GW - 48

PERMITS, RENEWALS, & MODS

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 7, 2009

Mr. Bob Stewart
211 N. Colorado
Midland TX 79701

Re: Renewal Discharge Permit, GW-048
Denton Davis Gas Plant
NW/4 SW/4 in Section 2, Township 15 South, Range 37 East, NMPM,
Lea County, New Mexico

Dear Mr. Stewart:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the **Davis Gas Processing Inc.** discharge permit for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit.** Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

ORIGINALLY SIGNED BY Glenn von Gonten

Glenn von Gonten
Acting Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT

DISCHARGE PERMIT

APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. The flat fee for a Gas Plant is $4000.00 and has already been paid and processed. Please submit a signed copy of the permit and return to the OCD within 30 days.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on September 12, 2014** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its July, 2009 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-

approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Part 35 Waste:** Pursuant to OCD Part 35 (19.15.35.8 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in

secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking

water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days. The OCD does not consider covering contaminated areas a remediation of the spill/release.

16. OCD Inspections: The OCD performed an inspection of this facility on August 27, 2009. Mr. Bob Stewart, David Pepper and Elena Hofmann witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

1. **Photo 1 – 2, 6:** The basin of the old cooling tower is holding fluids without any function. If Owner/Operator wishes to maintain this pond they must re-engineer it to meet Condition B of this permit. If Owner/Operator cannot demonstrate the integrity of this pond they must cease operations, verify integrity and modify the containment so as to divert fluids. The Owner/Operator must document weather the containment has an impermeable bottom.
2. **Photo 3 – 5**: The unused compressor building skid area is holding fluids that appear to have hydrocarbons. OCD requires the Owner/Operator to remove fluids and have the structure modified as to not receive any more fluids. Owner/Operator shall investigate any releases that may have occurred beneath the containment area. It appears that these fluids have overflowed to the north side of the building and have discharged on to the ground. The Owner/Operator shall remediate all releases from containment area.
3. **Photo 7 – 11**: Several staged waste are on site. The Owner/Operator shall refer to Condition 6 of this permit for all waste on site and OCD Rule Part 35 for disposal of oil field waste. If waste stream disposal is not identified within the original application or any other subsequent application then OCD approval is needed prior to disposal of used filters, contaminated soil, etc.
4. **Photo 12 – 18, 37 and 38**: Improperly managed containers and barrels. The June 2004 Permit Condition 4, 6, 7 and 8 identified procedures for maintaining containers and tanks. At the time of inspection there were several areas of concern. The Owner/Operator shall immediately address these concerns for all tanks/containers on site. Refer to OCD Rule Part 35 for disposal of containers and barrels. An inspection conducted by the OCD on February 8, 2005 previously noted these concerns.
5. **Photo 19 – 27, 33 – 36, 39**: There were several areas within the facility yard that showed signs of discharges and releases on to the ground. The June 24, 2004 Permit Condition 5 identifies protocols for leaks and spills. Condition 13 identified procedures

for release notification and protocol. The Owner/Operator shall immediately cease all discharges on to the ground and shall initiate a work plan to address these spills and releases. There were indications of contaminated soil covered with clean fill (**Photo 25 – 27**). This is not remediation of the contaminated soil and the Owner/Operator shall cease this practice immediately. The renewal Permit condition 18 specifies conditions on releases.

6. **Photo 28 – 32**: Sumps operated as below-grade tanks. All sumps are single walled and have never been cleaned and integrity tested. The June 2004 Permit Condition 9 specified procedures for properly maintaining sumps/below-grade tanks. The Owner/Operator shall submit a work plan to replace these below-grade tanks.

The GW-048 file does not have any records of hydrostatic testing of drain/process lines on the facility. Please provide the records and identification of lines for the facility. Submit this along with the work plan. The Owner/operator shall submit their work plans **by December 15, 2009** to address the identified concerns stated above.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: The owner/operator shall ensure that all employees understand all permit conditions.

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Davis Gas Processing, Inc.
Company Name-print name above

J. L. Davis
Company Representative- print name

Company Representative- Signature

Title President

Date: 12-10-09

OCD Inspection: Davis Denton GP, GW - 048

Inspector(s): Leonard Lowe

Company Rep: Bob Stewart, Elena Hofmann and David Pepper

Date: 08.27.09 Time: 8:00 – 10:40

Photo 1: Standing fluids near unused pump house.

Photo 2: Large quantities of standing fluids.

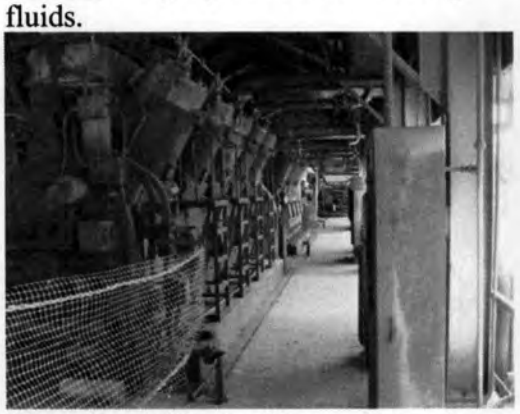

Photo 3: Fluids standing underneath unused compressor building.

Photo 4: Oily fluids noted in photo 3.

Photo 5: Oil fluids noted in photo 3.

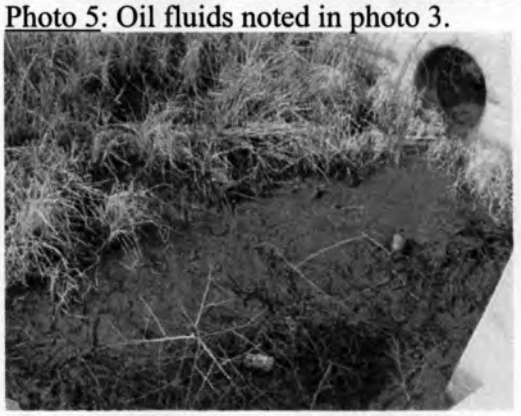

Photo 6: Old cooling tower containment full of black soil.

Photo 7: Staged Mol sieve.

Photo 8: Staged Mol Sieve.

Photo 9: Staged contaminated soil.

Photo 10: Used filters staged near contaminated soil staging area.

Photo 11: Amount of used filters.

Photo 12: Improper barrel storage.

Photo 13: Improper barrel storage.

Photo 14: Crushed barrel leaking contents.

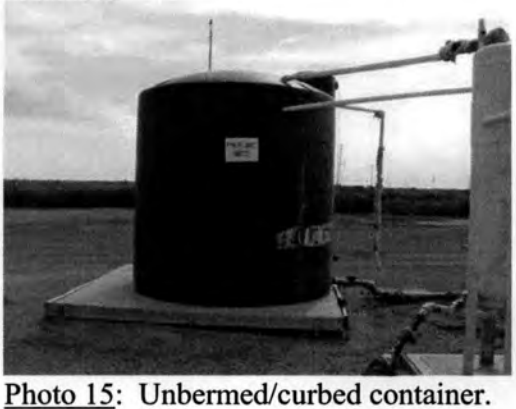

Photo 15: Unbermed/curbed container.

Photo 16: Question contents of barrel.

Photo 17: Improper barrel storage.

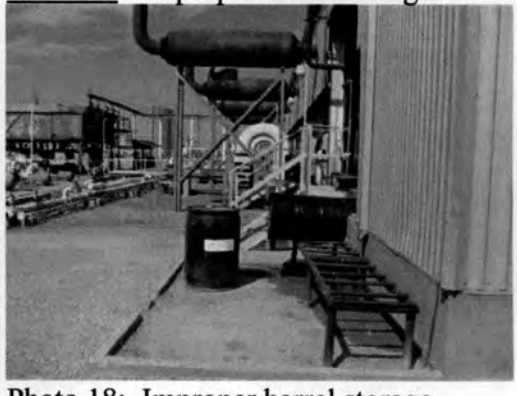

Photo 18: Improper barrel storage.

Photo 19: Discharge on ground.

Photo 20: Discharge on ground.

Photo 21: Discharge on ground.

Photo 22: Discharge on ground.

Photo 23: Discharge on ground.

Photo 24: Discharge on ground.

Photo 25: Discharged covered.

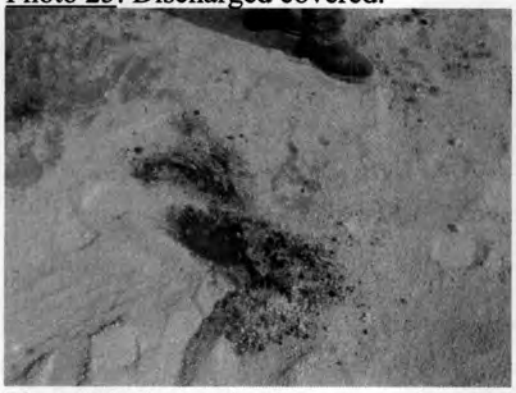

Photo 26: Contamination exposed under clean soil.

Photo 27: Clean soil spread around.

Photo 28: Single wall BGT skimmer.

Photo 29: Amount of fluids in BGT skimmer.

Photo 30: 2 BGT, one for each compressor.

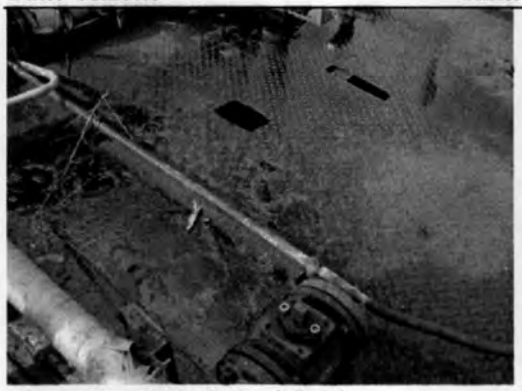

Photo 31: BGT full of fluids.

Photo 32: Single wall BGT.

Photo 33: Discharges.

Photo 34: Discharged within unlined AST secondary containment.

Photo 35: Discharged within unlined AST secondary containment.

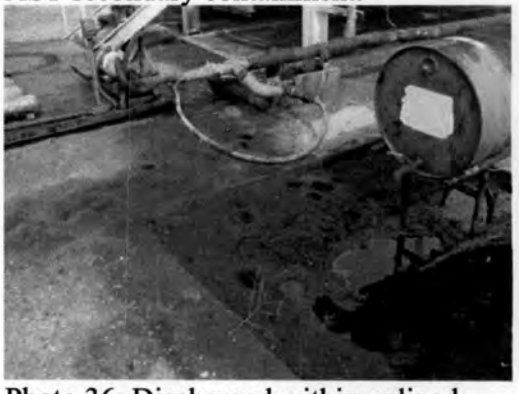

Photo 36: Discharged within unlined AST secondary containment.

Photo 37: Unbermed/lined saddle tank.

Photo 38: Unbermed/lined saddle tank.

Photo 39: Discharges within earthen unlined bermed area from AST.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, December 08, 2009 2:36 PM
To: bstewart@westtexasgas.com
Cc: Sanchez, Daniel J., EMNRD; 'Jones, Larry'
Subject: GW-048 Permit
Attachments: GW048 PERMIT.pdf

Mr. Stewart,

Here is the Permit for the Davis Gas Plant. Please sign and return by **December 18, 2009**.

Condition 16 within the permit noted a deadline day of December 16 2009 to submit items to the OCD. That dead line has passed. Submit those items by **January 16, 2010**.

Please submit these request in a timely manner.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

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Acting Environmental Bureau Chief

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B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking

water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days. The OCD does not consider covering contaminated areas a remediation of the spill/release.

16. OCD Inspections: The OCD performed an inspection of this facility on August 27, 2009. Mr. Bob Stewart, David Pepper and Elena Hofmann witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

1. **Photo 1 – 2, 6:** The basin of the old cooling tower is holding fluids without any function. If Owner/Operator wishes to maintain this pond they must re-engineer it to meet Condition B of this permit. If Owner/Operator cannot demonstrate the integrity of this pond they must cease operations, verify integrity and modify the containment so as to divert fluids. The Owner/Operator must document weather the containment has an impermeable bottom.
2. **Photo 3 – 5**: The unused compressor building skid area is holding fluids that appear to have hydrocarbons. OCD requires the Owner/Operator to remove fluids and have the structure modified as to not receive any more fluids. Owner/Operator shall investigate any releases that may have occurred beneath the containment area. It appears that these fluids have overflowed to the north side of the building and have discharged on to the ground. The Owner/Operator shall remediate all releases from containment area.
3. **Photo 7 – 11**: Several staged waste are on site. The Owner/Operator shall refer to Condition 6 of this permit for all waste on site and OCD Rule Part 35 for disposal of oil field waste. If waste stream disposal is not identified within the original application or any other subsequent application then OCD approval is needed prior to disposal of used filters, contaminated soil, etc.
4. **Photo 12 – 18, 37 and 38**: Improperly managed containers and barrels. The June 2004 Permit Condition 4, 6, 7 and 8 identified procedures for maintaining containers and tanks. At the time of inspection there were several areas of concern. The Owner/Operator shall immediately address these concerns for all tanks/containers on site. Refer to OCD Rule Part 35 for disposal of containers and barrels. An inspection conducted by the OCD on February 8, 2005 previously noted these concerns.
5. **Photo 19 – 27, 33 – 36, 39**: There were several areas within the facility yard that showed signs of discharges and releases on to the ground. The June 24, 2004 Permit Condition 5 identifies protocols for leaks and spills. Condition 13 identified procedures

for release notification and protocol. The Owner/Operator shall immediately cease all discharges on to the ground and shall initiate a work plan to address these spills and releases. There were indications of contaminated soil covered with clean fill (**Photo 25 – 27**). This is not remediation of the contaminated soil and the Owner/Operator shall cease this practice immediately. The renewal Permit condition 18 specifies conditions on releases.

6. **Photo 28 – 32**: Sumps operated as below-grade tanks. All sumps are single walled and have never been cleaned and integrity tested. The June 2004 Permit Condition 9 specified procedures for properly maintaining sumps/below-grade tanks. The Owner/Operator shall submit a work plan to replace these below-grade tanks.

The GW-048 file does not have any records of hydrostatic testing of drain/process lines on the facility. Please provide the records and identification of lines for the facility. Submit this along with the work plan. The Owner/operator shall submit their work plans **by December 15, 2009** to address the identified concerns stated above.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: The owner/operator shall ensure that all employees understand all permit conditions.

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

OCD Inspection: Davis Denton GP, GW - 048

Inspector(s): Leonard Lowe

Company Rep: Bob Stewart, Elena Hofmann and David Pepper

Date: 08.27.09 Time: 8:00 – 10:40

Photo 1: Standing fluids near unused pump house.

Photo 2: Large quantities of standing fluids.

Photo 3: Fluids standing underneath unused compressor building.

Photo 4: Oily fluids noted in photo 3.

Photo 5: Oil fluids noted in photo 3.

Photo 6: Old cooling tower containment full of black soil.

Photo 7: Staged Mol sieve.

Photo 8: Staged Mol Sieve.

Photo 9: Staged contaminated soil.

Photo 10: Used filters staged near contaminated soil staging area.

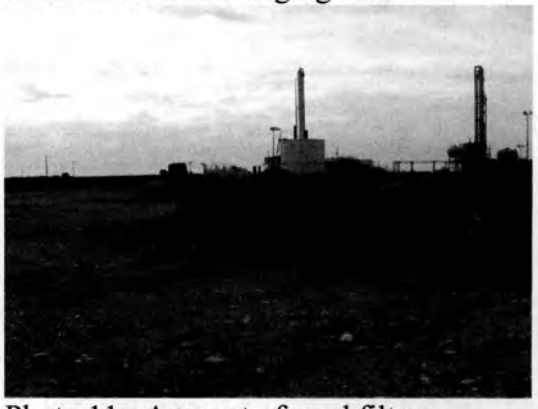

Photo 11: Amount of used filters.

Photo 12: Improper barrel storage.

Photo 13: Improper barrel storage.

Photo 14: Crushed barrel leaking contents.

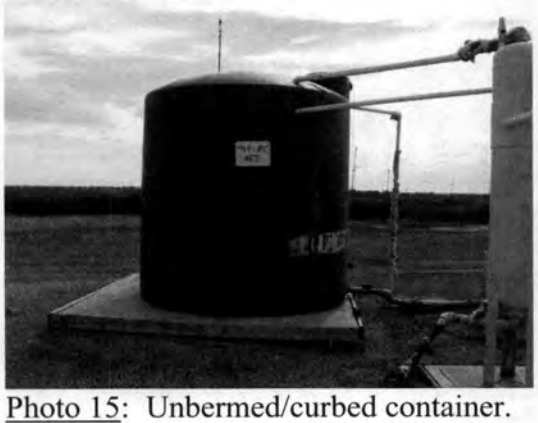

Photo 15: Unbermed/curbed container.

Photo 16: Question contents of barrel.

Photo 17: Improper barrel storage.

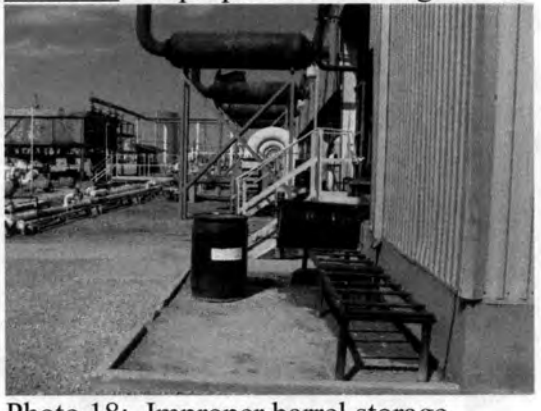

Photo 18: Improper barrel storage.

Photo 19: Discharge on ground.

Photo 20: Discharge on ground.

Photo 21: Discharge on ground.

Photo 22: Discharge on ground.

Photo 23: Discharge on ground.

Photo 24: Discharge on ground.

Photo 25: Discharged covered.

Photo 26: Contamination exposed under clean soil.

Photo 27: Clean soil spread around.

Photo 28: Single wall BGT skimmer.

Photo 29: Amount of fluids in BGT skimmer.

Photo 30: 2 BGT, one for each compressor.

Photo 31: BGT full of fluids.

Photo 32: Single wall BGT.

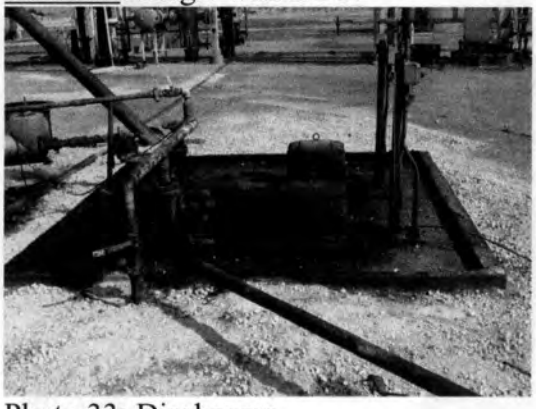

Photo 33: Discharges.

Photo 34: Discharged within unlined AST secondary containment.

Photo 35: Discharged within unlined AST secondary containment.

Photo 36: Discharged within unlined AST secondary containment.

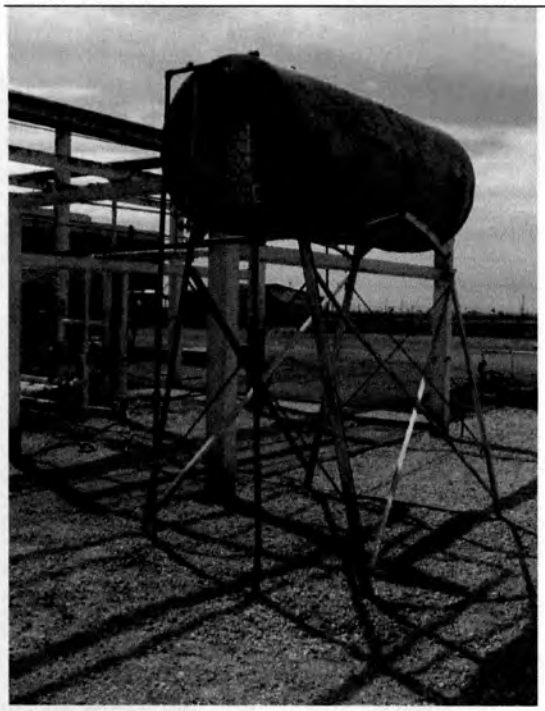

Photo 37: Unbermed/lined saddle tank.

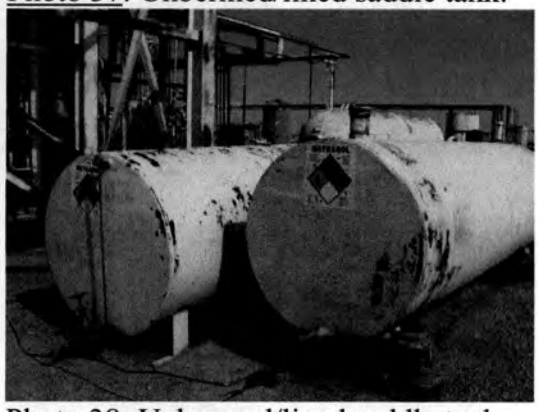

Photo 38: Unbermed/lined saddle tank.

Photo 39: Discharges within earthen unlined bermed area from AST.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, August 05, 2009 4:57 PM
To: bstewart@westtexasgas.com
Subject: GW-048, Administratively Complete
Attachments: GW-048, Admin Complete Letter.pdf; GW-048, Renewal Draft Permit.pdf; GW-048, OCD PN.pdf

Mr. Stewart,

The OCD has determined your discharge plan renewal application to be administratively complete.
Attached you will find:

1. Administratively complete letter
2. A DRAFT permit: addition requirements (condition 16) may be added once facility is inspected
3. The OCD version of the public notice.

