GW-SI

GENERAL CORRESPONDENCE

YEAR(S):

2006-1999



April 28, 2006

P.O. Box 2521 Houston, Texas 77252-2521 Office 713/759-3636 Facsimile 713/759-3783

SENT VIA FEDERAL EXPRESS NEXT DAY DELIVERY

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

Re:

TEPPCO NGL Pipelines, LLC

TEPPCO Val Verde System Discharge Permit Renewals

San Juan and Rio Arriba County, New Mexico

Dear Mr. Price:

TEPPCO NGL Pipelines, LLC ("TEPPCO") is submitting the enclosed signed groundwater discharge plans for 9 of its Val Verde Gas Gathering system compressor stations and 1 gas plant located in San Juan and Rio Arriba Counties, New Mexico. Enclosed with the discharge plan renewal is TEPPCO Check No. 0200001128 (Attachment 3) in the amount of \$19,300.00 for the permit fees. Please refer to the attached facility schedule (Attachment 2) which outlines the submittal dates and payments made for the filing fees and permit fees. Please note the application filing fees for each facility were previously paid with the submittal of the groundwater discharge plan renewal applications.

TEPPCO does not request any major changes to the permit documents as prepared by the New Mexico OCD; however, the dates referenced for the submittal of the discharge plan renewals are not correct for each facility. Each permit states that the renewal applications were submitted on October 31, 2005; however, the 10 renewals were submitted on a staggered schedule ranging from October 11, 2005 to October 31, 2005. Please refer to the attached facility schedule for the appropriate renewal submittal dates.

Notwithstanding the submittal of the enclosed permit fees and documents, TEPPCO does not waive its right to question or dispute the need and/or requirement for this permit at the referenced facilities or other Val Verde facilities.

If you have any questions or require additional information, please contact Peter Cain at (713) 284-5213 or myself at (713) 759-3553.

Sincerely

Deodat P. Bhagwandin

Manager, Environmental Protection



Val Verde Gas Gathering System Permit Renewal Costs and Schedule

Priority	Station Name	Permit #	Expiration Date	Submittal Date	Application	Permit Fees
					Fee	
1	Hart Canyon	GW-058	10/11/05	10/11/2005		\$1,700.00
2	Manzanares	GW-059	10/11/05	10/11/2005	\$ 100.00	\$1,700.00
3	Pump Canyon	GW-057	10/11/05	10/11/2005	\$ 100.00	\$1,700.00
4	Val Verde Treater	GW-051	9/27/05	10/27/2005	\$ 100.00	
5	Arch Rock	GW-183	2/21/05	10/19/2005	\$ 100.00	\$1,700.00
6	Sandstone	GW-193	6/2/05	10/19/2005	\$ 100.00	
7	Frances Mesa	GW-194	6/9/05	10/19/2005		\$1,700.00
8	Pump Mesa	GW-148	4/9/03	10/28/2005	\$ 100.00	
9	Gobernador	GW-056		10/31/2005		
10	Sims Mesa	GW-146	4/3/03			\$1,700.00
					The state of the s	

Grand Total:

\$1,000.00 \$19,300.00 (paid April 28, 2006) (paid)

Chavez, Carl J, EMNRD

From:

plcain@teppco.com

Sent:

Friday, April 28, 2006 2:37 PM

To:

Price, Wayne, EMNRD

Cc:

Chavez, Carl J, EMNRD; DPBhagwandin@TEPPCO.COM

Subject: TEPPCO Val Verde Discharge Permits

Mr. Price,

I wanted to let you know that we have signed and completed the discharge permits that you submitted to us at the beginning of April. We have sent them back to you via Federal Express Next Day. You should receive them by Monday. Also included is a check for the permit fees for all 10 facilities and a spreadsheet outlining all 10 facilities and the permit fees due. Please let me know if you do not receive the package.

While we really don't have any comments regarding the permits, I wanted to note that each discharge permit stated that the renewals were submitted on October 31, 2005, while in fact, they were submitted on a staggered schedule beginning October 11, 2005 until October 31, 2005. You may want to make note of that and perhaps change this language for each particular facility. Again, the spreadsheet outlines the dates in which we submitted the renewal applications.

Thanks for your assistance in this matter and please let us know if you have any questions. We enjoyed meeting you back in February and look forward to working with you more in the future.

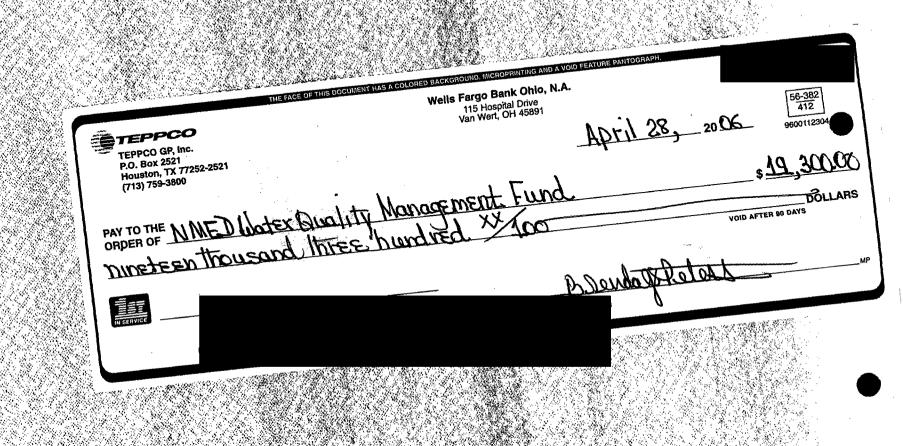
Regards,

Peter L. Cain TEPPCO, L.P. EH&S/ Environmental Protection Group (713) 284-5213 (phone) (713) 759-3931 (fax)

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Sale of Equipment	783	24	2500	9596	900000	4969302	**37
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TEPPCO PERMIT PAYMENT April 28, 2006

File No	iD	Address	Permit Fee
GW- 056	Gobernador Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 057	Pump Canyon Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 059	Manzanares Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 058	Hart Canyon Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 183	Arch Rock Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 194	Frances Mesa Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 193	Sandstone Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 146	Sims Mesa Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 148	Pump Mesa Compressor Station	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$1,700.00
GW- 051	Val Verde Gas Plant	TEPPCO NGL Pipelines; 2929 Allen Parkway; Houston TX 77019	\$ 4,000.00
Total		·	\$19,300.00



EMNRD MINING & MINERALS

4TTV: Wayne Price 1220 S St. Francis Dr SANTA FE NM 87505

OIL CONSERVATION ALTERNATE ACCOUNT: 56660DIVISION

AD NUMBER: 00148693 ACCOUNT: 00002190

LEGAL NO: 78092 P.O. #: 06-199-050125

477 LINES 1 TIME(S) 267.12

AFFIDAVIT: 0.00

TAX: 20.20 TOTAL: 287.32

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, R. Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 78092 a copy of which is hereto attached was published in said newspaper 1 day(s) between 12/06/2005 and 12/06/2005 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 6th day of December, 2005 and that the undersigned has personal knowledge of the matter and things set forth in this APPROVED. affidavit.

ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 6th day of December, 2005

Commission Expires:

Janet L. Montoya

NOTICE OF PUBLICATION

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

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

Ms L. Kristine Aparicio, Manager Environmental Protection, TEPPCO NGL Pipelines, LLC., 2929 Allen Parkway, 70019 P.O. Box 2521 Houston, Texas 77252-2521, telephone

713-759-3636, has submitted renewal applications for the previously approved discharge plans operated by Duke Energy Field Services for the following facilities:

Gobernador Compressor Station GW-056 located in NW/4 NW/4 of Section 31-Township 30N-Range 7W Ro Arriba County, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 80 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Pump Mesa Compressor Station GW-148 located in SE/4 of Section 14-Township 31N-Range 8W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of greater than 20 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Sims Mesa Compressor Station GW-146 located in NE/4 of Section 22-Township 30N-Range 7W Rio Arriba Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of greater than 14 feet with an estimated total dissolved solids concentration of 1700

Pur Station Station GW-057 located in NW/4 SW/4 of Section 24-Township 30N-Range 9W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 40-120 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Manzanares Compressor Station GW-059 located in SW/4 SE/4 of Section 4-Township 29N-Range 8W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 211 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Hart Canyon Compressor Station GW-058 located in NW/4 SE/4 of Section 20-Township 31N-Range 10W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 130 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Val Verde Treater Gas Processing Plan t Station GW-051 located in SE/4 SE/4 of Section 11-Township 29N-Range 11W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 26-55 feet with an estimated total dissolved solids concentration matching that of the San Juan River and Citizens Ditch..

Arch Rock Compressor Station GW-183 located in NW/4 SW/4 of Section 14-Township 31 -Range 10W San juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 51 feet with an estimated total dissolved solids concentration of 1300 mg/l.

Frances Mesa Compressor Station GW-194 located in SW/4 SW/4 of Section 27-Township 30N-Range 7W San Juan Country Naw Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 240 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Sandstone Compressor Station GW-193 located in SE/4 SE/4 of Section 32-Township 31 N-Range 8W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 80 feet with an estimated total dissolved solids concentration of 1700 mg/l.

The discharge plans addresses how best management practices will be used to properly handle, store, and dispose of oilfield materials and waste. The plan will also have contingencies for preventing and managing releases of accidental discharges of water contaminants to the surface in order to protect fresh water.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's web site http://www.emnrd.state.nm.us/ocd/. Prior to ruling on any pro-

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of November 2005.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

S F A L Mark Fesmire, Director Legal #78092 Pub. December 6, 2005

STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says: That she is the ADVERTISING MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Sunday, December 04, 2005.

And the cost of the publication is \$178.18.

ON 12/16/15 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

My Commission Expires November 17, 2008.

COPY OF PUBLICATION

918

Legals

NOTICE OF PUBLICATION

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

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

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Pump Canyon Compressor Station GW-057 located in NW/4 SW/4 of Section 24-Township 30N-Range 9W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 40-120 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Manzanares Compressor Stotion GW-059 located in SW/4 SE/4 of Section 4-Township 29N-Ronge 8W Son Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 211 feet with an estimated total dissalved solids concentration of 1700 mg/l.

Hart Canyan Compressor Station GW-058 located in NW/4 SE/4 of Section 20-Township 31N-Range 10W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 130 feet with an estimated total dissolved solids concentration of 1700 mg/l.

Val Verde Treoter Gas Processing Plan t Station GW-051 located in SE/4 SE/4 of Section 11-Township 29N-Range 11W San Juon Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 26-55 feet with an estimated total dissolved solids concentration matching that of the San Juan River and Citizens Ditch.

Arch Rock Compressor Station GW-183 lacated in NW/4 SW/4 of Section 14-Township 31 -Range 10W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 51 feet with an estimated total dissolved solids concentration of 1300 mg/l.

Frances Mesa Compressor Station GW-194 located in SW/4 SW/4 of Section 27-Township 30N-Range 7W San Juan Country, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at o depth of 240 feet with an estimated total dissolved solids concentration of 1700 ma/l.

Sandstane Compressor Station GW-193 located in SE/4 SE/4 of Section 32-Township 31 N-Range 8W San Juan Cauntry, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 80 feet with an estimated total dissolved solids concentration af 1700 mg/l.

The discharge plans addresses how best management practices will be used to properly handle, store, and dispose of oilfield materials and waste. The plan will also have contingencies for preventing and managing releases of accidental discharges of water contaminants to the surface in order to protect fresh water.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Mondoy through Fridoy. The draft discharge permit may also be viewed at OCD's web site http://www.emprd.state.nm.us/ocd/. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. Requests far a public hearing sholl set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Directar will approve or disapprove the proposed permit based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit and information submitted of the hearing.

GIYEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of November 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

Lenni No. 52636 mublished in The Date To

NOTICE OF PUBLICATION

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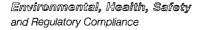
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of November 2005.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

S E A L Director Mark Fesmire,





October 27, 2005

RECEIVED

2929 Allen Parkway, 70019 P.O. Box 2521 Houston, Texas 77252-2521 Office 713/759-3636 Fax 713/759-3931

NOV - 2 2005 CERTIFIED MAIL NO.
OIL CONSERVATION RETURN RECEIPT REQUESTED

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

Re:

TEPPCO NGL Pipelines, LLC

TEPPCO Val Verde Treater Gas Processing Plant

San Juan County, New Mexico

Groundwater Discharge Plan (GW-051) Renewal Application

Dear Mr. Price:

TEPPCO NGL Pipelines, LLC ("TEPPCO") is submitting the enclosed Discharge Plan Application (Attachment 1) for its TEPPCO Val Verde Treater Gas Plant in San Juan County, New Mexico. Enclosed with the discharge plan renewal is TEPPCO Check No. **0200428488** (Attachment 4) in the amount of \$100.00 for the application filing fee. The permit fee in the amount of \$1,700 will be paid once the application is approved.

As mentioned in previous permit renewal applications submitted by the former operator, Duke Energy Field Services ("DEFS"), TEPPCO does not believe that a discharge plan is required for this facility under the Water Quality Control Commission ("WQCC") regulations because there are no discharges from the TEPPCO Val Verde Treater Gas Plant.

Notwithstanding the submittal of the enclosed permit fees and documents, TEPPCO does not waive its right to question or dispute the need and/or requirement for this permit at the referenced facility or other Val Verde facilities.

If you have any questions or require additional information, please contact Peter Cain at (713) 284-5213 or myself at (713) 759-3654.

Sincerely

L. Kristijie Apalicio

Manager, Environmental Protection



Attachment 1
Discharge Plan Application

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

Revised June 10, 2003

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:TEPPCO Val Verde Treater Gas Plant
2.	Operator: TEPPCO NGL Pipelines, LLC
	Address: PO Box 2521, Houston, Texas 77252-2521
	Contact Person: L. Kristine Aparicio Phone: 713-759-3636
3.	Location: SE /4 SE /4 Section 11 Township 29N Range 11W Submit large scale topographic map showing exact location.
4.	Attach the name, telephone number and address of the landowner of the facility site.
5.	Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6.	Attach a description of all materials stored or used at the facility.
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10	. Attach a routine inspection and maintenance plan to ensure permit compliance.
11	. Attach a contingency plan for reporting and clean-up of spills or releases.
12	. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13	. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
	14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
]	Name: L. Kristing Aparielo Title: Manager, Environmental Protection
	Signature: Lossene (Spareces Date: 10-27-05
]	E-mail Address:

Val Verde Treater Gas Plant SE/4, SE/4 of Section 11, Township 29N, Range 11W San Juan County, New Mexico

GROUNDWATER DISCHARGE PLAN

This document constitutes a renewal application for the Groundwater Discharge Plan for the Val Verde Treater Gas Plant in San Juan County, New Mexico. This Groundwater Discharge Plan has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (rev. 12-95) and the New Mexico Water Quality Control Commission ("WQCC") regulations, 20.6.2.3-104 and 3-106 NMAC.

1 Type of Operation

The facility does not intend or have a discharge or discharges that may move directly or indirectly into groundwater.

2 Operator / Legally Responsible Party

Operator

TEPPCO NGL Pipelines, LLC PO Box 2521 Houston, Texas 77252-2521 (713) 759-3636 Contact Person: L. Kristine Aparicio

Owner Val Verde Gas Gathering Company, LP PO Box 2521 Houston, Texas 77252-2521

3 Facility Location

SE/4, SE/4 of Section 11, Township 29N, Range 11W

4 Landowner

U.S. Department of the Interior Bureau of Land Management 1235 La Plata Highway Farmington, NM 87499 (505) 599-8900

5 Facility Description

The facility provides CO2 removal from the natural gas after it has been compressed.

6 Materials Stored or Used

There are no materials stored on-site or used that are discharged on site so that they may move directly or indirectly into groundwater.

7 Sources and Quantities of Effluent and Waste Solids

There are no effluents or waste solids that are discharged on-site or off-site at the TEPPCO Val Verde Treater Gas Plant. All effluent and waste solids generated at the facility are removed from the facility for off-site disposal in accordance with applicable NMOCD, New Mexico Environmental Department ("NMED"), and EPA regulations as stated in previous groundwater discharge plans.

Separators/Scrubbers

Effluents or waste solids generated from separators or scrubbers are not discharged on site so that they may move directly or indirectly into groundwater.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers/fans at the facility.

Process and Storage Equipment Wash Down

Effluent or waste solids generated from process and storage equipment wash down are not discharged on site so that they may move directly or indirectly into groundwater.

Solvents/Degreasers

Solvent or degreasers are not discharged on site so that they may move directly or indirectly into groundwater.

Spent Acids/Caustics

If generated, spent acids or caustics are not discharged on site so that they may move directly or indirectly into groundwater.

Used Engine Coolants

Engine coolants are not discharged on site so that they move directly or indirectly into groundwater.

Waste Lubrication and Motor Oils

Lubricating and motor oils are not discharged on site so that they may move directly or indirectly into groundwater.

Used Oil Filters

Used oil filters are not discharged on site so that they may move directly or indirectly into groundwater.

Solids and Sludges

Solids and sludges are not discharged on site so that they may move directly or indirectly into groundwater

Painting Wastes

Painting wastes are not discharged on site so that they may move directly or indirectly into groundwater

Sewage

There are no restroom facilities at the facility. A portable toilet is kept on site.

Lab Wastes

Lab wastes are not generated at the facility.

Other Liquids and Solid Wastes

Other liquids and solid wastes are not discharged on site so that they may move directly or indirectly into groundwater.

8 Liquid and Solid Waste Collection / Storage / Disposal

Collection / Storage

All liquid and solid wastes are collected and stored in closed containers for offsite disposal.

On-site Disposal

There are no on-site disposal activities at the facility

Off-site Disposal

All liquid and solid wastes are disposed off site.

9 Proposed Modifications

No modifications are proposed at this time.

10 Inspection, Maintenance, and Reporting

Routine inspections and maintenance are performed to ensure proper collection, storage, and off-site disposal of all wastes generated at the facility.

11 Spill / Leak Prevention and Reporting (Contingency Plans)

TEPPCO will respond to and report spills as outlined in the TEPPCO SPCC plan for TEPPCO Val Verde Treater Gas Plant and in accordance with the requirements of NMOCD Rule 116 (19.15.C.116) and WQCC regulation (20.6.2.1203 NMAC)

12 Site characteristics

Geological/hydrological information for this facility has not changed since the previous renewal application.

Hydrologic Features

Surface water near the Val Verde Treater Plant consists of the San Juan River and a nearby irrigation canal named Citizens Ditch. Citizens Ditch runs from east to west and is approximately one-half mile south of the plant site. The San Juan River is approximately 1.5 miles south of the plant site.

Cathodic well data in the area indicates the depth to groundwater to be approximately 26 to 55.5 feet.

Based on a review of the topographic map for the area, groundwater flow direction is likely to be to the south.

Geologic Description

The Val Verde Treater Plant's subsurface can be characterized by clayey sand and silt, and silty clay and sand resting on top of the sandstone and mudstone units of the Naciemento Formation.

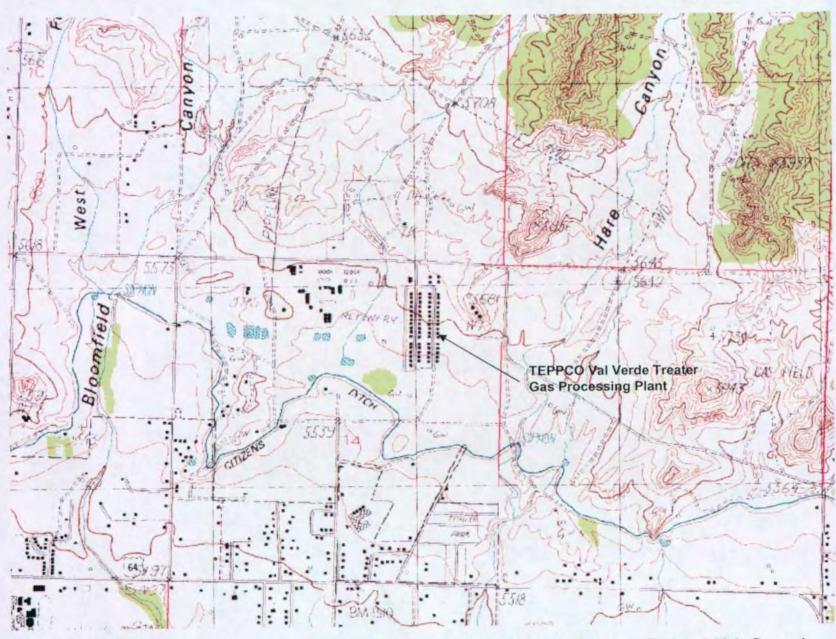
The sandstone and mudstone units only appear in the northern half of the plant site. It is thought that these units in the southern half of the plant were eroded away by what is now the San Juan River, and subsequently replaced with sediments eroded from the north and east.

TEPPCO Val Verde Treater Gas Plant lies more than 160 feet above the San Juan River to the south. One wash/arroyo lies to the northeast of the site. This area is not typically subject to flooding, therefore special flood protection measures are not needed.

13 Additional Information

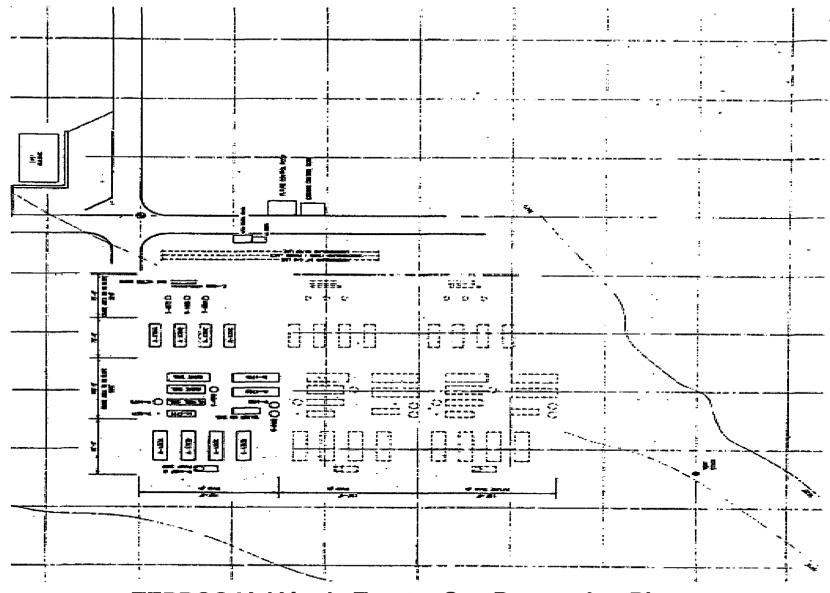
Any unauthorized releases or discharge will be reported to the NMOCD in accordance with NMOCD Rule 116, 19.15.C.116 NMAC, and WQCC regulation, 20.6.2.1203.

