _____
- _____

EXTRACTABLE SCREENS

- (751) Aliphatic Hydrocarbons
- (760) Organochlorine Pesticides
- (755) Base/Neutral Extractables
- (758) Herbicides, Chlorophenoxy acid
- (759) Herbicides, Triazines
- (760) Organochlorine Pesticides
- (761) Organophosphate Pesticides
- (767) Polychlorinated Biphenyls (PCB's)
- (764) Polynuclear Aromatic Hydrocarbons
- (762) SDWA Pesticides & Herbicides

ANALYTICAL RESULTS

COMPOUND(S) DETECTED	CONC. [PPB]	COMPOUND(S) DETECTED	CONC. [PPB]
<i>aromatic hydrocarbons *</i>	<i>N.D.</i>	<i>halogenated hydrocarbons *</i>	<i>N.D.</i>
<i>4.0 benzene</i>			
<i>4.0 toluene</i>			
<i>4.0 Ethylbenzene</i>			
<i>4.0 p-xylene</i>			
<i>4.0 m-xylene</i>			
<i>4.0 o-xylene</i>			
* DETECTION LIMIT *	<i>149/2</i>	+ DETECTION LIMIT +	<i>+</i>

ABBREVIATIONS USED:
 N D = NONE DETECTED AT OR ABOVE THE STATED DETECTION LIMIT
 T R = DETECTED AT A LEVEL BELOW THE STATED DETECTION LIMIT (NOT CONFIRMED)
 [RESULTS IN BRACKETS] ARE UNCONFIRMED AND/OR WITH APPROXIMATE QUANTITATION

LABORATORY REMARKS: _____

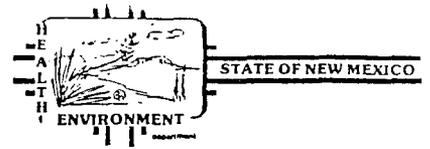
CERTIFICATE OF ANALYTICAL PERSONNEL

Seal(s) Intact: Yes No Seal(s) broken by: *not sealed* date: _____
 I certify that I followed standard laboratory procedures on handling and analysis of this sample unless otherwise noted and that the statements on this page accurately reflect the analytical results for this sample.
 Date(s) of analysis: *2/12/87* Analyst's signature: *Mary C. Edlin*
 I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block.
 Reviewers signature: *K. Magerheim* FEB 24 1987

87-0143-C

SCIENTIFIC LABORATORY DIVISION

700 Camino de Salud NE
Albuquerque, NM 87106 841-2570



REPORT TO: David Boyer
N.M. Oil Conservation Division
P. O. Box 2088
Santa Fe, N.M. 87504-2088

S.L.D. No. OR- 87-0143-A-B
DATE REC. 2-5-87

PHONE(S): 827-5812 USER CODE: 8 2 2 3 5

SUBMITTER: David Boyer CODE: 2 6 0

SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 8 7 0 1 2 7 1 3 3 0 4 B

SAMPLE TYPE: WATER [X], SOIL [], FOOD [], OTHER: [] CODE: [] [] []

COUNTY: LEA ; CITY: HOBBS CODE: [] [] [] []

LOCATION CODE: (Township-Range-Section-Tracts) 1 9 5 + 3 8 E + 0 4 + 1 1 2 (10N06E24342)

ANALYSES REQUESTED: Please check the appropriate box(es) below to indicate the type of analytical screens required. Whenever possible list specific compounds suspected or required.

PURGEABLE SCREENS

EXTRACTABLE SCREENS

- (753) Aliphatic Purgeables (1-3 Carbons)
- (754) Aromatic & Halogenated Purgeables
- (765) Mass Spectrometer Purgeables
- (766) Trihalomethanes
- Other Specific Compounds or Classes
- _____
- _____
- _____
- _____
- _____

- (751) Aliphatic Hydrocarbons
- (760) Organochlorine Pesticides
- (755) Base/Neutral Extractables
- (758) Herbicides, Chlorophenoxy acid
- (759) Herbicides, Triazines
- (760) Organochlorine Pesticides
- (761) Organophosphate Pesticides
- (767) Polychlorinated Biphenyls (PCB's)
- (764) Polynuclear Aromatic Hydrocarbons
- (762) SDWA Pesticides & Herbicides

Remarks: PHILLIPS HOBBS COOLING TOWER

FIELD DATA:

pH= _____; Conductivity= 1400 umho/cm at 17 °C; Chlorine Residual= _____ mg/l

Dissolved Oxygen= _____ mg/l; Alkalinity= _____ mg/l; Flow Rate _____ / _____

Depth to water _____ ft.; Depth of well _____ ft.; Perforation Interval _____ - _____ ft.; Casing: _____

Sampling Location, Methods and Remarks (i.e. odors, etc.)