The OCD has reviewed your submitted applicant public notice. Please verify the correct location and resubmit the notice for review. There was a discrepancy on the location in the notice and location stated within the application.

I would like to inspect your facility on Thursday August 27th. Please let me know if you or anyone within your organization can accommodate that date for inspection.

Thank you for your attention.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

August 5, 2009

Dear Mr. Stewart:

Re: Discharge Plan Renewal Permit GW-048
Davis Gas Processing, Inc.
Denton Davis Gas Plant
Lea County, New Mexico

The New Mexico Oil Conservation Division (NMOCD) has received Davis Gas Processing, Inc's request including the initial and facility fee, dated July 28, 2008 to renew GW-048 for their Davis Denton Gas Plant located in the NW/4 SW/4 of Section 2, Township 15 South, Range 37 East, NMPM, Lea County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe
Environmental Engineer

LRL/lrl

xc: OCD District I Office, Hobbs

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

August 5, 2009

Mr. Bob Stewart
211 N. Colorado
Midland TX 79701

Re: Renewal Discharge Permit, GW-048
Denton Davis Gas Plant
NW/4 SW/4 in Section 2, Township 15 South, Range 37 East, NMPM,
Lea County, New Mexico

Dear Mr. Stewart:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the **Davis Gas Processing Inc.** discharge permit for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit.** Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Glenn von Gonten
Acting Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT

DISCHARGE PERMIT
APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. The flat fee for a Gas Plant is $4000.00 and has already been paid and processed. Please submit a signed copy of the permit and return to the OCD within 30 days.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on September 12, 2014** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its July, 2009 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Part 35 Waste:** Pursuant to OCD Part 35 (19.15.35.8 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that

inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days. The OCD does not consider covering contaminated areas a remediation of the spill/release.

16. OCD Inspections: The OCD performed an inspection of this facility on month, day, year. Mr. Man and Ms. Man witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

1. **Photo 1:**

Owner/operator shall resolve these concerns and report within **by Month, Day, Year**. The report shall be submitted, with photographs, to the Environmental Bureau Oil Conservation Division identifying the resolutions to the concerns.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: The owner/operator shall ensure that all employees understand all permit conditions.

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator) by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-048) Mr. Bob Stewart, Environmental Coordinator, Davis Gas Processing Inc. 211 North Colorado, Midland Texas 79701, has submitted a renewal application for the previously approved discharge plan for their Denton Davis Gas Plant located in NW/4 SW/4 of Section 2, Township 15 South, Range 37E East, NMPM, Lea County. The facility compresses, treats, dehydrates and performs natural gas recovery. Approximately 750 gallons/day of produced water and 210 bbls/day of condensate are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 40 - 105 feet, with a total dissolved solids concentration of approximately 610 - 1600 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

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

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of August 2009.

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No _____ dated 7/28/09

or cash received on _____ in the amount of $ 4100.00

from Davis Gas Processing Inc

for GW-48

Submitted by: Lauterrie Ponero Date: 7/31/09

Submitted to ASD by: [signature] Date: 7/31/09

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other Facility Fees

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

RPS JDC

404 Camp Craft Rd., Austin, Texas 78746
Tel: (512) 347 7588 Fax: (512) 347 8243
Internet: www.rpsgroup.com/energy

Via Overnight Delivery

July 29, 2009

Mr. Leonard Lowe, Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, NM 87505

RECEIVED OCD
2009 JUL 31 A 8:57

Subject: Discharge Plan Renewal, GW-048
Davis Gas Processing, Inc.
Denton Plant

Dear Mr. Lowe:

On behalf of Davis Gas Processing, Inc., RPS is submitting two copies of the enclosed discharge plan renewal application. In addition to the application, we are also submitting a check in the amount of $4,100 for the application fee as well as draft notice language for your review. Within 30 days of approval of the application, Davis Gas Processing will post approved public notice language in the local newspaper and mail notice to landowners within 1/3 mile from the facility. The notice will be a minimum of two inches by three inches in size and will be published in both English and Spanish. Within 15 days of posting the public notice, Davis Gas Processing will submit proof of notice publication to you.

We appreciate your assistance in this matter. If you have any questions or comments regarding this submission, please call Mr. Bob Stewart of Davis Gas Processing, Inc. at (432) 682-6311 or me at (512) 347-7588.

Sincerely,

RPS

Kyle Shelton
Senior Consultant

c: Mr. Bob Stewart, Davis Gas Processing
Elena Hofmann, RPS

Enclosures

PUBLIC NOTICE

Davis Gas Processing, Inc., 211 N. Colorado, Midland, TX 79701, has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for a discharge plan permit renewal (GW-048) for their Denton, New Mexico gas processing plant located in the SE/4 of Section 2, Township 15 South, Range 37 East in Lea County, New Mexico. The physical address of the facility is approximately 11 miles east of Lovington, New Mexico, 88130 on the north site of US Highway 82.

The facility provides compression, storing, and distribution of oil and gas related material. Materials generated or used at the facility include pipeline condensate liquid, engine cooling water, and other wash down water. Approximately 4,000 gallons of wash down water are discharged to surface soil annually. All other liquids utilized at the facility are stored in dedicated above ground storage tanks prior to offsite disposal or recycling at an OCD approved site.

The aquifer most likely to be affected is 40 to 105 feet in depth, and the total dissolved solids concentration of this aquifer is approximately 610 to 1,600 mg/l.

Any interested person or persons may obtain information; submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

DAVIS GAS PROCESSING, INC.
DENTON PLANT
211 NORTH COLORADO MIDLAND, TEXAS 79701-4696
(432) 682-6311

0034661

DESCRIPTION	INV DATE	INVOICE REF. #	AMOUNT
	7/28/09	APPLICATION FOR	4,100.00

0110103	NMED-WATER QUALITY MANAGME	0034661	4,100.00

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: ***Gas Processing Plant***
2. Operator: ***Davis Gas Processing, Inc.***
   Address: ***211 N. Colorado, Midland, TX 79701***
   Contact Person: ***Bob Stewart*** Phone: ***(432) 682-6311***

3. Location: ***NW*** /4 ***SW*** /4 Section ***2*** Township ***155*** Range ***37E***
   Submit large scale topographic map showing exact location. ***Section 3.0***

4. Attach the name, telephone number and address of the landowner of the facility site. ***Section 4.0***

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. ***Section 5.0***

6. Attach a description of all materials stored or used at the facility. ***Section 6.0***

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. ***Section 7.0***

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. ***Section 8.0***

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. ***Section 9.0***

10. Attach a routine inspection and maintenance plan to ensure permit compliance. ***Section 10.0***

11. Attach a contingency plan for reporting and clean-up of spills or releases. ***Section 11.0***

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. ***Section 12.0***

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. ***Section 13.0***

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

Name: ***Bob Stewart*** Title: ***Environmental Coordinator***

Signature: Bob Stewart Date: 7-28-09

E-mail Address: ***bstewart@westtexasgas.com***

RPS JDC

404 Camp Craft Rd., Austin, Texas 78746
Tel: (512) 347 7588 Fax: (512) 347 8243
Internet: www.rpsgroup.com/energy

Via Overnight Delivery

July 29, 2009

Mr. Leonard Lowe, Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, NM 87505

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Davis Gas Processing, Inc.
Denton Plant

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Sincerely,

RPS

Kyle Shelton
Senior Consultant

c: Mr. Bob Stewart, Davis Gas Processing
Elena Hofmann, RPS

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1220 South St. Francis Dr.
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Revised June 10, 2003

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to Santa Fe
1 Copy to Appropriate
District Office

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(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: *Gas Processing Plant*
2. Operator: *Davis Gas Processing, Inc.*
   Address: *211 N. Colorado, Midland, TX 79701*
   Contact Person: *Bob Stewart* Phone: *(432) 682-6311*

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Name: *Bob Stewart* Title: *Environmental Coordinator*

Signature: Bob Stewart Date: 7-28-09

E-mail Address: *bstewart@westtexasgas.com*

PUBLIC NOTICE

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DAVIS GAS PROCESSING, INC.
DENTON PLANT
211 NORTH COLORADO MIDLAND, TEXAS 79701-4696
(432) 682-6311

[redacted]

DESCRIPTION		INV DATE	INVOICE REF. #	AMOUNT
		7/28/09	APPLICATION FOR	4,100.00
0110103	NMED-WATER QUALITY MANAGME		0034661	4,100.00

THIS CHECK IS VOID WITHOUT A BLUE AND RED BACKGROUND AND AN ARTIFICIAL WATERMARK ON THE BACK - HOLD AT AN ANGLE TO VIEW

DAVIS GAS PROCESSING, INC.
DENTON PLANT
211 NORTH COLORADO MIDLAND, TEXAS 79701-4696
(432) 682-6311

[redacted]

WEST TEXAS NATIONAL BANK
MIDLAND, TEXAS

7/28/09

PAY **********4,100 DOLLARS AND 00 CENTS $4,100.00

TO THE ORDER OF
NMED WATER QUALITY MANAGMENT
NEW MEXICO MINERALS & NATURAL
RESOURSES
OIL CONSERVATION DIVISION
1220 SOUTH ST FRANCIS DRIVE
SANTA FE, NM 87505

DAVIS GAS PROCESSING, INC.
DENTON PLANT

BORDER CONTAINS MICROPRINTING

[redacted]

Attachment A

Topographic Map

RPS JDC

404 Camp Craft Rd., Austin, Texas 78746
Tel: (512) 347 7588 Fax: (512) 347 8243
Internet: www.rpsgroup.com/energy

Discharge Plan GW-048
Davis Gas Processing, Inc.
Denton, NM

July 2009

RPS

Table of Contents

List of Attachments

RPS

Section 1
Introduction

This Discharge Plan details the nature, extent, and quality of all fluids discharged to surface soil at Davis Gas Processing, Inc.'s Denton, New Mexico Plant (Denton Plant). This plan also provides relevant information regarding location of the site, liquid materials used at the site, and operational procedures as prescribed under New Mexico Oil Conservation Division's (OCD's) implementation of Sections 3104 and 3106 of New Mexico Water Quality Control Commission (WQCC) regulations.

The Denton Plant is a gas processing plant that consists of inlet gas compression, gas treating, gas dehydration, and a cryogenic processing unit. All process cooling is via forced air and all heating is via direct combustion of gas. Consequently, there is no cooling tower or boiler system associated with current operations.

The major source of wastewater at the facility is produced water – most of which enters with the gas as water of saturation – and it is managed off-site. The major source of water that is managed on-site via discharge to surface soil is wash water.

RPS

Section 2
Responsible Party

The operator and legally responsible party for the facility is Davis Gas Processing, Inc. Contact information for the Denton Plant is as follows:

Name of Discharger:	Davis Gas Processing, Inc. 211 N. Colorado Midland, TX 79701
Name of Local Contact:	David Pepper Denton Plant Rt. 1, Box 510 Lovington, NM 88260 (575) 396-6022 – Plant
Official Contact:	Bob Stewart Davis Gas Processing, Inc. 211 N. Colorado Midland, TX 79701 (432) 682-6311 bstewart@westtexasgas.com

RPS

Section 3
Location of Discharge and Facility

The Denton Plant is located approximately 11 miles east of Lovington, New Mexico in SE/4, Section 2, Township 15S, Range 37E, Lea County, New Mexico at longitude -103.17190 and latitude 33.04537. A topographic map and aerial photograph, which shows the site plan, of the facility are provided as Attachments A and B, respectively. The map and photograph show relevant features of the site and surrounding areas.

Section 4
Landowner

The property on which the Denton Plant resides is owned by Davis Gas Processing, Inc. The mailing address for Davis Gas Processing, Inc. is as follows:

Name of Landowner: Davis Gas Processing, Inc.
211 N. Colorado
Midland, TX 79701

RPS

Section 5
Facility Description

Key components of production process at the Denton Plant are compression, treating, dehydration, and natural gas liquids recovery. Attachment C provides a process flow diagram showing these key elements.

Four 1,000 HP compressors are available to boost the incoming low-pressure gas to about 850 psig. The gas is treated after the second stage of compression in a 60 GPM DEA (amine) unit to remove CO_2 and H_2S. After the DEA treatment, the gas is returned to the compressors for the third stage of compression.

Following the inlet separator and each stage of compression, condensate and water are removed from the gas stream and discharged to the condensate recovery system.

High pressure gas, after compression, is dehydrated in a molecular sieve unit and enters the processing equipment. The gas is cooled via heat exchange and supplemental refrigeration and then passes through the expander unit. The expander unit drops the gas pressure to 140 psig which cools the gas to below – 100 F and causes liquid hydrocarbons to drop out.

The residue gas is warmed in the heat exchange equipment and then compressed to 1,000 psig via the rough stage of the inlet gas compressors. The residue gas is sold, and liquid products are removed via pipeline.

An idle ammonia plant and an idle/inoperative refrigerated gas plant process unit are on the same site. These plant processes don no consume/contribute any process liquids and do not result in any wastewater discharges.

Section 6
Materials Stored or Used

The following are the primary materials, which are described by major category, stored or used at the facility:

- Process-specific chemicals – since the facility is a gas processing plant, hydrocarbon liquids may be present in the form of condensate and/or waters mixed with hydrocarbon. Process liquids are generally described as condensate, crude oil, and slop oil;
- Acids/caustics – no significant acids/caustics are used in the process;
- Detergents/soaps – minor quantities of detergents and soaps are used for personal hygiene. In addition, detergents/soaps are also used to periodically wash down process units;
- Solvents, inhibitors, and degreasers – only small quantities of solvents/degreasers are used as part of maintenance activities;
- Paraffin treatment/emulsion breakers – no paraffin treatment/emulsion breaking liquids are used at the facility;
- Biocides – no biocides are used at the site;
- Sewage – domestic sewage is generated at the site; and
- Others – A water/glycol mixture is used in the engine jacket water system.

Additional detail regarding management of these materials is provided in Section 7.0 (Sources and Quantities of Effluent).

RPS

Section 7
Sources, Quantities, and Qualities of Effluent

As detailed below, the only two sources of waste waters, which consist of wash waters associated with cleaning the amine unit and the process skid, are discharged to surface soils, and the majority of these waters are typically routed to a storage tank for off-site disposal. All other waste waters are routinely collected in storage tanks/containers and transported for off-site disposal. The following descriptions provide summaries of plant processes that are the sources of effluent at the facility.

Amine Unit

Except during cleaning, there are no process waters resulting from the amine unit. The amine contactor is followed by an amine regeneration unit with off gases being routed to a flare.

Separators/Scrubbers (Produced Water)

This is low TDS water with traces of soluble/entrained hydrocarbons. The total annual volume is about 270,000 gallons based on 6 MMCFD of inlet gas. This equates to roughly 750 gallons per day. The produced water rate will be higher in the warmer months and less in the cooler months. Water removed in the dehydration unit is commingled with the produced water in the first stage separator. The separator water flows to a 9,000 gallon tank (TK-5) for oil separation and the separated water then flows to a 1,000 barrel storage tank (TK-4) for subsequent truck transport to a disposal well.

Slug Catchers/Condensate

There are four stages of section lines, which are each equipped with "slug catchers" that facilitate removal of condensate. In addition, condensate is also produced by the separators/scrubbers. Condensate flows into one of two tanks (TK-2A and TK-2B) with each having a capacity of 210 barrels. Condensate is pumped into trucks for subsequent transport to an authorized off-site facility.

Crude/Slop Oil

Crude/slop oil that may result from the separators flows into a 9,000-gallon tank (TK-5) for oil separation and the separated water then flows to a 1,000 barrel storage tank (TK-4) for subsequent truck transport to a disposal well.

Boilers/Heat Recovery/Cogeneration

There are no active boilers at the facility, and there are no heat recovery or cogeneration systems.

Engine Cooling Water-Gylcol

There is no routine discharge from the engine jacket water system. Depending on the product used, the engine jacket water-glycol mixture may contain a corrosion inhibitor.

Cooling Towers/Fans

There are no active cooling towers at the facility. Cooling is currently provided via forced air fans. The sump of the original cooling tower is used to collect and hold runoff rain water so as to minimize flooding during rainstorms. The runoff water typically is allowed to evaporate. Runoff water would be expected to contain trace levels of hydrocarbons (hydrocarbons from equipment wash effect). Excess rainwater runoff is pumped to the unlined pit.

Sewage

All sanitary sewage is handled separately from the process/plant waste water and is discharged to an approved, on-site septic system.

Other-Wash Water

The amine treating unit is washed down with a water hose (usually once per month), and the runoff water flows to the soil surface. Detergent is typically not used in the washing, and it is estimated that about 300 gallons of wash water are used (30 min. x 10 gpm). Less than one gallon of amine solution (pump seal drips, samples, etc.), some wind-blown dirt, and trace quantities of oil are estimated to be washed off the amine equipment. This wash water is typically routed to a 1,000 barrel storage tank (TK-4) for subsequent truck transport to a disposal well but may also be discharged to surface soils.

The process skid is typically steam cleaned at six month intervals. A mixture of roughly 250 gallons water to 20 pounds of powder detergent (e.g., "Red Power") is used. There is no hose down after cleaning, but the detergent is cut off and a 30 minute steam only wash is used to finish the job. It is estimated that 125 gallons of water condense and this plus about 15 pounds of the detergent is discharged. The discharge is typically routed to a 1,000 barrel storage tank

(TK-4) for subsequent truck transport to a disposal well but may also be discharged to surface soils. Trace quantities of lube oil and hydrocarbons are anticipated to be entrained in the water.

Similar to the process skid, the compressors are typically steam cleaned once per six months. The cleaner charge is the same 250 gallons water plus about 20 lbs. of powder detergent. After steam cleaning, the compressors are hosed down over a 2 hour interval. At 10 gpm, about 1,200 gallons of wash water are used. Wash water is collected in a sump below the compressor building and transferred first to a concrete 28' x 6' x 8' (deep) skimmer pit for oil separations. The wash water will contain minute quantities of lube oil residue in addition to the detergent. After the sump, the water is pumped to a 210 barrel tank (TK-2A or TK-2B) to settle the oil and then is pumped to the 1,000 barrel tank (TK-4) for subsequent off-site disposal.

Effluent Quality

Attachment D provides analytical results obtained by the OCD. These results are indicative of water quality within the plant. As described above, most waste water discharges are routed to the 1,000 barrel water tank (TK-4) for subsequent removal by a commercial third party hauling company with aqueous waste ultimately being disposed of in a disposal well. The following is a summary of the results provided in Attachment D:

- The toxic pollutants per WQCC Section 3-103 address elements such as arsenic, mercury, selenium, chromium, etc., and these pollutants are found only in the process discharge water, which is collected in the 1,000 barrel storage tank (TK-4) and does not contact soil surface. Moreover, concentrations of these pollutants are reported as being well below the established toxicity limit for human health standards.

- Toxic pollutants per WQCC 1-101.UU are present in the process discharge. These are primarily benzene and benzene derivatives. There are no halomethanes reported in the process discharge water, but trace levels of halomethanes are reported in the produced well water. This stream is external to the plant; moreover, the source of the halomethanes is unknown as the plant has never used a halomethane refrigerant. The plant refrigerant system is based on propane.

- No insecticides, PCB;s or radioactive pollutants were reported.

- No detectable toxic pollutants were reported for the cooling tower basin water. The basin acts mainly as a sump for runoff rainwater. The only source of pollutants would be the rainwater "wash" of the process equipment. An oily sheen was noted for the cooling tower basin water, but again, no detectable level of pollutants were reported.

- The waste water flow rate varies mainly with respect to the inlet gas volume, temperature and pressure. Most of the process waste water is water of saturation although a small amount enters irregularly as an incoming "slug".

- The gas rate is slightly higher in winter months due to demand, but the water content is low. The slightly lower gas rates of the summer months contain the highest quantities of process waste water because of the warm gas temperature. Likewise, more water is condensed in the daylight hours than during the cooler night hours and is transported off-site for disposal. Due to the hold time in the system, there is no sudden change on a daily basis. The seasonal change is gradual. Thus, except for equipment or well problems, there is no sudden fluctuation in the discharge water rate.

RPS

Section 8
Liquid Waste Storage and Disposal Procedures

The following are the primary elements associated with liquid waste storage and disposal procedures at the Denton Plant.

- Five primary tanks (TK-2A, TK-2B, TK-3, TK-4, and TK-5) are used for storage of liquids prior to recovery or disposal – depending on the liquids.
- Aside from the wash waters associated with the amine unit and the process skid as well as storm water, no other waste water from the from the facility is routinely discharged to soil. Other waste waters are collected in the 1,000 barrel tank (TK-4) and transported off-site to a disposal well.
- There is one historical surface impoundment (pit) at the facility, which is reflected as the "water feature" directly east of the facility on the topographic map (Attachment A). The impoundment was an unlined waste water evaporation pit. This unit was shut down approximately November 1, 1988, and replaced by the 1,000 barrel tank (TK-4).
- There is no leach field other than an approved septic tank system for sewage.
- There are no injection wells on site.
- There are no drying beds or flare pits.
- There are no on-site disposal areas.

Produced water is the only continual source of discharge at the Denton Plant. The inlet scrubber normally collects only a minor quality of water from the gathering system and process dehydrator scrubber. The second and third stage compressor section scrubbers likewise collect only a small quantity of condensed water. Each of the preceding water sources enters the main dump line in sequence and flows to the 9,000 gallon separation tank (TK-5). The third stage discharge scrubber collects the largest quantity of water. This source has a separate line to the 9,000 gallon tank. Lines are all above grade.

The compressor room wash water, and any process fluid or jacket water spilled when equipment is opened, drains to the sump below the engine room.

The wash water from the other process units (amine and skid) drains to the soil surface.

The waste engine and compressor oils are collected in drums. This is done on the floor over the engine room pit, hence any drips would go to the skimmer pit and tanks. No waste oil would go to the soil surface.

Engine jacket water leaks would likewise to the engine room pit and not contact the soil surface.

Minor amine leaks and drips resulting from filter change-outs may eventually wash to the soil surface if not wiped up following the change out.