Attachment 2
Site Location Map
USGS Topographic Map
Bloomfield Quad



TEPPCO Val Verde Treater Gas Processing Plant, Bloomfield, NM Quad

Attachment 3
Facility Plot Plan



TEPPCO Val Verde Treater Gas Processing Plant Facility Plot Plan

Attachment 4
TEPPCO Check No 0200428488

October 27, 2005



NEW EXICO ENERGY, MERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

September 30, 2005

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. 7001 1940 0004 7923 4788</u>

Karin Kimura
Duke Energy Field Service
370 17th Street
Denver, Colorado 80202

Subject Matter:

Compliance Orders

Dear Ms. Kimura:

Please find enclosed Compliance Orders for the following facilities:

Val Verde Plant	GW-051
Arch Rock Compressor St.	GW-183
Sandstone Compressor St.	GW-193
Hobbs Gas Processing Plant	GW-175
Apex Compressor St.	GW-163
	Arch Rock Compressor St. Sandstone Compressor St. Hobbs Gas Processing Plant

Sincerely,

Mark E. Fesmire, P.E.

Director-Oil Conservation Division



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

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

September 16, 2005

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. 7001 1940 0004 7923 4764</u>

Karin Kimura Duke Energy Field Service P.O. Box 5493 Denver, Colorado 80202

Subject Matter:

Compliance Orders

Dear Ms. Kimura:

Please find enclosed Compliance Orders for the following facilities:

Val Verde Plant	GW-051
Arch Rock Compressor St.	GW-183
Sandstone Compressor St.	GW-193
Hobbs Gas Processing Plant	GW-175
Apex Compressor St.	GW-163
	Sandstone Compressor St. Hobbs Gas Processing Plant

Sincerely,

J. Daniel Sanchez

Enforcement and Compliance Manager

Oil Conservation Division



NEW MEXICO ENERGY, MUNERALS and NATURAL RESOURCES DEPARTMENT

Governor

Joanna Prukop

Cabinet Secretary

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

September 16, 2005

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. 7001 1940 0004 7923 4764</u>

Karin Kimura
Duke Energy Field Service
P.O. Box 5493
Denver, Colorado 80202

Subject Matter:

Compliance Orders

Dear Ms. Kimura:

Please find enclosed Compliance Orders for the following facilities:

NM-OCD 2006-002	Val Verde Plant	GW-051
NM-OCD 2006-003	Arch Rock Compressor St.	GW-183
NM-OCD 2006-004	Sandstone Compressor St.	GW-193
NM-OCD 2006-005	Hobbs Gas Processing Plant	GW-175
NM-OCD 2006-006	Apex Compressor St.	GW-163

Sincerely,

J. Daniel Sanchez

Enforcement and Compliance Manager

Oil Conservation Division



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

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

September 15, 2005

This is a directive to notify that I, Mark Fesmire, will be out of the office from September 16 through 23, 2005.

During my absence, Daniel Sanchez is hereby given authority to sign all OCD documents requiring my signature.

Mark E. Fesmire, PE

Director

Price, Wayne

From:

Price, Wayne

Sent:

Monday, August 09, 2004 10:02 AM Karin Char (E-mail)

To:

Cc:

Foust, Denny

Subject:

Val Verde plant GW-051-

Second request for information:



Sincerely:

Wayne Price New Mexico Oil Conservation Division 1220 S. Saint Francis Drive Santa Fe, NM 87505 505-476-3487

fax:

505-476-3462

E-mail: WPRICE@state.nm.us





OCT 0 2 2003

OIL CONSERVATION DIVISION

September 29, 2003

DUKE ENERGY FIELD SERVICES 370 17th Street Suite 900 Denver, CO 80202

303 595 3331

CERTIFIED MAIL
RETURN RECEIPT REQUESTED (Article No. 7002 2030 0006 2471 1650)

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

Subject:

Val Verde Gas Processing Plant

Discharge Plan GW-51

San Juan County, New Mexico

Dear Mr. Anderson:

As you will recall from our previous discussions, Duke Energy Field Services, LP (DEFS) requests cancellation or termination of the discharge plan for the Val Verde Gas Processing Plant, located in San Juan County, on the grounds that the Water Quality Control Commission (WQCC) regulations do not require such a plan for this facility.

The purpose of the WQCC regulations at NMAC 20.6.2.3101 et seq. is to protect surface and ground water in the State of New Mexico by controlling discharges of water contaminants onto or below the surface of the ground. These regulations, at 20.6.2.3104, prohibit discharges of effluent or leachate unless such discharges are made pursuant to a permit and are consistent with the terms of that permit. In particular, a person intending to discharge any water contaminant or toxic pollutant so that it may move directly or indirectly into ground water must submit a discharge plan to the WQCC and obtain a permit allowing the proposed discharge. NMAC 20.6.2.3106B.

There are no discharges of effluent, leachate, water contaminants, or toxic pollutants at the Val Verde Gas Processing Plant, nor are any such discharges planned or intended. All wastes generated at this facility are disposed of offsite and in compliance with applicable regulations, either by DEFS or by third parties who have contracted with DEFS to perform such services. A Spill Prevention Control and Countermeasures Plan for the facility has been developed to ensure that accidental spills do not result in discharges to groundwater. Under these circumstances, the WQCC regulations do not require a discharge permit or plan. DEFS believes that the original discharge plan submitted for the Val Verde Plant was erroneously prepared on the basis of a misunderstanding of the regulations. DEFS desires to correct this error, rather than continuing to maintain a discharge plan for a facility where there are no discharges within the meaning of the regulations. Therefore, DEFS requests that the New Mexico Oil Conservation Division (NMOCD) cancel Discharge Plan GW-15.

DEFS would be happy to provide additional information about the Val Verde Gas Processing Plant, if such information would assist NMOCD in reviewing this matter. If you have any questions concerning DEFS' position or the request to cancel the discharge plan, please contact me at (303) 605-1717.

720-635-9460

Sincerely,

cc:

Duke Energy Field Services, LP

Karin Kimura

Senior Environmental Specialist

NMOCD District 3 Office (Certified Mail Return Receipt Requested Article No. 7002 2030 0006 2471 1667)

1000 Rio Brazos Road Aztec, New Mexico 87410



NEW JEXICO ENERGY, M NERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

August 09, 2004

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

Ms Karin Kimura Duke Energy Field Service 370 17th Street Suite 900 Denver, Co 80202

Reference:

Val Verde Gas Processing Plant

Discharge Plan GW-051

San Juan County, New Mexico

Subject: Seco

Second request for information

Dear Ms Kimura:

The New Mexico Oil Conservation Division (OCD) is in receipt of your response letter dated July 22, 2004. You stated in your letter that "DEFS submitted the renewal application with the understanding that the OCD would stay any proceedings until the application of the WQCC's groundwater regulations was resolved".

Please note that section 20.6.2.3106.F (copy enclosed herein) allows the permit not to expire until the application for renewal has been approved or disapproved. It also states that the application for discharge permit renewal must include and adequately address all of the information necessary for evaluation of a new discharge permit. OCD informed you on June 21, 2004 the application was deficient and requested information so OCD may proceed with the review process.

Your July 22, 2004 letter does not satisfy our request. Therefore please provide the information requested in OCD's letter of June 21, 2004 by October 11, 2004. If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or Email wprice@state.nm.us.

Sincerely,

Wayne Price

Environmental Bureau

Attachment-1



DUKE ENERGY FIELD SERVICES
370 17th Street

Suite 900 Denver, CO 80202

303 595 3331

July 22, 2004

<u>UPS Next Day Air</u> (Tracking Number1Z F46 915 23 1002 773 3)

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

Subject:

Val Verde Gas Processing Plant

Discharge Plan GW-051 San Juan County, New Mexico

Dear Mr. Price:

Duke Energy Field Services, LP (DEFS) received the New Mexico Oil Conservation Division's (OCD) letter dated June 21, 2004 requesting information for the Val Verde Plant's discharge plan renewal application dated May 26, 2004. DEFS submitted the renewal application with the understanding that the OCD would stay any proceedings until the application of the WQCC's groundwater regulations was resolved.

DEFS disagrees that the information requested in the letter is required to evaluate the application. As stated in the May 26, 2004 application, the facility does not intend or have a discharge or discharges that may move directly or indirectly into groundwater. DEFS' responses to OCD's specific requests are in *italic text* below.

1. <u>Item #5 Facility Description</u>. The plan does not properly describe the on site activities. OCD understands that gas is actually treated on-site. Please provide a site map, process flow diagram and a brief description of each process unit.

There are no activities that result in discharges that may move directly or indirectly into groundwater and DEFS does not intend to have a discharge that may move directly or indirectly into groundwater. A plot plan of the facility was submitted with the May 26, 2004 application. A description of the process units was provided in the previous discharge plan submitted by Burlington Resources on October 5, 2000; no significant changes have been made to the process.

2. <u>Item #6 Material Stored or Used</u>. The plan submitted did not list any materials store on site or how they are stored. Please provide this information.

As stated in the May 26, 2004 application, there are no materials stored on site or used that are discharged on site so that they may move directly or indirectly into groundwater.

3. <u>Item #7 Sources and Quantities of Effluent Waste Solids</u>. The plan listed a number of sources but failed to list quantities. Please provide this information.

As stated in the May 26, 2004 application, there are no effluents or waste solids that are discharge on site so that they may move directly or indirectly into groundwater. All effluents and waste solids generated at the facility are removed from the facility for off-site disposal in accordance with applicable regulations.



Field Services Mr. Wayne Price Page 2 of 2. July 22, 2004

4. <u>Item #8 Liquids and Solid Waste Collection/Storage/Disposal</u>. The plan failed to identify the liquid and solid waste collected and stored on-site before disposal. In addition, the plan failed to list where the waste is disposed of. Please provide this information.

As stated in the May 26, 2004 application, all liquid and solid wastes are collected and stored in containers for off-site disposal; there are no on-site disposal activities. The facility does not collect and store any liquid or solid wastes on site that result in a discharge that may directly or indirectly move into groundwater. All effluents and waste solids generated at the facility are removed from the facility for off-site disposal in accordance with applicable regulations.

If you have any questions, please call me at (303) 605-1717.

Sincerely,

Duke Energy Field Services, LP

Karin Kimura

Senior Environmental Specialist

cc: NMOCD District 3 Office (UPS 2nd Day Air Tracking Number1Z F46 915 37 1002 591 4)

1000 Rio Brazos Road Aztec, New Mexico 87410



NEW EXICO ENERGY, MENERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop Cabinet Secretary

June 21, 2004

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

Karin Kimura Senior Environmental Specialist **Duke Energy Field Services** 370 17th Street Suite 900 Denver, Colorado 80202

Re:

Val Verde Gas Processing Plant

Discharge Plan GW-051 Renewal Application

San Juan County, New Mexico

Dear Ms. Kimura:

The New Mexico Oil Conservation Division (OCD) is in receipt of Duke Energy Field Services' Discharge Plan renewal application dated May 26, 2004 and \$100 filing fee for the above referenced facility. After reviewing the submittal, OCD has determine the application is deficient in the following areas:

- Item #5 Facility Description. The plan does not properly describe the on site activities. OCD 1. understands that gas is actually treated on-site. Please provide a site map, process flow diagram and a brief description of each process unit.
- 2. Item #6 Material Stored or Used. The plan submitted did not list any materials stored on site or how they are stored. Please provide this information.
- Item #7 Sources and Quantities of Effluent and Waste Solids. The plan listed a number of 3. sources but failed to list quantities. Please provide this information.
- 4. Item #8 Liquids and Solid Waste Collection/Storage/Disposal. The plan failed to identify the liquid and solid waste collected and stored on-site before disposal. In addition, the plan failed to list where the waste is disposed of. Please provide this information.

In order to issue public notice the application must be administrately complete. OCD has determined the above information is required in order to properly evaluate the application and to issue public notice. Please provide the above information by July 23, 2004. If you have any questions please do not hesitate to contact me at 505-476-3487 or e-mail WPRICE@state.nm.us.

Sincerely:

Wayne Price-Pet. Engr. Spec.

OCD Aztec Office



DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202

303 595 3331

May 28, 2004

UPS Next Day Air (Tracking Number 1Z F46 915 22 1003 481 6)

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

Subject: Val Verde Gas Processing Plant

Discharge Plan GW-051

San Juan County, New Mexico

Dear Mr. Anderson:

As you will recall, Duke Energy Field Services, LP (DEFS) has requested cancellation or termination of the discharge plan GW-051 for the Val Verde Gas Processing Plant, located in San Juan County, on the grounds that the Water Quality Control Commission (WQCC) regulations do not require such a plan for this facility. DEFS submitted its written request on September 29, 2003, but has not yet received a response from the New Mexico Oil Conservation Division (NMOCD). Because the current discharge plan for the Val Verde Plant will expire on September 17, 2004, and the regulations require submittal of renewal applications at least 120 days in advance of expiration, DEFS is submitting a renewal application for this discharge plan even though DEFS continues to believe that it is not required to have such a plan for the Val Verde Gas Processing Plant.

NMOCD's representatives have advised DEFS to submit the renewal application pending the determination of NMOCD's legal counsel as to whether a discharge plan is required for the Val Verde Gas Processing Plant, and have stated that the NMOCD will place this renewal application on hold pending such a determination. DEFS will therefore wait for further instructions from NMOCD before fulfilling its public notice requirements for the Val Verde Gas Processing Plant Discharge Plan renewal.

The following enclosed items are hereby submitted for the Val Verde Gas Processing Plant:

- Discharge plan renewal application (original and a copy);
- Check in the amount of \$100 for the discharge plan renewal application filing fee.

Please note that DEFS' submittal of the renewal application and application filing fee does not constitute a withdrawal of DEFS' request for cancellation or termination of the discharge plan for this facility, nor does it signify that DEFS has conceded the applicability of the WQCC regulations.



Mr. Roger Anderson Page 2 of 2. May 28, 2004

DEFS would be happy to provide additional information about the Val Verde Gas Processing Plant, if such information would assist NMOCD in reviewing the request for cancellation or termination. If you have any questions concerning DEFS' position or the enclosed renewal application materials, please contact me at (303) 605-1717.

Sincerely,

Duke Energy Field Services, LP

Karin Kimura

Senior Environmental Specialist

Enclosures

NMOCD District 3 Office (UPS Next Day Air Tracking Number 1Z F46 915 22 1003 480 7)

1000 Rio Brazos Road Aztec, New Mexico 87410 District I 1625 N. French Dr., Hobbs, NM 88240 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: Val Verde Plant
2.	Operator: Duke Energy Field Services, LP
	Address: 10 Desta Drive, Ste 400 West, Midland, TX 79705
	Contact Person: Mike Betz, Asset Manager Phone: (505) 632-6461
3.	Location: SE /4 SE /4 Section 11 Township 29N Range 11W Submit large scale topographic map showing exact location.
4.	Attach the name, telephone number and address of the landowner of the facility site.
5.	
6.	See attached discharge plan. Attach a description of all materials stored or used at the facility.
7.	See attached discharge plan. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8.	See attached discharge plan. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. See attached discharge plan.
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems. See attached discharge plan.
10.	Attach a routine inspection and maintenance plan to ensure permit compliance.
11.	See attached discharge plan. Attach a contingency plan for reporting and clean-up of spills or releases.
12	See attached discharge plan. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
14,	See attached discharge plan.
13.	Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
	See attached discharge plan.
	4. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the
t	pest of my knowledge and belief.
1	Name: Mike Betz Title: Asset Manager
S	Signature: MD3 Date: 5-26-04
F	E-mail Address: MBETED DUKE - ENERGY. (OM

Val Verde Gas Processing Plant SE/4 SE/4 Section 11 Township 29N Range 11W

DISCHARGE PLAN

This document constitutes a renewal application for the Groundwater Discharge Plan for the Val Verde Gas Processing Plant which was previously approved by the NMOCD on August 11, 2000. This Discharge Plan application has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95) and New Mexico Water Quality Control Commission (WQCC) regulations, 20.6.2.3-104 and 3-106 NMAC.

1 Type of Operation

The facility does not intend or have a discharge or discharges that may move directly or indirectly into groundwater.

2 Operator / Legally Responsible Party

Operator

Duke Energy Field Services, LP 10 Desta Drive, Ste 400 West Midland, TX 79705 (505) 634-6461 Contact Person: Mike Betz – Asset Manager

Owner

Val Verde Gas Gathering Company, LP 2929 Allen Parkway Houston, TX 77019

3 Location Facility

SE/4 SE/4 Section 11 Township 29N Range 11W, San Juan County, NM

See Figure 1 – Site Location Map.

4 Landowner

Val Verde Gas Gathering Company, LP 2929 Allen Parkway Houston, TX 77019

5 Facility Description

The facility provides natural gas compression for the gathering system.

6 Materials Stored or Used

There are no materials stored on-site or used that are discharged on site so that they may move directly or indirectly into groundwater.

7 Sources and Quantities of Effluent and Waste Solids

There are no effluent or waste solids that are discharged on site so that they may move directly or indirectly into groundwater. All effluent and waste solids generated at the facility are removed from the facility for off-site disposal in accordance with applicable NMOCD, NMED, and EPA regulations.

Separators/Scrubbers

Effluent or waste solids generated from separators or scrubbers are not discharged on site so that they may move directly or indirectly into groundwater.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers/fans at the facility.

Process and Storage Equipment Wash Down

Effluent or waste solids generated from process and storage equipment wash down are not discharged on site so that they may move directly or indirectly into groundwater.

Solvents/Degreasers

Solvent or degreasers are not discharged on site so that they may move directly or indirectly into groundwater.

Spent Acids/Caustics

If generated, spent acids or caustics are not discharged on site so that they may move directly or indirectly into groundwater.

Used Engine Coolants

Engine coolants are not used at the facility.

Waste Lubrication and Motor Oils

Lubricating and motor oils are not discharged on site so that they may move directly or indirectly into groundwater.

Used Oil Filters

Used oil filters are not generated at the facility.

Solids and Sludges

Solids and sludges are not discharged on site so that they may move directly or indirectly into groundwater.

Painting Wastes

Painting wastes are not discharged on site so that they may move directly or indirectly into groundwater.

Sewage

Sewage generated on site is routed to an on-site septic tank and leach line system subject to the New Mexico Environment Department Liquid Waste Disposal regulation, 20.7.3 NMAC.

Lab Wastes

Lab wastes generated at the facility for testing amine is returned to the amine recycling system and not discharged on site so that they may move directly or indirectly into groundwater.

Other Liquids and Solid Wastes

Other liquids or solid wastes are not discharged on site so that they may move directly or indirectly into groundwater.

8 Liquid and Solid Waste Collection / Storage / Disposal

Collection/Storage

All liquid and solid wastes are collected and stored in containers for off-site disposal.

On-site Disposal

There are no on-site disposal activities at the facility.

Off-site Disposal

All liquid and solid wastes are disposed off site.

9 Proposed Modifications

DEFS requests modification to Condition 11 in the August 11, 2000 Discharge Plan Approval Conditions. Condition 11 states: "Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery." Since the facility is located in an area that does not receive much rainfall, DEFS requests to modify this condition to inspect all systems designed for spill collection/prevention, and leak detection on a monthly basis and after each storm event.

10 Inspection, Maintenance, and Reporting

Routine inspections and maintenance are performed to ensure proper collection, storage, and offsite disposal of all wastes generated at the facility.

11 Spill / Leak Prevention and Reporting (Contingency Plans)

DEFS will respond to and report spills as outlined in the DEFS Environmental Compliance Manual and in accordance with the requirements of NMOCD Rule 116 [19.15.C.116 NMAC] and WQCC regulation [20.6.2.1203 NMAC].

12 Site Characteristics

No Changes.

13 Additional Information

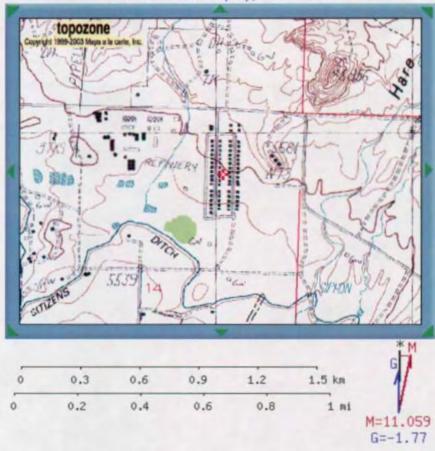
All unauthorized releases and discharges will be reported to the NMOCD in accordance with NMOCD Rule 116, 19.15.C.116 NMAC, and WQCC regulation, 20.6.2.1203 NMAC.

FIGURES

FIGURE 1. Site Location Map - Val Verde Gas Processing Plant.

