

GW - 71-1

**PERMITS,
RENEWALS,
& MODS**



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 9, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-269-269-392

Mr. David Bays
El Paso Field Services Company
P.O. Box 99234
El Paso, Texas 79999-9234

Re: Discharge Plan (GW-71-1)
Ballard Hydrocarbon Recovery Facility
San Juan County, New Mexico

Dear Mr. Bays:

The groundwater discharge plan (GW-71-1) for El Paso Field Services Company's Ballard Hydrocarbon Recovery Facility located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico is **hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated January, 1996. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division Santa Fe Office** within five working days of receipt of this letter.

The discharge plan was submitted pursuant to Section 3106 of the Water Quality Control Commission Regulations. It is approved pursuant to Section 3109.A.. Please note Section 3109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve El Paso Field Services Company of liability should their operation result in pollution of surface water, ground water or the environment.

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

Please note that Section 3104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3107.C. El Paso Field Services Company is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

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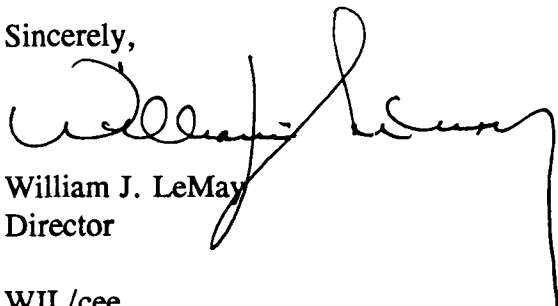
Pursuant to Section 3109.G.4., this approval is for a period of five years. This approval will expire May 9, 2001 and El Paso Field Services Company should submit an application for renewal in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.'

The discharge plan application for El Paso Field Services Company's Ballard Hydrocarbon Recovery Facility is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars and a flat rate fee. The flat fee is five hundred seventy-five dollars (\$575.00) for hydrocarbon recovery facilities with daily discharge volumes between zero and four thousand four hundred ninety-nine gallons per day.

The New Mexico Oil Conservation Division has received the fifty dollar filing fee.

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

Sincerely,



William J. LeMay
Director

WJL/cee
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-232 APPROVAL
EL PASO FIELD SERVICES COMPANY
BALLARD HYDROCARBON RECOVERY FACILITY
DISCHARGE PLAN REQUIREMENTS
(May 9, 1996)

1. Commitments: El Paso Field Services Company will abide by all the commitments submitted in the discharge plan application dated January, 1996.
2. Pit Maintenance: All exposed pits shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds. Any hydrocarbons that accumulate on the pond will be skimmed off within 24 hours.
3. Drum Storage: All drums containing materials other than fresh water must be stored on pad and curb type containment. All empty drums will be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemical(s) stored in any other containers such as buckets and sacks must be stored on pad and curb type containment.
4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device (i.e. drip pan) incorporated into the design.
5. Sump Inspection: All pre-existing sumps will be cleaned and visually inspected on an annual basis. All inspections will be documented and recorded for a period of five years and the records will be available to New Mexico Oil Conservation Division inspectors upon request. Any new sumps or below-grade tanks will be approved by the New Mexico Oil Conservation Division prior to installation and will incorporate leak detection in their designs.
6. Above Ground Tanks: All above ground tanks which contain fluids other than freshwater must be bermed to contain a volume of one and one-third (1-1/3) more than the total volume of the largest tank within the berm or of all interconnected tanks. All new or replacement tanks will be placed on an impermeable liner.
7. Saddle Tanks: All saddle tanks will be placed on pad and curb type containment unless they contain fresh water or liquids that are gases at atmospheric temperature and pressure.
8. Tank Labeling: All tanks must be clearly labeled to identify their contents and other emergency information necessary if the tank(s) were to rupture, spill and/or ignite.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps and pits must be approved by the New Mexico Oil Conservation Division prior to installation or upon modification and must incorporate secondary containment and leak detection into the design. All pre-existing sumps and below grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the New Mexico Oil Conservation Division.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every five years thereafter. Permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the New Mexico Oil Conservation Division.
11. Spill Reporting: All spills and/or leaks will be reported to the New Mexico Oil Conservation Division Aztec District Office pursuant to WQCC Rule 1203 and OCD Rule 116.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected daily to ensure proper operation, prevent overtopping and/or system failure.
13. Transfer of Discharge Plan: The New Mexico Oil Conservation Division will be notified prior to the transfer of ownership, control or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the New Mexico Oil Conservation Division prior to transfer.
14. Closure: The New Mexico Oil Conservation Division will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
15. OCD Inspections: Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.
16. Conditions Accepted by:

Company Representative

Date

Title