Due to the combination of containment of the process water and very low quantity of other liquids entering the soil surface, no preventative measures are scheduled other than good housekeeping.

There are numerous sample points available in the system via conventional valves. There is no direct measurement. A reasonably accurate measurement can be calculated via timing the rise of liquid level in the various scrubbers. When the vessels are blocked in, an overall estimation can be obtained from the temperature/pressure of the inlet gas and various scrubbers; only the inlet entrained water is immeasurable via this method.

No monitoring systems exist. Again, the discharge volume is contained and any fluid discharge to the soil surface will be minimized.

Section 9
Proposed Modifications

No modifications are proposed as part of this discharge plan.

Section 10
Inspection, Maintenance, and Reporting

Inspection, maintenance, and reporting are key components of facility operations to minimize the potential for equipment malfunction and/or operator error that could result in spills, leaks, and other releases. To this end, equipment is regularly inspected to ensure that it is safe and effective in its operation. Visual observations of the tanks and associated piping that manage liquids at the facility are made on a routine basis. If material defects and/or leaks are observed, they are reported and repaired as soon as practical.

Regular maintenance of equipment is performed to maximize its functionality and minimize the opportunity for releases. Mechanical equipment (e.g., motors, pumps, etc.) is serviced (e.g., lubricated, replace belts, etc.) regularly to ensure good operation. Filters are replaced as necessary to prevent significant back-pressure in process lines.

Any problems noted via inspection and/or maintenance are reported to operations management and repairs/resolution is implemented to address the issue.

RPS

Section 11
Spill/Leak Prevention and Reporting

The Denton Plant does not have a written contingency plan; however, as described below, the facility has procedures in place to prevent spills. However, if a spill or leak results, it will be managed in accordance with the requirements of OCD Rule 116 and WQCC Section 1203. Specifically, the OCD Director and Field Office will be notified by telephone within 24 hours of a significant spill or release. Steps to mitigate impacts to surface and/or ground water will be taken upon initial discovery of the spill/leak followed by source removal activities to minimize impacts.

The Denton Plant has prevention procedures (inspection, maintenance, and reporting) in place to minimize the potential for spills/leaks at the facility. Accordingly, spills and leaks are not likely, but the potential for them to occur does exist. In addition to prevention procedures, other site features exist to minimize impacts of a spill at the facility, and response procedures are used to quickly and effectively manage spills/leaks.

The following specific measures are in place to address containment and cleanup of a major spill at the Denton Plant:

- There is a historical pit at the facility that was used for evaporation. The pit is situated immediately east of the operating area and is visible on the topographic map included as Attachment A. In the event of a release, the pit could serve as a hydraulic control measure.

- The primary source of hydrocarbons at the facility is the condensate that is stored in two tanks (TK-2A and TK-2B), which are each 210 barrels in capacity. The two tanks are co-located with a common secondary containment berm having an approximate total capacity of 519 barrels. Factoring in displacement from a 4-inch rainfall yields a containment capacity of roughly 175% of the largest tank.

- If the 1,000 barrel water tank (TK-4) ruptured when full and all contents were lost, the net result would be a "one-time" discharge of relatively innocuous aqueous fluid. Should any of the process vessels rupture, the net effect would be minimal, if any, with respect to the water table. If the 1,000 barrel disposal tank (TK-4) ruptures, no remedial action would be taken. This tank basically contains produced water and a single discharge would not likely be serious. The pit could be used until the leak was repaired or the tank replaced. It is estimated that repair or replacement would require no more than 5 to 10 days.

- The light hydrocarbon product storage tank (TK-3) may contain up to 30,000 gallons of high pressure product, but more normally contains 15,000 to 20,000 gallons. If this tank ruptured, the vast majority of the liquids would vaporize. A fire hazard is the prime concern should this tank rupture. Should this vessel in fact rupture and spill the contents to the soil surface, any badly saturated zone would be dug out and stored for the interim on a plastic tarp. The ultimate disposal would be decided after review of the situation.

- If either of the 210 barrel condensate/water tanks (TK-2A and TK-2B) rupture, any hydrocarbon saturated zone would be dug out, aerated and disposed of in similar fashion described above.

- If the 1,000 barrel condensate tank (TK-5) develops a leak and the leak is contained prior to drainage of the hydrocarbon layer, it is assumed that no remedial action is necessary. If the leak caused the entire tank to drain, thus releasing hydrocarbon condensate, the hydrocarbon saturated soil would be handled as described above.

- Rainwater runoff collected in the cooling tower basin is partially evaporated, then pumped to the unlined pit. This same practice is anticipated for future operations.

- All underground piping is no more than 6 to 12 inches below grade. It is buried mainly to facilitate vehicle and personnel traffic, and is in regularly traveled areas. Any leak would be immediately noticed as a seep. If a leak is detected, the leaking portion of the line will be dug out and replaced.

RPS

Section 12
Site Characteristics

The following summarize the prominent geologic, hydrogeologic, and hydrologic features at and near the facility:

- There are no natural water courses or active bodies of water within one mile of the outside plant perimeter. However, there is a historical evaporation pond (pit) located east of the facility that can be used for hydraulic control/containment.
- Per the USGS topographic map, there are no wells within a one mile radius of the outside plant perimeter. However, there are two wells within the plant boundaries.
- A USGS topographical map of the area is provided as Attachment A. It reflects surrounding areas within one mile of the facility.
- As described above, there are no wells reflected on the USGS map within one mile of the facility. However, the following is geographical location, ownership, and end use of wells in the vicintiy:
    - Well situated at 14S37E35.324213, is owned by Dickenson Minor Estate, and is used for a stock tank; and
    - Well situated at 14S37E36.314, is owned by Bht. Pope, and is used for a stock tank.
- The depth to the ground water table is approximately 40 feet to the top sand and 105 feet to the main sand. The water table is the "To" aquifer of the Ogallala. This information is a composite of the plant well report L-610-AS plus the USGS Hydrologic Investigation Atlases HA-330 and HA-62.
- The TDS in groundwater ranges 610 to 1600 mgl.
- Attachment E contains well water analyses from OCD.
- The groundwater flow is to the east southeast. The groundwater flow direction is at a right angle to the base groundwater gradient. This gradient was obtained from the contours on the USGS hydrologic Investigation Atlases HA-330 and HA-62.
- The soil structure in the area of the plant site consists of about one to two feet of topsoil (sandy loam) followed by a layer of caliche that is 15 to 20 feet thick. Below the caliche is a water-bearing a zone of unconsolidated sedimentary sand cemented somewhat by lime or caliche. An irregular layer of limestone (not impervious) caps the main Ogallala formation which consist primarily of course sand and gravel. At the bottom of the Ogallala is the impervious "red bed" structure.
- The aquifer is the "To" aquifer of the Ogallala formations.

- The aquifer represents sections of the Pliocene, Tertiary, and Cenozoic Ages. It consists of irregularly-bedded sand, grit and local gravel conglomerate cemented by lime or caliche and local beds of sand, clay and limestone. It may include some re-deposited material from the underlying Cretaceous and Triassic ages.

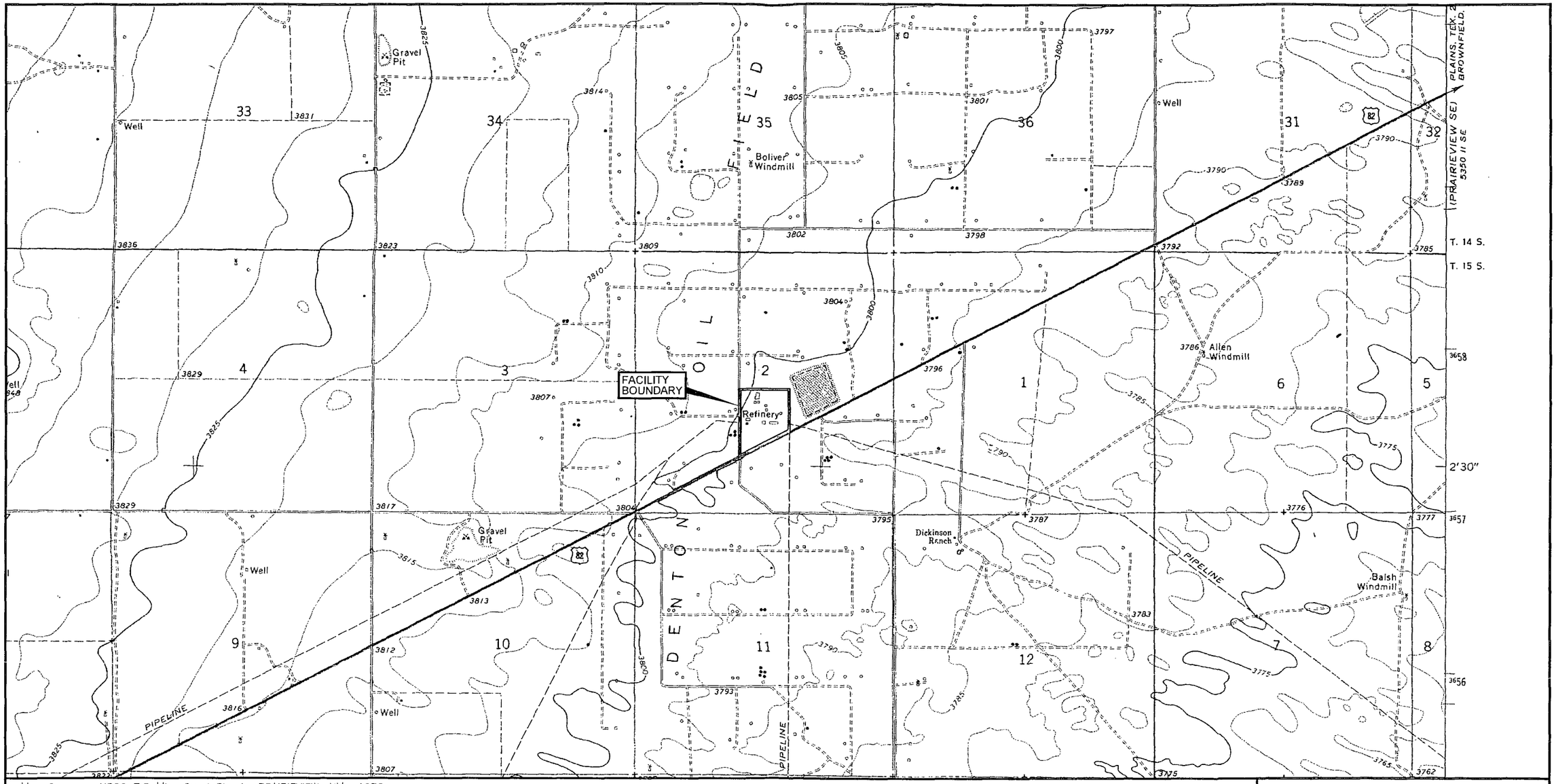
- The depth to rock at the base of the alluvium is approximately 200 feet for the overall area. This was determined as the difference between the approximately 3,800 feet elevation of the soil surface (USGS Topographical Map) and the 3,600 feet elevation for the base of the Ogallala (USGS Atlas HA-330).

- A major rainfall can cause localized flooding which could involve highway 82. The old cooling tower basin at the site will intercept much of the rainwater and prevent flooding of Highway 82 in all but the worse storms.

RPS

Section 13
Other Information

Per OCD rules (i.e., Part 11, Hydrogen Sulfide Gas) and request by OCD, a copy of the facility H_2S contingency plan is provided as Attachment F.



Map Source: USGS 7.5 Min. Quad Sheet PRAIRIEVIEW, NM., 1970.

0 2000
SCALE IN FEET

LEGEND

FACILITY BOUNDARY

NEW MEXICO

QUADRANGLE LOCATION

WEST TEXAS GAS
DENTON, NEW MEXICO

PROJ. NO.: West Tx Gas	DATE: 06/08/09	FILE: WTxGas--B01

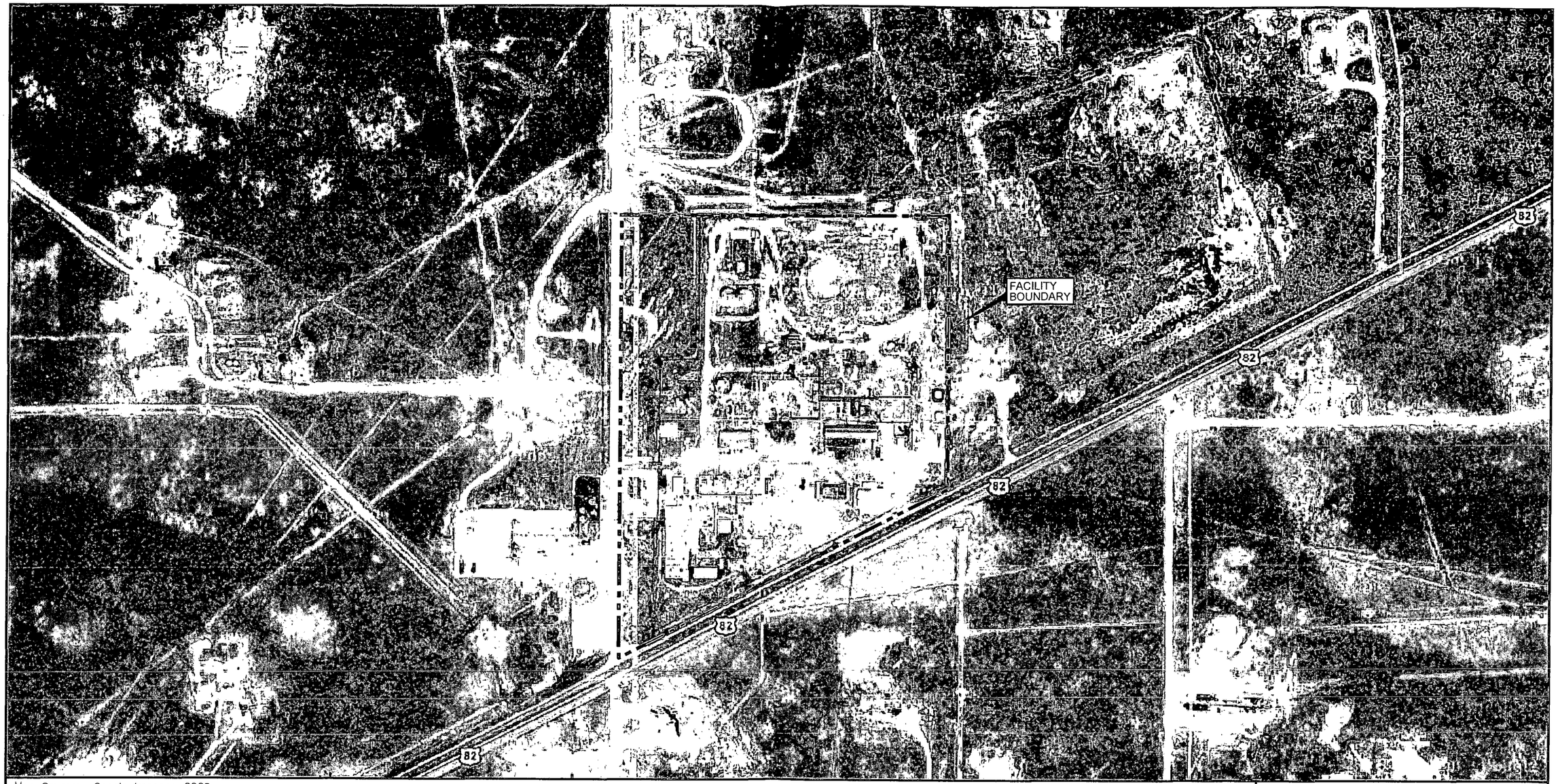
FIGURE 1
SITE LOCATION MAP
DENTON, NEW MEXICO PROJECT

404 Camp Craft Road
Austin, Texas 78746
RPS JDC

RPS

Attachment B

Aerial Drawing



Map Source: Google Imagery, 2009.

0 300
SCALE IN FEET

LEGEND

FACILITY BOUNDARY

WEST TEXAS GAS
DENTON, NEW MEXICO

PROJ. NO.: West Tx Gas | DATE: 06/08/09 | FILE: WTxGas-B01

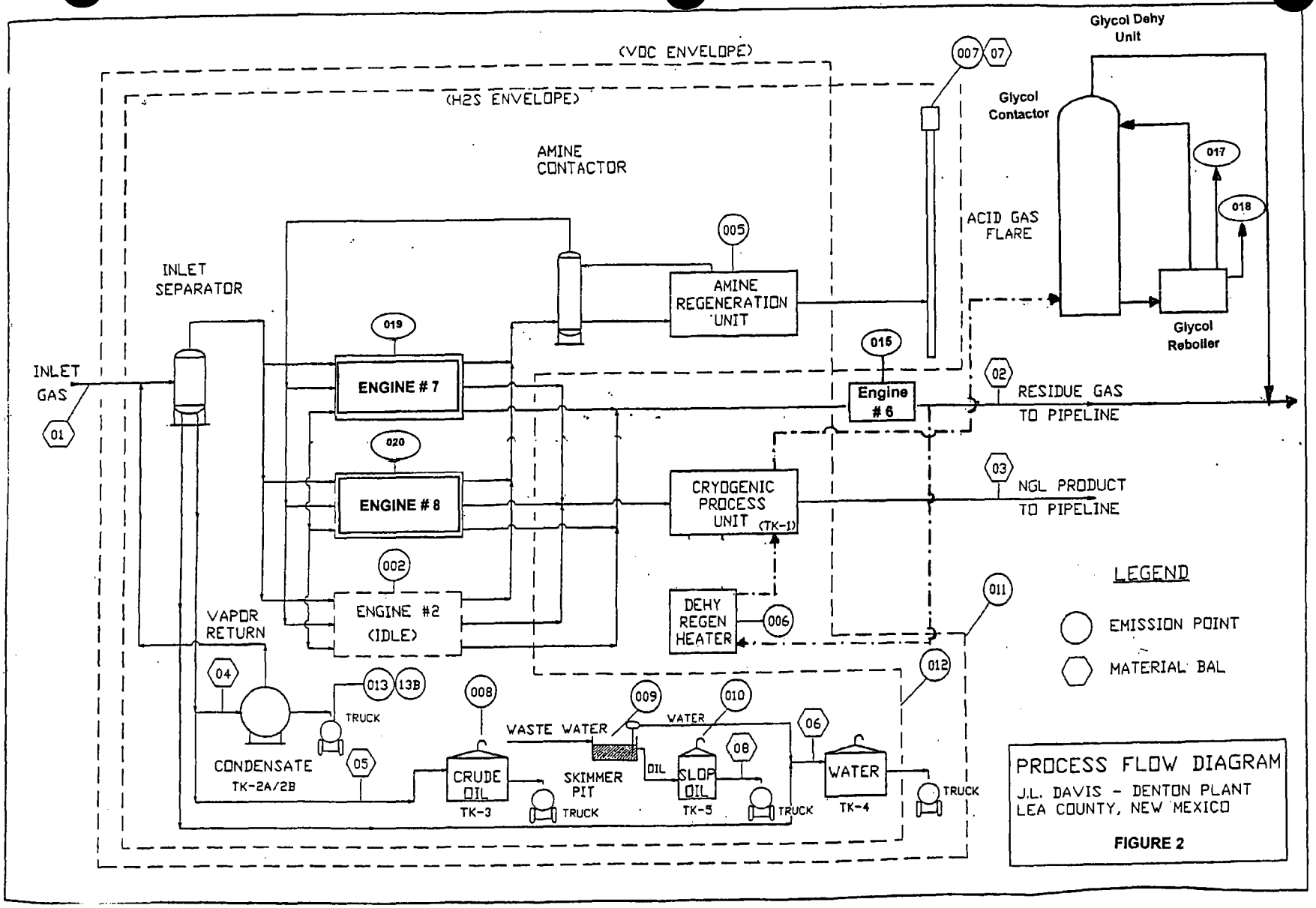
FIGURE 2
AERIAL PHOTOGRAPH
DENTON, NEW MEXICO PROJECT

RPS JDC
404 Camp Craft Road
Austin, Texas 78746

RPS

Attachment C

Process Flow Diagram


(VOC ENVELOPE)
(H2S ENVELOPE)
AMINE CONTACTOR
INLET SEPARATOR
INLET GAS
01
ENGINE # 7
019
ENGINE # 8
020
ENGINE #2 (IDLE)
002
005
AMINE REGENERATION UNIT
CRYOGENIC PROCESS UNIT (TK-1)
DEHY REGEN HEATER
006
Engine # 6
015
007 07
ACID GAS FLARE
Glycol Dehy Unit
Glycol Contactor
017
018
Glycol Reboiler
02
RESIDUE GAS TO PIPELINE
03
NGL PRODUCT TO PIPELINE
011
012
VAPOR RETURN
04
013 13B
TRUCK
CONDENSATE
TK-2A/2B
05
008
CRUDE OIL
TK-3
WASTE WATER
009
SKIMMER PIT
TRUCK
010
WATER
OIL
SLOP OIL
TK-5
08
TRUCK
06
WATER
TK-4
TRUCK
LEGEND
EMISSION POINT
MATERIAL BAL
PROCESS FLOW DIAGRAM
J.L. DAVIS - DENTON PLANT
LEA COUNTY, NEW MEXICO
FIGURE 2

RPS

Attachment D

Effluent Quality

754 WPM

SCIENTIFIC LABORATORY DIVISION
ORGANIC ANALYSIS REQUEST FORM
Organic Section - Phone: 841-2570

OR89-0908-C

REPORT TO: DAVID BOYER
N.M. OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87504-2088

S.L.D. No. OR-
DATE REC. 6-27-89
PRIORITY 3
PHONE(S): 827-5812

COLLECTION CITY: Lovington ; COUNTY: Lea

COLLECTION DATE/TIME CODE: (Year-Month-Day-Hour-Minute) 8 9 0 6 2 1 1 6 0 3

LOCATION CODE: (Township-Range-Section-Tracts) 1 5 S+3 7 E+0 2+4 1-1 (10N06E24342)

USER CODE: 8 2 2 3 5 SUBMITTER: David Boyer CODE: 2 6 0

SAMPLE TYPE: WATER ☒, SOIL ☐, FOOD ☐, OTHER:

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-AA: Sample Preserved with Ascorbic Acid to remove chlorine residual.
- ☒ P-HCl: Sample Preserved with Hydrochloric Acid (2 drops/40 ml)

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

- ☐ (753) Aliphatic Headspace (1-5 Carbons)
- ☒ (754) Aromatic & Halogenated Purgeables
- ☐ (765) Mass Spectrometer Purgeables
- ☐ (766) Trihalomethanes
- ☐ (774) SDWA VOC's I (8 Regulated +)
- ☐ (775) SDWA VOC's II (EDB & DBCP)

Other Specific Compounds or Classes

- ☐ _____
- ☐ _____

EXTRACTABLE SCREENS

- ☐ (751) Aliphatic Hydrocarbons
- ☐ (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: _____

FIELD DATA:

pH= 7 ; Conductivity= 1750 umho/cm at 41 °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.)
Dorris Gas Processing - Cooling Jacket Water

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

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 ☐ OR Seals Intact: Yes ☐ No ☐

Signatures _____ _____

For OCD use: Date owner notified: 8/3/89 Phone or (Letter?) Initials CC

ANALYSES PERFORMED

LAB. No.: OR-

THIS PAGE FOR LABORATORY RESULTS ONLY

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

PURGEABLE SCREENS

- ☐ (753) Aliphatic Headspace (1-5 Carbons)
- ☐ (754) Aromatic & Halogenated Purgeables
- ☐ (765) Mass Spectrometer Purgeables
- ☐ (766) Trihalomethanes
- ☐ (774) SDWA VOC's I (8 Regulated +)
- ☐ (775) SDWA VOC's II (EDB & DBCP)

Other Specific Compounds or Classes

- ☐ _____
- ☐ _____

EXTRACTABLE SCREENS

- ☐ (751) Aliphatic Hydrocarbons
- ☐ (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]
* DETECTION LIMIT * ✱		+ DETECTION LIMIT + †	

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) Not Sealed ☐ Intact: Yes ☐ No ☐. Seal(s) broken by: _____ 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: _____. Analyst's signature: _____

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block.