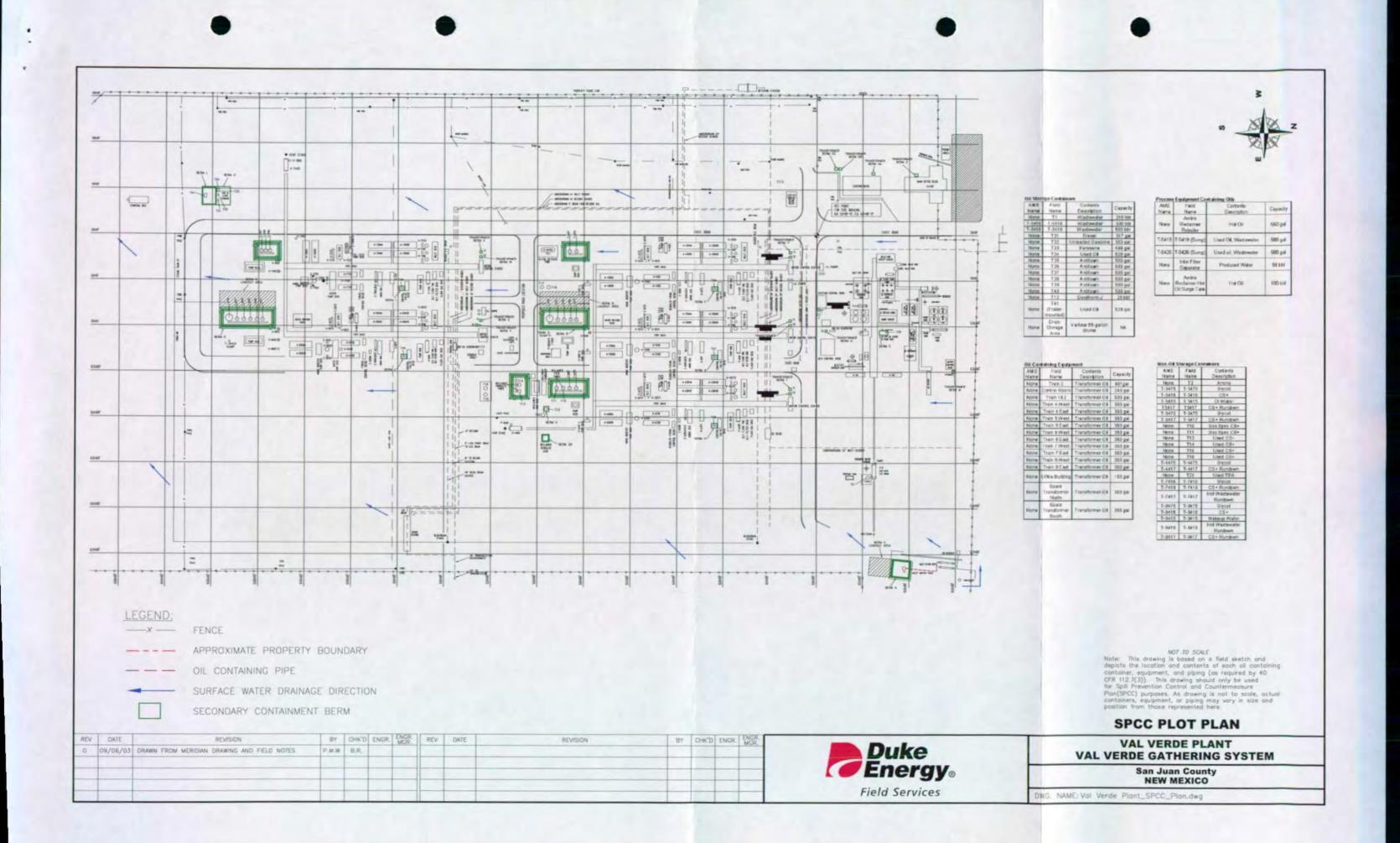
36.7302°N, 107.9565°W (WGS84/NAD83) USGS **Bloomfield** Quad

View TopoZone Pro aerial photos, shaded relief, street maps, interactive coordinate display, and elevation data



* Facility

FIGURE 2. Facility Plot Plan -Val Verde Gas Processing Plant.



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: Val Verde Plant
2.	Operator: Duke Energy Field Services, LP
	Address: 10 Desta Drive, Ste 400 West, Midland, TX 79705
	Contact Person: Mike Betz, Asset Manager Phone: (505) 632-6461
3.	Location: SE /4 SE /4 Section 11 Township 29N Range 11W Submit large scale topographic map showing exact location.
4.	Attach the name, telephone number and address of the landowner of the facility site.
5.	See attached discharge plan. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
5.	See attached discharge plan. Attach a description of all materials stored or used at the facility. See attached discharge plan.
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8.	See attached discharge plan. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. See attached discharge plan.
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems. See attached discharge plan.
10.	Attach a routine inspection and maintenance plan to ensure permit compliance.
11.	See attached discharge plan. Attach a contingency plan for reporting and clean-up of spills or releases.
12.	See attached discharge plan. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. See attached discharge plan.
13.	Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
	See attached discharge plan. 4. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the est of my knowledge and belief.
N	Yame: Mike Betz Title: Asset Manager
S	ignature: MDTBJ Date: 5-26-04
E	-mail Address: MBETZO DUKE - ENEAGY. (Duy

Val Verde Gas Processing Plant SE/4 SE/4 Section 11 Township 29N Range 11W

DISCHARGE PLAN

This document constitutes a renewal application for the Groundwater Discharge Plan for the Val Verde Gas Processing Plant which was previously approved by the NMOCD on August 11, 2000. This Discharge Plan application has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95) and New Mexico Water Quality Control Commission (WQCC) regulations, 20.6.2.3-104 and 3-106 NMAC.

1 Type of Operation

The facility does not intend or have a discharge or discharges that may move directly or indirectly into groundwater.

2 Operator / Legally Responsible Party

Operator

Duke Energy Field Services, LP 10 Desta Drive, Ste 400 West Midland, TX 79705 (505) 634-6461 Contact Person: Mike Betz – Asset Manager

Owner

Val Verde Gas Gathering Company, LP 2929 Allen Parkway Houston, TX 77019

3 Location Facility

SE/4 SE/4 Section 11 Township 29N Range 11W, San Juan County, NM

See Figure 1 – Site Location Map.

4 Landowner

Val Verde Gas Gathering Company, LP 2929 Allen Parkway Houston, TX 77019

5 Facility Description

The facility provides natural gas compression for the gathering system.

6 Materials Stored or Used

There are no materials stored on-site or used that are discharged on site so that they may move directly or indirectly into groundwater.

7 Sources and Quantities of Effluent and Waste Solids

There are no effluent or waste solids that are discharged on site so that they may move directly or indirectly into groundwater. All effluent and waste solids generated at the facility are removed from the facility for off-site disposal in accordance with applicable NMOCD, NMED, and EPA regulations.

Separators/Scrubbers

Effluent or waste solids generated from separators or scrubbers are not discharged on site so that they may move directly or indirectly into groundwater.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers/fans at the facility.

Process and Storage Equipment Wash Down

Effluent or waste solids generated from process and storage equipment wash down are not discharged on site so that they may move directly or indirectly into groundwater.

Solvents/Degreasers

Solvent or degreasers are not discharged on site so that they may move directly or indirectly into groundwater.

Spent Acids/Caustics

If generated, spent acids or caustics are not discharged on site so that they may move directly or indirectly into groundwater.

Used Engine Coolants

Engine coolants are not used at the facility.

Waste Lubrication and Motor Oils

Lubricating and motor oils are not discharged on site so that they may move directly or indirectly into groundwater.

Used Oil Filters

Used oil filters are not generated at the facility.

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Sewage

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Other Liquids and Solid Wastes

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All liquid and solid wastes are collected and stored in containers for off-site disposal.

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There are no on-site disposal activities at the facility.

Off-site Disposal

All liquid and solid wastes are disposed off site.

9 Proposed Modifications

DEFS requests modification to Condition 11 in the August 11, 2000 Discharge Plan Approval Conditions. Condition 11 states: "Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery." Since the facility is located in an area that does not receive much rainfall, DEFS requests to modify this condition to inspect all systems designed for spill collection/prevention, and leak detection on a monthly basis and after each storm event.

10 Inspection, Maintenance, and Reporting

Routine inspections and maintenance are performed to ensure proper collection, storage, and offsite disposal of all wastes generated at the facility.

11 Spill / Leak Prevention and Reporting (Contingency Plans)

DEFS will respond to and report spills as outlined in the DEFS Environmental Compliance Manual and in accordance with the requirements of NMOCD Rule 116 [19.15.C.116 NMAC] and WQCC regulation [20.6.2.1203 NMAC].

12 Site Characteristics

No Changes.

13 Additional Information

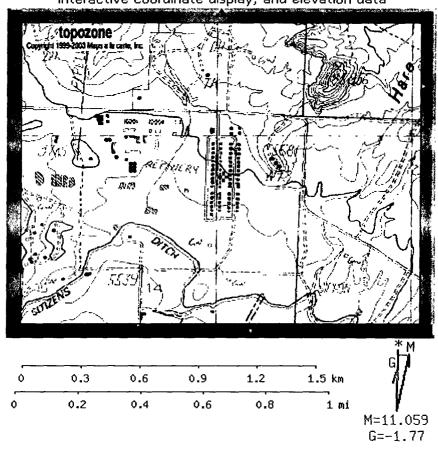
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FIGURES

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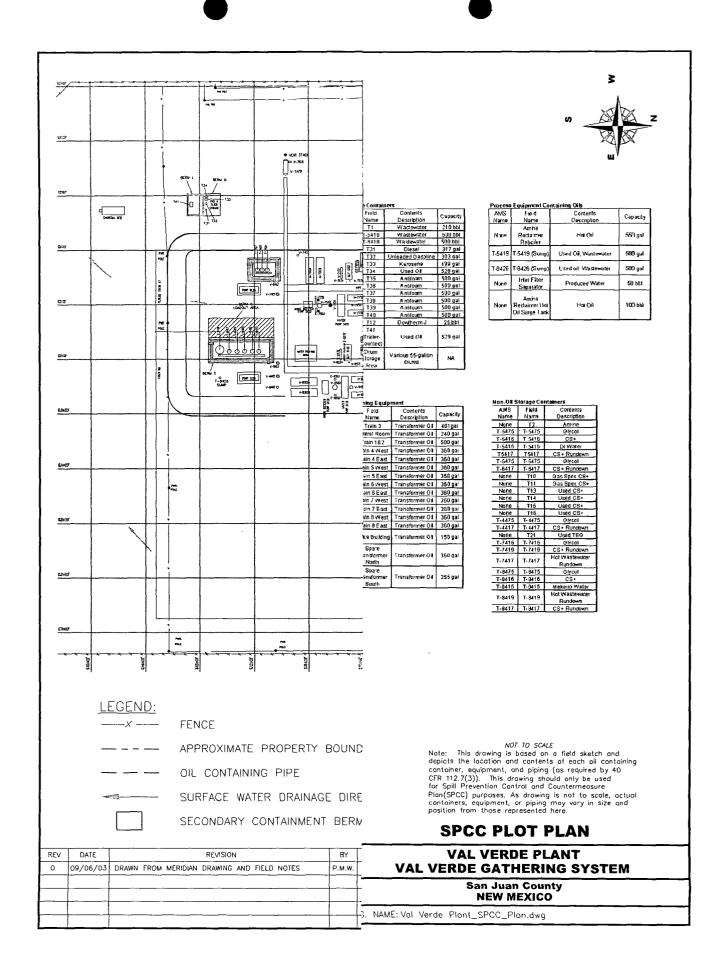
36.7302°N, 107.9565°W (WGS84/NAD83) USGS **Bloomfield** Quad

View *TopoZone Pro* aerial photos, shaded relief, street maps, interactive coordinate display, and elevation data



♣ Facility

FIGURE 2. Facility Plot Plan -Val Verde Gas Processing Plant.



Founded 1849

NM OIL CONSERVATION DIVISION

ATTN: DONNA DOMINGUEZ 2040 S. PACHECO ST. SANTA FE, NM 87505

AD NUMBER: 147215

ACCOUNT: 56689

LEGAL NO: 67378 P.O.#: 00199000278 185 LINES 1 time(s) at \$ 81.55

AFFIDAVIT OF PUBLICATION

AFFIDAVITS:

5.25

TAX: 5.43

TOTAL:

92.23

NOTICE OF PUBLICATION

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

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

(GW-051) Burlington Resources. Jeffery Schoenbacher, Environmental Representative, P.O. Box 4289, Farming-New ton. Mexico 87499-4289, has submitted a renewal application for the previously ap-proved discharge plan for their Val Verde Gas Plant located in the SE/4 SE/4 of Section 11, Township 29 North, Range West, NMPM, San Juan County, New Mexico. Approximately 1440 gallons per day of waste water is stored in above ground, closed-top steel tanks prior to transport to an OCD approved Class II injection well for disposal. Ground water most likely to be affected in the event of an accidental discharge is at a depth ranging from 10 to 50 feet with a total dissolved solids concentration ranging from 1000 mg/l to 6000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this fourth (4th) day of May, 2000.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION LORI WROTENBERY,

Director Legal #67378 Pub. May 10, 2000

dress given above. The COUNTY OF SANTA FE discharge plan application I, Burney being first duly sworn declare and may be viewed at the above address between say that I am Legal Advertising Representative of THE 8:00 a.m. and 4:00 p.m., SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of its modification, the Direc New Mexico and being a Newspaper duly qualified to publish tor of the Oil Conservation legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67378 a copy of which is hereto attached was published in said newspaper 1 day(s) between 05/10/2000 and 05/10/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 10 day of May, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

LEGAL ADVERTIGEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 9 day of

May A.D., 2000

Commission Expires ____



P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 Direct: 303-595-3331 Fax: 303-389-1957

October 24, 2002

Mr. Wayne Price New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Re: Results of the annual sump integrity inspection program - Val Verde Facilities.

Dear Mr. Price:

The purpose of this correspondence is to provide your office with written notice that Duke Energy Field Services (DEFS) completed the annual sump integrity testing at its Val Verde Area Facilities. I have sent you multiple copies of this letter such that you can file one copy per site.

The below listed facilities have double wall sumps with leak detection between the walls. The following actions were taken at each facility sump:

- 1. Visually inspect for liquids between the sump walls
- 2. Pull the leak sensor
- 3. Place it in water.
- 4. Check the control panel for a positive indication of a leak
- 5. Return the leak sensor.
- 6. Check the control panel to assure a return to a negative reading

These procedures were implemented at each of the inspections, at the facilities below. There were no visual signs of leaks and all equipment functioned correctly.

Facility Name / inspection date	Visual inspection	Electronic Sensor	Facility Name	Visual inspect	Electronic Sensor
Arch Rock 8/20/02	PASS	PASS	Middle Mesa 8/23/02	PASS	PASS
Buena Vista 8/22/02	PASS	PASS	Pump Canyon 8/19/02	PASS	PASS
Cedar Hill 8/21/02	PASS	PASS	Pump Mesa 8/19/02	PASS	PASS
Francis Mesa 8/20/02	PASS	PASS	Sandstone 8/19/02	PASS	PASS
Gobernador 8/20/02	PASS	PASS	Sims Mesa 8/20/02	PASS	PASS
Manzanares 8/20/02	PASS	PASS	Hart 8/20/02	PASS	PASS



Field Services

RECEIVED

AUG 0 4 2002

Environmental Bureau
Oil Conservation Division

July 31, 2002

Mr. Wayne Price New Mexico Oil Conservation Division 1220 South Street Francis Drive Santa Fe, NM 87505 P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 Direct: 303-595-3331 Fax: 303-389-1957



Re: Notification regarding sump integrity inspections - Val Verde Facilities

Dear Mr. Price:

The purpose of this correspondence is to provide your office with written notice that Duke Energy Field Services (DEFS) intends to conduct sump integrity testing at its Val Verde Area Facilities. The facilities listed below were recently purchased from Burlington Resources. In order to give your office at least 72 hours notice, please note that we will begin the testing on August 12, 2002.

Sumps at the following facilities will be tested:

Facility Name	County	Facility Name	County	
Arch Rock	San Juan	Middle Mesa	∠ San Juan	
Buena Vista 🗸	San Juan	Pump Canyon 🗸	San Juan	
Cedar Hill 🗸	San Juan	Pump Mesa //	San Juan	
Francis Mesa //	Rio Arriba	Quinn	San Juan	
Gobernador //	Rio Arriba	Sandstone /	San Juan	
Manzanares 🗸	San Juan	Sims Mesa	Rio Arriba	
Hart	San Juan	Val Verde Treater	San Juan	

All sumps are double walled with electronic leak detection between the two walls. If liquid is "sensed" between the sump walls an alarm is indicated on the facility control computer and the operator can respond. DEFS proposes to use the following testing procedure:

- 1. Conduct a visual inspection between the sump walls, to the extent possible.
- 2. Pull the electronic sensor from between the walls.
- 3. Place the sensor in a cup of water.
- 4. Check the computer screen for a positive test reading.



OIL CONSERVATION DIV.

02 JUL -5 PM 1:58

Duke Energy Field Services P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303/595-3331

July 1, 2002

CERTIFIED MAIL RETURN RECEIPT

Electronic Delivery July 1, 2002

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

Subject:

Change in Ownership

Val Verde System

Dear Mr. Price:

On behalf of Val Verde Gas Gathering Company, LP, Duke Energy Field Services, LP (DEFS) is submitting notification of a change in ownership of 14 facilities in Rio Arriba and San Juan Counties, New Mexico. Effective July 1, 2002, Val Verde Gas Gathering Company, LP is the new owner of the facilities identified in the attached list. The attachment lists the facility name, discharge plan number and legal location.

DEFS will be operating the facilities identified in the attached lists. Therefore, DEFS requests the transfer of the discharge plans identified in the attached list to Duke Energy Field Services, LP.

DEFS will comply with the terms and conditions of the previously approved discharge plans submitted by Burlington Resources Gathering, Inc.

If you have any questions regarding this transfer of ownership and/or the discharge plans, please call me at (303) 605-1717.

Sincerely,

Duke Energy Field Services, LP

Karin Char

Environmental Specialist

Attachment

cc: NMOCD District 3 Office (hard copy)

1000 Rio Brazos Road Aztec, NM 87410

Notification of Change in Ownership Val Verde System Effective July 1, 2002

Facility/Project	Plan Number	Location Sec-Twushp-Range	County / State
Arch Rock Compressor Station	GW-183	14 -T31N - R10W	San Juan / New Mexico
Buena Vista Compressor Station	GW-255	13 – T30N – R9W	San Juan / New Mexico
Cedar Hill Compressor Station	GW-258	29 – T32N – R10W	San Juan / New Mexico
Frances Mesa Compressor Station	GW-194	27 – T30N – R7W	Rio Arriba / New Mexico
Gobernador Compressor Station	GW-056	31 - T30N - R7W	Rio Arriba / New Mexico
Manzanares Compressor Station	GW-059	4 ~ T29N – R8W	San Juan / New Mexico
Hart Canyon Compressor Station	GW-058	20 - T31N - R10W	San Juan / New Mexico
Middle Mesa Compressor Station	GW-077	10 – T31N – R7W	San Juan / New Mexico
Pump Canyon Compressor Station	GW-057	24 – T30N – R9W	San Juan / New Mexico
Pump Mesa Compressor Station	GW-148	14 – T31N – R8W	San Juan / New Mexico
Quinn Compressor Station	GW-239	16 – T31N – R8W	San Juan / New Mexico
Sandstone Compressor Station	GW-193	32 – T31N – R8W	San Juan / New Mexico
Sims Mesa Compressor Station	GW-146	22 – T30N – R7W	Rio Arriba / New Mexico
Val Verde Gas Handling Facility	GW-51	14 – T29N – R11W	San Juan / New Mexico

Price, Wayne

From:

Anderson, Roger

Sent:

Monday, March 25, 2002 3:12 PM Price, Wayne; Kieling, Martyne

To: Subject:

RE: Granulated Charcoal managed at the Tierra Land farm Farmington, New Mexico.

Wayne: I agree with their recommendation to continue land farming the material. We will place interim requirements on the land farm.

Roger C. Anderson Environmental Bureau Chief Oil Conservation Division

----Original Message----

From: Price, Wayne

Sent: Monday, March 25, 2002 1:54 PM To: Kieling, Martyne; Anderson, Roger

Subject: FW: Granulated Charcoal managed at the Tierra Land farm

Farmington, New Mexico.

----Original Message----

From: Wurtz Gregg [mailto:GWurtz@br-inc.com]

Sent: Monday, March 25, 2002 11:46 AM

To: Wayne Price (E-mail)

Cc: Foust (E-mail); Hasely Ed; Gantner Bruce; Goosey Paul

Subject: Granulated Charcoal managed at the Tierra Land farm Farmington,

New Mexico.

Good Morning,

As per your request, Burlington Resources investigated your recent findings RE: granulated charcoal smoldering at the Tierra Landfarm, Farmington, New Mexico.

- 1. The source of the granulated charcoal is the Val Verde Gas Plant. The charcoal is used to strip the amine of hydrocarbons after the amine is used to strip the gas stream of CO2. The potential constituents that may be in the spent charcoal included trace amounts of amine and glycol and larger amounts of hydrocarbons. The charcoal is replaced approximately 3 times a year and landfarmed at the Tierra landfarm facility in Farmington, New Mexico as an except gas plant waste . The amount of material generated and farmed at Tierra is less than 100 cu. yds per year.
- 2. I reviewed BR's database for the certificate of waste record for this shipment and I contacted the gas plant engineer 3/21 to determine the source of the charcoal and the potential for other constituents in the charcoal. The charcoal was from Train #3 and was part of a routine charcoal replacement. No changes in the treatment process or the chemicals used in the process were discovered. As part stripping process the charcoal is raised to an elevated temperature and is allowed to cool prior to off site transport and landfarming. The 'charcoal may be still moist (Note: no free liquids) and contain minor process heat when delivered to the Tierra landfarm. The apparent cause of the heat generation is a minor reaction with the trace amounts of hydrocarbon and the granulate charcoal as the material dries.

- I contacted and performed a site visit of the Tierra Landfarm on 3/21/02 to review the special charcoal handling practices and/or issues with this particular disposal shipment at the facility. I was instructed that the material arrives at the Tierra facility with a minor amount of temperature and moisture and if left piled will generate a minor amount of heat on its own. The material reportedly has never generated sufficient heat to combust into flames only minor smoldering for 1-2 days if pilled. Tierra's standard practice is to spread the charcoal immediately and till/mix with dirt. This procedure appears to sufficient to prevent self generation of heat and the resulting smoldering of materials. The material observed during the OCD audit of Tierra was explained to be just delivered and the Tierra personnel were busy with the OCD staff at the time of delivery. The charcoal material (a second and different shipment) that was observed during the most recent visit by OCD was spread onto the land but not tilled into the soil. I observed a more recent shipment of charcoal material recently delivered to the landfarm that was spread and tilled during my visit on 3/21. No smoldering of the charcoal materials was observed during my inspection. BR has specifically instructed Tierra personnel to immediately farm the charcoal material by spreading and mixing with soil when it arrives.
- 4. My recommendation is to allow the landfarming of the charcoal material using the standard procedure currently used by the landfarm.

 I also reviewed the approved discharge plan and confirmed that the charcoal media and Tierra Landfarm was included in the plan.

Please contact me if you have questions concerning this issue. Thank you for you observation and correspondence.

Gregg Wurtz Sr. Environmental Representative Environmental Health and Safety Dept. Burlington Resources, San Juan Division gwurtz@br-inc.com Mobil (505) 320-2653 Office (505) 326-9537

Price, Wayne

From: Sent: Wurtz Gregg [GWurtz@br-inc.com] Monday, March 25, 2002 11:46 AM

To:

Wayne Price (E-mail)

Cc:

Foust (E-mail): Hasely Ed; Gantner Bruce; Goosey Paul

Subject:

Granulated Charcoal managed at the Tierra Land farm Farmington, New Mexico.