I certify that the results in this block accurately reflect the results of my field analyses, observations and activities. (signature collector): Ami Boyer Method of Shipment to the Lab: Hand Carried

This form accompanies 2 Septum Vials, _____ Glass Jugs, and/or _____

- Samples were preserved as follows:
- NP: No Preservation; Sample stored at room temperature.
 - P-Ice Sample stored in an ice bath (Not Frozen).
 - P-Na₂S₂O₃ Sample Preserved with Sodium Thiosulfate to remove chlorine residual.

CHAIN OF CUSTODY

I certify that this sample was transferred from _____ to _____
at (location) _____ on _____ / _____ / _____ - _____ : _____ and that
the statements in this block are correct. Evidentiary Seals: Not Sealed Seals Intact: Yes No

Signatures _____

For OCD Use: Date Owner Notified _____ Phone or Letter? _____ Initials _____

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

February 4, 1987

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. E. Jennings
Agent, Permian Basin Region
Phillips 66 Natural Gas Co.
4001 Penbrook
Odessa, Texas 79762

RE: Discharge Plan Requirement
Phillips 66 Natural Gas Co.
Hobbs Compressor Station
Lea County, New Mexico

Dear Mr. Jennings:

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan for your existing Hobbs compressor station located in NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, is required.

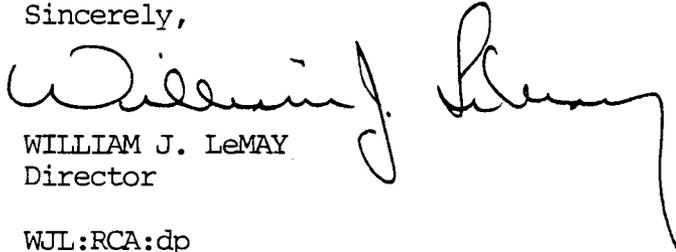
This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan defined in Section 1-101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping).

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. Three copies of your discharge plan should be submitted for review purposes.

Section 3-106-A. of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Section 3-106.A. also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the director that a discharge plan is required. An extension of this time may be sought and approved for good cause.

If there are any questions on this matter, please feel free to call David Boyer (827-5812) or Roger Anderson at 827-5885 as they have the assigned responsibility for review of all discharge plans.

Sincerely,

A handwritten signature in cursive script, appearing to read "William J. LeMay". The signature is written in dark ink and is positioned to the right of the typed name.

WILLIAM J. LeMAY
Director

WJL:RCA:dp

cc: OCD, Hobbs
Mike Ford, Phillips, Odessa

Mr. Michael D. Ford

- 4) During the OCD inspection of January 27, 1987 oil and sludges were observed under the engine room (#7, your attachment 1) and on the ground around the engine room. Black stained soil was also observed approximately two feet below the surface at an excavation point adjacent to the engine room. Is there a concrete pad under the entire engine room? If so is it completely curbed? What actions do you propose to contain oil leaks from the engine room? What actions do you propose to undertake to remove the standing oil under and around the engine room? How deep is the hydrocarbon contamination? What remedial actions do you propose for the past hydrocarbon seepage?

- 5) During the January 27, 1987 inspection water was observed ponding adjacent to the cooling tower. What is your proposal to contain and prevent seepage of these liquids?

If you have any questions please do not hesitate to call me at (505) 827-5885.

Sincerely,


Roger C. Anderson
Environmental Engineer

cc: OCD - Hobbs

P 612 458 646

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1983-403-517

Sent to	Mr. Michael D. Ford
Street and No.	4001 Benbrook
P.O., State and ZIP Code	Oklahoma, TX 79702
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	

PS Form 3800, Feb. 1982

Bill.