Reviewers signature: _____

STATE OF NEW MEXICO HEALTH AND ENVIRONMENT DEPARTMENT
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud, NE
Albuquerque, NM 87106 [505]-841-2500
ORGANIC CHEMISTRY SECTION [505]-841-2570

July 25, 1989

ANALYTICAL REPORT
SLD Accession No. OR-89-0908

Distribution
(■) Submitter
(※) SLD Files

To: NM Oil Consv. Div.
State Land Office Bldg.
P. O. Box 2088
Santa Fe, NM 87504-2088

From: Organic Chemistry Section
Scientific Laboratory Div.
700 Camino de Salud, NE
Albuquerque, NM 87106

Re: **A purgeable water sample submitted to this laboratory on June 27, 1989**

User:
OIL CONSERVATION DIV
State Land Office Bldg.
P. O. Box 2088
Santa Fe, NM 87504-2088

DEMOGRAPHIC DATA

COLLECTION *LOCATION*

On: 21-Jun-89 *By:* Boy . . .
At: 16:03 hrs. *In/Near:* Lovington

ANALYTICAL RESULTS: Aromatic & Halogenated Purgeable Screen

Parameter	Value	Note	MDL	Units
Halogenated Purgeables (33)	0.00	N	5.00	ppb
Benzene	80.00		10.00	ppb

Notations & Comments:

MDL = Minimal Detectable Level.

A = Approximate Value; N = None Detected above Detection Limit; P = Compound Present, but not quantified; T = Trace (<Detection Limit); U = Compound Identity Not Confirmed.

Evidentiary Seals: Not Sealed [X]; Intact: No [ ], Yes [ ] & Broken By: _____ Date: _____

Laboratory Remarks: Davis Gas- Cooling Jacket Wtr

Analyst: _____ 7-12-89
Michael J. Owen — Analysis Date
Analyst, Organic Chemistry

Reviewed By: _____
Richard F. Meyerhein 07/25/89
Supervisor, Organic Chemistry Section

RECEIVED
JUL 31 1989
OIL CONSERVATION DIV.
SANTA FE

Lab No. ACCU-LABS 77-521.07-123

ORGANIC ANALYSIS REQUEST FORM

REPORT TO: DAVID BOYER
N.M. OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87504-2088

Sample No. 8903291630
DATE REC. _____
PRIORITY _____
PHONE(S): 827-5812

COLLECTION CITY: Lovington ; COUNTY: Lea

COLLECTION DATE/TIME CODE: (Year-Month-Day-Hour-Minute) 8 9 1 0 1 3 1 2 9 1 1 6 1 3 1 0

LOCATION CODE: (Township-Range-Section-Tracts) _ _ _ + _ _ + _ + _ _ (10N06E24342)

SUBMITTER: David Boyer

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

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

Samples were preserved as follows:

- [ ] NP: No Preservation; Sample stored at room temperature.
- [X] P-Ice . Sample stored in an ice bath (Not Frozen).
- [ ] P-AA Sample Preserved with Ascorbic Acid to remove chlorine residual.
- [X] P-HCl Sample Preserved with Hydrochloric Acid (2 drops/40 ml)

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

- [ ] (753) Aliphatic Headspace (1-5 Carbons)
- [X] (754) Aromatic & Halogenated Purgeables
- [ ] (765) Mass Spectrometer Purgeables
- [ ] (766) Trihalomethanes
- [ ] (774) SDWA VOC's I (8 Regulated +)
- [ ] (775) SDWA VOC's II (EDB & DBCP)

Other Specific Compounds or Classes

- [ ] _____
- [ ] _____

EXTRACTABLE SCREENS

- [ ] (751) Aliphatic Hydrocarbons
- [ ] (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: _____

FIELD DATA:

pH= 7 ; Conductivity= 1400 umho/cm at 33 °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.)

Sample from cooling jacket surge tank Effluent Davis Gas Processing

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

CHAIN OF CUSTODY

I certify that this sample was transferred from DB to Dan

at (location) ACR on 4/5/89 - 12:25 and that

the statements in this block are correct. Evidentiary Seals: Not Sealed [ ] OR Seals Intact: Yes [X] No [ ]

Signatures: David R Boyer

For OCD use: Date owner notified: 6/9/89 Phone or (Letter?) Initials DRB

Contract Lab ACCU LABS
Contract No. 77-521.07-123

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED	LAB NO.
Collection DATE 89 10 31 29	SITE INFORMATION ►
Collection TIME 1630	
Collected by — Person/Agency Boyer/Anderson/OCD	

Sample No. 8903291630

Sample location: Davis Gas Processing

Collection site description: Surge tank at Cooling Jackets for engine effluent line to ground

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

Station/well code

Owner

SAMPLING CONDITIONS

☐ Bailed ☐ Dipped ☐ Pump ☒ Tap	Water level	Discharge	Sample type Grab
pH (00400) 7 (Strip)	Conductivity (Uncorrected) 1480 µmho	Water Temp. (00010) 33 °C	Conductivity at 25°C (00094) µmho

Field comments

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted

☒ NF: Whole sample (Non-filtered) ☐ F: Filtered in field with 0.45 µmembrane filter ☐ A: 2 ml H_2SO_4/L added

☐ NA: No acid added ☐ Other-specify: ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA	Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	µmho	
☐ Total non-filterable residue (suspended) (00530)	mg/l	
☒ Other: Lab pH		
☐ Other:		
☐ Other:		

A-H_2SO_4		
☐ Nitrate-N + Nitrate-N total (00630)	mg/l	
☐ Ammonia-N total (00610)	mg/l	
☐ Total Kjeldahl-N ( )	mg/l	
☐ Chemical oxygen demand (00340)	mg/l	
☐ Total organic carbon ( )	mg/l	
☐ Other:		
☐ Other:		

From NF, NA Sample:

		Date Analyzed
☒ Calcium	mg/l	
☒ Potassium	mg/l	
☒ Magnesium	mg/l	
☒ Sodium	mg/l	
☒ Bicarbonate	mg/l	
☒ Chloride	mg/l	
☒ Sulfate	mg/l	
☒ Total Solids	mg/l	
☒ CO_3		
☒ BD		
☒ Cation/Anion Balance		

Analyst	Date Reported	Reviewed by

Laboratory remarks

FOR OCD USE -- Date Owner Notified _____ Phone or Letter? _____ Initals _____

Contract Lab ACCU-LABS

Contract No. 77-391.07-123

HEAVY METAL ANALYSIS FORM

Date Received		Lab No.		Sample No. 8903291630

COLLECTION DATE & TIME: yy 89 mm 03 dd 29 hh 16 mm 30

COLLECTED BY: Boyer/Anderson OCD

TO:

COLLECTION SITE DESCRIPTION: Davis Gas Processing Cooling Jacket Surge tank Effluent

OWNER:

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg., PO Box 2088
SANTA FE, NM 87504-2088

ATTN: D. Boyer
TELEPHONE: 827-5812

SITE LOCATION:
County: Lea

Township, Range, Section, Tract: (10N06E24342)

STATION/ WELL CODE:

LATITUDE, LONGITUDE:

SAMPLING CONDITIONS:

☐ Bailed ☐ Pump ☒ Tap ☐ Dipped

Water Level:

Discharge:

Sample Type: Grab

pH(00400)	Conductivity(Uncorr.)	Water Temp.(00010)	Conductivity at 25°C (00094)
7	1400 µmho	33 °C	µmho

FIELD COMMENTS:

SAMPLE FIELD TREATMENT
Check proper boxes:

☒ WPN: Water Preserved w/HNO_3 Non-Filtered

☐ WPF: Water Preserved w/HNO_3 Filtered

LAB ANALYSIS REQUESTED:

☐ ICAP Scan
Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	☒	☐	Silicon	☐	☐
Barium	☒	☐	Silver	☒	☐
Beryllium	☐	☐	Strontium	☒	☐
Boron	☒	☐	Tin	☐	☐
Cadmium	☒	☐	Vanadium	☐	☐
Calcium	☐	☐	Zinc	☒	☐
Chromium	☐	☒	Arsenic		☒
Cobalt	☒	☐	Selenium		☒
Copper	☒	☐	Mercury		☒
Iron	☒	☐		☐	☐
Lead	☐	☒		☐	☐
Magnesium	☐	☐		☐	☐
Manganese	☒	☐		☐	☐
Molybdenum	☒	☐		☐	☐
Nickel	☒	☐		☐	☐

LAB COMMENTS:

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

ICAP Analyst Reviewer

Date Analyzed Date Reveived

Accu-Labs Research, Inc.

RECEIVED
MAY 17 1989
OIL CONSERVATION DIV.
SANTA FE

Mr. David Boyer
NM Oil Conservation Division

RE: 9649-29859-20
Date Samples Rec'd: 4-5-89
P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation Sponsor Designation	9649-29859-20-4 8903291055 3-29-89	9649-29859-20-5 8903301230 3-30-89	9649-29859-20-6 8903291630 3-29-89
Determination: µg/L			
Toluene	100	1300	<5
Chlorobenzene	<5	<50	<5
Ethyl benzene	64	170	<5
Total Dichlorobenzenes	<5	<50	<5
Total Xylenes	130	370	<5
Determination: mg/L			
Aluminum, total	<1*	<1*	<0.1
Barium, total	1.4	0.4	0.10
Boron, total	60	49	0.2
Cadmium, total	<0.05*	<0.05*	<0.005
Calcium, total	4300	4400	110
Chromium, total	<0.05*	<0.05*	<0.005
Cobalt, total	<0.05*	<0.05*	<0.005
Copper, total	<0.05*	<0.05*	0.032
Iron, total	2.2	0.9	1.4
Magnesium, total	6200	700	22
Manganese, total	4.5	0.22	0.21
Mercury, total	<0.001*	<0.001*	<0.001*
Molybdenum, total	<0.05*	<0.05	<0.005
Nickel, total	<0.1*	<0.1*	<0.01
Potassium, total	320	250	5.4
Silver, total	<0.005	0.018	<0.005
Sodium, total	72,000	43,000	120
Strontium, total	100	460	1.0
Zinc, total	<0.05*	<0.05*	<0.005
Total Alkalinity, (as $CaCO_3$ to pH 4.5)	580	300	170

Accu-Labs Research, Inc.

Mr. David Boyer
NM Oil Conservation Division

RE: 9649-29859-20
Date Samples Rec'd: 4-5-89
P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation	9649-29859-20-4	9649-29859-20-5	9649-29859-20-6
Sponsor Designation	8903291055	8903301230	8903291630
	3-29-89	3-30-89	3-29-89
Determination: mg/L			
Carbonate (as CO_3)	<5	<5	<5
Bicarbonate (as HCO_3)	700	360	200
pH	7.2	6.9	7.6
Specific Conductance, µmhos/cm	390,000	230,000	1400
Arsenic, total	0.51	<0.005	<0.005
Lead, total	0.008	0.050	<0.005
Selenium, total	<0.25*	<0.10*	<0.005
Total Solids	210,000	120,000	750
Bromide	270	<80*	<5*
Chloride	130,000	70,000	250
Sulfate (as SO_4)	4100	1400	110
Ion Balance	102	107	100

Accu-Labs Research, Inc.

Mr. David Boyer
NM Oil Conservation Division

RE: 9649-29859-20
Date Samples Rec'd: 4-5-89
P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation Sponsor Designation	9649-29859-20-4 8903291055 3-29-89	9649-29859-20-5 8903301230 3-30-89	9649-29859-20-6 8903291630 3-29-89
GC/MS VOLATILE ORGANICS, µg/L:			
Chloromethane	<10	<100	<10
Bromomethane	<10	<100	<10
Vinyl chloride	<10	<100	<10
Chloroethane	<10	<100	<10
Methylene chloride	<5	<50	<5
1,1-Dichloroethene	<5	<50	<5
1,1-Dichloroethane	<5	<50	<5
Total 1,2-Dichloroethene	<5	<50	<5
Chloroform	<5	<50	<5
1,2-Dichloroethane	<5	<50	<5
1,1,1-Trichloroethane	<5	<50	<5
Carbon tetrachloride	<5	<50	<5
Bromodichloromethane	<5	<50	<5
1,2-Dichloropropane	<5	<50	<5
c-1,3-Dichloropropene	<5	<50	<5
Trichloroethene	<5	<50	<5
Benzene	75	2200	<5
Dibromochloromethane	<5	<50	<5
1,1,2-Trichloroethane	<5	<50	<5
t-1,3-Dichloropropene	<5	<50	<5
2-Chloroethylvinyl ether	<5	<50	<5
Bromoform	<5	<50	<5
1,1,2,2-Tetrachloroethane	<5	<50	<5
Tetrachloroethene	<5	<50	<5

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 4/1[illegible] LAB NO. WC-1367 USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE 88/04/14
Collection TIME 11:15
Collected by — Person/Agency Boyer/Seay /OCD

SITE INFORMATION ►
Sample location: Davis Gas Processing-Loving[illegible]
Collection site description: Discharge pipe from East pit to Field

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

Station/well code
Owner

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level —	Discharge —	Sample type Grab
pH (00400) —	Conductivity (Uncorrected) 860 µmho	Water Temp. (00010) 19 °C	Conductivity at 25°C (00094) µmho

Field comments: oil on pit surface

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1
☒ NF: Whole sample (Non-filtered) ☐ F: Filtered in field with 0.45 µmembrane filter ☐ A: 2 ml H_2SO_4/L added
☒ NA: No acid added ☐ Other-*specify*: ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA		Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	1020	µmho	5/23
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: lab pH	7.41		5/24
☐ Other:			
☐ Other:			

A-H_2SO_4		Units	Date analyzed
☐ Nitrate-N + Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

From NF, NA Sample:

			Date Analyzed
☒ Calcium	90	mg/l	5/16
☒ Potassium	4	mg/l	5/10
☒ Magnesium	19.5	mg/l	5/16
☒ Sodium	91	mg/l	5/10
☒ Bicarbonate	174	mg/l	5/24
☒ Chloride	209	mg/l	5/18
☒ Sulfate	71.2	mg/l	5/18
☒ Total Solids	722	mg/l	5/20
☐			
☐			
☒ Cation/Anion Balance			

Analyst | Date Reported 5/29/88 | Reviewed by [illegible]

Laboratory remarks: 207

FOR OCD USE -- Date Owner Notified__________ Phone or Letter?________ Initals________

CATIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
CA	4.49	90.00	<3.0
MG	1.60	19.50	<0.3
NA	3.96	91.00	<10.0
K	0.10	4.00	<0.3
NH4	0.00	0.00	
FE	0.00	0.00	
SUM	10.15	204.50	

ANIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
HCO3	2.85	174.00	<1.0
SO4	1.48	71.20	<10.0
CL	5.90	209.00	<5.0
NO3	0.00	0.00	< 0.
CO3	0.00	0.00	< 1.
NH3	0.00	0.00	< 0.
PO4	0.00	0.00	< 0
	10.23	454.20	

Total Dissolved Solids= 722
Ion Balance = 99.24%

WC No. = 8801269
Date out/By 5/27

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud
Albuquerque, NM 87106

HEAVY METAL ANALYSIS FORM

Telephone: (505)841-2553

Date Received	4/4/8?	Lab No.	ICP 1?1	User Code	☒ 82235 ☐ Other:

COLLECTION DATE & TIME: yy | mm | dd | hh | mm

COLLECTION SITE DESCRIPTION: Davis Gas Processing Discharge pipe ? East Pit to Field

COLLECTED BY:

TO:

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg., PO Box 2088
SANTA FE, NM 87504-2088
ATTN: David Boyer
TELEPHONE: 827-5812

OWNER:

SITE LOCATION:
County:
Township, Range, Section, Tract: (10N06E24342) 15S+37E+02+4/1/1

STATION/ WELL CODE:

LATITUDE, LONGITUDE:

SAMPLING CONDITIONS:

☐ Bailed ☐ Pump ☒ Dipped ☐ Tap	Water Level: -	Discharge: -	Sample Type: Grab

pH(00400)	Conductivity(Uncorr.)	Water Temp.(00010)	Conductivity at 25°C (00094)
—	860 µmho	19 °C	µmho

FIELD COMMENTS: oil on pit surface

SAMPLE FIELD TREATMENT Check proper boxes:		LAB ANALYSIS REQUESTED:
☒ WPN: Water Preserved w/HNO_3 Non-Filtered	☐ WPF: Water Preserved w/HNO_3 Filtered	☒ ICAP Scan Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	<0.1		Silicon	14.	
Barium	<0.1		Silver	<0.1	☐
Beryllium	<0.1		Strontium	0.7	
Boron	0.2		Tin	<0.1	
Cadmium	<0.1	☐	Vanadium	<0.1	
Calcium	78.		Zinc	<0.1	
Chromium	<0.1	☒ 0.015	Arsenic		☒ <0.005
Cobalt	<0.05		Selenium		☒ <0.005
Copper	<0.1		Mercury		☒ <0.0005
Iron	0.2				☐
Lead	<0.1	☒ <0.01			☐
Magnesium	16.				☐
Manganese	0.14				☐
Molybdenum	<0.1				☐
Nickel	<0.1				☐

LAB COMMENTS: DIGEST 5/1/88

For OCD Use:			
Date Owner Notified:		ICAP Analyst: JB	Reviewer: [signature]
Phone or Letter?		Date Analyzed: 5/3/88	Date Received: 6/14/88
Initials:			

754 Wpn

88-0488-B

SCIENTIFIC LABORATORY DIVISION

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

HEALTH ENVIRONMENT STATE OF NEW MEXICO

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

S.L.D. No. OR- 488 A
DATE REC. 4-19-88
PRIORITY 3

PHONE(S): 327-5812   USER CODE: 8 2 2 3 5

SUBMITTER: David Boyer   CODE: 2 6 0

SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 8804141115DKB

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

COUNTY: Lea ; CITY: Lovington   CODE: ______

LOCATION CODE: (Township-Range-Section-Tracts) 15S+37E+02+411 (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

- [ ] (753) Aliphatic Purgeables (1-3 Carbons)
- [X] (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

Remarks: ______

FIELD DATA:

pH= ____; Conductivity= 860 umho/cm at 19 °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.)

Davis Gas Processing - Discharge ~~to~~ pipe from east pit to field, oil on pit surface

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

This form accompanies 2 Septum Vials, (1 broken) ____ Glass Jugs, and/or ____

Samples were preserved as follows:

- [ ] NP: No Preservation; Sample stored at room temperature.
- [X] P-Ice Sample stored in an ice bath (Not Frozen).
- [ ] P-$Na_2S_2O_3$ Sample Preserved with Sodium Thiosulfate to remove chlorine residual.