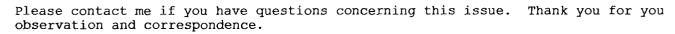
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- 1. The source of the granulated charcoal is the Val Verde Gas Plant. The charcoal is used to strip the amine of hydrocarbons after the amine is used to strip the gas stream of CO2. The potential constituents that may be in the spent charcoal included trace amounts of amine and glycol and larger amounts of hydrocarbons. The charcoal is replaced approximately 3 times a year and landfarmed at the Tierra landfarm facility in Farmington, New Mexico as an except gas plant waste. The amount of material generated and farmed at Tierra is less than 100 cu. yds per year.
- 2. I reviewed BR's database for the certificate of waste record for this shipment and I contacted the gas plant engineer 3/21 to determine the source of the charcoal and the potential for other constituents in the charcoal. The charcoal was from Train #3 and was part of a routine charcoal replacement. No changes in the treatment process or the chemicals used in the process were discovered. As part stripping process the charcoal is raised to an elevated temperature and is allowed to cool prior to off site transport and landfarming. The charcoal may be still moist (Note: no free liquids) and contain minor process heat when delivered to the Tierra landfarm. The apparent cause of the heat generation is a minor reaction with the trace amounts of hydrocarbon and the granulate charcoal as the material dries.
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Gregg Wurtz Sr. Environmental Representative Environmental Health and Safety Dept. Burlington Resources, San Juan Division gwurtz@br-inc.com Mobil (505) 320-2653 Office (505) 326-9537

VAL VERDE GAS PROCESSING PLANT DISCHARGE PLAN NO. GW-51

October 5, 2000

Prepared for:

Burlington Resources Gathering System, Inc.

Updated by:

Gregg Wurtz

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FIGURE 3b: MDEA PROCESS FLOW DIAGRAM (TRAINS 3)

FIGURE 3c: MDEA PROCESS FLOW DIAGRAM (TRAINS 4 THROUGH 8)

FIGURE 4a: TEG PROCESS FLOW DIAGRAM (TRAINS 1 THROUGH 3)
FIGURE 4b: TEG PROCESS FLOW DIAGRAM (TRAINS 4 THROUGH 8)

FIGURE 5: TRAIN 5 PROCESS AND INSTRUMENTATION DIAGRAMS

FIGURE 6: TRAIN 8 PROCESS AND INSTRUMENTATION DIAGRAMS

DISCHARGE PLAN NO. GW-51

VAL VERDE GAS PROCESSING PLANT

1.0 GENERAL INFORMATION

1.1 Val Verde Gas Processing Plant (Val Verde Plant) is owned and operated by

Burlington Resources, Inc. 3535 East 30th Street P.O. Box 4289 Farmington, NM 87499-4289 (505) 326-9700

1.2 Name of Legally Responsible Party

Mark Ellis Vice President, Regional Operations Burlington Resources, Inc. P.O. Box 4289 Farmington, New Mexico 87499-4289 (505) 326-9700

1.3 Name of Contact Person or Representative

BR requests that all correspondence regarding this plan be sent to:

Gregg Wurtz
Environmental Representative
Burlington Resources, Inc.
P.O. Box 4289
Farmington, New Mexico 87499-4289
(505) 326-9537

BR requests that copies of correspondence also be sent to:

Greg Kardos Senior Plant Supervisor Burlington Resources, Inc. P.O. Box 4289 Farmington, New Mexico 87499-4289 (505) 326 9508

1.4 Plant location

SE/4 of the SE/4 of Section 11, T29N, R11W, NMPM San Juan County, NM (Figure 1)

1.5 Purpose of Plant

Val Verde Plant is a facility, which removes CO₂ from a coal seam gas stream by contacting the gas with an amine based solvent that has a high affinity for CO₂. CO₂ stripped from the coal seam gas stream is vented to the atmosphere. The residue gas is contacted with Triethylene Glycol (TEG) to provide a set dew point.

The Val Verde Plant produces a natural gas stream that is stripped of CO₂ After the natural gas stream is treated within the facility it is sold and transported to El Paso Natural Gas or Trans-Western Pipeline.

1.6 Copies

Copies of this updated Discharge Plan No. GW-51 and Discharge Plan Approval Conditions has been provided to the Santa Fe and Aztec district office of the OCD. The OCD will make available copies for District offices and public review.

1.7 Affirmation

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

Signature

Date

Burlington Resources Gathering Inc.

John F. Zent Attorney in Fact

2.0 PLANT PROCESS

2.1 Process Description

Dehydrated coal seam natural gas enters Val Verde Plant via pipeline from individual gas production facilities located throughout northwest New Mexico and southwest Colorado. The natural gas entering the plant is essentially methane and carbon dioxide (CO₂). The CO₂ laden natural gas stream is sent to one of eight process trains for CO₂ removal.

Chemicals used in each process train include a Methyldiethanoloamine based solvent (MDEA) to remove CO₂ and Triethylene Glycol (TEG) to remove water entrained in the natural gas stream during CO₂ stripping.

The natural gas stream in each process train is contacted in a vertical trayed countercurrent absorber vessel with a 65% water and a 35% MDEA solution.

The rich MDEA solvent leaving the absorber vessels is regenerated in a typical MDEA regeneration system consisting of the following equipment (Figure 3a) for trains 1 and 2:

- Rich MDEA Flash Tank
- Lean/Rich Cross Exchanger
- Hot Oil Heated Reboiler (Gas Fired Hot Oil Heater)
- Lean MDEA Surge Tank
- Hot Oil Surge Tank

- Stripping Column
- Stripper Reflux Condenser (Fan Cooled)
- Lean MDEA Cooler (Fan Cooled)
- Reflux Condenser Cooler

The MDEA regeneration process for Train 3 is identical to Trains 1 and 2 except for the addition of a Final Lean/Rich Amine Exchanger (Figure 3b).

The amine regeneration system for trains 4, 5, and 6 (Figure 3c) is the same, except the amine heated reboiler is a direct fired reboiler, in place of a hot oil heated reboiler. Trains 4, 5, and 6 also have two flash tanks (high pressure and low pressure) as opposed to only one in trains 1, 2, and 3.

Train 7 and 8 MDEA regeneration system utilizes the same equipment as trains 4, 5 and 6 with the addition of a Hot Water Surge Tank, and Still Side Reboilers to accommodate an indirect fired heater rather that a direct fired reboiler.

CO₂ removed from the MDEA solution from trains 1, 2, and 3 is piped to a common 16-inch vent line, through an 8-foot diameter by 32-foot seam-to-seam, carbon steel, horizontal, vent scrubber and then discharged to the atmosphere via a vertical vent stack. Trains 4, 5 and 6 use a common 20-inch vent line, through a 10-foot by 25-foot seam-to-seam, carbon steel, horizontal, vent scrubber. Condensed water vapor collected in the vent scrubber is pumped back into the regeneration units.

Trains 1, 2, and 3 have a combined gas treating capacity of 135 MMSCF/d. Trains 4 through 8 each have a gas treating capacity of 117 MMSCF/d per train.

The dehydration process for the Val Verde Plant includes a common contactor (countercurrent absorber) for trains 1 and 2 and individual contactors for each of trains 3 through 8. Trains 1 through 3 share a common TEG regeneration system (Figure 4a) and train groups 4 through 8 (Figures 4b) each has its own TEG regeneration system.

A TEG regeneration system includes the following equipment:

- TEG flash tank
- Lean/Rich TEG cross exchangers
- Direct fired TEG reboiler with packed stripping column
- Lean TEG surge tank
- Lean TEG cooler (Fan cooled)

2.2 Water System

Process water is supplied to the Val Verde Plant by a set of raw water storage tanks to the east of the plant location. The water is passed through an ion exchange system prior to distribution throughout the plant. The ion exchange system is a portable truck mounted system that is self contained and regenerated at an offsite location.

Process water is used for make-up and cooling water in the amine regeneration process. Make-up water for the regeneration units amounts to approximately 45,000 gpd. Reject water from the regeneration system is collected in a waste water drain line system (WWD) and stored in an aboveground welded steel storage tank.

The cooling water from the regeneration system is drained into the WWD system's sumps and pumped into storage tanks. Trains 4 through 6 share a common sump and trains 7 and 8 share a common sump. From the sump the wastewater is transferred to an above ground tank. Trains 1, 2 and 3 do not have a wastewater drain system. Trains 1 through 3 utilize a hot oil heat transfer media that is used as needed.

Figure 5 and Figure 6 contain the Process and Instrumentation Diagrams (P&ID) for train 5 and train 8 respectively. The P&ID for train 5 are representative of the process fluids and wastewater collection systems in trains 4 through 6. Train 8 P&ID are representative of the process fluids and wastewater collection systems of trains 7 and 8.

2.3 Effluent Sources

Domestic discharges are made through one septic tank system shown on the facility diagram (Figure 2). The warehouse building, control rooms, shop building, and the new office building will discharge into the septic tank.

An evaporative cooling system using deionized water is operated in the summer months to increase amine cooling system efficiency. The water used in the evaporative cooling system does not come in contact with process materials or equipment. The over spray from the cooling system naturally evaporates or is collected in a small surface water impoundment and used for dust control if needed.

Potential sources for process discharges include:

- Demineralized cooling wastewater
- Unrecyclable process fluids
- MDEA test samples
- MDEA
- TEG
- Heat Transfer Oil

Spills or leaks are more likely to occur around fluid pumps, gas contactors, flash tanks and heaters.

MDEA test samples are collected once every day to determine MDEA strength and lean loading. Total sample volume collected per day is 1750 ml. Included in this sample volume are small amounts of the following test reagents:

- •Distilled H₂O
- •Methyl Red Indicator
- •N Sulfuric Acid
- Methyl Alcohol
- •Thymolphthalen Indicator 0.05%
- •Normal Potassium Hydroxide

This sample is poured into the laboratory sink that drains to the WWD and is then transferred to an aboveground wastewater tank.

Spent MDEA and TEG that cannot undergo a recycling process are characterized as unrecyclable process fluids and disposed of properly offsite.

The Val Verde Plant also recycles used MDEA and TEG generated at the plant as well as used MDEA from other non-BR gas facilities. The non-BR gas facilities use Val Verde Plant's recycling program as an alternative to disposal and the Val Verde Plant reuses the regenerated MDEA. The advantages to the recycling program are extended reuse of NDEA and minimization of environmental risk of offsite transportation to a disposal facility. The recycling equipment and process is a self-contained system that generates minor amounts of residual byproduct as a result of the regeneration process. These byproducts from the regeneration process are considered exempt waste and is managed in above ground storage tanks on site and later disposed of at the Class II McGrath SWD.

3.0 TRANSFER/STORAGE OF PROCESS FLUIDS

The WWD system for trains 4, through 6 is independent of Trains 7 and 8. Each WWD system includes a general sump that is transferred to an above ground steel tank. Fluids stored in the wastewater tank are periodically hauled off site to an OCD approved Class II SWD.

Makeup TEG and MDEA in trains 1-3 are stored in aboveground 500-gallon steel storage tanks. A small portable centrifugal pump is used to transfer from the storage tank into the system. In trains 4 through 8 makeup TEG and MDEA are stored in separate aboveground 90 bbl steel storage tanks.

The hot oil systems for trains 1, 2 and 3 are closed-loop systems, utilizing an elevated surge drum. Hot oil makeup requires a bulk truck delivery.

All high pressure process vessels and piping are installed above grade with the exception of a small amount of 2-inch glycol piping. This 2-inch line is externally coated and is welded utilizing schedule 80 pipe and weld fittings. Design pressure for this line is 1000 psig and it was hydrotested at 1500 psig. The line was doped and wrapped for external corrosion protection.

All pressure vessels in this plant are ASME Coded. All process piping was designed and fabricated per ASME/ANSI B31.3. All pressure piping welds 2-inch and larger were 100 percent x-rayed.

Critical areas in the high pressure gas piping have been inspected by ultrasonic thickness examination for corrosion. These inspections are performed by qualified inspectors focusing on the critical areas in the liquid process piping for corrosion.

Three 400 bbl steel storage tanks facilitate the storage of spent MDEA generated from Trains 1 through 8. These tanks will be situated within the proximity of the MDEA reclaimer and the spent product will be stored in these units until reclaimed. In addition, one 100 bbl steel storage tank will be installed adjacent to the reclaimer to retain residual by-product generated from the MDEA reclamation activities. Furthermore, the tanks situated on gravel within an earthen berm to contain any release that may occur.

3.1 Spill/Leak Prevention and Reporting

3.1.1 Operating Procedures

The Val Verde Plant is operated in a manner to prevent and mitigate any unplanned releases to the environment. The plant is manned 24 hours per day and 365 days per year including holidays. Plant process and storage units are regularly observed by a number of personnel during normal operation, and any evidence or sign of spill/leaks are routinely reported to supervisory personnel so that repairs or cleanup can be promptly performed. Routine maintenance procedures conducted at the Val Verde Plant also help to assure that equipment remains functional and that the possibility of spills/leaks is minimized.

If a spill/leak occurs, general cleanup procedures may involve minor earthwork to prevent migration, and recovery of as much free liquid as possible. Recovered fluids would then be transported off-site for recycling or disposal. Based on existing literature, analysis and regulatory guidelines, any contaminated soil will either be left in place, transferred to other existing waste-management areas, or transported off-site for proper disposal.

1.2 Spill/Leak Containment

To reduce the risk of spilled process fluids from contacting the ground surface, Val Verde Plant has constructed curbed concrete containment basins under process areas with a higher probability of a spill/leak (described in Section 2.3). Each of the containment basins either has a small open top sump or a drain to the general sump for that particular train. The small open top sumps are periodically cleaned and vacuumed out. Concrete curbing around process equipment is illustrated on the Facility Site Diagram, Figure 2.

Process pumps without concrete containment basins are equipped with drip pans for collecting seal or packing leakage. Drums and leaking equipment are stored inside a 20' x 20' curbed concrete area. Some equipment cleaning is also performed inside this area.

Above ground tanks are located within bermed areas with a capacity of at least 1.5 times the largest tank within each bermed area. A gravel pad is placed under each tank to assist in leak detection efforts.

3.1.3 Reporting

Should a release of materials occur, BR will comply in accordance with provisions described in NMOCD Rule and Regulation #116.

4.0 EFFLUENT AND SOLID WASTE DISPOSAL

On-Site Disposal:

The Val Verde Plant does not conduct any on-site waste disposal, except for sewage, which is processed through an approved septic system. All other waste streams are taken off-site for recycling or disposal.

Off-Site Disposal:

The following table provides information about off-site disposal:

Waste Stream	Collection Method	Shipment Method	Final Disposition	Receiving Facility
Waste water	Aboveground Steel Tank	Truck	Class II Injection Well	See Note 2
	with Containment	See Note 1		
Unrecyclable process	Aboveground Steel Tank	Truck	Class II Injection Well	See Note 2
fluids	with Containment			
		See Note 1		1
Caustic wash rinsate	Aboveground Steel Tank	Truck	Class II Injection Well	See Note 2
	with Containment	See Note 1		
Amine Mechanical Filter	20 cyd. Roll-Off	Waste Management	Landfill	Control Recovery, Inc.
		Trucking		
Bag Filter		}	}	Hobbs, New Mexico
Horizontal Inlet Filter	20 cyd. Roll-Off	Waste Management	Landfill	County Municipal
		Trucking		Landfill
Coalescer Inlet Filter				
Hot Oil Filter				
Glycol Filter				
Lubricating Oil	Aboveground Steel Tank	Vendor Truck	Fuel Blending or	Waste Oil Recycling
	with Containment		Recycling	Facility
Heat transfer oil	Aboveground Steel Tank	Truck	Fuels Blending	Waste Oil Recycling
	with Containment	See Note 1	or Recycling	Facility
Charcoal filter media	Concrete Charcoal	Truck	Soil Remediation	Envirotech or Tierra
	Drainage Pad		Landfarm	Landfarm
		See Note 1		1

Note 1. The trucking agent contracted to ship effluents off-site will be one of the following:

Dawn Trucking Co. 16B Rd 5860

Safety Clean Corp.

Sunco Trucking

4210 Hawkins Rd.

708 S. Tucker Ave.

Farmington, New Mexico.

Farmington, New

Farmington, New Mexico

Note 2. The off-site Disposal facility will be one of the following:

McGrath SWD #4

Basin Disposal

Key Disposal

Sec. 34, T-30-N, R-12-W San Juan County

Sec. 3, T-29-N, R-11-W 6 County Rd 5046

Sec. 2, T-29-N, R-12-W 323 County Rd. 3500

New Mexico

Bloomfield, New Mexico

Farmington, New Mexico

5.0 SITE CHARACTERISTICS

Much of the information for the site characteristics of the Val Verde Plant was taken from two reports prepared by Buys and Associates, Inc. One report, dated September 11, 1990 (1990 Report), was written during the initial assessment of the Val Verde Plant before BR purchased the property from South-Tex Treaters Inc. The second report, dated April 24, 1991 (1991 Report), is a groundwater monitoring and sampling report. The two Buys and Associates, Inc. reports are not attached to this discharge plan.

5.1 Surface water

Surface water near the Val Verde Plant consists of the San Juan River and a nearby irrigation canal named Citizens Ditch. Citizens Ditch runs from east to west and is approximately ½ mile south of the plant site. The San Juan River is approximately 1.5 miles south of the plant site.

5.2 Soils

The 1990 Report characterized the subsurface at the Val Verde Plant as clayey sand and silt, and silty clay and sand resting on top of the sandstone and mudstone units of the Naciemento Formation.

The sandstone and mudstone units only appear in the northern half of the plant site. It is thought that these units in the southern half of the plant were eroded away by what is now the San Juan River, and subsequently replaced with sediments eroded from the north and east.

Underling the plant site is erosion-resistant sandstone that was encountered during the drilling of monitoring wells in the area. This sandstone layer is thought to be the bedrock feature underling the Val Verde Plant site.

5.3 Groundwater

Groundwater levels were measured on March 11 and 12, 1991 by Buys and Associates, Inc. Depth to groundwater in the plant area was measured to range from 55.5 feet to 26.5 feet within the southern half of the plant site. No groundwater was encountered in the northern half of the plant site. No total dissolved solids (TDS) measurements were taken during the May 11 and 12, 1991 monitoring program at the Val Verde Plant (1991 Report).

Groundwater monitoring efforts at the El Paso Natural Gas (EPNG) Blanco Plant show the TDS in the groundwater to range from 5330 mg/l to 7620 mg/l. The EPNG Blanco Plant is directly adjacent to BR's Val Verde Plant (See Figure 2).

6.0 FLOOD POTENTIAL

Flood hazard data for Val Verde Plant is limited to Flood Insurance Rating Maps (FIRM) from the Federal Emergency Management Association (FEMA). Val Verde Plant lies approximately 160 feet above the San Juan River. According to the FIRM maps for San Juan County, Val Verde Plant would not be threatened by flood from a 100 year storm event. Flood protection is not necessary.

7.0. PRECIPITATION/STORM WATER RUNOFF CONTROL

Storm water run-off does not come in contact with the station process and waster streams, enclosed sumps, drainlines, equipment, and pipelines. Exposure minimization is the general management practice used to lessen the potential for storm water to come into contact with process and waste streams. Precipitation and cooling water that contacts the outside surface of equipment and the facility pad adjacent to equipment is drained to containment areas and allowed to evaporate or is captured in the WWD system. Storm water runoff that doesn't contact process equipment or adjacent process areas is allowed to naturally leave the facility. The facility pad is regularly maintained to prevent surface accumulations and where necessary the pad is armored with gravel to minimize erosion. Open top tanks are inspected periodically to monitor fluid levels.

A storm water plan for gas processing plants is not a requirement of the EPA (Federal; Register/Vol. 55 No. 22, Friday, November 16, 1990). A permit is necessary only if a facility has had a release of a reportable quantity of oil or a hazardous substance in storm water within the last three years. The Val Verde Plant has not had a release of a reportable quantity to date.