This plant was inspected on 1-27-86. The plant is a pre '50's plant. The area under the compressors is covered with used oil. It is unknown if there is a concrete pad. The oil, from leaks and runoff after oil changes or maintenance, has left the area under the building and saturated the soil. I feel we need a discharge plan to address and control these spills. Groundwater in the area is from 20 to 50 feet.

Roger

I concur; this plant is in downtown Hobbs, and domestic wells are nearby.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING. HARMFUL OR FATAL IF SWALLOWED OR ABSORBED THROUGH THE SKIN. CAUSES EYE DAMAGE AND SKIN IRRITATION. In case of contact remove contaminated clothing and immediately wash skin with soap and water. If irritation persists get medical attention. In case of contact with eyes, immediately flush with water and get medical attention. Wash contaminated clothing before reuse. The use of goggles or face shield and rubber gloves is recommended.

PHYSICAL AND CHEMICAL HAZARDS

DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not apply in marine and/or estuarine oil fields. Do not discharge treated effluent into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidelines contact your regional office of the Environmental Protection Agency.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL

STORAGE: Protect from freezing and temperatures in excess of 140°F. Keep container closed when not in use. If contents are spilled or leaked due to container damage, collect liquid with absorbant material and dispose of in accordance with local, state and federal pesticide disposal regulations.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Metal Containers - Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic Containers -Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

TOXSENE 37

(Antimicrobial Agent)

(FOR INDUSTRIAL USE ONLY)

ACTIVE INGREDIENT:

Methylene bis (thiocyanate) 10%

INERT INGREDIENTS:..... 90%

TOTAL 100%

KEEP OUT OF REACH OF CHILDREN

DANGER

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REGISTRATION NO. 9386-4-14805
EPA ESTABLISHMENT NO. 14805-TX-1

Manufactured By

CONTINENTAL PRODUCTS OF TEXAS

100 Industrial Ave., Odessa, Texas 79760
Phone: 915/337-4681

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THE PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING

RECIRCULATING COOLING WATER SYSTEMS: FOR CONTROL OF SLIME-FORMING BACTERIA (cooling towers, evaporative condensers) Bacterial control: Use 1.6 to 7.9 fluid ounces of Toxsene 37 per 1000 gallons water (1.25 to 6.20 ppm active) as a continuous treatment, one to three times a week or as required to maintain control. When the system is just noticeably fouled use 5.8 to 12.5 fluid ounces of Toxsene 37 per 1000 gallons water (4.5 to 9.8 ppm active) as a continuous treatment daily or as required to obtain control. Badly fouled systems must be cleaned before treatment begun. Apply at a point in the system where thorough mixing and even distribution will occur, such as the cooling tower basin or sump.

OILFIELD DRILLING MUDS AND WORKOVERS FOR CONTROL OF SLIME-FORMING AND/OR SPOILAGE BACTERIA: Determine the total volume of the circulating system. Calculate the number of gallons of Toxsene 37 needed to produce a concentration of 5000 ppm (1.75 lb/bbl) of Toxsene 37 in the drilling mud circulating system. For example, 2000 gallons of Toxsene 37 per 1000 barrels of drilling fluid will produce the proper concentration. For best results add Toxsene 37 in a thin stream to the mud pit while the drilling fluid is circulating. As the total volume increases, due to greater well depth, add additional Toxsene 37 to maintain the proper concentration.

OILFIELD WATER TREATMENT AND WATER FLOODING FOR CONTROL OF SLIME-FORMING AND/OR SPOILAGE BACTERIA: Calculate the total volume of water to be treated. Using this volume, calculate the number of gallons of Toxsene 37 needed to produce a concentration of approximately 750 ppm Toxsene 37. For example, 0.75 gallons of Toxsene 37 per each 1000 gallons of total volume will produce this dilution. Add Toxsene 37 as a slug treatment or intermittently. 500 ppm Toxsene 37 added each week, is recommended to maintain bacterial control. This may be accomplished by adding 0.50 gallons of Toxsene 37 to each 1000 gallons of total volume.

8.3 lbs. per gallon