RECEIVED JUN 6 1988 OIL CONSERVATION DIVISION SANTA FE

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 7/6/88 (Phone or Letter?) ______ Initials ______

ANALYSES PERFORMED

LAB. No.: OR- 488

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]
halogenated purgeables	N.D.		
aromatic purgeables			
benzene	492		
Toluene	12.5		
p+m-xylene	20		
o-xylene	15		
ethylbenzene	T.R.		
* DETECTION LIMIT *	12.5 ug/L	+ DETECTION LIMIT +	

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: 4/20/88. Analyst's signature: Mary C. Allen

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 Meyerhein

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: 4/29/88 LAB NO.: WC-1267 USER CODE: ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE: 88/04/14
Collection TIME: 1050
Collected by — Person/Agency: Roger Gray /OCD

SITE INFORMATION ▶
Sample location: Davis Gas Processing Lovington
Collection site description: Hose discharge from plant oil/water separator to field

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

Station/well code:
Owner:

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level —	Discharge —	Sample type Grab
pH (00400) —	Conductivity (Uncorrected) 2675 µmho	Water Temp. (00010) 27 °C	Conductivity at 25°C (00094) µmho

Field comments: oily sheen, dark color

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1 ☒ NF: Whole sample (Non-filtered) ☐ F: Filtered in field with 0.45 µmembrane filter ☐ A: 2 ml H_2SO_4/L added

☒ NA: No acid added ☐ Other-specify: ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA

	Result	Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	2641	µmho	5/23
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: pH-lab	7.24		5/24
☐ Other:			
☐ Other:			

A-H_2SO_4

	Result	Units	Date analyzed
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

From NF, NA Sample:

	Result	Units	Date Analyzed
☒ Calcium	152	mg/l	5/16
☒ Potassium	12	mg/l	5/10
☒ Magnesium	135.4	mg/l	5/16
☒ Sodium	216	mg/l	5/10
☒ Bicarbonate	504	mg/l	5/24
☒ Chloride	590	mg/l	5/17
☒ Sulfate	112	mg/l	5/17
☒ Total Solids	1916	mg/l	5/17
☐			
☐			
☒ Cation/Anion Balance			

Analyst: Date Reported: 5/26/88 Reviewed by: [signature]

Laboratory remarks: 633

FOR OCD USE -- Date Owner Notified ________ Phone or Letter? ________ Initals ________

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud
Albuquerque, NM 87106

HEAVY METAL ANALYSIS FORM

Telephone: (505)841-2553

Date Received	4/19/88	Lab No.	ICP-123	User Code	☒ 82235 ☐ Other:

COLLECTION DATE & TIME: yy 88 mm 04 dd 14 hh 10 mm 50

COLLECTED BY Boyd / Seay Ock

COLLECTION SITE DESCRIPTION: Davis Gas Proc. Plant Hose Discharge from plant separator to Field

TO:

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg., PO Box 2088
SANTA FE, NM 87504-2088

ATTN: David Boyd
TELEPHONE: 827-5812

OWNER:

SITE LOCATION:
County:

Township, Range, Section, Tract: (10N06E24342)
1 1 5 1 5 + 3 1 7 1 E + 0 2 + 4 1 1 1

STATION/ WELL CODE:

LATITUDE, LONGITUDE: -

SAMPLING CONDITIONS:

☐ Bailed ☐ Pump ☑ Dipped ☐ Tap | Water Level: | Discharge: | Sample Type: Grab

pH(00400)	Conductivity(Uncorr.)	Water Temp.(00010)	Conductivity at 25°C (00094)
—	2675 µmho	27°C	µmho

FIELD COMMENTS: oily sheen, dark color

SAMPLE FIELD TREATMENT Check proper boxes:		LAB ANALYSIS REQUESTED:
☒ WPN: Water Preserved w/HNO_3 Non-Filtered	☐ WPF: Water Preserved w/HNO_3 Filtered	☒ ICAP Scan Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	0.4		Silicon	12.	
Barium	0.1		Silver	<0.1 ☐	
Beryllium	<0.1		Strontium	1.4	
Boron	0.3		Tin	<0.1	
Cadmium	<0.1 ☐		Vanadium	<0.1	
Calcium	150.		Zinc	0.1	
Chromium	<0.1	☒ 0.012	Arsenic		☒ 0.007
Cobalt	<0.1		Selenium		☒ <0.005
Copper	<0.1		Mercury		☒ <0.0005
Iron	1.8				☐
Lead	<0.1	☒ <0.01			☐
Magnesium	36.				☐
Manganese	<0.05				☐
Molybdenum	<0.1				☐
Nickel	<0.1				☐

LAB COMMENTS: DIGEST

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

ICAP Analyst QB Reviewer Jim Ruby
Date Analyzed 5/3/88 Date Received 6/14/88

754
wpn

88-0493

SCIENTIFIC LABORATORY DIVISION

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

STATE OF NEW MEXICO
ENVIRONMENT

REPORT TO: David Boyer
N.M. Oil Conservation Division
P. O. Box 2088
Santa Fe, N.M. 87504-2088
PHONE(S): 827-5812
SUBMITTER: David Boyer

S.L.D. No. OR- 493 AAB
DATE REC. 4-19-88
PRIORITY 3
USER CODE: 82235
CODE: 260

SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 880414105088

SAMPLE TYPE: WATER ☒, SOIL ☐, FOOD ☐, OTHER: _____ CODE: _____

COUNTY: Lea ; CITY: Lovington CODE: _____

LOCATION CODE: (Township-Range-Section-Tracts) 15S+37E+02+411 (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

- ☐ (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

Remarks: _____

FIELD DATA:

pH=_____; Conductivity=2625 umho/cm at 27 °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.)

Davis Gas Processing - Hose discharge from plant oil/water separator to field - oily sheen, dark color

I certify that the results in this block accurately reflect the results of my field analyses, observations and activities.(signature collector): K. Roop Method of Shipment to the Lab: State car

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-$Na_2S_2O_3$ 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 _____ _____

RECEIVED
JUN 8 1988
OIL CONSERVATION DIVISION
SANTA FE

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

ANALYSES PERFORMED

LAB. No.: OR- 493-

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]
Halogenated purgeables	N.D.		
Aromatic, purgeables	see remarks		
benzene	7525		
Toluene	1875		
ethylbenzene	50		
p+m-xylene	225		
o-xylene	135		
* DETECTION LIMIT *	12.5 ug/l	+ DETECTION LIMIT +	

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: Four early eluting unsaturated compounds at 10-50 ppb and six late eluting compounds in the C3 substituted benzene region at 10-50 ppb detected by the photoionization detector but not identified.

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: 4/20/88 Analyst's signature: Mary C. Eberr

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block.

Reviewers signature: R Meyerhen

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: / / | LAB NO. | USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE: 05/04/14 | Collection TIME: 1030 | SITE INFORMATION ▶ | Sample location: Davis Gas Processing-Lovington

Collected by (Person/Agency): Boyer / Easy OCD | Collection site description: Cooling tower drain hose to catch pit.

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

Station/well code:

Owner:

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level: ~	Discharge: —	Sample type: GRAB
pH (00400): —	Conductivity (Uncorrected): 750 µmho	Water Temp. (00010): 14 °C	Conductivity at 25°C (00094): µmho

Field comments: oil on surface

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1

☒ NF: Whole sample (Non-filtered) ☐ F: Filtered in field with 0.45 µmembrane filter ☐ A: 2 ml H_2SO_4/L added

☒ NA: No acid added ☐ Other-*specify:* ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA		Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	1030	µmho	5/13
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: pH-Lab	7.41		5/24
☐ Other:			
☐ Other:			

A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

From NF, NA Sample:			Date Analyzed
☒ Calcium	78	mg/l	5/16
☒ Potassium	4	mg/l	5/10
☒ Magnesium	23.2	mg/l	5/16
☒ Sodium	97.5	mg/l	5/10
☒ Bicarbonate	135	mg/l	5/24
☒ Chloride	252	mg/l	5/17
☒ Sulfate	105	mg/l	5/17
☒ Total Solids	690	mg/l	5/17
☐			
☐			
☒ Cation/Anion Balance			

Analyst: | Date Reported: 5/26/88 | Reviewed by:

Laboratory remarks: 196

FOR OCD USE -- Date Owner Notified_____ Phone or Letter?_____ Initals_____

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud
Albuquerque, NM 871

HEAVY METAL ANALYSIS FORM

Telephone: (505)841-2553

Date Received	4/19/88	Lab No.	ICP-172	User Code	☒ 82235 ☐ Other:

COLLECTION DATE & TIME: yy 88 mm 04 dd 19 hh 10 mm 30

COLLECTED BY: Boyer/Sealy OCD

COLLECTION SITE DESCRIPTION: Davis Gas Processing, Lovington, Cooling Tower & Brain Hoses, East pit

TO:

OWNER:

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg., PO Box 2088
SANTA FE, NM 87504-2088

ATTN: David Boyer
TELEPHONE: 827-5812

SITE LOCATION:
County: Lea

Township, Range, Section, Tract: (10N06E24342)
1 1 5 S + 3 7 E + 0 2 + 4 1 1 1

STATION/ WELL CODE:

LATITUDE, LONGITUDE:

SAMPLING CONDITIONS:

☐ Bailed ☐ Pump ☒ Dipped ☐ Tap	Water Level: —	Discharge: —	Sample Type: GRAB

pH(00400)	Conductivity(Uncorr.)	Water Temp.(00010)	Conductivity at 25°C (00094)
—	750 µmho	14 °C	µmho

FIELD COMMENTS: Oil on surface

SAMPLE FIELD TREATMENT Check proper boxes:		LAB ANALYSIS REQUESTED:
☒ WPN: Water Preserved w/HNO_3 Non-Filtered	☐ WPF: Water Preserved w/HNO_3 Filtered	☒ ICAP Scan. Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	<0.1		Silicon	15.	
Barium	<0.1		Silver	<0.1	☐
Beryllium	<0.1		Strontium	0.8	
Boron	0.2		Tin	<0.1	
Cadmium	<0.1	☐	Vanadium	<0.1	
Calcium	75		Zinc	<0.1	
Chromium	<0.1	☒ 0.013	Arsenic		☐
Cobalt	<0.05		Selenium		☐
Copper	<0.1		Mercury		☐
Iron	0.4				☐
Lead	<0.1	☒ <0.01			☐
Magnesium	18.				☐
Manganese	0.05				☐
Molybdenum	<0.1				☐
Nickel	<0.1				☐

LAB COMMENTS: DIGEST 5/11/88

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

ICAP Analyst JB
Date Analyzed 5/3/88

Reviewer [signature]
Date Reviewed 6/14/88

754 WPW

88-0490-C

SCIENTIFIC LABORATORY DIVISION

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

STATE OF NEW MEXICO ENVIRONMENT

REPORT TO: David Boyer
N.M. Oil Conservation Division
P. O. Box 2088
Santa Fe, N.M. 87504-2088
PHONE(S): 827-5812

S.L.D. No. OR- 490 A+B
DATE REC. 4-19-88
PRIORITY 3
USER CODE: 8 2 2 3 5

SUBMITTER: David Boyer
CODE: 2 6 0

SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 8 8 0 4 1 4 1 0 3 0 A & B

SAMPLE TYPE: WATER ☒ SOIL ☐, FOOD ☐, OTHER:_____ CODE:_____

COUNTY: Lea ; CITY: Lovington CODE:_____

LOCATION CODE: (Township-Range-Section-Tracts) 1 5 S + 3 7 E + 0 2 + 4 1 1 1 (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

- ☐ (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

Remarks:_____

FIELD DATA:

pH=_____; Conductivity= 750 umho/cm at 14 °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.)

Davis Gas Processing - Cooling tower drain hose
Oil on surface To east pit

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

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-$Na_2S_2O_3$ 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 _____ _____

RECEIVED
JUN 6 1988
OIL CONSERVATION DIVISION
SANTA FE

For OCD Use: Date Owner Notified 4/6/88 (Phone or Letter?) _____ Initials _____

ANALYSES PERFORMED

LAB. No.: OR- 490

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]
aromatic purgeables	N.D.		
halogenated purgeables	N.D		
* DETECTION LIMIT * *	5 ug/L	+ DETECTION LIMIT + +	

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: 4/29/88 Analyst's signature: Tony C. Chen

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block.

Reviewers signature: L Mugenborn

957
WIPP

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 4/19/88	LAB NO. WW-1265	USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235	
Collection DATE 04/14	SITE INFORMATION ►	Sample location: Lewis Gas Discovery-Lovington	
Collection TIME 1005		Collection site description: Cooling Jacket Pump	
Collected by — Person/Agency: Boyer/Seay /OCD			

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

Station/well code
Owner

SAMPLING CONDITIONS

☐ Bailed ☐ Dipped ☐ Pump ☒ Tap	Water level: —	Discharge: —	Sample type: GRAB
pH (00400): —	Conductivity (Uncorrected): 1680 µmho	Water Temp. (00010): 45 °C	Conductivity at 25°C (00094): µmho

Field comments:

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1

☒ NF: Whole sample (Non-filtered) ☐ F: Filtered in field with 0.45 µmembrane filter ☐ A: 2 ml H_2SO_4/L added

☒ NA: No acid added ☐ Other-*specify:* ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA		Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	1227	µmho	5/23
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: pH-Lab	8.22		5/24
☐ Other:			
☐ Other:			

A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

From NF, NA Sample:

			Date Analyzed
☒ Calcium	88	mg/l	5/16
☒ Potassium	4	mg/l	5/10
☒ Magnesium	24.4	mg/l	5/16
☒ Sodium	118	mg/l	5/10
☒ Bicarbonate	137	mg/l	5/24
☒ Chloride	271	mg/l	5/18
☒ Sulfate	112	mg/l	5/20
☒ Total Solids	809	mg/l	5/20
☐			
☐			
☒ Cation/Anion Balance			

Analyst | Date Reported: 5/27/88 | Reviewed by: CG

Laboratory remarks:
332

FOR OCD USE -- Date Owner Notified _____ Phone or Letter? _____ Initals _____

CATIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
Ca	4.39	88.00	<3.0
Mg	2.00	24.40	<0.3
Na	5.13	118.00	<10.0
K	0.10	4.00	<0.3
Mn	0.00	0.00	
Fe	0.00	0.00	
SUMS	11.63	234.40	

Total Dissolved Solids= 809
Ion Balance = 95.15%

ANIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
HCO3	2.25	137.00	<1.0
SO4	2.33	112.00	<10.0
CL	7.64	271.00	<5.0
NO3	0.00	0.00	< 0.
CO3	0.00	0.00	< 1.
NH3	0.00	0.00	< 0.
PO4	0.00	0.00	< 0.
	12.22	520.00	

WC No. = 8801268
Date out/By

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud N
Albuquerque, NM 87106

HEAVY METAL ANALYSIS FORM

Telephone: (505)841-2553

Date Received	4/19/88	Lab No.	IT 136	User Code	☒ 82235 ☐ Other:

COLLECTION DATE & TIME: yy 88 mm 04 dd 14 hh 10 mm 25

COLLECTED BY: Boyd/Roy OCD

COLLECTION SITE DESCRIPTION: Davis Gas Processing Cooling Jacket Pump

TO:

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg., PO Box 2088
SANTA FE, NM 87504-2088

ATTN: DAVID ROYER
TELEPHONE: 827-5812

OWNER:

SITE LOCATION:
County: Lea

Township, Range, Section, Tract: (10N06E24342)
1515+312E+02+4111

STATION/ WELL CODE:

LATITUDE, LONGITUDE: -

SAMPLING CONDITIONS:

☐ Bailed ☐ Pump ☐ Dipped ☒ Tap

Water Level:	Discharge:	Sample Type:
—	—	GRAB

pH(00400)	Conductivity(Uncorr.)	Water Temp.(00010)	Conductivity at 25°C (00094)
	1680 µmho	45 °C	µmho

FIELD COMMENTS:

SAMPLE FIELD TREATMENT Check proper boxes:		LAB ANALYSIS REQUESTED:
☒ WPN: Water Preserved w/HNO_3 Non-Filtered	☐ WPF: Water Preserved w/HNO_3 Filtered	☒ ICAP Scan Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	<0.1		Silicon	20.	
Barium	0.1		Silver	<0.1	☐
Beryllium	<0.1		Strontium	0.9	
Boron	0.3		Tin	<0.1	
Cadmium	<0.1	☐	Vanadium	<0.1	
Calcium	80.		Zinc	0.1	
Chromium	<0.1	☒ 0.05	Arsenic		☐
Cobalt	<0.05		Selenium		☐
Copper	<0.1		Mercury		☐
Iron	0.5				☐
Lead	<0.1	☒ <0.01			☐
Magnesium	22.				☐
Manganese	<0.05				☐
Molybdenum	<0.1				☐
Nickel	<0.1				☐

At standard

LAB COMMENTS: DIGEST 5/11/88

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

ICAP Analyst JB Reviewer MA

Date Analyzed 5/13/88 Date Reveived 6/14/88

754
WPA

88-0492-C

SCIENTIFIC LABORATORY DIVISION

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

STATE OF NEW MEXICO
ENVIRONMENT

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

S.L.D. No. OR- 492 AYB
DATE REC. 4-19-88
PRIORITY 3

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

SUBMITTER: David Boyer
CODE: 2 6 0

SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 8 8 0 4 1 4 1 0 0 5 A Y B

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

COUNTY: Lea ; CITY: Lovington CODE: [ ]

LOCATION CODE: (Township-Range-Section-Tracts) 1 5 S + 3 7 E + 0 2 + 4 1 1 (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

- [ ] (753) Aliphatic Purgeables (1-3 Carbons)
- [X] (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

Remarks: _____

FIELD DATA:

pH= — ; Conductivity= 1680 umho/cm at 45 °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.)

Davis Gas Processing - Cooling Jacket Pump

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

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

Samples were preserved as follows:

- [ ] NP: No Preservation; Sample stored at room temperature.
- [X] P-Ice Sample stored in an ice bath (Not Frozen).
- [ ] P-$Na_2S_2O_3$ Sample Preserved with Sodium Thiosulfate to remove chlorine residual.

RECEIVED
JUN 6 1988
OIL CONSERVATION DIVISION
SANTA FE

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 7/6/88 Phone or Letter? _____ Initials _____

ANALYSES PERFORMED

LAB. No.: OR- 492

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]
halogenated purgeables	N.D.		
aromatic purgeables			
benzene	73		
toluene	35		
p + m-xylene	9		
o-xylene	6		
ethylbenzene	N.D.		
* DETECTION LIMIT * ✳	5 ppb	+ DETECTION LIMIT + +	

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: 4/20/88 Analyst's signature: Mary C. Eden

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. Meyerhen

RPS

Attachment E

Well Water Analysis

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 4/19/88	LAB NO. WC-671
USER CODE	☐ 59300 ☐ 59600 ☒ OTHER: 82235
Collection DATE 880414	SITE INFORMATION ► Sample location: Bates Gas Processing Lovington
Collection TIME 1130	Collection site description: East Water well
Collected by — Person/Agency: Boyer Key /OCD	

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

Station/well code:

Owner:

SAMPLING CONDITIONS

☐ Bailed ☒ Pump ☐ Dipped ☒ Tap	Water level —	Discharge —	Sample type GRAB
pH (00400) —	Conductivity (Uncorrected) 1180 µmho	Water Temp. (00010) 18.5 °C	Conductivity at 25°C (00094) µmho

Field comments: Deeper well, turbine pump

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1

☒ NF: Whole sample (Non-filtered) ☐ F: Filtered in field with 0.45 µmembrane filter ☐ A: 2 ml H_2SO_4/L added

☒ NA: No acid added ☐ Other-*specify*: ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA		Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	1339	µmho	5/23
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: Lab pH	7.92		5/24
☐ Other:			
☐ Other:			

A-H_2SO_4		Units	Date analyzed
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

From NF, NA Sample:

		Units	Date Analyzed
☒ Calcium	120	mg/l	5/16
☒ Potassium	4	mg/l	5/10
☒ Magnesium	30.5	mg/l	5/16
☒ Sodium	117	mg/l	5/10
☒ Bicarbonate	238	mg/l	5/24
☒ Chloride	268	mg/l	5/20
☒ Sulfate	121	mg/l	〃
☒ Total Solids	884	mg/l	5/20
☐			
☐			
☒ Cation/Anion Balance			

Analyst	Date Reported	Reviewed by
	5/27/88	[signature]

Laboratory remarks: 250

FOR OCD USE -- Date Owner Notified ________ Phone or Letter? ________ Initals ________

RECEIVED JUL 11 1988

CATIONS				ANIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT	ANALYTE	MEQ.	PPM	DET. LIMIT
Ca	5.99	120.00	<3.0	HC03	3.90	238.00	<1.0
Mg	2.51	30.50	<0.3	SO4	2.52	121.00	<10.0
Na	5.09	117.00	<10.0	CL	7.56	268.00	<5.0
K	0.10	4.00	<0.3				
Mn	0.00	0.00		NO3	0.00	0.00	< 0.
Fe	0.00	0.00		C03	0.00	0.00	< 1.
				NH3	0.00	0.00	< 0.
				PO4	0.00	0.00	< 0.
SUMS	13.68	271.50			13.98	627.00	

Total Dissolved Solids= 884
Ion Balance = 97.88%

WC No. = ~~1271~~
Date out/By _____

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: 4/19/85 LAB NO. WC-6270 USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE: 850414
Collection TIME: 1125
Collected by — Person/Agency: Boyer/Sealy /OCD

SITE INFORMATION ►
Sample location: Davis Gas Processing Loving ter
Collection site description: West water well (Shallower-submersible pump)

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

Station/well code:
Owner:

SAMPLING CONDITIONS

☐ Bailed ☐ Dipped ☒ Pump ☒ Tap	Water level —	Discharge —	Sample type Grab
pH (00400) —	Conductivity (Uncorrected) 1920 µmho	Water Temp. (00010) 20 °C	Conductivity at 25°C (00094) µmho

Field comments

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1
☒ NF: Whole sample (Non-filtered)
☐ F: Filtered in field with 0.45 µmembrane filter
☐ A: 2 ml H_2SO_4/L added
☒ NA: No acid added ☐ Other-*specify*:
☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA		Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	2127	µmho	5/23
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: Lab pH	7.83		5/24
☐ Other:			
☐ Other:			
A-H_2SO_4			
☐ Nitrate-N + Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

From NF, NA Sample:

			Date Analyzed
☒ Calcium	204	mg/l	5/16
☒ Potassium	4	mg/l	5/10
☒ Magnesium	36.6	mg/l	5/16
☒ Sodium	188	mg/l	5/10
☒ Bicarbonate	224	mg/l	5/24
☒ Chloride	660	mg/l	5/20
☒ Sulfate	114	mg/l	"
☒ Total Solids	1610	mg/l	5/20
☐			
☐			
☒ Cation/Anion Balance			

Analyst: | Date Reported: 5/27/85 | Reviewed by: [signature]

Laboratory remarks: 557

FOR OCD USE — Date Owner Notified______ Phone or Letter?______ Initals______

CATIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
Ca	10.18	204.00	<3.0
Mg	3.01	36.60	<0.3
Na	8.18	188.00	<10.0
K	0.10	4.00	<0.3
Mn	0.00	0.00	
Fe	0.00	0.00	
SUMS	21.47	432.60	

Total Dissolved Solids= 1610
Ion Balance = 87.03%

ANIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
HC03	3.67	224.00	<1.0
SO4	2.38	114.00	<10.0
CL	18.62	660.00	<5.0
NO3	0.00	0.00	< 0.
C03	0.00	0.00	< 1.
NH3	0.00	0.00	< 0.
PO4	0.00	0.00	< 0.
	24.66	998.00	

WC No. = 8801270
Date out/By 4-7

754 WPA

88-0489-C

SCIENTIFIC LABORATORY DIVISION

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

STATE OF NEW MEXICO ENVIRONMENT

REPORT TO: David Boyer
N.M. Oil Conservation Division
P. O. Box 2088
Santa Fe, N.M. 87504-2088
PHONE(S): 827-5812

S.L.D. No. OR- 489 A+B
DATE REC. 4-19-88
PRIORITY 3
USER CODE: 8 2 2 3 5
SUBMITTER: David Boyer
CODE: 2 6 0

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

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

COUNTY: Lea ; CITY: Lovington CODE: _____

LOCATION CODE: (Township-Range-Section-Tracts) 1 5 S + 3 7 E + 0 2 + 3 2 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

- [ ] (753) Aliphatic Purgeables (1-3 Carbons)
- [X] (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

Remarks: _____

FIELD DATA:

pH= — ; Conductivity= 1180 umho/cm at 18.5 °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.)