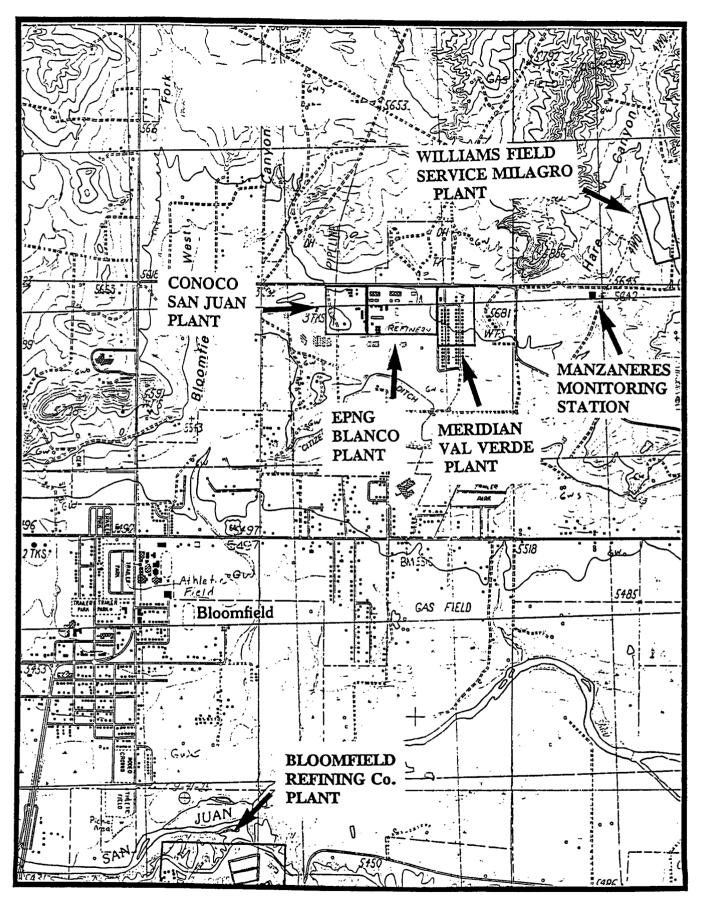
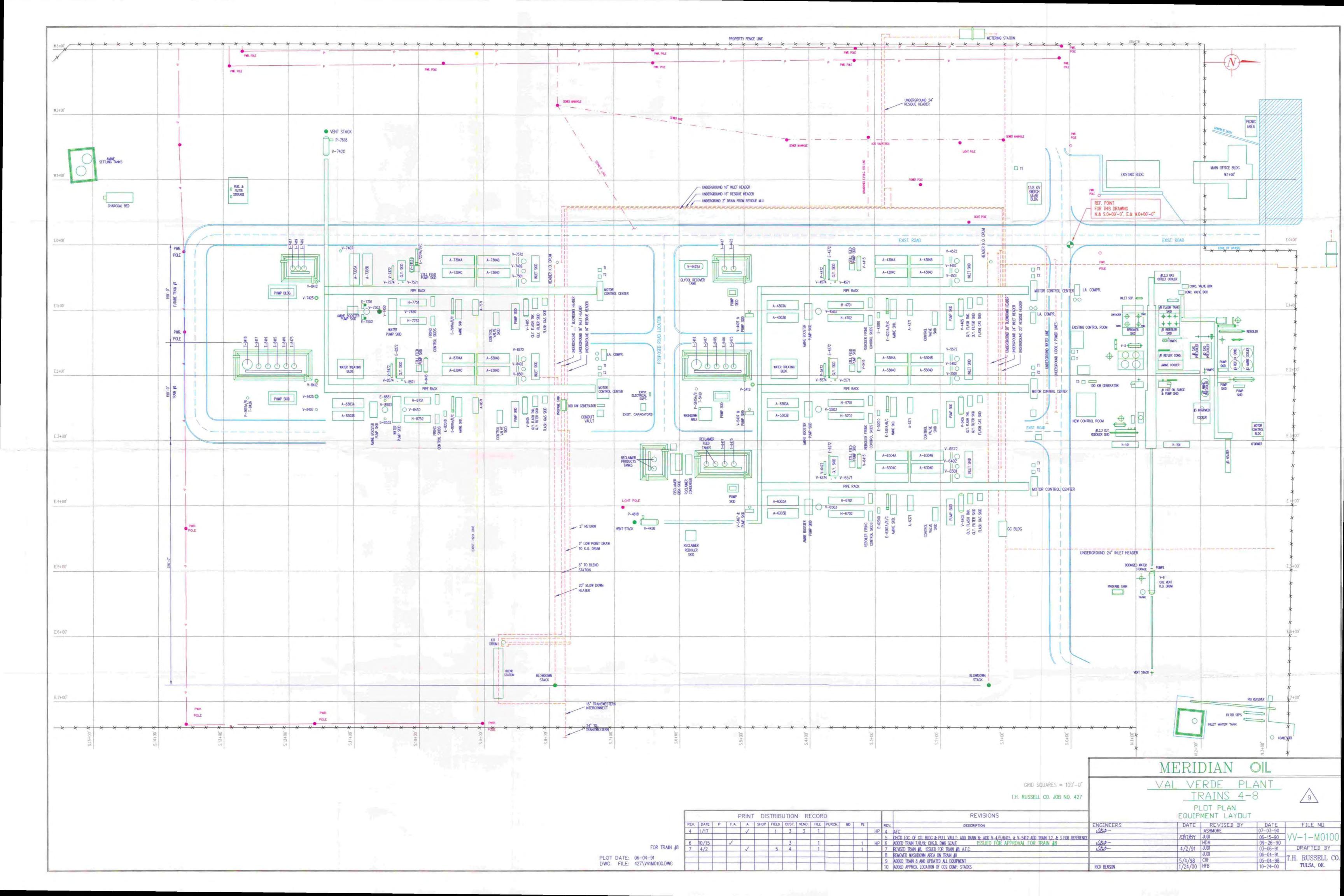
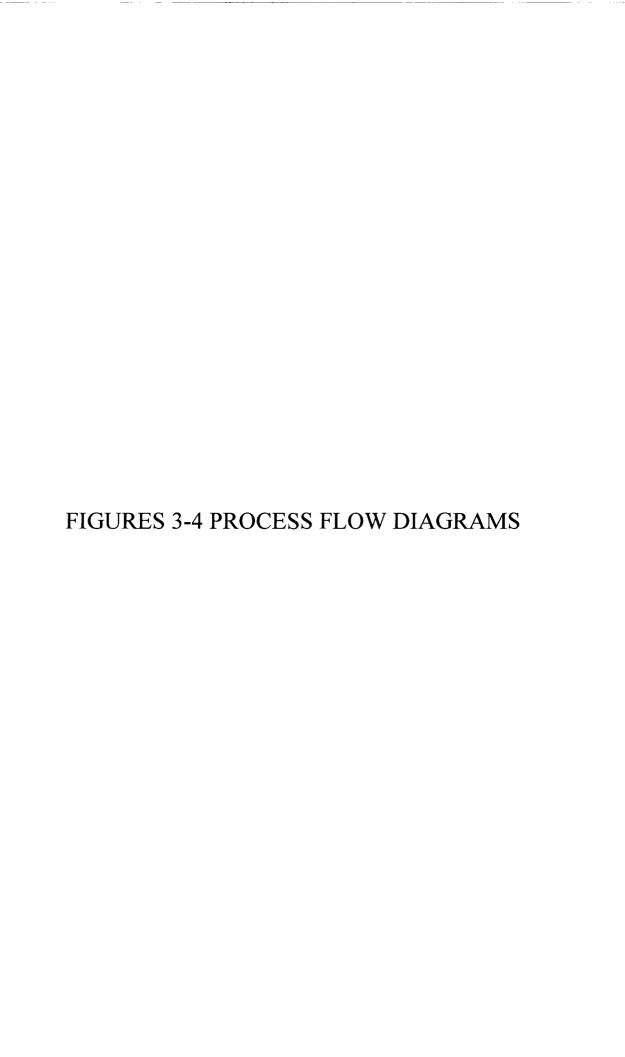
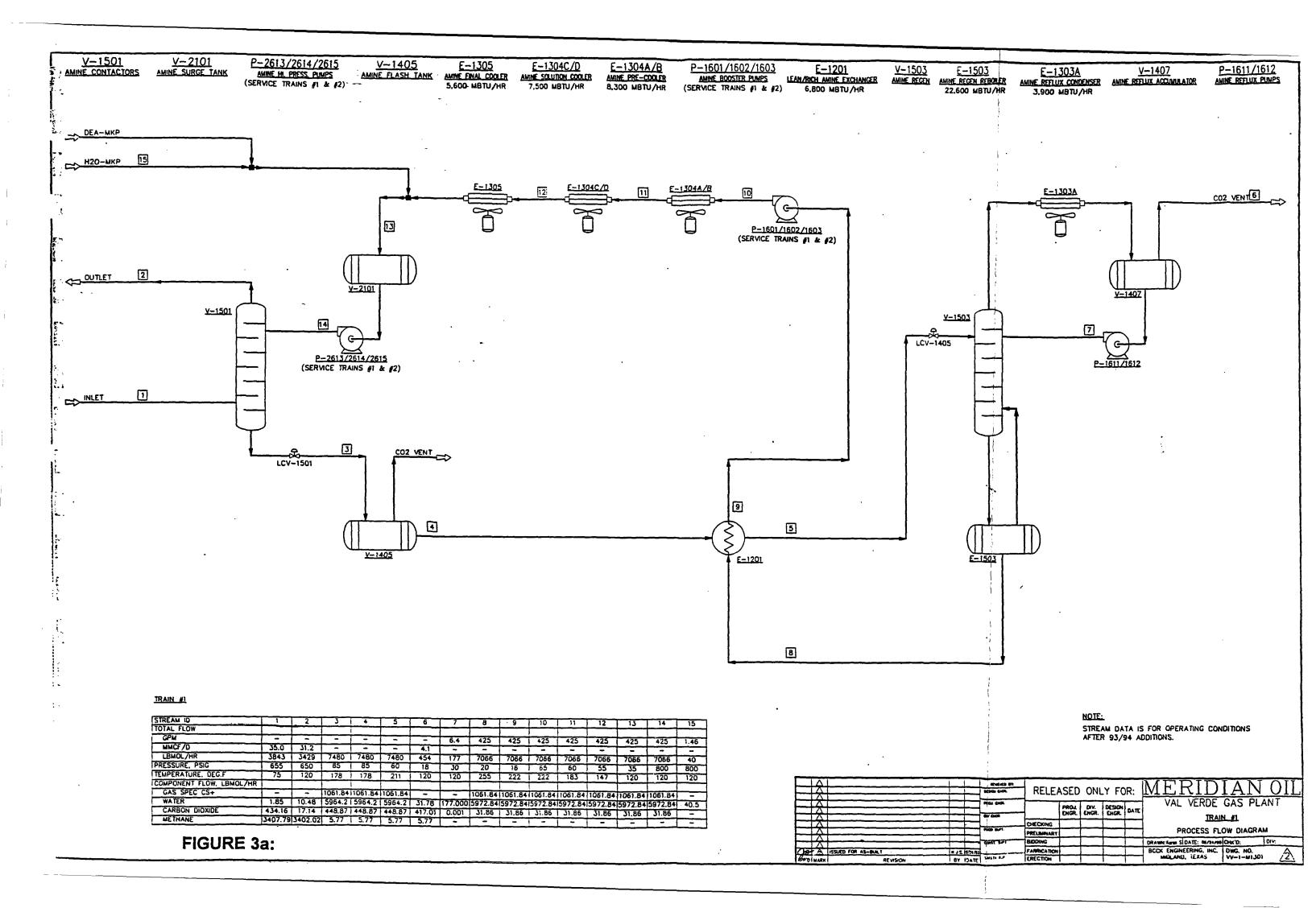
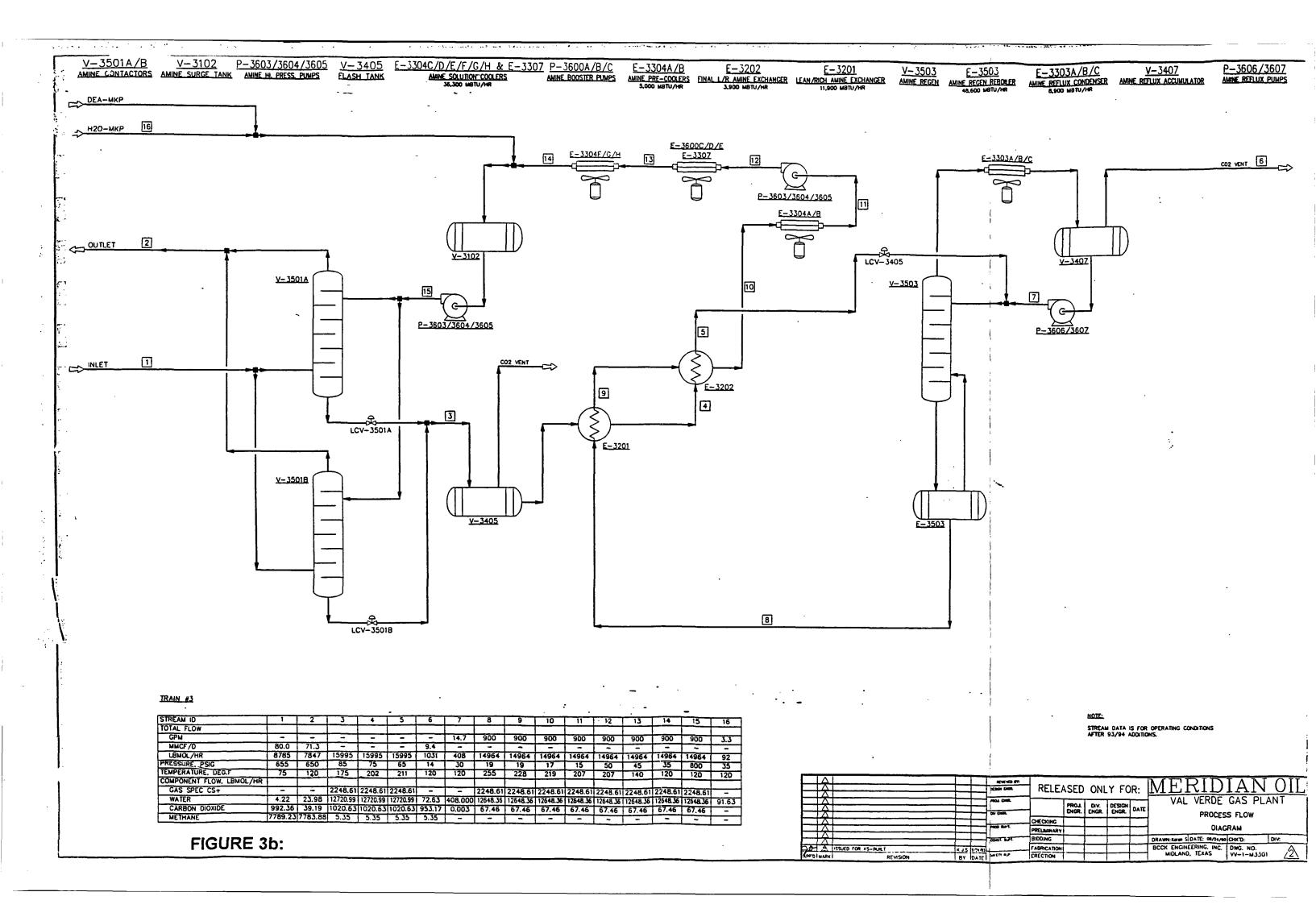


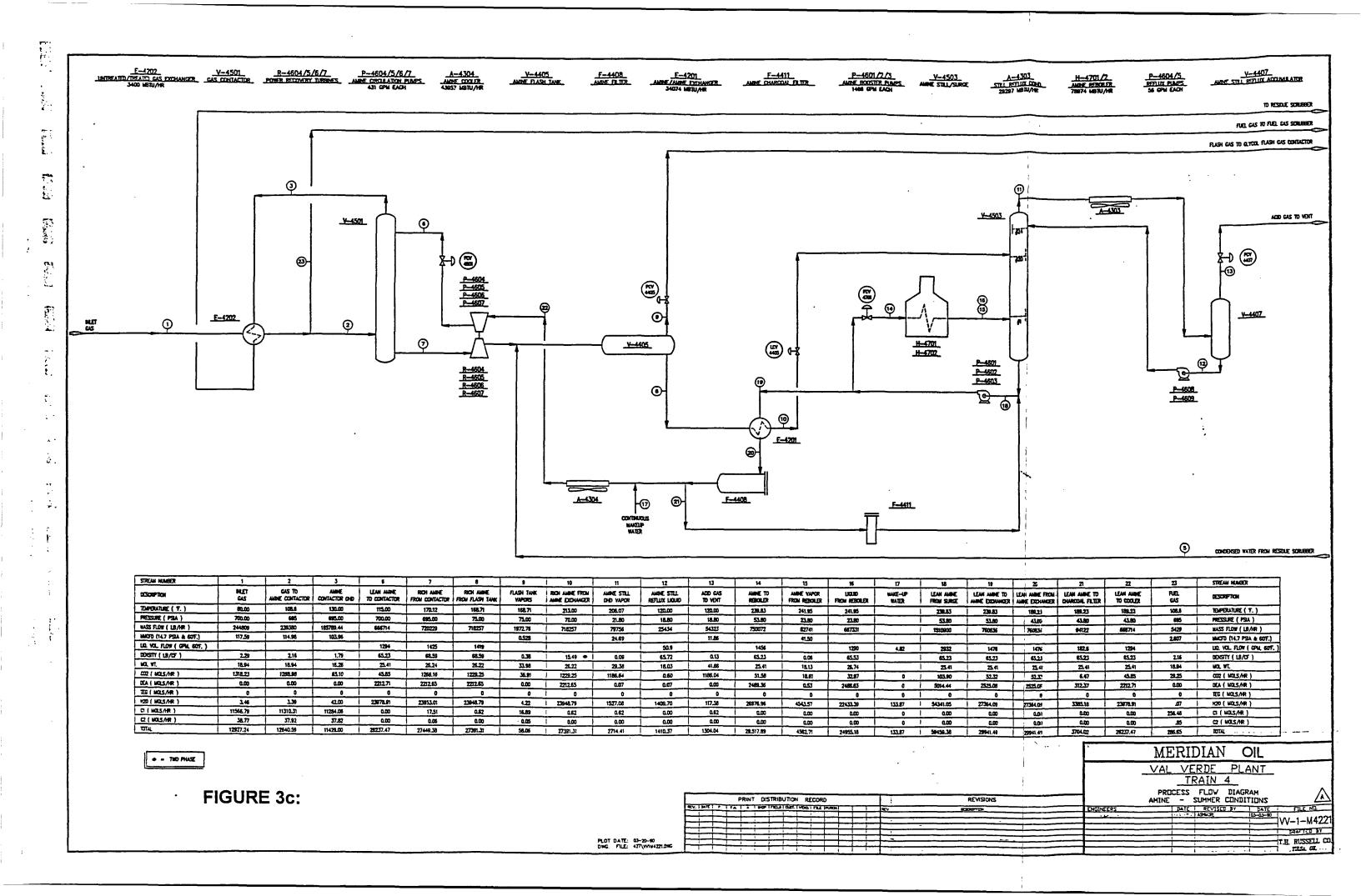
FIGURE 1: VAL VERDE SITE MAP

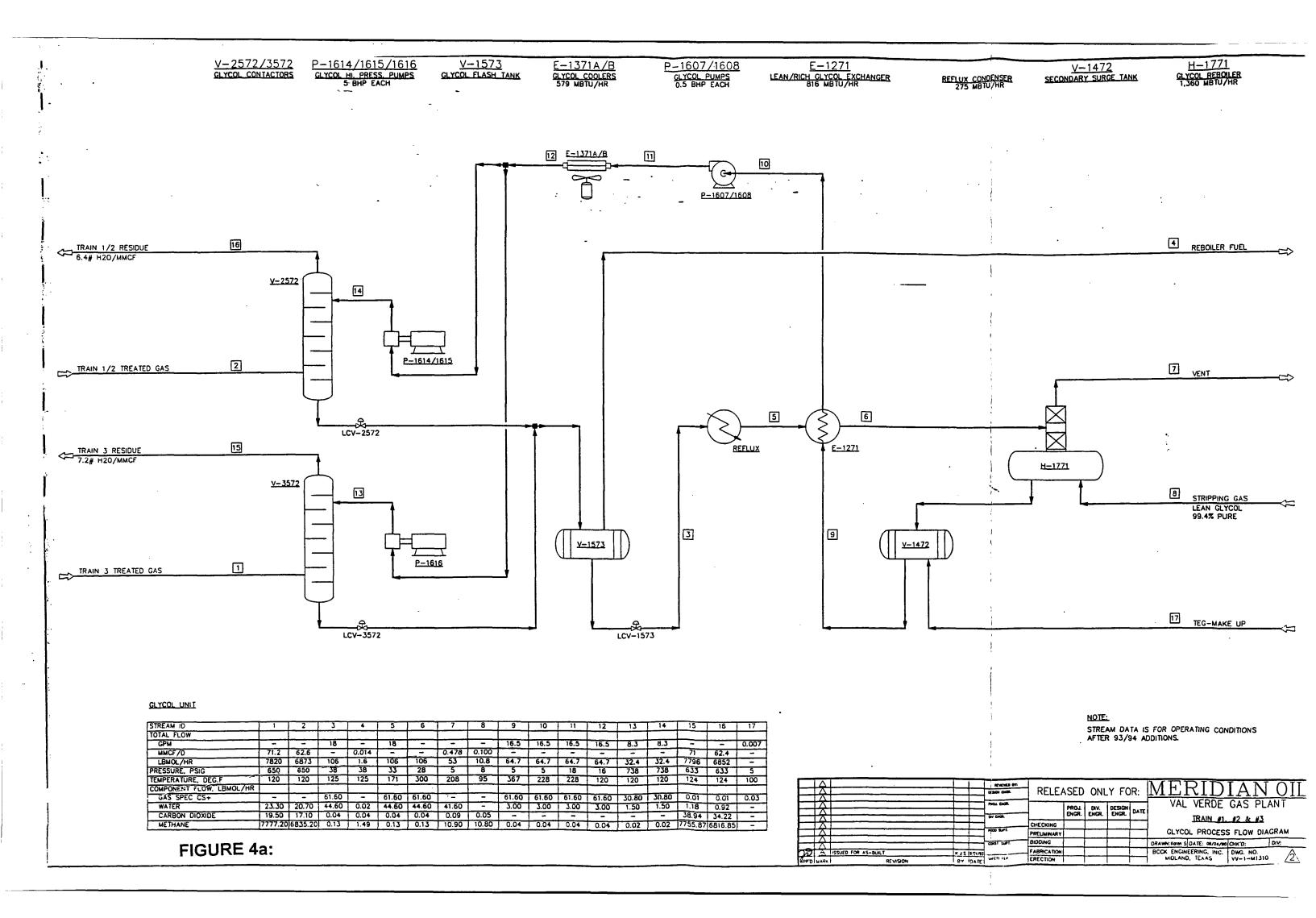












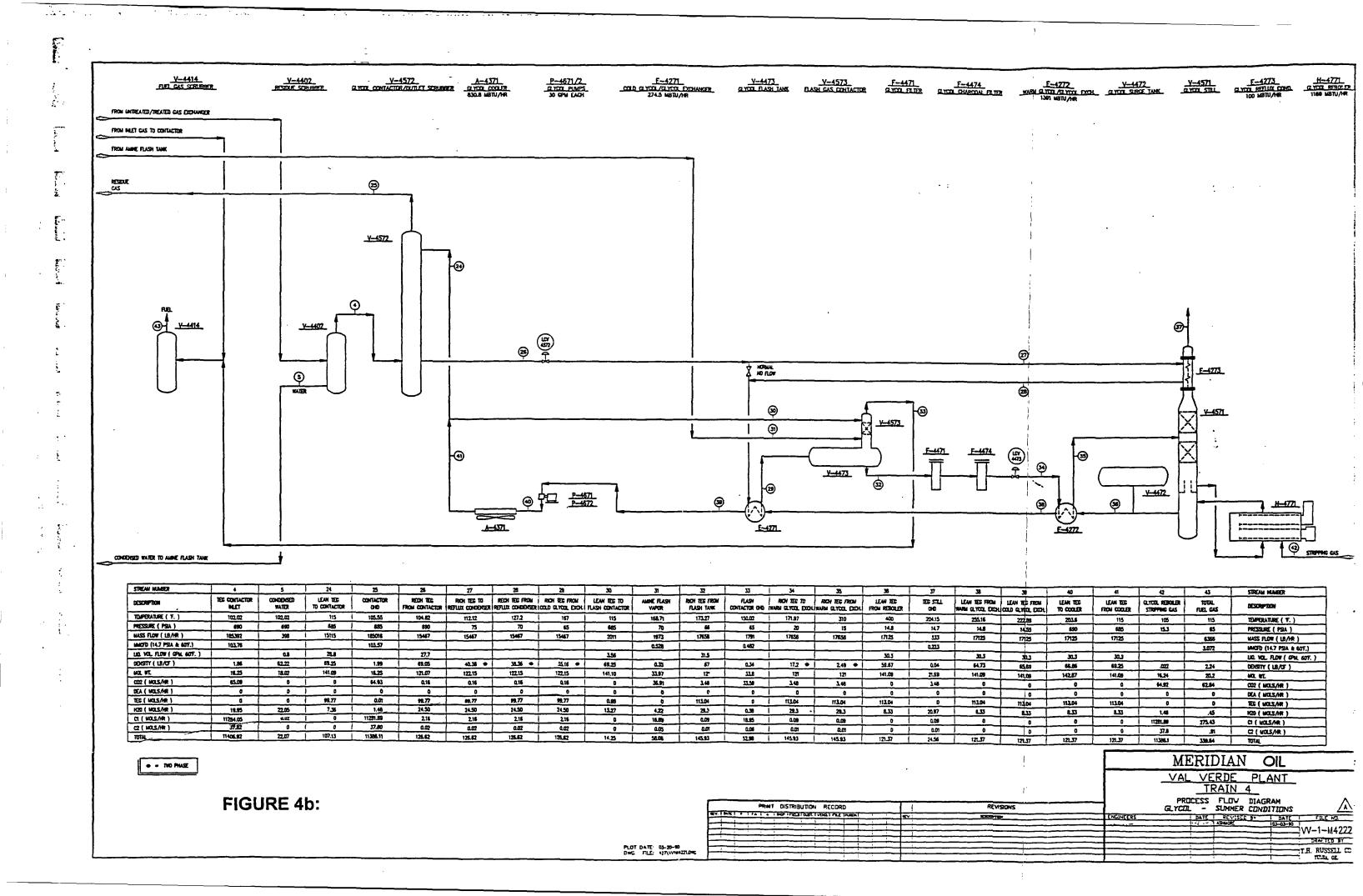
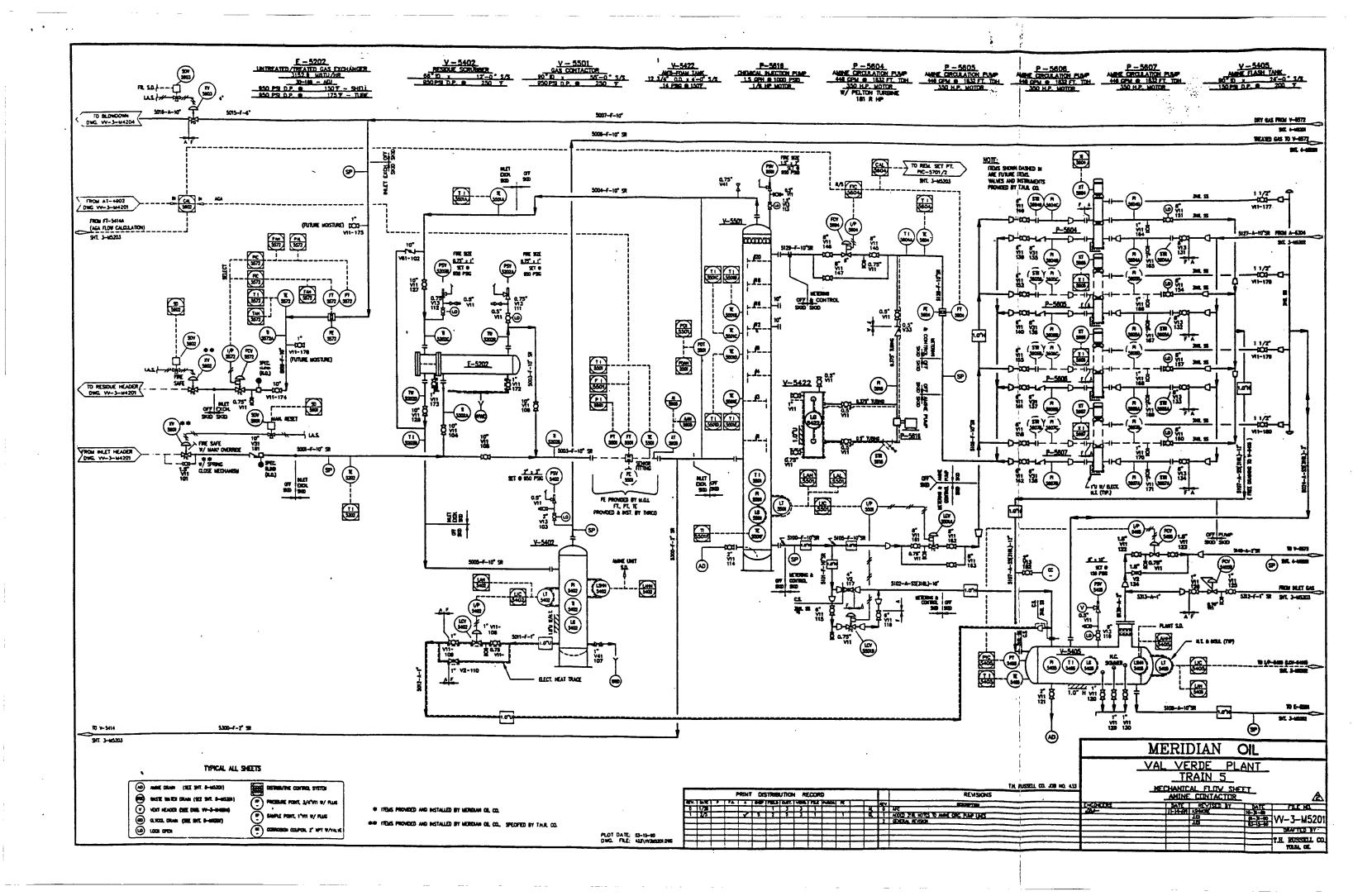
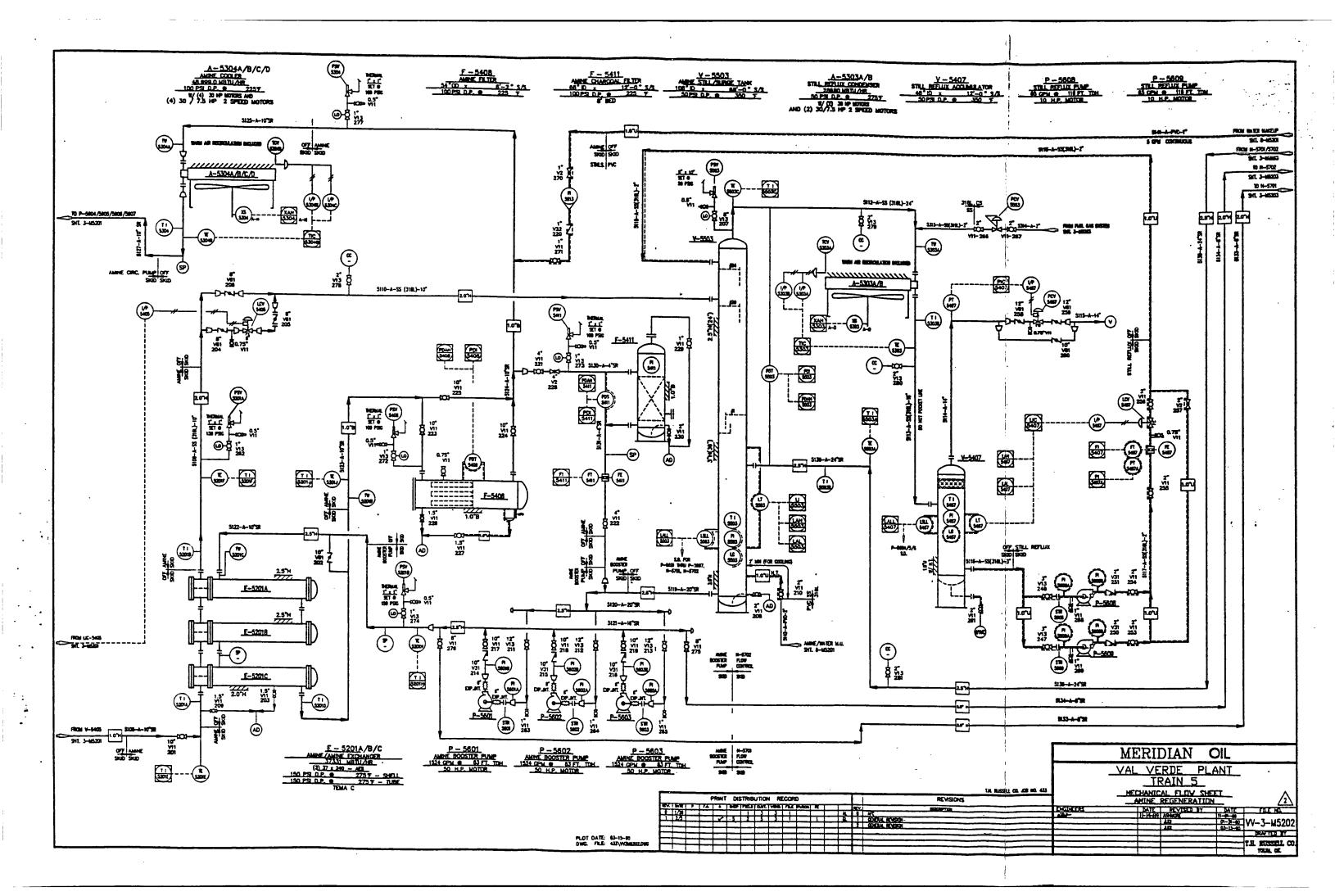
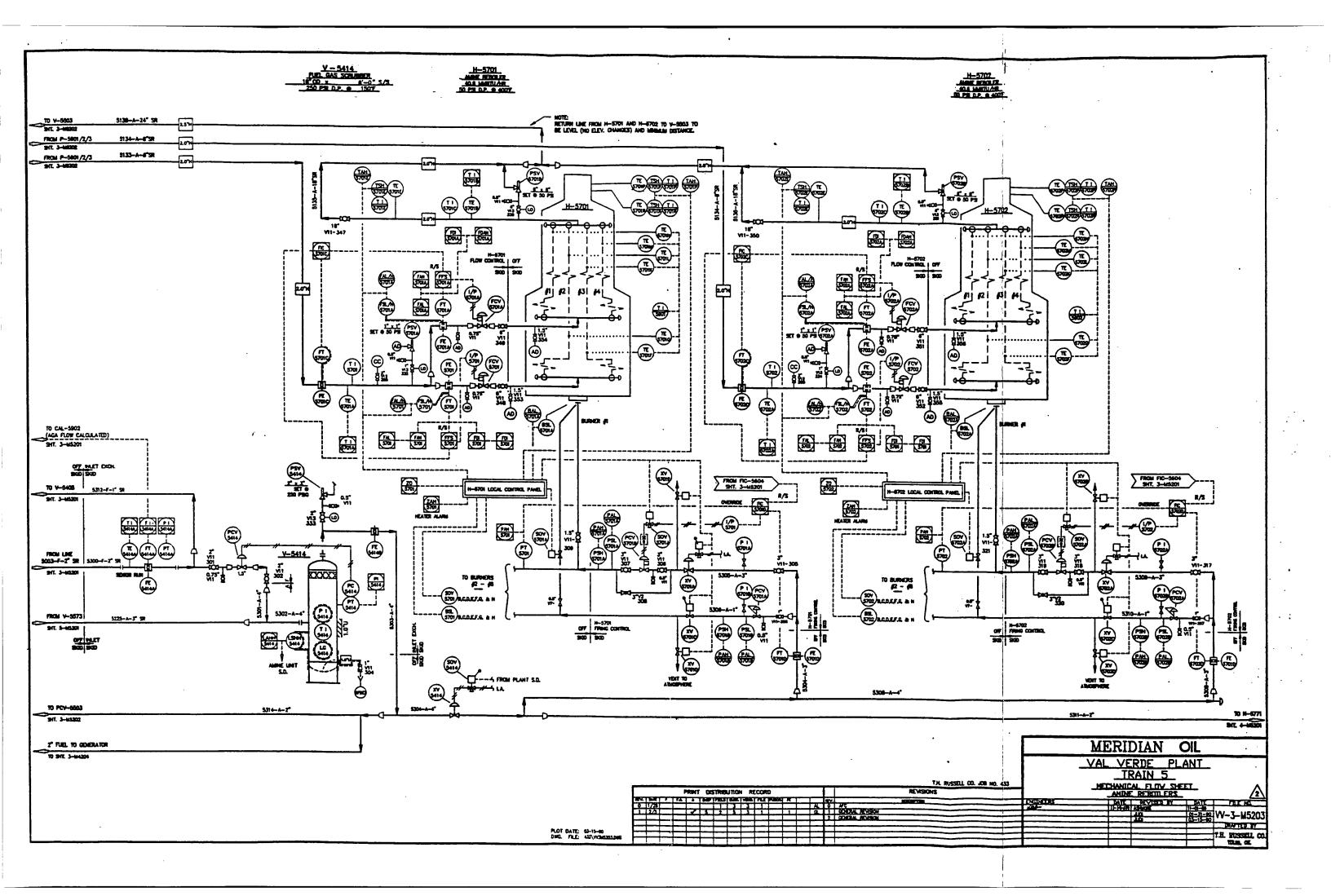
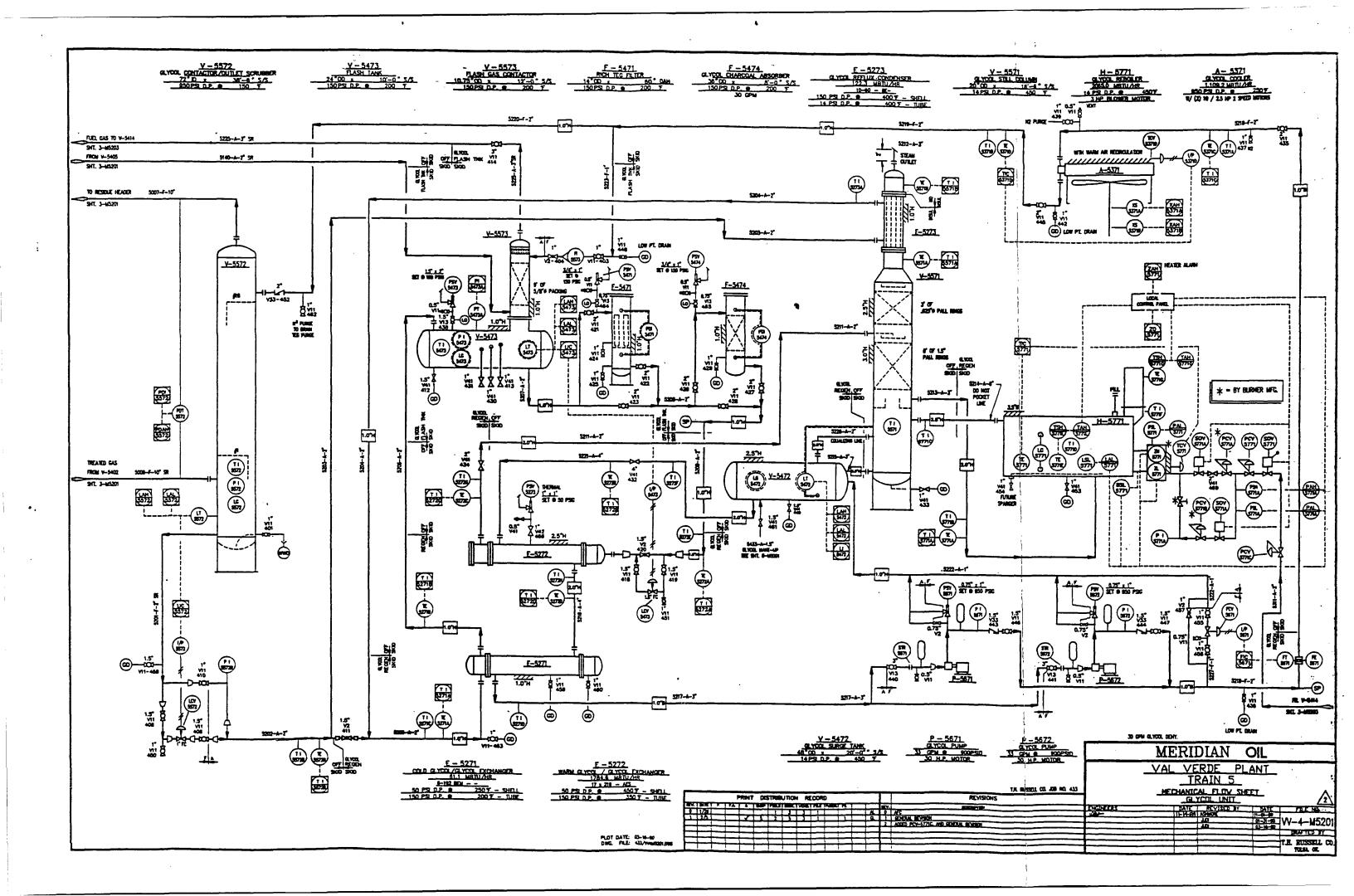