Davis Gas Processing — East water well (deep, turbine pump)

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

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

Samples were preserved as follows:

- [ ] NP: No Preservation; Sample stored at room temperature.
- [X] P-Ice Sample stored in an ice bath (Not Frozen).
- [ ] P-$Na_2S_2O_3$ Sample Preserved with Sodium Thiosulfate to remove chlorine residual.

RECEIVED
JUN 6 1988
OIL CONSERVATION DIVISION
SANTA FE

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 4/20 Phone or Letter? _____ Initials _____

ANALYSES PERFORMED

LAB. No.: OR- 489

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]
aromatic purgeables	N.D.		
halogenated purgeables			
1,1 Dichloroethane	1.5		
* DETECTION LIMIT *	~~0.5~~ ~~12.5~~	+ DETECTION LIMIT +	

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: 4/20/88. Analyst's signature: Mary C. Eden

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block.

Reviewers signature: L. Meyerhein

754 WPW

88-049

...FIC LABORATORY DIVISION

700 Camino de Salud NE
...ouquerque, NM 87106 841-2570

STATE OF NEW MEXICO
ENVIRONMENT

REPORT TO: David Boyer
N.M. Oil Conservation Division
P. O. Box 2088
Santa Fe, N.M. 87504-2088
PHONE(S): 827-5812

S.L.D. No. OR- 491 A+B
DATE REC. 4-19-88
PRIORITY 3
USER CODE: 8 2 2 3 5

SUBMITTER: David Boyer
CODE: 2 6 0

SAMPLE COLLECTION CODE: (YYMMDDHHMMIII) 8 8 0 4 1 4 1 1 2 5 A B

SAMPLE TYPE: WATER ☒, SOIL ☐, FOOD ☐, OTHER: _____ CODE: _____

~~COUNTY~~ City: Lovington ; ~~CITY~~ County: Lea CODE: _____

LOCATION CODE: (Township-Range-Section-Tracts) T 1 5 S + 3 7 E + 0 2 + 3 S 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

- ☐ (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

Remarks: _____

FIELD DATA:

pH= — ; Conductivity= 1920 umho/cm at 20 °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.)

Davis Gas Processing - West Water well
(Shallower, submersible pump)

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

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-$Na_2S_2O_3$ 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 _____ _____

RECEIVED
APR 6 1988
OIL CONSERVATION DIVISION
SANTA FE

For OCD Use: Date Owner Notified 7/6/88 Phone or Letter? _____ Initials _____

ANALYSES PERFORMED

LAB. No.: OR- 491

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]
halogenated purgeables			
1,1 Dichloroethane	.5		
trichloroethene	.5		
aromatic purgeables	N.D.		
* DETECTION LIMIT * ✳	.5 ppb	+ DETECTION LIMIT + +	

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: 4/20/88 . Analyst's signature: Mary C. Ellen

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 Meyerhen

754
Wpll

SCIENTIFIC LABORATORY DIVISION
ORGANIC ANALYSIS REQUEST FORM
Organic Section - Phone: 841-2570

OR89-0909-C

REPORT TO: DAVID BOYER
N.M. OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87504-2088

S.L.D. No. OR-
DATE REC. 6-27-89
PRIORITY 3
PHONE(S): 827-5812

COLLECTION CITY: Lovington ; COUNTY: Lea

COLLECTION DATE/TIME CODE: (Year-Month-Day-Hour-Minute) |8|9|0|6|2|1|1|6|1|9|

LOCATION CODE: (Township-Range-Section-Tracts) |1|5|S|+|3|7|E|+|0|2|+|4|-|-| (10N06E24342)

USER CODE: |8|2|2|3|5| SUBMITTER: David Boyer CODE: |2|6|0|

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

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

Samples were preserved as follows:

- [ ] NP: No Preservation; Sample stored at room temperature.
- [X] P-Ice Sample stored in an ice bath (Not Frozen).
- [ ] P-AA Sample Preserved with Ascorbic Acid to remove chlorine residual.
- [X] P-HCl Sample Preserved with Hydrochloric Acid (2 drops/40 ml)

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

- [ ] (753) Aliphatic Headspace (1-5 Carbons)
- [X] (754) Aromatic & Halogenated Purgeables
- [ ] (765) Mass Spectrometer Purgeables
- [ ] (766) Trihalomethanes
- [ ] (774) SDWA VOC's I (8 Regulated +)
- [ ] (775) SDWA VOC's II (EDB & DBCP)

Other Specific Compounds or Classes

- [ ] _____
- [ ] _____

EXTRACTABLE SCREENS

- [ ] (751) Aliphatic Hydrocarbons
- [ ] (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: _____

FIELD DATA:

pH= 7 ; Conductivity= 1175 umho/cm at 24° 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.)
Davis Gas Processing - East (Deep) water supply well

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

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 [ ] OR Seals Intact: Yes [ ] No [ ]

Signatures _____ _____

For OCD use: Date owner notified: 8/3/89 Phone or (Letter?) Initials RCD

ANALYSES PERFORMED

LAB. No.: OR-

THIS PAGE FOR LABORATORY RESULTS ONLY

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

PURGEABLE SCREENS

- ☐ (753) Aliphatic Headspace (1-5 Carbons)
- ☐ (754) Aromatic & Halogenated Purgeables
- ☐ (765) Mass Spectrometer Purgeables
- ☐ (766) Trihalomethanes
- ☐ (774) SDWA VOC's I (8 Regulated +)
- ☐ (775) SDWA VOC's II (EDB & DBCP)

Other Specific Compounds or Classes

- ☐ _____
- ☐ _____

EXTRACTABLE SCREENS

- ☐ (751) Aliphatic Hydrocarbons
- ☐ (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]
* DETECTION LIMIT * ✱		+ DETECTION LIMIT + +	

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) Not Sealed ☐ Intact: Yes ☐ No ☐. Seal(s) broken by: _____ 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: _____. Analyst's signature: _____

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block.

Reviewers signature: _____

STATE OF NEW MEXICO HEALTH AND ENVIRONMENT DEPARTMENT
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud, NE
Albuquerque, NM 87106 [505]-841-2500
ORGANIC CHEMISTRY SECTION [505]-841-2570

July 25, 1989

ANALYTICAL REPORT
SLD Accession No. OR-89-0909

Distribution
(■) Submitter
(※) SLD Files

To: NM Oil Consv. Div.
State Land Office Bldg.
P. O. Box 2088
Santa Fe, NM 87504-2088

From: Organic Chemistry Section
Scientific Laboratory Div.
700 Camino de Salud, NE
Albuquerque, NM 87106

Re: **A purgeable water sample submitted to this laboratory on June 27, 1989**

User:
OIL CONSERVATION DIV
State Land Office Bldg.
P. O. Box 2088
Santa Fe, NM 87504-2088

DEMOGRAPHIC DATA

COLLECTION

On: 21-Jun-89 *By:* Boy . . .
At: 16:19 hrs. *In/Near:* Lovington

LOCATION

ANALYTICAL RESULTS: Aromatic & Halogenated Purgeable Screen

Parameter	Value	Note	MDL	Units
Aromatic Purgeables (6)	0.00	N	0.50	ppb
Halogenated Purgeables (33)	0.00	N	1.00	ppb

Notations & Comments:

MDL = Minimal Detectable Level.

A = Approximate Value; N = None Detected above Detection Limit; P = Compound Present, but not quantified;
T = Trace (<Detection Limit); U = Compound Identity Not Confirmed.

Evidentiary Seals: Not Sealed[X]; Intact: No[ ], Yes[ ] & Broken By: _____ Date: _____

Laboratory Remarks: Davis Gas- East Wtr Supply

Analyst: J M J. Owen 7-12-89 **Reviewed By:** Larry Edson for RFM

Michael J. Owen — *Analyst, Organic Chemistry* — Analysis Date

Richard F. Meyerhein 07/25/89 — *Supervisor, Organic Chemistry Section*

Lab ACCU-LABS
No. 77-521.07-123

ORGANIC ANALYSIS REQUEST FORM

REPORT TO: DAVID BOYER
N.M. OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87504-2088

Sample No. 8903291645
DATE REC. ______
PRIORITY ______
PHONE(S): 827-5812

COLLECTION CITY: Lovington ; COUNTY: Lea

COLLECTION DATE/TIME CODE: (Year-Month-Day-Hour-Minute) 8 9 0 3 2 9 1 6 4 5

LOCATION CODE: (Township-Range-Section-Tracts) __ __ + __ __ + __ + __ __ (10N06E24342)

SUBMITTER: David Boyer

SAMPLE TYPE: WATER [✓], SOIL ☐, FOOD ☐, OTHER: ______

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-AA Sample Preserved with Ascorbic Acid to remove chlorine residual.
- ☒ P-HCl Sample Preserved with Hydrochloric Acid (2 drops/40 ml)

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

- ☐ (753) Aliphatic Headspace (1-5 Carbons)
- ☒ (754) Aromatic & Halogenated Purgeables
- ☐ (765) Mass Spectrometer Purgeables
- ☐ (766) Trihalomethanes
- ☐ (774) SDWA VOC's I (8 Regulated +)
- ☐ (775) SDWA VOC's II (EDB & DBCP)

Other Specific Compounds or Classes

- ☐ ______
- ☐ ______

EXTRACTABLE SCREENS

- ☐ (751) Aliphatic Hydrocarbons
- ☐ (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: ______

FIELD DATA:

pH= 7 ; Conductivity= 1170 umho/cm at 20 °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.)
Sample from East (deep) water well next to machine shop.
(taken from outlet at west well after isolating water tank)

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

CHAIN OF CUSTODY

I certify that this sample was transferred from DB to DM
at (location) ALR on 4/5/89-12:25 and that the statements in this block are correct. Evidentiary Seals: Not Sealed ☐ OR Seals Intact: Yes ☐ No ☐
Signatures [illegible]

For OCD use: Date owner notified: 6/19/89 Phone or [✓ Letter]? Initials [illegible]

Contract Lab Accu-Labs
Contract No. 77-521.07-123

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED		LAB NO.	Sample No. 8903291645
Collection DATE 89103129		SITE INFORM-ATION ►	Sample location Dave's Gas Processing
Collection TIME 1645			Collection site description East water well (from tap next to W. Well after Horsetrole isolated)
Collected by — Person/Agency Boyer/Anderson/OCD			

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

Station/well code
Owner

SAMPLING CONDITIONS

☐ Bailed ☐ Dipped ☐ Pump ☒ Tap	Water level	Discharge	Sample type Grab
pH (00400) 7	Conductivity (Uncorrected) 1170 µmho	Water Temp. (00010) 20 °C	Conductivity at 25 °C (00094) µmho

Field comments (West well disconnected)

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted 1

☒ **NF:** Whole sample (Non-filtered) ☐ **F:** Filtered in field with 0.45 µmembrane filter ☐ **A:** 2 ml H_2SO_4/L added

☒ **NA:** No acid added ☐ Other-*specify:* ☐ A: 5ml conc. HNO_3 added ☐ A: 4ml fuming HNO_3 added

ANALYTICAL RESULTS from SAMPLES

NA	Units	Date analyzed
☒ Conductivity (Corrected) 25°C (00095)	µmho	
☐ Total non-filterable residue (suspended) (00530)	mg/l	
☒ Other: Lab pH		
☐ Other:		
☐ Other:		

A-H_2SO_4	Units	Date analyzed
☐ Nitrate-N +, Nitrate-N total (00630)	mg/l	
☐ Ammonia-N total (00610)	mg/l	
☐ Total Kjeldahl-N ( )	mg/l	
☐ Chemical oxygen demand (00340)	mg/l	
☐ Total organic carbon ( )	mg/l	
☐ Other:		
☐ Other:		

From NE, NA Sample:

	Units	Date Analyzed
☒ Calcium	mg/l	
☒ Potassium	mg/l	
☒ Magnesium	mg/l	
☒ Sodium	mg/l	
☒ Bicarbonate	mg/l	
☒ Chloride	mg/l	
☒ Sulfate	mg/l	
☒ Total Solids	mg/l	
☒ CO_3		
☒ Fluoride		
☒ Cation/Anion Balance		

Analyst	Date Reported	Reviewed by

Laboratory remarks

FOR OCD USE -- Date Owner Notified _____ Phone or Letter? _____ Initals _____

7

Contract Lab Accu-Labs
Contract No. 77-[illegible].07-123

HEAVY METAL ANALYSIS FORM

Date Received | | | Lab No. | Sample No. 8903291645

COLLECTION DATE & TIME: yy 89 | mm 03 | dd 29 | hh 16 | mm 45

COLLECTED BY: Boyer / Anderson OCD

COLLECTION SITE DESCRIPTION: Davis Gas Processing
East Water Well

OWNER:

TO:

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg., PO Box 2088
SANTA FE, NM 87504-2088

ATTN: D. Boyer
TELEPHONE: 827-5812

SITE LOCATION:
County: Lea

Township, Range, Section, Tract: (10N06E24342)

STATION/ WELL CODE:

LATITUDE, LONGITUDE:

SAMPLING CONDITIONS:

☐ Bailed ☐ Pump ☒ Tap ☐ Dipped

Water Level: | Discharge: | Sample Type: Grab

pH(00400)	Conductivity(Uncorr.)	Water Temp.(00010)	Conductivity at 25°C (00094)
7	1170 µmho	20 °C	µmho

FIELD COMMENTS: East well is deeper, Both two wells (Taken from tap at west well after pulling water storage tank) West well disconnected

SAMPLE FIELD TREATMENT
Check proper boxes:

☒ WPN: Water Preserved w/HNO_3 Non-Filtered

☐ WPF: Water Preserved w/HNO_3 Filtered

LAB ANALYSIS REQUESTED:

☐ ICAP Scan
Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	☒	☐	Silicon	☐	☐
Barium	☒	☐	Silver	☒	☐
Beryllium	☐	☐	Strontium	☒	☐
Boron	☒	☐	Tin	☐	☐
Cadmium	☒	☐	Vanadium	☐	☐
Calcium	☐	☐	Zinc	☒	☐
Chromium	☐	☒	Arsenic		☒
Cobalt	☒	☐	Selenium		☒
Copper	☒	☐	Mercury		☒
Iron	☒	☐		☐	☐
Lead	☐	☒		☐	☐
Magnesium	☐	☐		☐	☐
Manganese	☒	☐		☐	☐
Molybdenum	☒	☐		☐	☐
Nickel	☒	☐		☐	☐

LAB COMMENTS:

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

ICAP Analyst Reviewer
Date Analyzed Date Reveived

Accu-Labs Research, Inc.

Mr. David Boyer
NM Oil Conservation Division

RECEIVED
MAY 17 1989
OIL CONSERVATION DIV.
SANTA FE

RE: 9649-29859-20
Date Samples Rec'd: 4-5-89
P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation	9649-29859-20-7	9649-29859-20-8	9649-29859-20-9
Sponsor Designation	8903291645	8903291345	8903291210
	3-29-89	3-29-89	3-29-89
GC/MS VOLATILE ORGANICS, µg/L:			
Chloromethane	<10	<10	<100
Bromomethane	<10	<10	<100
Vinyl chloride	<10	<10	<100
Chloroethane	<10	<10	<100
Methylene chloride	<5	<5	<50
1,1-Dichloroethene	<5	<5	<50
1,1-Dichloroethane	<5	<5	<50
Total 1,2-Dichloroethene	<5	<5	<50
Chloroform	<5	<5	<50
1,2-Dichloroethane	<5	<5	<50
1,1,1-Trichloroethane	<5	<5	<50
Carbon tetrachloride	<5	<5	<50
Bromodichloromethane	<5	<5	<50
1,2-Dichloropropane	<5	<5	<50
c-1,3-Dichloropropene	<5	<5	<50
Trichloroethene	<5	<5	<50
Benzene	13	<5	3400
Dibromochloromethane	<5	<5	<50
1,1,2-Trichloroethane	<5	<5	<50
t-1,3-Dichloropropene	<5	<5	<50
2-Chloroethylvinyl ether	<5	<5	<50
Bromoform	<5	<5	<50
1,1,2,2-Tetrachloroethane	<5	<5	<50
Tetrachloroethene	<5	<5	<50

Accu-Labs Research, Inc.

Mr. David Boyer
NM Oil Conservation Division

RE: 9649-29859-20
Date Samples Rec'd: 4-5-89
P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation Sponsor Designation	9649-29859-20-7 8903291645 3-29-89	9649-29859-20-8 8903291345 3-29-89	9649-29859-20-9 8903291210 3-29-89
Determination: µg/L			
Toluene	<5	<5	3500
Chlorobenzene	<5	<5	<50
Ethyl benzene	<5	<5	670
Total Dichlorobenzenes	<5	<5	<50
Total Xylenes	<5	<5	1400
Determination: mg/L			
Aluminum, total	<0.1	0.1	<1*
Barium, total	0.10	0.27	0.9
Boron, total	0.2	0.7	9.3
Cadmium, total	<0.005	<0.005	<0.05*
Calcium, total	160	570	3500
Chromium, total	<0.005	0.008	<0.05*
Cobalt, total	<0.005	<0.005	<0.05*
Copper, total	0.048	0.070	<0.05*
Iron, total	1.7	1.6	2.5
Magnesium, total	24	72	980
Manganese, total	0.069	0.027	1.1
Mercury, total	0.0007	<0.001*	0.002
Molybdenum, total	<0.005	0.011	<0.05*
Nickel, total	<0.01	0.01	<0.1*
Potassium, total	4.3	26	570
Silver, total	<0.005	<0.005	<0.005
Sodium, total	120	280	19,000
Strontium, total	1.0	4.6	65
Zinc, total	0.022	0.024	<0.05
Total Alkalinity, (as $CaCO_3$ to pH 4.5)	280	110	1600

Accu-Labs Research, Inc.

Mr. David Boyer
NM Oil Conservation Division

RE: 9649-29859-20
Date Samples Rec'd: 4-5-89
P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation	9649-29859-20-7	9649-29859-20-8	9649-29859-20-9
Sponsor Designation	8903291645	8903291345	8903291210
	3-29-89	3-29-89	3-29-89
Determination: mg/L			
Carbonate (as CO_3)	<5	<5	<5
Bicarbonate (as HCO_3)	330	140	1900
pH	7.5	7.2	7.3
Specific Conductance, µmhos/cm	1600	5400	120,000
Arsenic, total	0.008	0.015	0.72
Lead, total	<0.005	<0.005	<0.005
Selenium, total	<0.005	0.006	<0.005
Total Solids	930	3300	65,000
Bromide	--	11	<200*
Fluoride	1.4	--	--
Chloride	260	630	37,000
Sulfate (as SO_4)	110	1400	1300
Ion Balance	101	95	99

RPS

Attachment F

H_2S Monitoring Plan

Hydrogen Sulfide Contingency Plan

PURPOSE

I. **Purpose of Plan** - To provide an organized plan of action for alerting and protecting the public following the accidental release of a potentially hazardous volume of hydrogen sulfide.

II. **Activation of Plan** - This plan shall be activated immediately by plant personnel on duty upon the detection of a potentially hazardous volume of hydrogen sulfide released to the atmosphere.

III. **Area of Exposure** - A major pipeline failure of any gas pipeline transporting gas containing Hydrogen Sulfide (H_2S) to or from the Denton Gas Plant will create a hazardous area of exposure in the vicinity of the failure. The plat included in this plan indicates areas of exposure which involve public or private facilities. Pipeline ruptures within these indicated areas of exposure will require immediate action to protect the lives of persons that may be in or may enter into these areas.

IV. **Notification** - A call list is included in this plan which lists telephone numbers of various public services and home telephone numbers of Davis Gas Processing supervisors that the person on duty may notify for timely assistance in handling the emergency.

V. **Shut-off Source of Gas and Evacuate Area-** Personnel on duty at the time of an emergency shall take immediate steps to simultaneously block traffic from entering the area and evacuate the area of persons already in the area. Call for assistance from city officials, if necessary. Since there is one resident and no public buildings in the area, all persons in the area will be transient.

Simultaneously with action to evacuate the area of persons, steps shall be taken to close all block valves on the ruptured pipeline to shut off the supply of gas to the ruptured area. Source of gas to the rupture may be from either the plant or the field, therefore, the proper block valves at the plant and in the field must be closed. See enclosed map of Gathering System, valves and exposure areas.