FIGURE 2 PLOT PLAN AND EQUIPMENT LAYOUT FIGURE 5
TRAIN 5 PROCESS AND INSTRUMENT DIAGRAMS









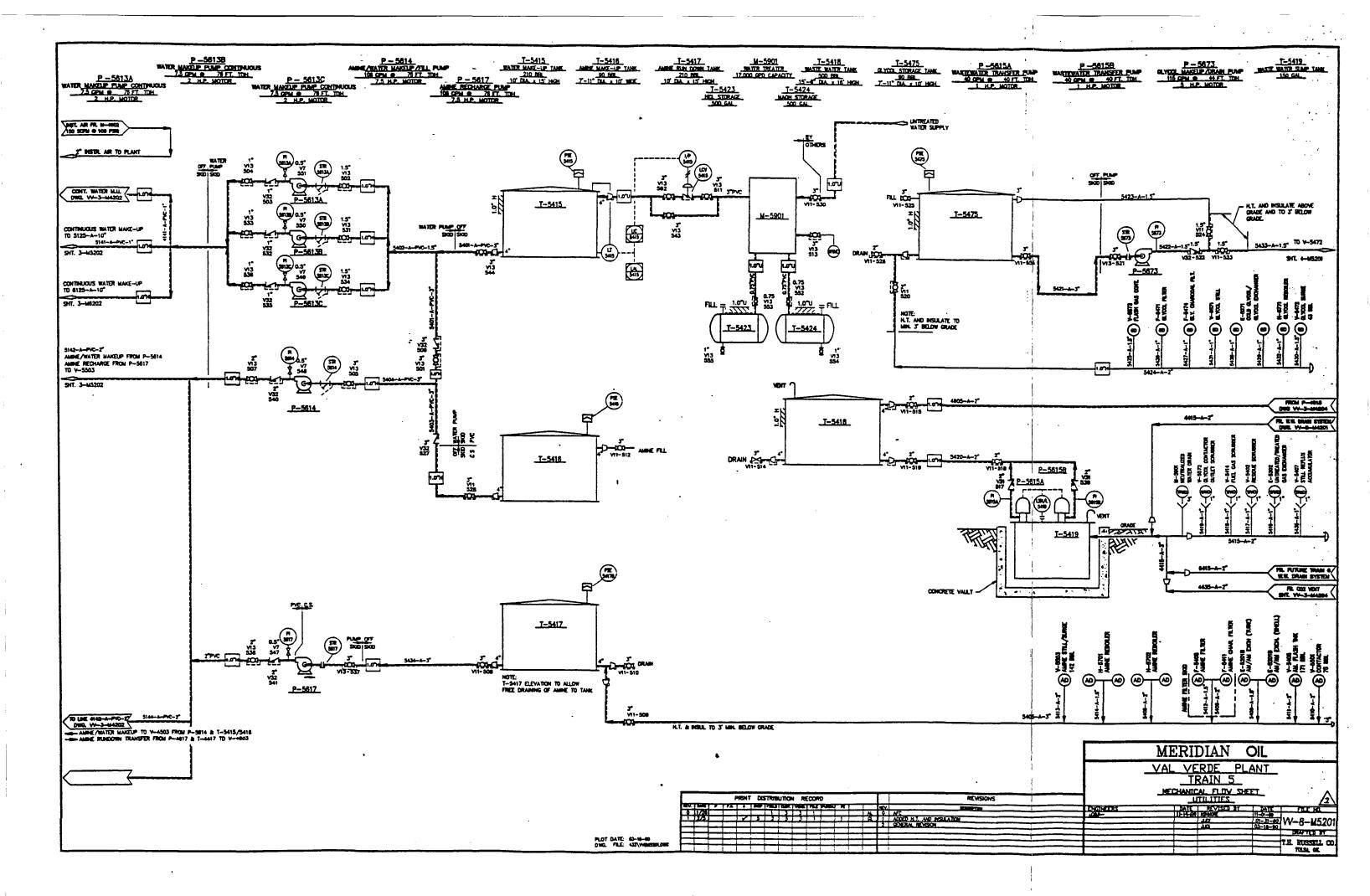
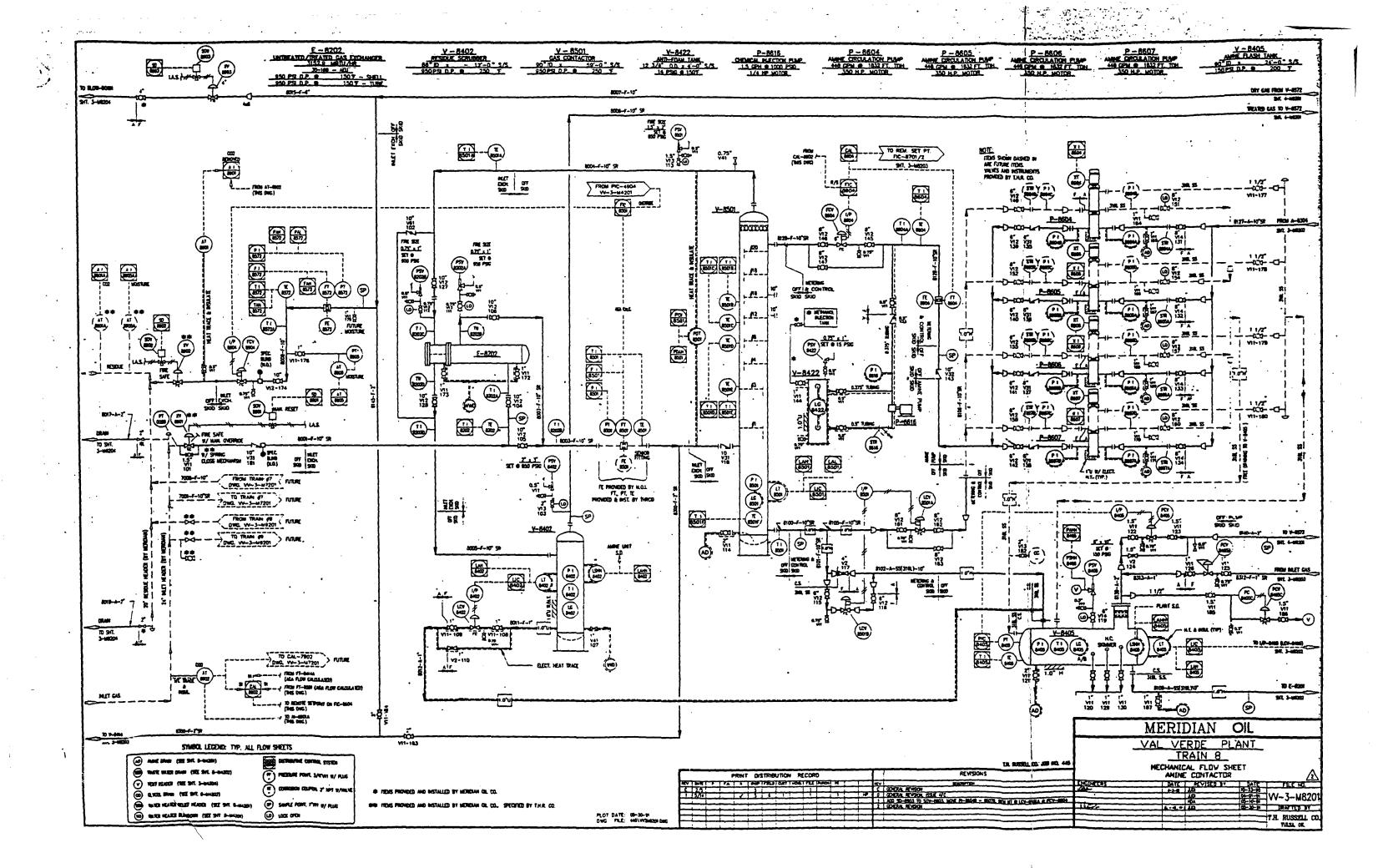
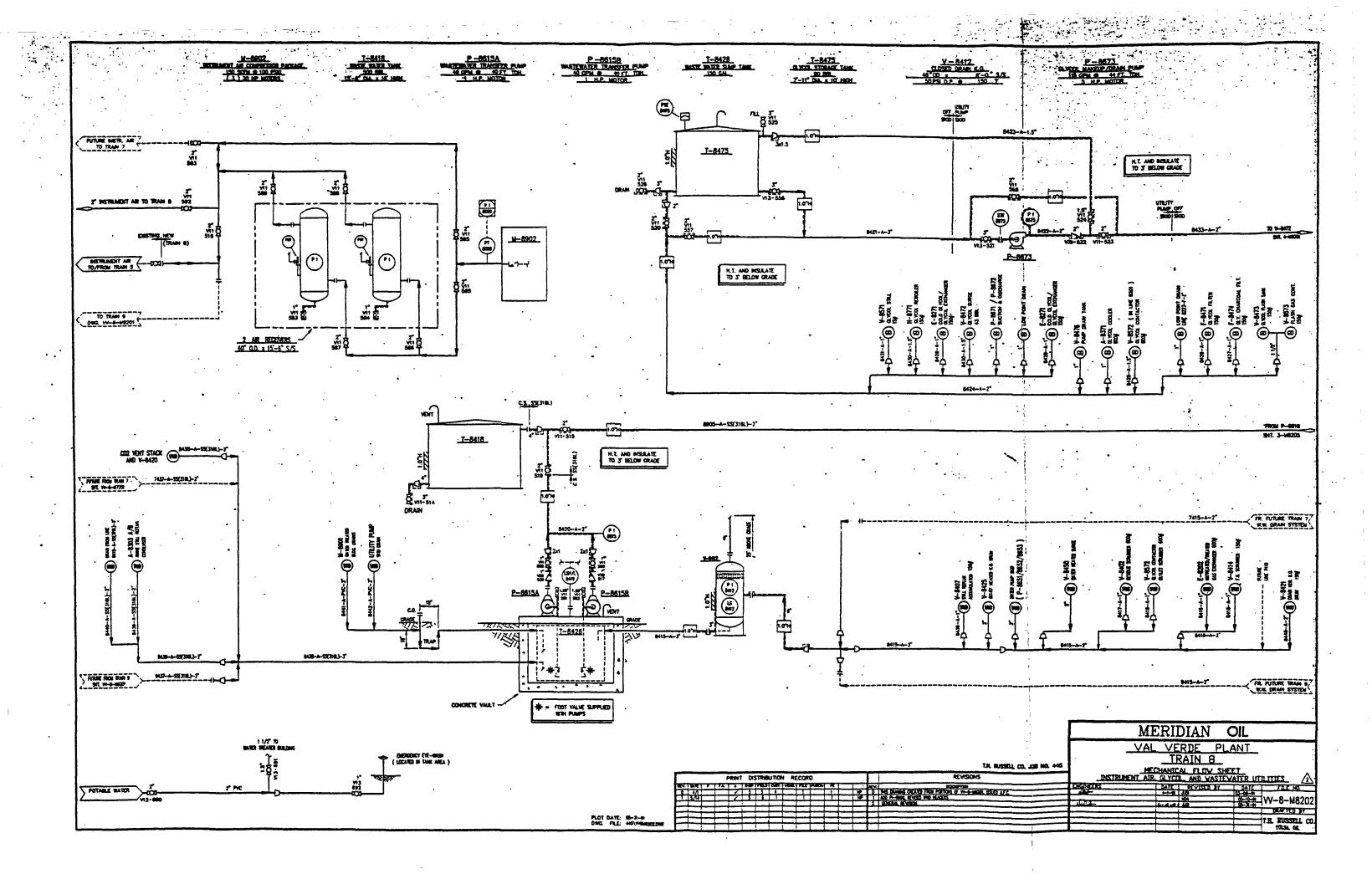
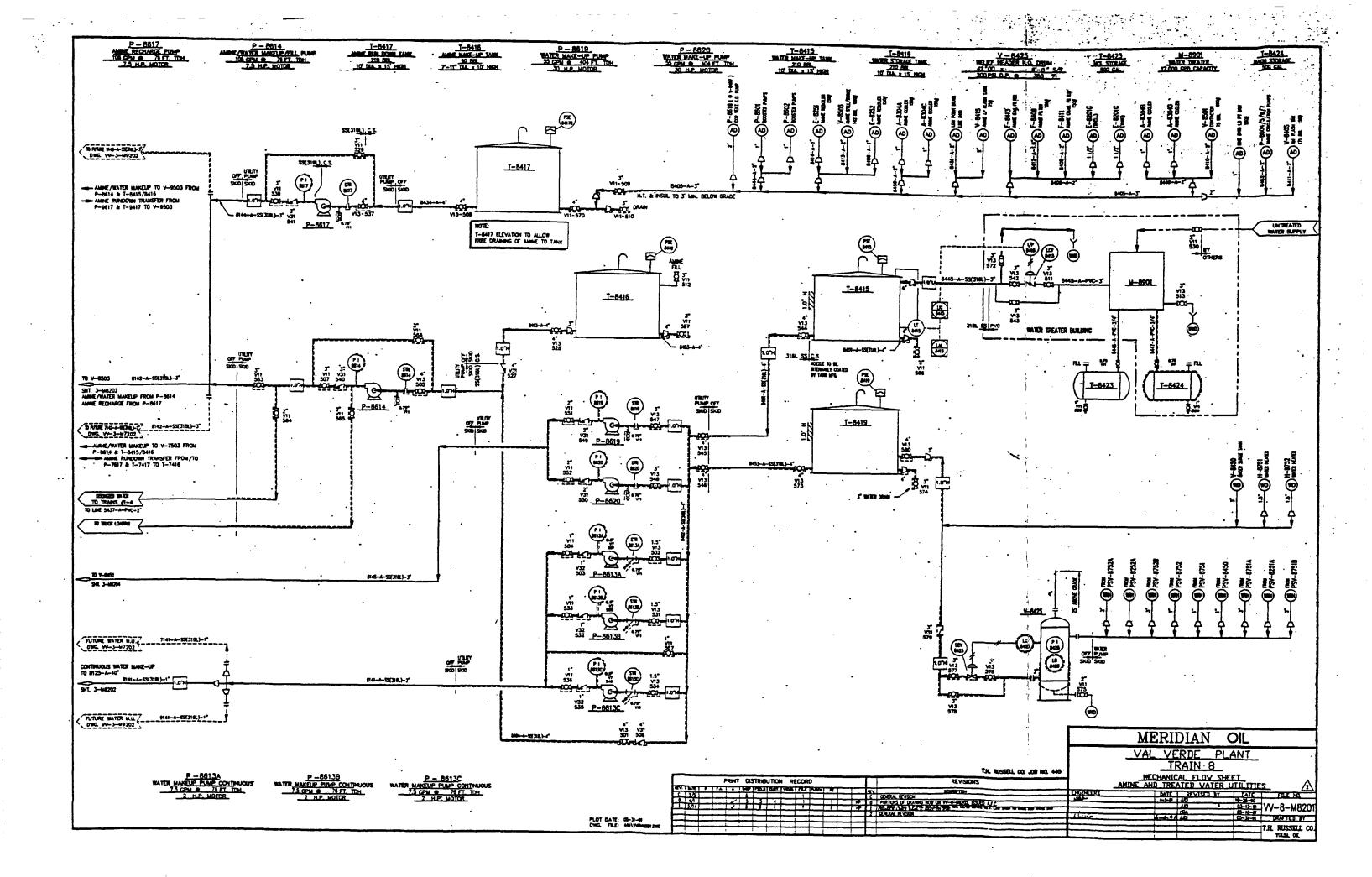
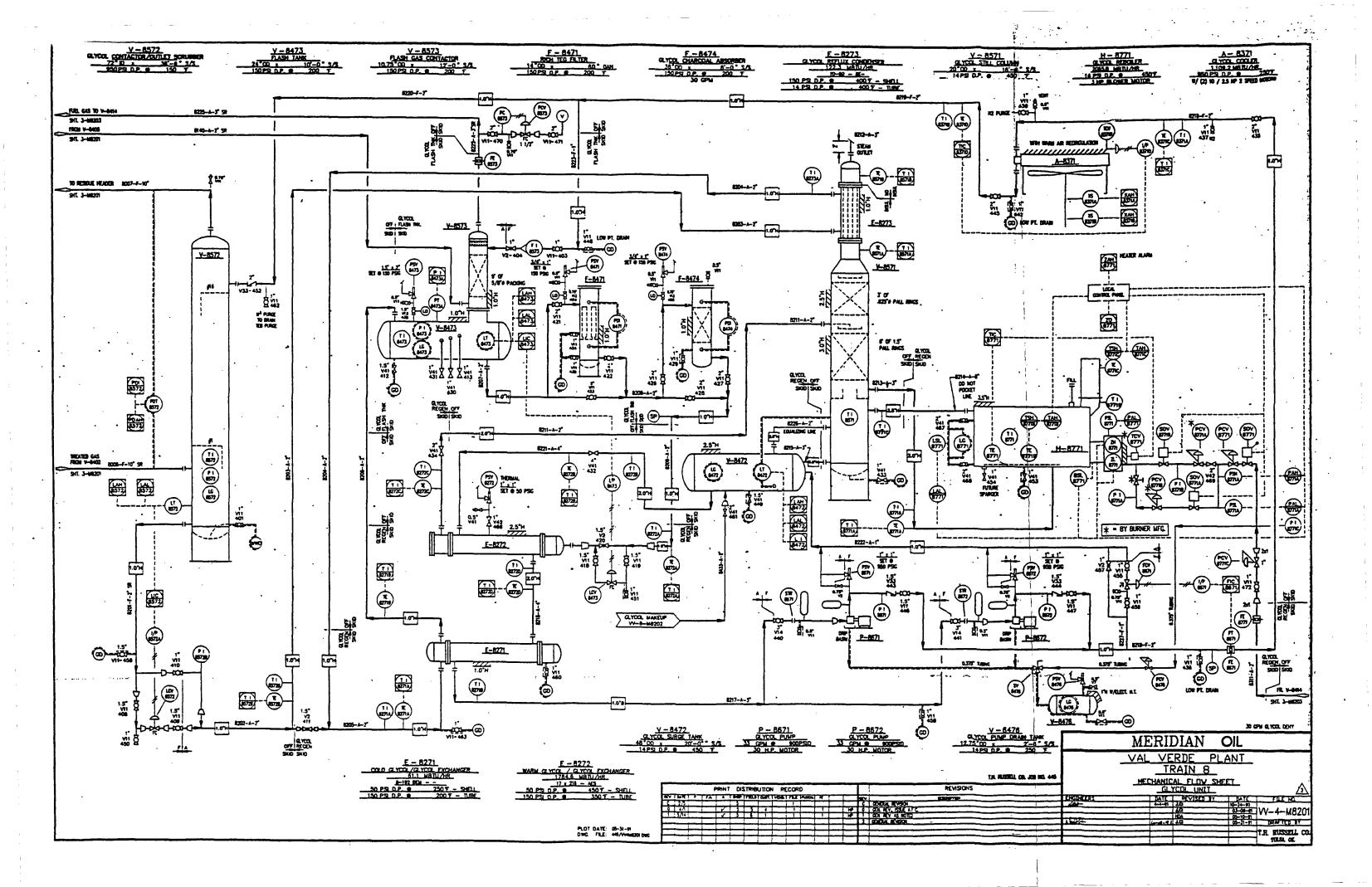