VI. **Special Considerations** - All H_2S bearing gas entering or leaving the Denton Gas Plant (except the acid gas flare within the Plant fenced area) is lighter than air and, therefore, will tend to rise at the point it is released to the atmosphere. At the point the gas is released to the atmosphere, it (including the H_2S component) will begin a dispersion process within the atmosphere, thereby becoming less and less Concentrated both vertically and horizontally away from the point of release.

The rate of dispersion of the gas into the atmosphere varies with the temperature difference between the gas and atmosphere, the volume of gas, and the wind speed. The table below shows the concentration of H_2S expressed in parts per million by volume in the various gas streams entering the Denton Gas Plant. Also, the table shows estimated H_2S dispersion expressed as the 100 ppm radius of exposure, and the 500 ppm radius of exposure for each gas stream. These latter figures are calculated distances downwind from point of release at which the air would be expected to have H_2S concentration of 100 ppm or 500 ppm by volume. The radial of exposures were calculated using the equations set out in New Mexico Statewide Rule 118.

H_2S Concentration		**Radius of Exposure, ft.**	
Gas Stream	ppm	100 ppm	500 ppm
North Denton Inlet	20,260	853 feet	390 feet
South Denton Inlet	25,380	1101 feet	503 feet
C&K / Ship Lateral Inlet	60		
High Plains & Austin Lateral Inlet	0		
Mesa Inlet	8		
Denton Plant	9,250	935 feet	427 feet

CALL LIST

NEW MEXICO STATEWIDE RULE 118
CONTINGENCY PLAN

SERVICES

FIRE DEPARTMENT	LOVINGTON, N.MEXICO	575-396-2359
GENERAL HOSPITAL	LOVINGTON, N.MEXICO	575-396-6611
POLICE DEPARTMENT	LOVINGTON, N.MEXICO	575-396-2811
HELICOPTER (DPS)	HOBBS, NEW MEXICO	575-392-6581
VETERINARIAN	HOBBS, NEW MEXICO	575-392-5563
HIGHWAY PATROL (DPS)	HOBBS, NEW MEXICO	575-392-5588
COUNTY SHERIFF	HOBBS, NEW MEXICO	575-393-2515
ENVIRONMENTAL IMPROVEMENT DIV.	HOBBS, NEW MEXICO	575-397-5250

DAVIS GAS SUPERVISORS

DAVID PEPPER Plant Foreman	LOVINGTON, N. MEXICO	575-396-6022 575-369-5945
DAN MEACHAM Oper. Supervisor	BIG LAKE, TEXAS	325-884-2299 432-556-5381
BOBBY ROACH Safety Director	MIDLAND, TEXAS	432-563-1247 432-528-6434
BOB STEWART Environmental Director	MIDLAND, TEXAS	432-682-6311 432-664-0186
MICHAEL DAVIS V.P. OPERATIONS	ABILENE, TEXAS	325-695-2370 325-668-6339

PUBLIC NEAR H2S EXPOSURE RADIUS

FREDDY WHITMAN	NORTH DENTON LATERAL	575-398-6678

VII. General

Hydrogen sulfide is one of the most potentially lethal hazards found in the oil and gas industry. Davis Gas Processing intends to make every effort to provide adequate safeguards against harm to persons both on location and in the immediate vicinity from the effects of H_2S released to the atmosphere. In those areas where H_2S is common, the following safety procedures/policies shall be in effect.

1.) This contingency plan shall be read and understood by all Plant personnel. Proper exercise of the Plant's gas leak detection program should assure that no major escape of H_2S bearing gas will ever occur at the Davis Gas Plant. However it is essential and is required by New Mexico Statewide Rule 118, adopted March 15, 1976, that this contingency plan be understood by all plant personnel and at all times be available for personnel referral and use.

2.) During the Plant's regular training sessions regarding use, care, and storage of respiratory equipment, all personnel will be reminded of possible need for the equipment during activation of this contingency plan.

3.) Location of all block valves for shutting off sources of gas to a pipe rupture area as shown on the plat accompanying this plan shall be personally visited by all plant personnel to assure each person's knowledge of exact location.

4.) Gas released from pipeline ruptures may be ignited by automotive ignition and exhaust systems, as well as by persons smoking, and by lightning. The possibility of ignition by whatever means should always be considered and avoided in all efforts to evacuate persons or to control the escape of gas in an area of H_2S exposure.

It should always be remembered that the bulk of gas emitted to the atmosphere will flow with the wind as it disperses, therefore, contact with the gas can be prevented by avoiding positions directly downwind from the point of emission. This fact should always be considered in working in the area (closing valves, etc.) and evacuating persons from the area.

VIII. Physical Characteristics

Hydrogen sulfide (H_2S) is a colorless, flammable gas which may be liquefied under pressure and which occurs in a variety of natural and industrial settings. Typically called "sour gas", hydrogen sulfide is soluble in water, crude oil or petroleum fractions, and is extremely corrosive. The gas can cause severe stress cracking of steel and other metals. Hydrogen sulfide burns with a blue flame to form sulfur dioxide which is also a toxic gas. Hydrogen sulfide is slightly heavier than air and may accumulate to dangerous concentrations in low lying areas and confined spaces. The gas can be dispersed by wind movement or air currents.

IX. Effects From Exposure

The health effects associated with hydrogen sulfide exposure are primarily determined by the concentration of the gas in the individuals breathing zone, the length of the exposure period(s) and individual susceptibility to the contaminant.

The health effects associated with hydrogen sulfide exposure are most often the result of sudden, excessive exposures experienced over a short time period. For example, a short-term exposure to hydrogen sulfide at a concentration of 500 ppm can result in respiratory arrest, loss of consciousness, and death within minutes.

A most important characteristic of hydrogen sulfide gas is its ability to cause olfactory fatigue or a failure in the sense of smell. At concentrations approaching 100 ppm, exposure to hydrogen sulfide causes a loss of the sense of smell. This effect can result in an individual developing a false sense of security relative to the exposure conditions. High concentrations of hydrogen sulfide, especially those capable of causing death or serious physical injury, cannot be detected by the sense of smell.

X. Hydrogen Sulfide Work Practices

The incorporation of the following specific work practices discussed below into routine operation and maintenance activities can help prevent overexposure to hydrogen sulfide. These work practices have proven effective in controlling hydrogen sulfide exposure in various Davis Gas operations.

1.) Engineering controls

A. Ventilation

When the potential for hydrogen sulfide exposure occurs during routine operation and maintenance activities, ventilation of the worker's breathing zone is extremely important. Hydrogen sulfide gas is slightly heavier than air and does not readily dissipate. As such the gas may accumulate in low lying areas and confined spaces and may remain for an extended time.

Laboratory operations involving hydrogen sulfide gas or materials containing hydrogen sulfide shall be conducted under a properly functioning laboratory hood or with local exhaust ventilation placed at the source of emission.

For indoor work, such as in buildings containing transfer pumps, gas processing equipment, gas compressors, treaters, LACT, or other equipment the accumulation of hydrogen sulfide gas in these enclosed work areas is prevented through the use of general/dilution ventilation.

2.) Work Practices

If possible, workers shall always remain upwind from the source of hydrogen sulfide gas while completing tasks. Wind direction shall be verified by a wind sock, streamer, or vane prior to initiating work. Wind conditions cannot be relied on, however, as a single means of controlling exposure.

3.) Monitoring

A. Personal Alarm Monitors

When routine and maintenance tasks involve potential exposure to hydrogen sulfide above 10 ppm, the use of continuous reading personal monitors with audible and/or visual alarms is required. When a group of employees is working close together, it is not necessary that each employee wear a monitor. Representative employees shall be selected to wear personal monitors when such group tasks are to be performed. A portable monitor can be substituted for the personal type as long as it adequately samples the work area used by all potentially exposed employees.

Monitors shall be utilized for the complete duration of work activity. It is required that monitors be set to alarm at 10 ppm or less. If the alarm sounds, indicating a concentration at/or above this level, workers shall immediately leave the area. Workers shall withdraw upwind to a position which is considered to be a safe distance from the source of the gas. The alarm will continue to sound until the detector-sensor is cleared of hydrogen sulfide. Depending on the type of monitor and the concentration of the gas, this can take several minutes, even though the monitor is removed to a hydrogen sulfide free atmosphere. Allowing workers to re-enter, and work in the area shall be permitted only if they are wearing a full face pressure-demand airline respirator with egress bottle or self-contained breathing apparatus (SCBA) . This procedure shall be followed, until it has been established that the area is safe from hydrogen sulfide (less than 10 ppm).

B. Fixed (Stationary) Monitors

Continuous fixed area monitors shall be permanently installed in locations where the sudden release of hydrogen sulfide is possible. The monitor sensors shall be placed in proximity to potential sources of a hydrogen sulfide release. Several sensors may be needed at points of possible gas emission and shall be connected to a central monitor. The monitor H_2S warning device, audible and visual, shall be located so that the alarm can be easily recognized throughout the facility. Employees must be instructed to follow established response procedures in the event that an alarm is activated.

Survey measurements shall be made using portable hydrogen sulfide monitors. The following applications are most suitable for survey monitoring with portable devices.

* Monitoring of work areas prior to entry
* Monitoring of confined spaces
* Detection of leak sources
* Monitoring when lines, valves, or vessels are opened

4.) Respiratory Protection

Supplied-air (airline or SCBA) respiratory protection against hydrogen sulfide exposure is required in the following situations.

- When routine or maintenance work tasks involve exposure to H_2S concentrations of 10 ppm or greater.
- When a fixed monitor alarms, and re-entry to the work area is required to complete a job.
- If entry is required into a confined space is necessary and measurable levels of hydrogen sulfide are identified within the confined space.
- During rescue of employees suspected of H_2S overexposure.
- For specific tasks identified with significant exposure potential and outlined in local program guidelines.

All respiratory protection equipment for hydrogen sulfide must be of the supplied-air type, equipped with pressure-demand regulators and operated in the pressure demand mode only and meet the Standard of Industrial Hygiene Practice for Respiratory Protection. This is the only type of respiratory protection recommended for hydrogen sulfide application. If airline units are used, an egress bottle with at least a 5-minute supply shall also be carried. Gas masks or other air-purifying respirators must never be used for hydrogen sulfide due to the poor warning properties of the gas.

Use of respiratory protection shall be accompanied by a written respiratory protection program referenced to Davis Gas' " Respiratory Protection Program"

5.) Confined Space Entry

Work conducted in low lying areas and confined spaces where hydrogen sulfide may accumulate requires specific precautions beyond those described above. These conditions may be encountered during excavation and line repair or tank (vessel) entry or maintenance and inspection. Before starting work, these tasks require that the excavated area or vessel be thoroughly tested with a direct reading hydrogen sulfide instrument, as well as tested for sufficient oxygen and the absence of flammable atmospheres. These measurements are to be included as an integral part of an entry procedure. Furthermore, where entry permits are required these measured levels must be noted on the permit. Combination hydrogen sulfide detectors which also measure combustible gas and oxygen are available. Care must be taken to determine the hydrogen sulfide concentration throughout the complete area.

If hydrogen sulfide levels are determined to be above 10 ppm, entry into a confined space requires respiratory protection. Efforts must be made to ventilate the confined space prior to scheduled entry. When concentrations of hydrogen sulfide remain above 10 ppm, additional forced air venting is required before entry, when time permits. If entry is necessary under the above conditions respiratory protection shall consist of a pressure-demand airline respirator with an egress bottle or an SCBA. A standby person, also equipped with proper respiratory protection, is required to be outside the vessel and in constant audio or visual contact with the worker inside. This precaution is necessary to ensure that rapid rescue of the worker inside can be accomplished.

XI. Warning Signs

Warning signs for hydrogen sulfide must be posted to remind employees of the potential hazard at each specific location. Additionally, signs must indicate the need for monitors or respiratory protection in areas where such equipment is required. Warning signs shall be posted on all units where the potential for a dangerous release of hydrogen sulfide exists.

XII. Emergency Procedures

The prompt performance of specific rescue and emergency first aid procedures can very often result in the full recovery of victims overcome by hydrogen sulfide. These victims shall be immediately removed from the contaminated atmosphere by a rescuer wearing full-face pressure-demand supplied air respiratory protection, e.g., SCBA or supplied air with egress unit. Rescue must never be attempted without proper respiratory protection! Many such attempts have resulted in the rescuer also becoming a victim.

Once the victim is safely removed from the contaminated atmosphere, the rescuer is to begin artificial respiration or administer oxygen if breathing has ceased. Caution must be taken during the application of artificial respiration not to inhale air directly from the victim's lungs, as this could also result in the rescuer being overcome. Depending on the length of exposure and concentration of hydrogen sulfide, heart failure may occur within 4 to 6 minutes. If the victim's heart has stopped, cardiopulmonary resuscitation (CPR) must be started immediately. If the victim does not respond to emergency aid, emergency medical aid must be summoned to the scene, and the individual taken, as soon as possible, to a hospital for further treatment. Regardless of apparent condition, all overexposure victims shall receive appropriate medical attention as soon as possible.

XIII. Training

A. All field personnel, whether regularly assigned, contracted, or employed on an unscheduled basis, shall be H_2S trained and certified. They shall be trained and made familiar with detection equipment, ventilation equipment, prevailing winds, briefing areas, warning systems, and evacuation procedures where appropriate.

B. All Field personnel shall be trained in basic first-aid procedures applicable to victims of H_2S exposure. During subsequent on-site training sessions and drills, emphasis shall be placed upon rescue and first aid for H_2S victims. The training shall consist of the following:

a. Introduction
- Definition
- Dangers of H_2S
- Properties of H_2S
- Physical Effects
- Sources of H_2S

b. Hydrogen Sulfide Detection
- Types of Equipment
- Detector use in the field

c. Protective Breathing Equipment
- Types of Equipment
- Practical exercise in the use of company owned equipment

d. Safety Precautions To Be Used
e. Emergency Procedures
f. Written Examination

C. Safety Precautions to be used when dealing with H_2S

While in the field during normal working conditions employees shall abide by the following rules:

Davis Gas Processing employee will designate an upwind briefing area where any personnel on location can assemble for a "tailgate" safety meeting or to meet in the event of an emergency situation. A designated vehicle with ample fuel, will be facing an exit with nothing blocking the path, in case of an emergency.

1. Stay upwind of any escaping gas. Be alert to any wind direction changes.

2. Use fresh air breathing equipment when a on tank battery where H_2S gas concentration is KNOWN OR SUSPECTED.

3. OBSERVE AND OBEY all warning signs on location.

4. Use extreme caution when gauging all tanks. Stay on the upwind side of the hatch. Turn your body away from the hatch when opening.

5. Produced water contains H_2S. Use the same precautions as with crude oil.

6. Smoking, open flames, etc., are prohibited where gas is present or in a NO SMOKING AREA.

7. IF at any time a job is considered to be hazardous, shut down operations and **contact the company supervisor in charge of the job and a Davis Gas Supervisor.**

8. Do not enter any tank or enclosed vessel without using fresh air breathing equipment. A supervisor MUST be on location at all times, when entering Confined Spaces and a Confined Space Permit will be required.

9. If it does become necessary to enter any tank or enclosed vessel the following conditions must be met:
   a. The individual entering the tank must have in his possession a card stating that he has been trained in Hydrogen Sulfide Procedures and Confined Space Safety.
   b. The tank can be entered only if the employee is wearing a 'breathing air' work unit. The minimum equipment required is: a self-contained emergency fresh air bottle, a harness, and a non-sparking lifeline. The lifeline must be adequate to remove them from the vessel of Confined Space, in the event of failure of their breathing equipment or any other accident that could incapacitate them.
   c. An individual entering vessels must obtain a proper facemask seal.
   d. Breathing equipment must be inspected and face mask seal must be tested by a supervisor before entry.
   e. Backup personnel with proper equipment must be stationed at the entrance of the tank or enclosed vessel. They will man the safety lifeline, maintain communication and keep the individual inside under observation in case of an accident or emergency.

f. A designated supervisor must be on location to monitor conditions of air bottles, manifold, and airline as each bottle in use is depleted. The supervisor will designate the briefing and safe smoking area. He/she is responsible for safety conditions on the job location. He/she will be responsible for the cleaning and disinfecting of the breathing apparatus after and before storage.

10. All Davis Gas Processing owned fresh air breathing equipment will be inspected monthly by the Plant Personnel and quarterly by a designated outside company determined by the Safety Department. A record of the inspections will be maintained. Any equipment found to be unserviceable shall be tagged "OUT OF ORDER" and turned in for repairs.

D. In the event of escaping gas or a hydrogen sulfide emergency, these procedures should be used:

1. Immediately go to the upwind briefing area and determine if all crew members and other personnel working on the location are safe and accounted for.
2. Notify the Davis Gas Processing supervisor and the plant supervisor /personnel as soon as possible.
3. Under no circumstances attempt to rescue anyone that has been overcome by gas unless #2 has been completed and wearing fresh air breathing equipment in use while making the rescue.
4. After protective breathing equipment is in use move any victims to a safe location upwind from the H_2S source.
5. If the victim is unconscious and not breathing, trained personnel shall immediately apply mouth-to-mouth artificial respiration and continue it until normal breathing is restored.
6. After a victim is revived do not leave him alone. H_2S victims can have irritations or suffer other complications from H_2S exposure.
7. All H_2S victims should receive medical attention. Keep victims under observation until examined by a doctor.
8. Keep everyone away from the scene of the H_2S danger until supervisory personnel can take charge of the location.

E. Hydrogen Sulfide Work Procedures

1. Employees working in areas of 10 to 100 ppm shall use H_2S detection monitors while performing work at these locations. Should the monitor alarm, the employee shall go to a safe area (up or cross wind) and shall not re-enter without supplied air respirator or until the levels are less than 10ppm. Any well, tank, battery, or work area where H_2S may be in the atmosphere, should be approached form upwind if possible. Windsocks must be clearly visible and should be displayed at a height of at least eight feet.

2. Where the level of H_2S is 100 to 299 ppm employees shall use H_2S detection monitors while performing work in these locations. Should the monitor alarm, the employee shall egress to a safe area (up or cross wind) and shall not re-enter without supplied air respirator or until the levels are less than 10 ppm. Notify your supervisor when the potential for H_2S is above 10 ppm before re-entry with respiratory protection. Respiratory Protection equipment shall be available in adequate

numbers and strategically located for quick and easy access. SCBA or airline respirators shall be donned before performing specific tasks such as:

a. Where employee exposure exceeds or is expected to exceed, 10 ppm measured in the work-area atmosphere,
b. For confined space entry work when the concentration has not yet been determined and entry is required to perform the initial check. Persons shall not enter a tank, vessel, enclosed area or confined space, or any other area suspected to have H2S accumulation without addressing confined space entry permitting.
c. During emergency rescue where a worker may have been overcome by H_2S.
d. When opening a system or bleeding down a systems vessels, lines or scrubbers and the concentration of H_2S gas in the work-area atmosphere is at or suspected to be at 10 ppm or greater.

3. Employees who are required to work in areas where the atmosphere contains H_2S concentrations of **300 ppm or greater** shall use monitors while performing work in these areas. Employees shall approach an open source only while wearing a SCBA or airline respirator and at least one standby person must be present and equipped with a SCBA or airline respirator.

4. Davis Gas Processing requires, back up personnel when H_2S levels are greater than 100 ppm.

F. Electronic Monitors

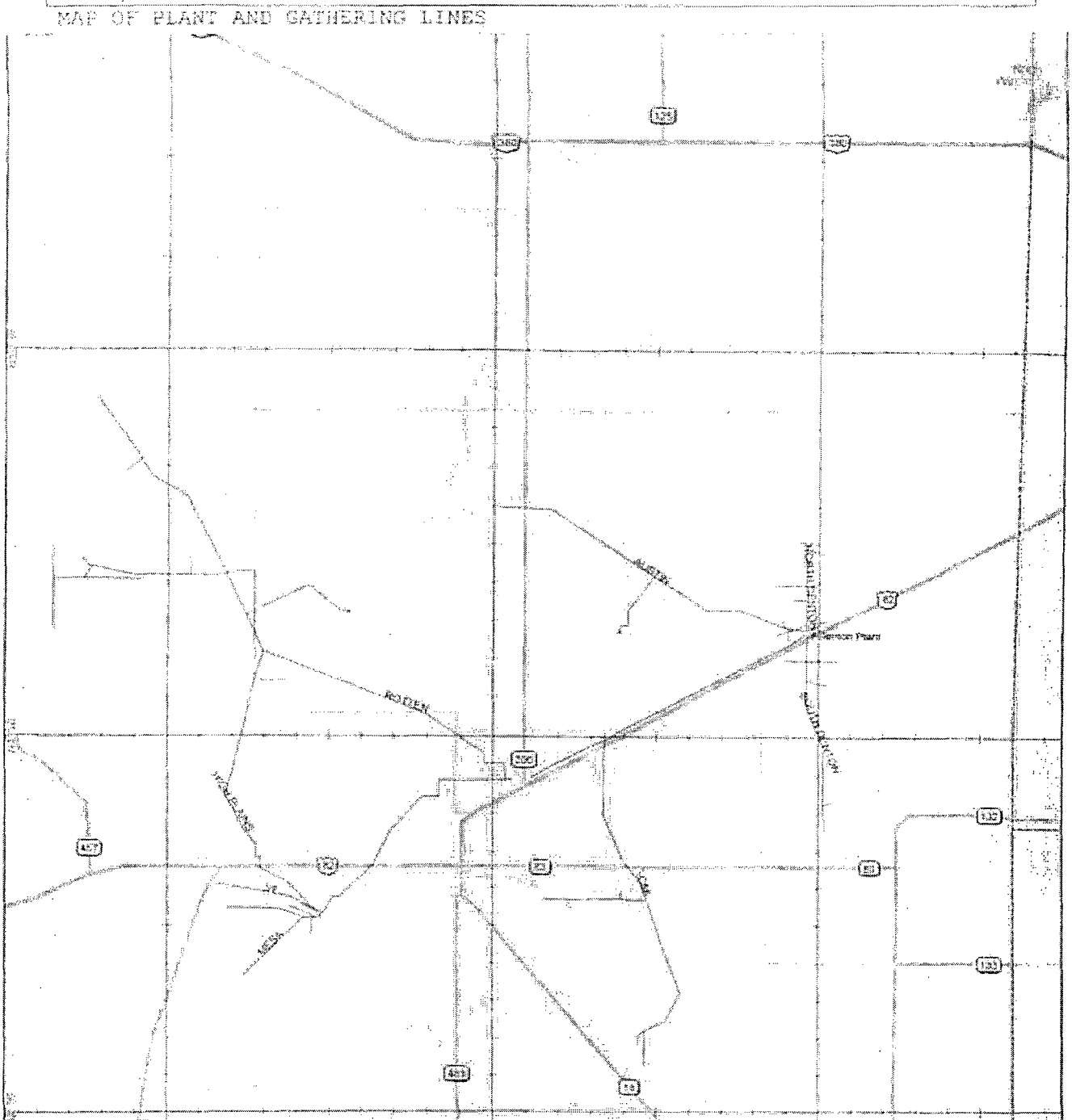
1. H_2S monitors are required whenever personnel are working in an area with potential exposure to hydrogen sulfide gas is at or above the Permissible Exposure Limit (PEL) of 10 parts per million (PPM) in the atmosphere. Employees assigned to a sour gas lease must have an electronic H_2S monitor available for his/her use. All Davis Gas Processing employees, when working in a suspected H_2S area, MUST utilize an H_2S monitor, that registers an alert at a H_2S level greater than 10 ppm. Crews can share a monitor's coverage if all the workers are within 6 feet of a portable H_2S monitor, when they are on the same level (no worker breathing zones below sensor levels), when there is an unimpeded line of sight between each individual and the sensor, and when the sensor is generally upwind from each individual.

2. H_2S monitors must be calibrated so that the first alarm reacts to H_2S levels equal to or less than 10 ppm (permissible exposure limit, PEL), with the second alarm reacting to H_2S levels equal to or less than 15 ppm (short term exposure limits, STEL). H_2S monitors must have both an audible and a visual alarm.

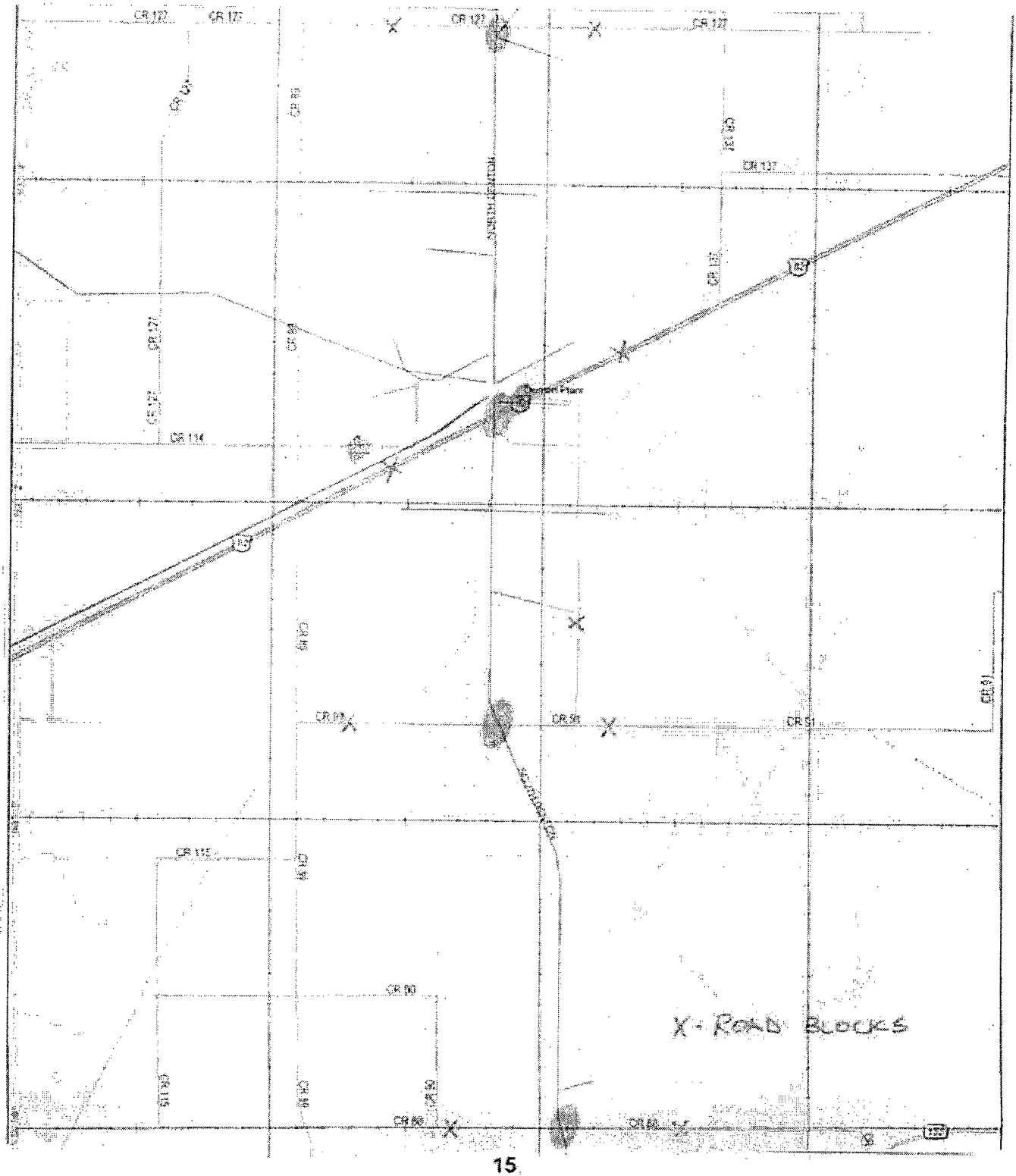
3. H_2S monitors shall be tested daily by the user to assure the monitor is functional, turning the monitor off, then on or pushing a test button will initiate the alarm sequence. If the alarm does not sound, the monitor shall be returned to the issuer for repairs. Monitors must be bump tested or calibrated as to the manufacturer's recommendations. Generally calibrations are required whenever the battery or sensor is replaced and every month or before use, whichever is less frequent. If the manufacturer recommends a calibration interval of less than 30 days, follow the manufacturer's recommendation.

4. Documentation of bump test and calibrations shall be maintained for 5 years.

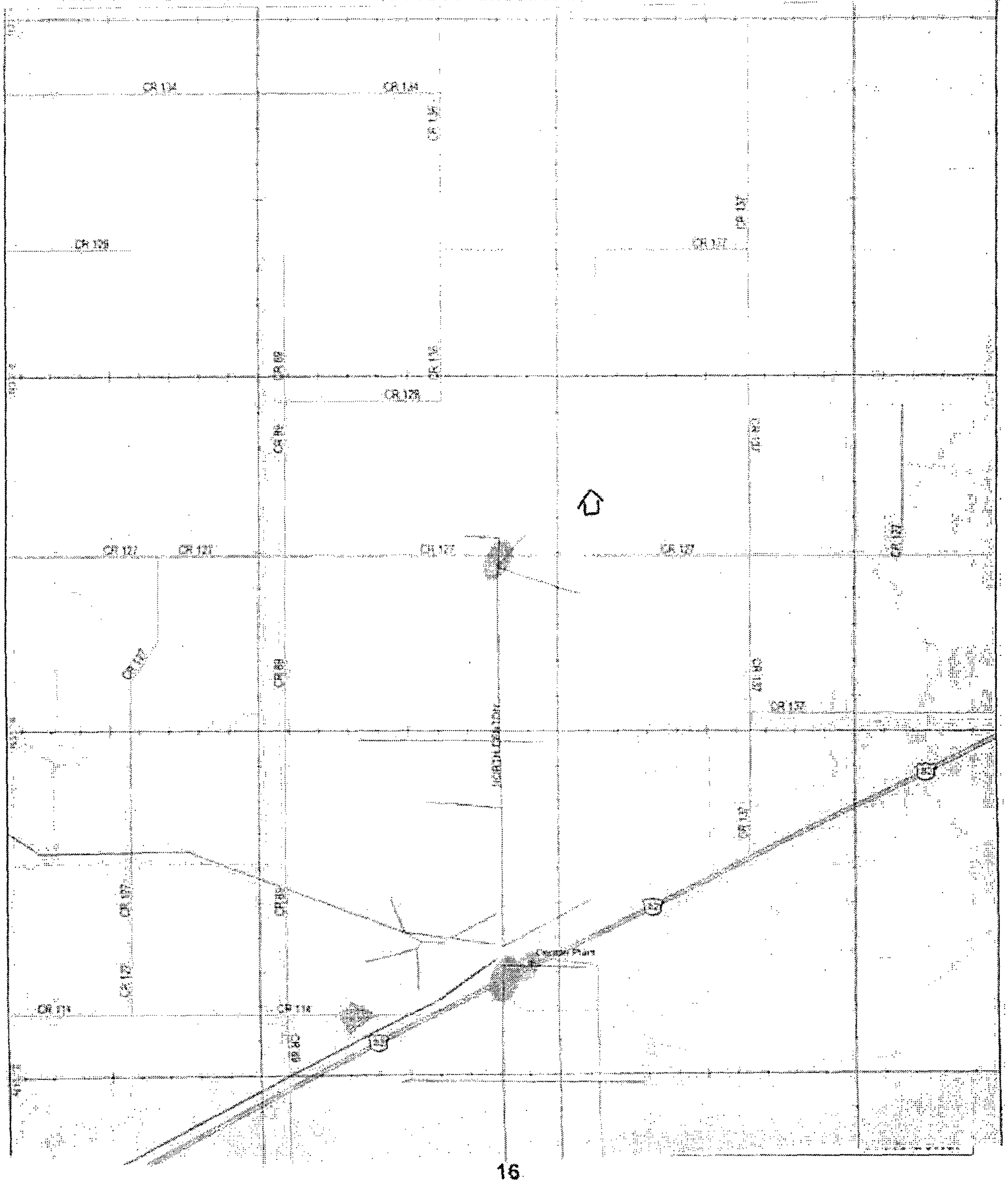
MAP OF PLANT AND GATHERING LINES



MAP OF RADIUS OF H2S EXPOSURE AREAS



MAP OF NORTH DENTON LINE (PUBLIC EXPOSURE)



ATTACHMENT TO THE DISCHARGE PERMIT GW-048
DAVIS GAS PROCESSING, INC.
DENTON GAS PLANT
DISCHARGE PERMIT APPROVAL CONDITIONS
(June 28, 2004)

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received by the OCD. The $4,000.00 required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. Davis Gas Processing, Inc. Commitments: Davis Gas Processing, Inc. will abide by all commitments submitted in the Discharge Permit renewal application dated November 20, 2003.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: 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.

6. 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.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. 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 to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to Discharge Permit. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans that are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will 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 retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: Davis Gas Processing, Inc. shall maintain storm water runoff controls. As a result of Davis Gas Processing, Inc.' operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Davis Gas Processing, Inc. shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Davis Gas Processing, Inc. shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Denton Gas Plant are discontinued for a period in excess of six months. Prior to closure of the Denton Gas Plant a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: Davis Gas Processing, Inc., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Davis Gas Processing, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

DAVIS GAS PROCESSING, INC.

by _____
Title

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

June 28, 2004

Mr. J. L. Davis
Davis Gas Processing, Inc.
211 North Colorado
Midland, Texas 79701-4696

RE: Discharge Permit Renewal GW-048
Davis Gas Processing, Inc.
Denton Gas Plant
Lea County, New Mexico

Dear Mr. Davis:

The ground water Discharge Permit GW-048 renewal for the Davis Gas Processing, Inc. Denton Gas Plant located in the NW/4 SW/4 of Section 2, Township 15 South, Range 37 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment.

The discharge plan consists of the original discharge permit for GW-048 approved September 12, 1989, the renewal application dated June 18, 2004 and the attached stipulations of approval. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The Discharge Permit application was submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to 20 NMAC 3109.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provide for possible future amendments or modifications of the permit. Please be advised that approval of this permit does not relieve Davis Gas Processing, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that 20 NMAC 3104 of the regulations provides: "When a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to 20 NMAC 3107.C., Davis Gas Processing, Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to 20 NMAC 3109.G.4., this permit is for a period of five years. This approval will expire on **September 12, 2009**, and Davis Gas Processing, Inc. should submit an application in ample time before this date. Note that under 20 NMAC 3106.F. of the regulations, if a discharger submits a Discharge Permit application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for Discharge Permit.

The Discharge Permit application for the Davis Gas Processing, Inc. Denton Gas Plant is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of $100 plus a flat fee of $4,000.00 for gas processing plants. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PERMIT GW-048
DAVIS GAS PROCESSING, INC.
DENTON GAS PLANT
DISCHARGE PERMIT APPROVAL CONDITIONS
(June 28, 2004)

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received by the OCD. The $4,000.00 required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the permit, with the first payment due upon receipt of this approval.

2. Davis Gas Processing, Inc. Commitments: Davis Gas Processing, Inc. will abide by all commitments submitted in the Discharge Permit renewal application dated November 20, 2003.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: 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.

6. 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.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. 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 to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to Discharge Permit. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans that are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will 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 retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: Davis Gas Processing, Inc. shall maintain storm water runoff controls. As a result of Davis Gas Processing, Inc.' operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Davis Gas Processing, Inc. shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Davis Gas Processing, Inc. shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Denton Gas Plant are discontinued for a period in excess of six months. Prior to closure of the Denton Gas Plant a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: Davis Gas Processing, Inc., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Davis Gas Processing, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

DAVIS GAS PROCESSING, INC.

by_____
Title

DAVIS GAS PROCESSING

DAVIS GAS PROCESSING, INC.
211 North Colorado
MIDLAND, TEXAS 79701-4696

OFF: (915) 682-6311
FAX: (915) 682-4024

October 18, 1999

Mr. Roger C. Anderson
Chief, Environmental Bureau
New Mexico Energy, Minerals
And Natural Resources Department
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal GW-408
Davis Gas Processing, Inc.
Denton Gas Plant
Lea County, New Mexico

Dear Mr. Anderson:

In my letter of September 27, 1999 (copy attached), we transmitted the flat fee and filing fee to you. The letter indicates a signed copy of the conditional approval form was also transmitted; however, I found two signed copies of this document on my desk. In the event this document was accidentally not transmitted, I am sending a signed copy hereunder.

Very truly yours,

Don K. Judd
Agent

cc: J.L. Davis

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-048
DAVIS GAS PRODUCING
DENTON GAS PLANT
DISCHARGE PLAN APPROVAL CONDITIONS
(September 15, 1999)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has not been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas plants. The renewal flat fee required for this facility is $1,667.50 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.

2. Davis Gas Producing Commitments: Davis Gas Producing will abide by all commitments submitted in the discharge plan renewal application dated May 20, 1999 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: 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.

6. 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.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. 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 to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than February 28, 2000 and every 5 years, from tested date, thereafter. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for constructed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will 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 retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Closure: The OCD will be notified when operations of the Denton Gas Plant are discontinued for a period in excess of six months. Prior to closure of the Denton Gas Plant a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

16. Certification: Davis Gas Producing, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Davis Gas Producing further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

DAVIS GAS PRODUCING

by _____
Title

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 15, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-533

Mr. Donald K. Judd
Davis Gas Producing
211 North Colorado
Midland, Texas 79701

RE: Discharge Plan Renewal GW-048
Davis Gas Producing
Denton Gas Plant
Lea County, New Mexico

Dear Mr. Judd:

The ground water discharge plan renewal GW-048 for the Davis Gas Producing Denton Gas Plant located in the SW/4 of Section 2, Township 15 South, Range 37 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the discharge plan as approved September 12, 1989 and renewed on February 1, 1995, and renewal application dated May 20, 1999. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The discharge plan renewal application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F, which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Davis Gas Producing of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

15. Closure: The OCD will be notified when operations of the Denton Gas Plant are discontinued for a period in excess of six months. Prior to closure of the Denton Gas Plant a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

16. Certification: Davis Gas Producing, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Davis Gas Producing further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

DAVIS GAS PRODUCING

by_____
Title

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Davis Gas Producing is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.G.4., this renewal plan is for a period of five years. This renewal will expire on **September 12, 2004**, and Davis Gas Producing should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

The discharge plan renewal application for the Davis Gas Producing Denton Gas Plant is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of $50. There is a renewal flat fee assessed for gas plant facilities equal to one-half of the original flat fee or $1,667.50. The OCD has not received the filing fee.

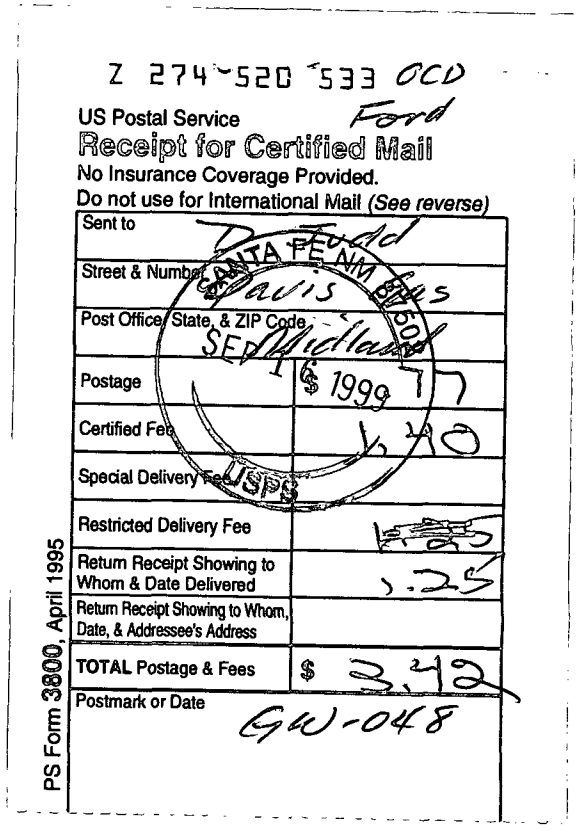
On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office


Z 274 520 533 OCD

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

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Street & Number	Davis
Post Office, State, & ZIP Code	SEP 1999
Postage	$ 1999 77
Certified Fee	1 10
Special Delivery Fee	USPS
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$ 3.92
Postmark or Date	GW-048

PS Form 3800, April 1995

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-048
DAVIS GAS PRODUCING
DENTON GAS PLANT
DISCHARGE PLAN APPROVAL CONDITIONS
(September 15, 1999)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has not been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas plants. The renewal flat fee required for this facility is $1,667.50 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.

2. Davis Gas Producing Commitments: Davis Gas Producing will abide by all commitments submitted in the discharge plan renewal application dated May 20, 1999 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: 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.

6. 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.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. 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 to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than February 28, 2000 and every 5 years, from tested date, thereafter. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for constructed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will 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 retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Closure: The OCD will be notified when operations of the Denton Gas Plant are discontinued for a period in excess of six months. Prior to closure of the Denton Gas Plant a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

16. Certification: Davis Gas Producing, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Davis Gas Producing further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

DAVIS GAS PRODUCING

by_____
Title

File copy

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

September 12, 1989

Certified Mail
Return Receipt No. P-106 675 313

Mr. Donald K. Judd
Davis Gas Processing
211 North Colorado
Midland, TX 79701

RE: Discharge Plan GW-48
Denton Gas Plant
Lea County, New Mexico

Dear Mr. Judd:

The groundwater discharge plan (GW-48) for the Denton Gas Plant located in the SE/4 of Section 2, Township 15 South, Range 37 East, NMPM, Lea County, New Mexico is hereby approved.

The approved discharge plan consists of the plan dated December 8, 1988 and materials dated March 14, 1989 and September 5, 1989 submitted as supplements to the discharge plan.

The discharge plan was submitted pursuant to Section 3-106 of the N.M. 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 the Oil Conservation Division (OCD) 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 September 12, 1994 and you should submit an application for renewal in ample time before that date.

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

Sincerely,

William J. LeMay,
Director

WJL/RCA/ag

cc: Oil Conservation Division - Hobbs

P-106 675 313

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

Sent to Donald K. Judd	
Street and No. 211 North Colorado	
P.O., State and ZIP Code Midland, TX 79701	
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, June 1985

Davis Gas Proc.
4/14/88 D. & B. Fields
Pit & Field E side plant. Field receives
oil-water separator fluids,
E. pit discharge.

Davis Gas Proc.

4/14/88 DWR

E. Pit - receives cooling tower sump drain water

Pit Drains to field.

Oil-Water Separator
Davis Gas Proc.
4/14/88 APB

Ammine Storage & transfer area
Dairy Coal Proc.
4/14/88 DJB

Oil Stained Soil
Barrs Gas Processing
4/19/88 DRB

Davis Gas Proc.
4/14/58
D-2-3

Oil on ground
N. of compressors

Davis Gas Prod.
4/14/88 DSR
Condensate tank bottom
drain line

Davis Gas Proc.
4/14/88 D & R
Leaky oil transfer pumps

Davis Gas Proc 4/19/88 BKS
Compressors and piping N of
compressors

Davis Cat
4/14/88
D-98
cryogenic plant

Davis Gas Processing
4/14/88 DJK.

Water leaks from 4 cooling jacket pumps drains to N-Plant unused cooling tower for pumping to East pit. Oil from leaks at compressors mixes with water from jackets and moves to lower sump.

Davis Gas Proc.
4/14/08 DRB
Drainage from E side
Amine storage to field