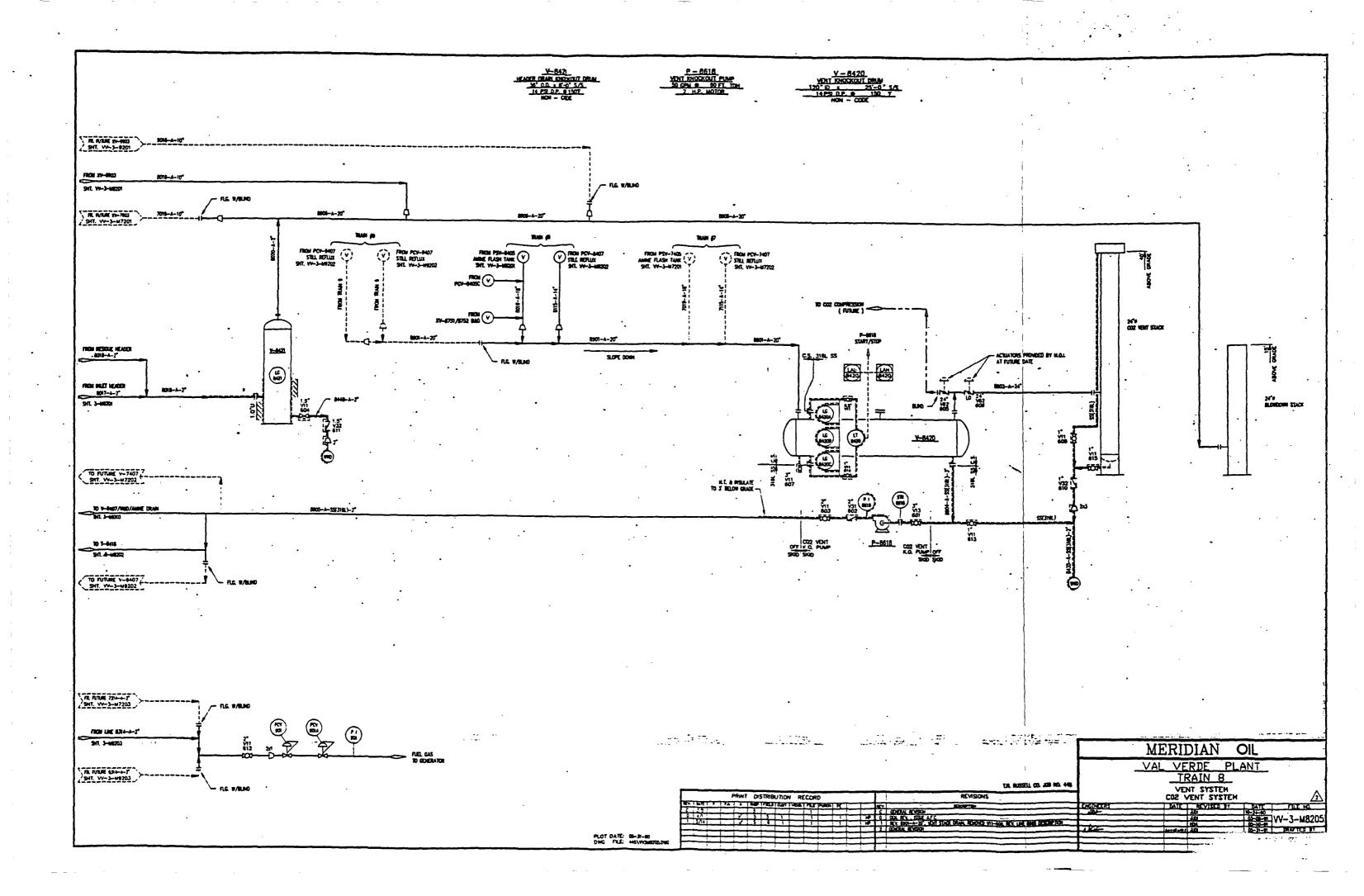
FIGURE 6
TRAIN 8 PROCESS AND INSTRUMENTATION
DIAGRAMS

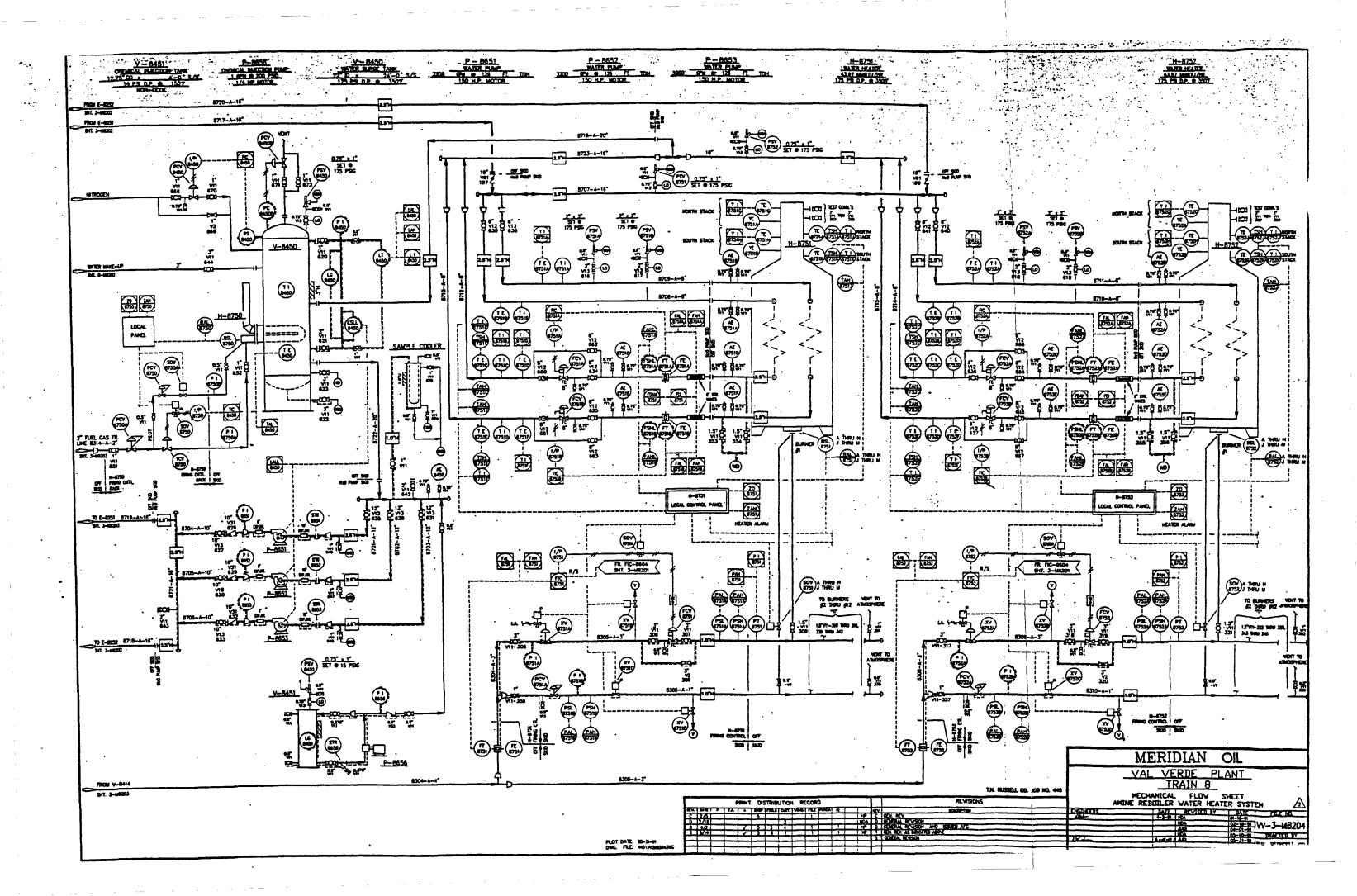


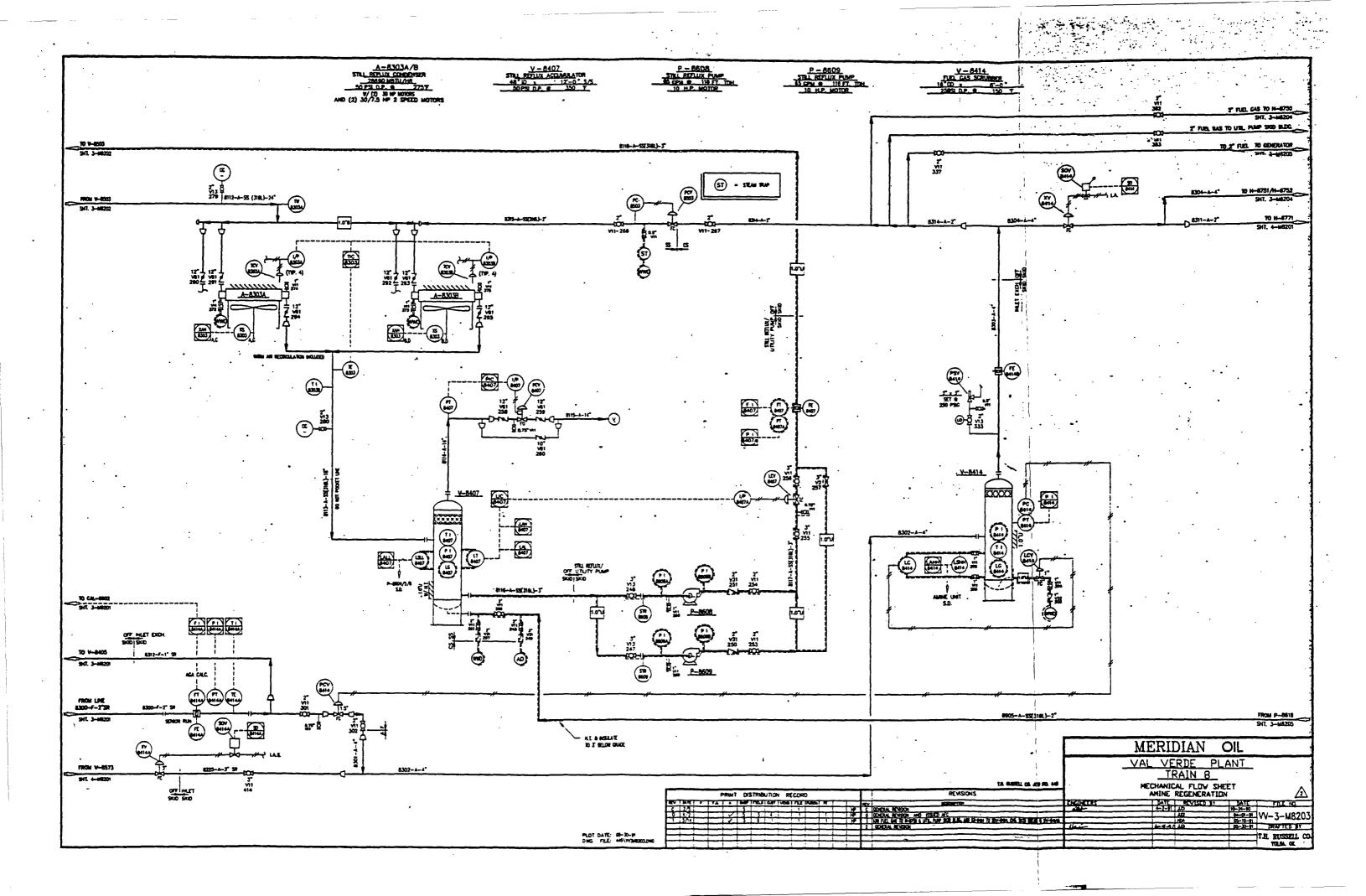


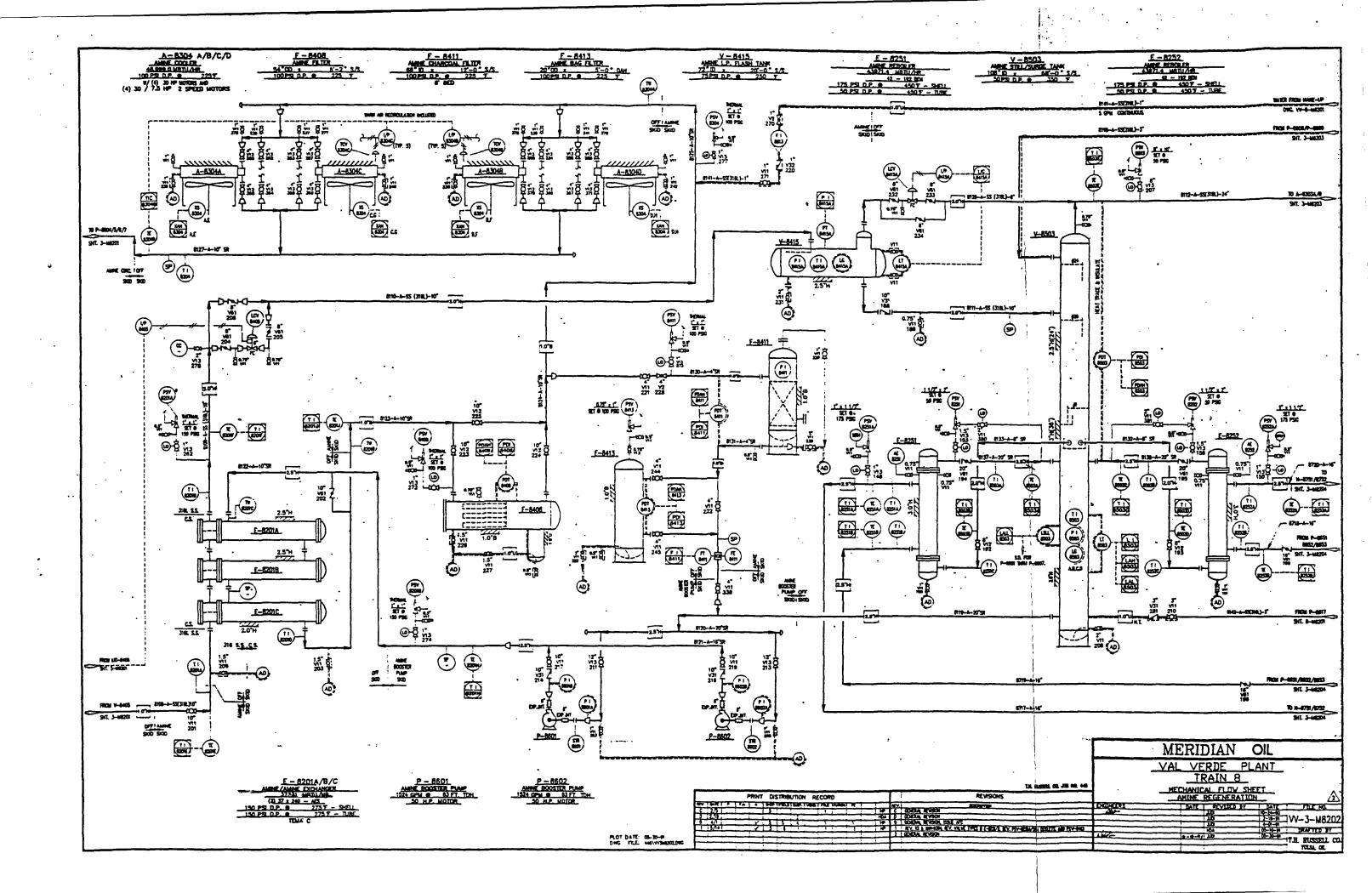












AFFIDAVIT OF PUBLICATION

Ad No. 42792

STATE OF NEW MEXICO County of San Juan:

EMMETT MCKINLEY, being duly sworn says: That he is the Advertising Director of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Sunday, May 14, 2000

And the cost of the publication is: \$82.76

On //6/2000 EMMETT MCKINLEY appeared before me, whom I know personally to be the person who signed the above document.

My Commission Expires April 10, 2004

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

Legals

AL'S AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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

(GW-051) Burlington Resources, Jeffery T. Schoenbacher, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a renewal application for the previously approved discharge plan for their Val Verde Gas Plant located in the SE/4 SE/4 of Section 11, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1440 gallons per day of waste water is stored in above ground, closed-top steel tanks prior to transport to an OCD approved Class II injection well for disposal. Ground water most likely to be affected in the event of an accidental discharge is at a depth ranging from 100 mg/l to 50 feet with a total dissolved solids concentration ranging from 1000 mg/l to 6000 mg/l. The discharges plan addresses how spills, leaks and other accidental discharge to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this *fourth (4th) day of May, 2000.*

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Is/ Roger Cullander
Roger Cullander
for LORI WROTENBERY, Director

Legal No. 42792 published in the Daily Times, Farmington, New Mexico, Sunday, May 14, 2000.

COPY OF PUBLICATION

File os1

SAN JUAN DIVISION August 24, 1999

New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Attention: Wayne Price

Re:

Val Verde Plant Waste Water Line and Sump Testing Completion

Dear Mr. Price:

The purpose of this correspondence is to provide your department with the results of the underground waste line testing and the sump evaluation that was conducted at the Val Verde Plant on August 17, 18, and 19.

Feb. 98 Current

As you are aware, the underground lines were hydro tested per the testing protocol specified in my correspondence dated July 27, 1999, notifying OCD of the testing dates. The inlet gas waste line was cumbersome for the hydro monitoring device due to space limitations, therefore, since this line was steel this unit was pressure tested to 15 psi for 30 minutes and passed. The following are the line locations that were tested and the results that were achieved for each underground line:

Date	Line Location	Testing Criteria	Witnesses	Comment
			Blair King	
8 /1 7 /99	Inlet line sump	Pressure 15-psi/30 min.	Henry Humada	1 Steel Line
		Passed	Jeff Schoenbacher	
			Blair King	
8/18/99	Sump Train 5	Hydro tested 3-psi/30 min.	Henry Humada	2 Underground
	<u>-</u>	Passed	Jeff Schoenbacher	Lines were tested.
			Blair King	
8/19/99	Sump Train 8	Hydro tested 3-psi/30 min.	Henry Humada	3 Underground
	<u> </u>	Passed	Jeff Schoenbacher	Lines were tested.
			Blair King	
8/19/99	Amine Reclaimer waste line.	Hydro tested 3-psi/30 min.	Henry Humada	1 Underground
		Passed	Jeff Schoenbacher	Lines was tested.
			Denny Foust	

A total of seven underground waste lines were tested within the three-day time frame and all passed the 3 psi criteria specified in Condition #9 of the Discharge Plan special conditions. On August 19, 1999, the sump inspections for Train 5 and 8 were also completed and each unit exhibited exceptional integrity for holding the waste contents that enter these units. As a result of these tests, Burlington Resources has fulfilled the Discharge Plan requirements that were specified in the renewal letter. Should you have any questions or need the photographs that further document the testing please feel free to contact me and I will submit this information to your department.

Until that time, I thank you for your time and consideration and should you have any questions regarding this correspondence please feel free to contact me at 505-326-9537.

effery T. Schoenbacher

Epvironmental Representative

CC:

Bruce Gantner

Ed Hasely

Greg Kardos

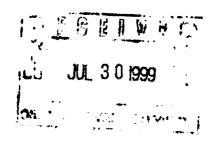
Gaza Seabolt

Denny Foust

Correspondence

Val Verde Plant File

SAN JUAN DIVISION July 27, 1999



Certified Mail: Z 186 732 888

New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Attention: Wayne Price

Re:

Val Verde Plant Waste Water Line and Sump Testing Completion

Dear Mr. Price:

The purpose of this correspondence is to provide your department with the required 72-hour notice for the Val Verde Plant line and sump-testing schedule. This testing is being conducted in order to comply with items 8 and 9 of the discharge plan "special conditions".

The testing has been scheduled for August 17, 18, and 19, and the last day will consist of completing the line test and a visual inspection of the sump. As specified in the letter dated November 10, 1998 for Pump Mesa and Sims Mesa line testing, the same hydro test will be employed for these lines. I have attached this correspondence for your convenience.

As specified in the November correspondence the following is the proposed line testing method:

- The lines will be plugged at the end with balloon fittings.
- At the entry point of the underground lines a threaded site glass column assembly will be installed and utilized as a monitoring point for the test. The site glass designated filling mark will be elevated a sufficient distance from the pipe to be equivalent to a static head pressure of 3 psi on the piping system.
- After all exit points are sealed with balloon fittings, the underground lines will be filled with water to a common mark on the glass column assembly.
- The site glass will be monitored for 30 minutes at the designated filling mark to verify the fluids retained in the pipe do not leak.
- The test will be deemed successful when the level does not fluctuate from the test mark on the glass column.
- Upon completing all the testing a correspondence will be sent to your attention summarizing the test results for all lines.

I thank you for your time and consideration and should you have any questions regarding this correspondence please feel free to contact me at 505-326-9537.

Sincerely.

Jeffery T. Schoenbacher

Enylronmental Representative

CC:

Bruce Gantner

Ed Hasely

Greg Kardos

Gaza Seabolt

Blair King

Denny Foust

SAN JUAN DIVISION

November 10, 1998

Certified Mail: P 103 693 148

New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe. NM 87505

Attention: Roger Anderson

Re: Pump Mesa and Sims Mesa Waste Water Line Testing Completion

Dear Mr. Anderson:

The purpose of this correspondence is to follow-up on Wayne Price's letter dated October 14, 1998, regarding the denial of the proposed "volume in volume out" test for the underground waste water line.

Per Mr. Price's letter, he stated that the proposed test method would have to demonstrate the underground lines were "leak free". Referring to the OCD Discharge Plan Condition #9, "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 plan renewal. Permittees may <u>propose</u> 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." As you are aware, the underground waste lines are constructed of PVC and are responsible for conveying waste to the point of origination to the point of accumulation and storage. Burlington Resource's valid concern to pressure testing these lines is exposing them to pressure could result to damaging the PVC line. Therefore, Burlington Resources is proposing to test the lines to verify "leak free" criteria by the following protocol:

- 1. There are two lines at Sims Mesa that flow into a common sump and these lines will be plugged at the end of the sump with balloon fittings.
- 2. At the entry point of the underground lines a threaded site glass column assembly will be installed and utilized as a monitoring point for the test.
- 3. After all exit points are sealed with balloon fittings, the underground lines will be filled with water to a common mark on the glass column assembly.
- 4. The site glass will be monitored for 30 minutes at the designated filling mark to verify the fluids retained in the PVC pipe do not leak.
- 5. The test will be deemed successful with the level not fluctuating from the test mark on the glass column.

This procedure is being proposed only for Sims Mesa Compressor Station's underground lines because at Pump Mesa Compressor Station the lines from the compressors to the sump are above ground and are not required to be tested. The only remaining underground line to be tested at Pump Mesa is one steel line that runs from the sump to the waste oil tank. This line will be pressure tested at the same date of the hydro test and will complete the underground testing for this facility. Upon completing all testing for both facilities a correspondence will be sent to your attention summarizing the test results for all lines.

In conclusion, I will await your reply regarding the above-mentioned testing procedure however, it is Burlington Resources intentions to have the lines tested by the end of December. Therefore, an expeditious reply would be greatly appreciated. I thank you for your time and consideration and should you have any questions regarding this correspondence please feel free to contact me at 505-326-9537.

Sincerely

Jeffery T. Schoenbacher Environmental Representative

CC:

Bruce Gantner

Ed Hasely

Greg Kardes

Ken Johnson

Bill McGaha

Denny Foust, OCD District Office

Pump Mesa Correspondence

Sims Mesa Correspondence

JTS:

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

Certified Mail Return Receipt No. P 288 259 087

November 19, 1998

Mr. Jeffery T. Schoenbacher Environmental Representative Burlington Resources (BR) P.O. Box 4289 Farmington, New Mexico 87499-4289

Re: Pump Mesa (GW-148) and Sims Mesa (GW-146) Waste Water Line Testing

Dear Mr. Schoenbacher:

New Mexico Oil Conservation Division (NMOCD) is in receipt of your letter dated November 10, 1998 concerning the above referenced sites. The proposed procedure for pressure testing the underground lines is hereby approved with the following condition:

* The site glass designated filling mark shall be elevated a sufficient distance above the pipe to be equivalent to a static head pressure of 3 psi on the piping system.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-PES

NMOCD Environmental Bureau

wp:brtest1

cc: Denny Foust-NMOCD District III

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

NOTICE OF PUBLICATION

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

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

(GW-051) Burlington Resources, Jeffery T. Schoenbacher, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a renewal application for the previously approved discharge plan for their Val Verde Gas Plant located in the SE/4 SE/4 of Section 11, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1440 gallons per day of waste water is stored in above ground, closed-top steel tanks prior to transport to an OCD approved Class II injection well for disposal. Ground water most likely to be affected in the event of an accidental discharge is at a depth ranging from 10 to 50 feet with a total dissolved solids concentration ranging from 1000 mg/l to 6000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this fourth (4th) day of May, 2000.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

ŁOŔI WROTENBERY, Director

SEAL

SAN JUAN DIVISION

April 19, 1999

Certified Mail: P 160 090 734

New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division C/O Wayne Price 2040 South Pacheco Street Santa Fe, NM 87505

Re:

Val Verde Plant GW-51 Discharge Plan Renewal

Dear Mr. Price:

Thank you for the 120 day advanced notice regarding the expiration of the Val Verde Plant Discharge Plan. The purpose of this correspondence is to renew the Discharge Plan before the expiration date to avoid a lapse in compliance.

Currently, there have been no changes to Val Verde Plant system since the March 25, 1998 renewal that documented the waste disposal practices. Therefore, this letter is to submit the appropriate renewal fee for this facility, which you will find, enclosed a check for \$1,717.50 that comprises of the \$50.00 filing fee and the flat fee of \$1,667.50 for natural gas plants.

I thank you for your time and consideration and should you any questions regarding this correspondence please feel free to contact me at 505-326-9537.

Sincerely

Jeffery T. Schoenbacher

Environmental Representative

Enc. Check \$1,717.50

CC:

Bruce Gantner

Ed Hasely Greg Kardos Gaza Seabolt

Denny Foust, OCD, Aztec

Val Verde Plant File - Discharge Plan

Correspondence

JTS:

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of che	ck No.	dated 04/22/99
or cash received on	in the amount o	e \$ 1717.50
from BURLINGTON RESOURCES		
for VAL VERde PLANT		-W-51 -
Submitted by: Mayre Price	Date:_	5/3/49
Submitted to ASD by:		•
Received in ASD by:		
Filing Fee New Facility		
Modification Other		·
Organization Code <u>521.07</u>		99
To be deposited in the Water Qualit	y Management Fur	ıd.
Full Payment V or Annual	Increment	
\$ 1667.50 +\$50° = 1717.50		

BURLINGTON RESOURCES 801 Cherry Street Suite 200 Ft. Worth TX 76102-6842 CITIBANK (Delaware) A Subsidiary of Citicorp One Penn's Way New Castle DE 19720 62-20/311

Vendor No. 67738200

Date 04/22/1999 Pay Amount \$1,717.50 Void If Not Presented for Payment Within 60 Days

To The Order Of

NEW MEXICO ENVIRONMENTAL DEPARTMENT WATER QUALITY MANAGEMENT 2040 S PACHECO ST SANTA FE NM 87505-

Sugarme & Back



SAN JUAN DIVISION

March 16, 2000

ROGER ANDERSON JUNE

GAVE VERBAL AL TOLE: 11AM

GAVE

ON 3-29-00 House

ON 3-29-00 H

New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Attention: Roger Anderson

RE: Approval for disposal of amine reclaimer residue as exempt waste

Dr. Mr. Anderson:

The purpose of this correspondence is to request approval for disposal of amine reclaimer residue as exempt waste. Burlington's Val Verde Plant (VVP) will generate the residue after reclaiming a spent amine solution stored at Red Cedar Gathering Company's Antler Facility. The request is based on OCD's approval to process spent amine at the VVP dated March 12, 1999 and Burlington's commitment to waste minimization and pollution prevention.

Burlington Resources is requesting OCD's determination that the residue generated from reclaiming the spent amine solution will remain exempt for disposal purposes. The recovered amine will be reused as product at the VVP's CO2 abatement system.

The approximate 60,000 gallons of spent solvent is known as CS-Plus Solvent and is manufactured by Dow Chemical Corporation. The solvent was generated from the contact reboiler and captured in a holding pond isolated to receive only exempt waste streams. It is estimated that the volume contained in the holding tank includes 23% amine, 7.0 % triethylene glycol (TEG) and produced water. A review of the analysis of the solvent exhibits the spent solvent to be similar to solvent regenerated routinely at the VVP.

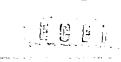
Burlington Resources is proposing to accept the spent solvent at the VVP where it will be stored in 400-bbl steel tanks before being reclaimed in VVP's amine reclaimer. The time frame for reclaiming the amine would be approximately 10 days and is estimated that approximately 13,800 gallons of useable product would be recovered for direct use at the Val Verde Plant along with the produced water. The residues generate from the reclaiming activities would be still bottoms and concentrated TEG. Burlington Resources is requesting OCD approve to manage these residues as an exempt waste that would be disposed at the McGrath Class II Facility.

The Val Verde Plant will document that the following criteria have been met before accepting the spent amine for regeneration and residue is disposed:

- 1. A declaration signed from the Red Cedar Gathering Company's Antler Facility validating the material is eligible for the RCRA exemption contained in 40 CFR 261.4 exclusions. The declaration will include the declaration that no non-exempt waste streams have been commingled with the solvent.
- 2. Red Cedar Gathering Company will provide analysis that documents the estimated percentages of recoverable amine contained in the solvent.
- 3. The waste residue generated from the amine recycling shall remain RCRA exempt before disposal.



SAN JUAN DIVISION



JAN 2 | 1999

January 15, 1999

Certified Mail: P 103 693 162

New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

Attention: Wayne Price

Re: Approval to Process Spent Amine at Val Verde Plant Facility

Dear Mr. Price:

I would like to thank you for your assistance and correspondence dated December 10, 1998 regarding OCD's approval of the amine recycling program. As a result, the amine recycling has been a positive influence towards waste minimization and pollution prevention not to mention improving Burlington Resources operating productivity.

Given the success of the Burlington Resources amine-recycling program, there has been an increase interest from other natural gas facilities to take advantage of Val Verde Plant's amine regeneration process. Therefore, the purpose of this correspondence is to further explore the possibilities of Val Verde Plant (VVP) providing an amine regenerating service for spent CS-Plus Solvent in the Four Corners Area. Before considering this proposal, Burlington Resources is requesting OCD's regulatory approval for providing this service for other natural gas facilities that generate spent amine from CO₂ abatement systems. Currently, the amount of spent amine generation of other facilities is unknown; however it is anticipated that VVP tank capacities required to provide this service would not have to be modified or increased. In the event additional tank capacity is needed, the Discharge Plan would be modified to reflect the additional tanks, location, and volume. Furthermore, it would be Burlington Resources intentions to process the received spent amine within the same month that it is received and return the refined product to the customer facility.

Before the material is accepted the Val Verde Plant would follow the following procedures before accepting the spent amine for regeneration:

- 1. A declaration would have to be signed from the customer facility validating the material is eligible for the RCRA exemption contained in 40 CFR 261. 4 exclusions. The declaration would also include the declaration that no non-exempt waste streams have been commingled with the solvent.
- 2. The generator would have to supply analysis that documents the percentages of recoverable amine contained in the solvent. The analysis of the solvent would have to validate that the spent solvent is analogous to solvent regenerated at the Val Verde Plant.
- 3. Spent solvent that did not meet the minimal requirements for regeneration would not be accepted for processing.

Furthermore, Burlington Resources would also comply with the following stipulations that were documented in your December 10, 1998 correspondence:

1. The waste residue generated from the amine recycling shall remain RCRA exempt before disposal.

Page 2. VVP Amine Recycling 01/15/99

- 2. The waste disposal facility must be approved to accept this type of waste and the physical state of the waste must be compatible with the fluids being injected in the EPA Type Class II well. The disposal must have a current OCD UIC permit. Lastly, McGrath SWD facility would receive the waste and as a contingency an alternative approved facility would be designated.
- 3. All other federal, state, and local laws and/or regulations will be complied with.

In conclusion, by further developing the VVP amine-recycling program to include other facilities means the promotion and implementation of waste minimization and reuse practices in the San Juan Basin natural gas industry. Not only does waste minimization in the gas industry benefit the environment, but it also ads economic value to facilities that practice viable reuse policies. With OCD approval Burlington Resources would be optimizing the VVP regeneration process while also providing a service that benefits the environment as well as industry. I thank you for your time and consideration and should you have any questions regarding this correspondence please feel free to contact me at 505-326-9537.

Sincerely

effery T. Schoenbacher Environmental Representative

CC:

Bruce Gantner Greg Kardos Gaza Seabolt Ed Hasely

Denny Foust, OCD District Office

Correspondence

JTS: