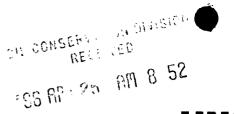
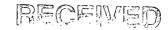
GW - \_\_\_\_\_

DP Cancelled
according 2
RBDMS
GENERAL
CORRESPONDENCE

YEAR(S): /996-199/



Unocal Oil & Gas Division Unocal Corporation P.O. Box 760 Moab, Utah 84532 Telephone (801) 686-2236



APR 26 1996

Environmental Bureau
Oil Conservation Division



State of New Mexico
New Mexico Oil Conservation Division
Attn: Pat Sanchez
NMED - Water Quality Management
2040 South Pacheco Street
Santa Fe. New Mexico 87505

April 22, 1996

RE: NMOCD Approved Discharge Plans for compressor sites that never were constructed

Approval for two Compressor stations, GW-81 and GW-83 was given to Unocal by NMOCD on October 11, 1991. Both of these compressor stations were never constructed.

At this time Unocal does not foresee the construction of either one of these compressor sites. Tracking and monitoring these sites for NMOCD and filing renewals by Unocal is not productive, so Unocal is requesting that discharge plan permits for GW-81 and GW-83 be withdrawn from the NMOCD files in Santa Fe and Aztec.

If you require further information to accomplish this task, please call me at 801-686-7604 or contact me at the letterhead address.

Thank you.

Sincerely,

Union Oil Company of California, dba Unocal

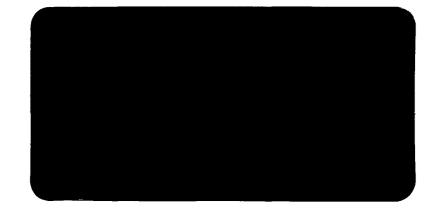
Mike Tabet

Staff HES Coordinator

cc: Brett Ligget Bob Caine Randy Koliba Denny Foust STATE OF NEW MEXICO OIL CONSERVATION DIVISION

### MEMORANDUM OF MEETING OR CONVERSATION

Telephone	Personal	Time 9:00/	+~	Date 4	1-18-96	
	Originating Party	•		<u>0</u> t	her Parties	
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<u>Discussion</u>	These facil	ities i	9 (1 ov	Ling	to	Mv.
M: ke	tabet w	/ Unac	y v	eve	hever	built.
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	Agreements  MMOCD  Permits  Turc  Tile (6w-81,6w				Dischand Gw	



GCL



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1.0	General Information	1
	1.1 Name of Discharger or Legally Responsible Party	1
	1.2 Name of Local Representative or Contact Person	1
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### List of Appendices

### Appendix

A Material Safety Data Sheets

### List of Plates

### Plate

- 1 Compressor Station Number 2
- 2 Compressor Station Number 2 Site Diagram

Hygienetics, Inc./Geoscience Consultants, Ltd.

This document follows the format presented in "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants."

### 1.0 General Information

1.1 Name of Discharger or Legally Responsible Party

Union Oil Company of California dba Unocal 3300 North Butler Avenue, Suite 200 Farmington, NM 87401 (505) 326-7600

1.2 Name of Local Representative or Contact Person

Steven W. Gregory, District Safety and Environment Coordinator Unocal Corporation 3300 North Butler Avenue, Suite 200 Farmington, NM 87401 (505) 326-7600

1.3 Location of Discharge

Section 13, Township 27 North, Range 7 West, NMPM UTM East 273200, UTM North 4050100 Rio Arriba County, NM (plate 1)

1.4 Types of Natural Gas Operation

Field compression facility, which will be used for the transmission of pipeline quality gas (plate 2).

• Process: Pipeline quality gas enters the station at a relatively low pressure.

The natural gas will be compressed and discharged into a pipeline leaving the station.

Hygienetics, Inc./Geoscience Consultants, Ltd.

• Design Conditions: Single Stage Compression

Gas Volume

1 MMSCFD

Station hp

335 hp

### 1.5 Copies

Three copies of Discharge Plan are submitted to OCD as required.

### 1.6 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

Printed Name of Person Signing Document

DESTRUT PRODUCTION ENGINEER

### 2.0 Plant Processes

### 2.1 Sources and Quantities of Effluent and Process Fluids

The natural gas stream entering the plant is a very lean gas with greater than 90% methane by volume.

• Fresh water will be used to clean or wash-down the compressors and engines. Contaminants in the water consist of dirt and small amounts of lubricating oil that may spill into the skid-mounted catch basin below the compressor during routine maintenance. Water collected in the catch basin will overflow into a

Hygienetics, Inc./Geoscience Consultants, Ltd.

500 gallon underground storage tank. The usage rate of wash-down water is estimated at 10 gallons per month.

- During routine maintenance of the compressor engines, the oil in the engines will be changed approximately every 1,000 hours, at a oil usage rate of 15-20 gallons per month.
- A glycol coolant is added to the compressors as evaporation takes place.

  The replacement rate of the coolant is estimated to be 4-5 gallons per year.
- Water will be removed from the inlet gas streams via an inlet scrubber. Less than 5 barrels per day of water will be produced by the scrubber.

### 2.2 Quality Characteristics

- Unocal Guardol Motor Oil 30 or equivalent is used as the lubricating oil for the compressor engines. Refer to the Material Safety Data Sheets (MSDS) in appendix A for a description of this product.
- Dow Chemical Ethylene Glycol or equivalent is used as the coolant for the compressor engines. Refer to the Material Safety Data Sheets (MSDS) in appendix A for a description of this product.

### 2.3 Transfer and Storage of Process Fluids and Effluents

- Make-up engine oil will be stored in a 30 gallon above-ground drum. The drum will sit in an ecological pan which will contain any spills. Larger quantities of oil required for maintenance will be brought to the site on an as-needed basis in a dual tank truck. Used engine oil will be pumped into one storage tank on the truck and will be replaced with new engine oil from the other tank.
- Additional coolant will be stored on site in an above-ground 55-gallon drum. The drum will stand in an ecological pan which will contain any spills.
- Wash-down water will be piped to a 100 square foot evaporation pond. This pond will be lined with a 30 ml PVC underliner, a single layer 6 oz

Hygienetics, Inc./Geoscience Consultants, Ltd.

geotextile middle liner, and a 30 ml reinforced XR5 primary liner. The pond will be equipped with a vacuum-type leak detection system.

• Produced water will be piped into the same 100 square foot evaporation pond as the wash-down water.

### 2.4 Spill/Leak Prevention and Housekeeping Procedures

- 1. All operations personnel have been instructed to handle process fluid spills or leaks as follows:
  - Small spills: Cover spill with sand to soak up fluid and shovel fluidsoaked sand into drums for OCD approved disposal.
  - Large spills: Dike around spill and pump into drums. Call vacuum truck if necessary.
  - Any spill large enough to require a dike to contain it will be reported immediately by phone to the OCD. Verbal and written notification of leaks or spills will be made to OCD in accordance with OCD Rule 116.
- 2. A daily walk-through inspection will be performed by the compressor station operator.
- 3. All areas identified during operation as susceptible to leaks or spills will be paved, bermed, or otherwise contained to prevent the discharge of any effluents.

### 3.0 Effluent Disposal

All effluents from this site will be collected by a recycling contractor. This contractor will be approved by the New Mexico Environmental Improvement Division for the hauling and final disposition of the effluents.

The shipping agent contracted for off-site disposal is Mesa Oil, Inc., 4701 Broadway Boulevard SE, Albuquerque, New Mexico.

Hygienetics, Inc./Geoscience Consultants, Ltd.

### 4.0 Site Characteristics

### 4.1 Hydrologic Features

Based on information found in Hydrogeology and Water Resources of San Juan Basin, New Mexico by the New Mexico Bureau of Mines and Mineral Resources, the estimated depth to water is 550 feet.

The ground water aquifer in this area is most likely in the San Jose formation. Total dissolved solids (TDS) concentration is estimated to be from 500 to 1,500 mg/l.

### 4.2 Geologic Description of Discharge Site

Based on information found in *Hydrogeology and Water Resources of San Juan Basin, New Mexico* by the New Mexico Bureau of Mines and Mineral Resources, the formations in the area are characterized by intermittently occurring grey to yellow and purple clay; white to red silts; white to yellow fine grained massive-bedded sandstone; conglomerate; and red and green shale.

### 4.3 Flood Protection

Flood potential is very unlikely and flood protection is not necessary.

### 5.0 Additional Information

Produced water will not be present in the pipeline because all gas transported through this system will be a marketable, methane rich, pipeline quality gas.

Contractors used for the hauling and final disposal of the compressor oil will be approved by the New Mexico Environmental Improvement Division.

0540/PLAN2.DOC

Appendix A

Material Safety Data Sheets



DOW CHEMICAL U.S.A.

MIDLAND, MICHIGAN 48674

EMERGENCY (517) • 636 • 4400

Product Code: 30478

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

1. INGREDIENTS: (% w/w, unless otherwise noted)

Ethylene glycol

CAS# 000107-21-1 >99%

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

### 2. PHYSICAL DATA:

BOILING POINT: 387.1F 197C VAP PRESS: 0.12 mmHg @ 25C

VAP DENSITY: 2.14

SOL. IN WATER: Completely miscible.

SP. GRAVITY: 1.1155 @ 20/20C APPEARANCE: Colorless liquid. ODOR: Practically odorless.

#### 3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: 247F, 119C METHOD USED: Setaflash

FLAMMABLE LIMITS

LFL: 3.2%

UFL: Not determined.

EXTINGUISHING MEDIA: Water fog, alcohol foam, CO2, and dry chemical.

FIRE & EXPLOSION HAZARDS: None expected under normal storage and handling conditions (i.e. ambient temperatures). However,

(Continued On Page 2) (R) Indicates a Trademark of The Dow Chemical Company

Dow Chemical U.S.A.\* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 3

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

### 6. HEALTH HAZARD DATA:

EYE: May cause slight transient (temporary) eye irritation.

Corneal injury is unlikely. Vapors or mists may irritate eyes.

SKIN CONTACT: Essentially nonirritating to skin.

SKIN ABSORPTION: Repeated skin exposure to large quantities may result in absorption of harmful amounts. The dermal LD50 has not been determined.

INGESTION: Single dose oral toxicity is moderate. Excessive exposure may cause central nervous system effects, cardio-pulmonary effects (metabolic acidosis), and kidney failure. The estimated lethal dose for an average person is 100 ml. The oral LD50 for rats is in the 6000-13,000 mg/kg range. Amounts ingested incidental to industrial handling are not likely to cause injury; however ingestion of larger amounts could cause serious injury, even death.

INHALATION: At room temperature, vapors are minimal due to low vapor pressure. If heated or sprayed as an aerosol, concentrations may be attained that are sufficient to cause irritation and other effects.

SYSTEMIC & OTHER EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Did not cause cancer in long-term animal studies. Based on animal studies, ingestion of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals) or skin contact, the primary routes of occupational exposure, have minimal or essentially no effect on the fetus. In studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of

(Continued On Page 4)

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<sup>\*</sup> An Operating Unit of The Dow Chemical Company

Dow Chemical U.S.A.\* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 4

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

### 6. HEALTH HAZARD DATA: (CONTINUED)

ethylene glycol in large amounts caused a small decrease in the number of litters per pair, live pups per litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests have been negative. Results of mutagenicity tests in animals have been negative.

### 7. FIRST AID:

EYES: Irrigate immediately with water for at least 5 minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Early administration of ethanol may counter the toxic effects of ethylene glycol--metabolic acidosis and renal damage. Hemodialysis or peritoneal dialysis have been of benefit. New Eng. J. Med. 304:21 1981. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

### 8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE (S): OSHA PEL and ACGIH TLV are 50 ppm Ceiling for ethylene glycol vapor.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary

(Continued On Page 5)

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\* An Operating Unit of The Dow Chemical Company

Dow Chemical U.S.A.\* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 5

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

### 8. HANDLING PRECAUTIONS: (CONTINUED)

for some operations.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator.

SKIN PROTECTION: Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

### 9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Avoid ingestion. Practice reasonable caution and personal cleanliness. Avoid skin and eye contact.

Trace quantities of ethylene oxide (£0) may be present in this product. While these trace quantities could accumulate in headspace areas of storage and transport vessels, they are not expected to create a condition which will result in £0 concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zone of the workplace for appropriate applications. OSHA has established a permissible exposure limit of 1.0 ppm 8 hr TWA for £0. (Code of Federal Regulations Part 1910.1047 of Title 29)

MSDS STATUS: Revised section 9 and regsheet.

(Continued On Page 6)
(R) Indicates a Trademark of The Dow Chemical Company

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Dow Chemical U.S.A.\* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 6

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

### REGULATORY INFORMATION: (Not meant to be all-inclusive--selected regulations represented.)

NOTICE: The information herein is presented in good faith and believed to be accurate as the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numberous federal, state or provincial, and local laws and regulations. See MSD Sheet for health and safety information.

### U.S. REGULATIONS

-----------------

SARA 313 INFORMATION: This product contains the following substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

CHEMICAL NAME CAS NUMBER CONCENTRATION

ETHYLENE GLYCOL 000107-21-1 99 %

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard A delayed health hazard

### CANADIAN REGULATOINS

(Continued on Page 7)

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Dow Chemical U.S.A.\* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 7

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

REGULATORY INFORMATION (CONTINUED)

The Workplace Hazardous Materials Information System (W.H.M.I.S.) Classification for this product is:

D2A

The Transportation of Dangerous Goods Act (T.D.G.A.) classification for this product is:

Not regulated

<sup>(</sup>R) Indicates a Trademark of The Dow Chemical Company
The Information Herein Is Given In Good Faith, But No Warranty,
Express Or Implied, Is Made. Consult The Dow Chemical Company
For Further Information.

<sup>\*</sup> An Operating Unit of The Dow Chemical Company

### **UNOCALØ**

Product Name: UNOCAL GUARDOL MOTOR OIL 30

Product Code No: 03650XX30

Page 1 of Issue Date: 6/5

MANUFACTURER:

UNOCAL REFINING & MARKETING DIVISION UNION OIL COMPANY OF CALIFORNIA 1201 W. 5TH STREET LOS ANGELES, CALIFORNIA 90017

CONTACT FOR FURTHER INFORMATION: MSDS COORDINATOR (213) 977-7589

Transportation Emergencies
Call CHEMTREC
(800) 424-9300 Cont. U
(202) 483-7616 (Collectrom Alaska & Hawaii
Health Emergencies:
CALL LOS ANGELES POISON
INFORMATION CENTER (24 hr
(213) 664-2121

PRODUCT IDENTIFICATION

PRODUCT NAME:

UNOCAL GUARDOL MOTOR OIL 30

SYNONYMS:

UNION GUARDOL MOTOR OIL 30

GENERIC NAME:

CRANKCASE DIL

CHEMICAL FAMILY: PETROLEUM HYDROCARBON

DOT PROPER

SHIPPING NAME:

NOT APPLICABLE

ID NUMBER:

NONE

SECTION I - INGREDIENTS

TLV UNITS AGENCY

TYPE

OIL MIST, IF GENERATED

5.00 MG/M3 OSHA

FULL TERM THA

THE IDENTITIES OF INGREDIENTS THAT ARE TRADE SECRETS ARE EXCLUDED FROM THIS LIST.

SECTION II - EMERGENCY AND FIRST AID PROCEDURES

\*\*\*EMERGENCY\*\*

Have physician call LOS ANGELES POISON INFORMATION CENTER (24 hrs.) (213) 664-2121

#### EYE CONTACT!

FOR DIRECT CONTACT, FLUSH THE AFFECTED EYE(S) WITH CLEAN WATER. IF IRRITATION OR REDNESS DEVELOPS, SEEK MEDICAL ATTENTION.

### SKIN CONTACT:

DO NOT USE GASOLINES, THINNERS OR SOLVENTS TO REMOVE PRODUCT FROM SKIN. WIPE MATERIAL FROM SKIN AND REMOVE CONTAMINATED CLOTHING. CLEANSE AFFECTED AREA(S) THOROUGHLY BY WASHING WITH SOAP AND WATER AND, IF NECESSARY, A WATERLESS SKIN CLEANSER. IF IRRITATION OR REDNESS DEVELOPS AND PERSISTS, SEEK MEDICAL ATTENTION.

SECTION IV - SPECIAL PROTECTION INFORMATION

### EYE PROTECTION:

APPROVED EYE PROTECTION TO SAFEGUARD AGAINST POTENTIAL EYE CONTACT, IRRITATION OR INJURY IS RECOMMENDED.

#### OTHER PROTECTIVE EQUIPMENT:

IT IS SUGGESTED THAT A SOURCE OF CLEAN WATER BE AVAILABLE IN WORK AREA FOR FLUSHING EYES AND SKIN. BARRIER CREAMS THAT ARE SPECIFIC FOR OIL-BASED MATERIALS ARE RECOMMENDED WHEN GLOVES ARE IMPRACTICAL.

SECTION V - REACTIVITY DATA

#### STABILITY:

STABLE

### INCOMPATIBILITY (MATERIALS TO AVOID):

AVOID CONTACT WITH STRONG OXIDIZING AGENTS. EXTENDED EXPOSURE TO HIGH TEMPERATURES MAY CAUSE DECOMPOSITION.

### **HAZARDOUS DECOMPOSITION PRODUCTS:**

THERMAL DECOMPOSITION IN THE PRESENCE OF AIR MAY YIELD MAJOR AMOUNTS OF OXIDES OF CARBON AND MINOR AMOUNTS OF OXIDES OF NITROGEN, PHOSPHORUS, SULFUR AND ZINC.

#### HAZARDOUS POLYMERIZATION:

HILL NOT OCCUR

SECTION VI - SPILL OR LEAK PROCEDURES

\*\*\*HIGHHAY OR RAILWAY SPILLS\*\*\*
Call CHEMTREC (800) 424-9300 Cont. U.S.
 (Collect) (202) 483-7616 from Alaska & Hawa

### PRECAUTIONS IN CASE OF RELEASE OR SPILL:

COLLECT LEAKING LIQUID IN SEALABLE CONTAINERS. ABSORB SPILLED LIQUID IN SAND OR INERT ABSORBANT. CONTACT FIRE AUTHORITIES AND APPROPRIATE STATE/LOCAL AGENCIES. IF SPILL OF ANY AMOUNT IS MADE INTO OR UPON U.S. NAVIGABLE WATERS, THE CONTIGUOUS ZONE, OR ADJOINING SHORELINES, NOTIFY COAST GUARD NATIONAL RESPONSE CENTER (PHONE NUMBER 800-424-8802).

#### **MASTE DISPOSAL METHOD:**

DISPOSE OF PRODUCT IN ACCORDANCE WITH LOCAL, COUNTY, STATE, AND FEDERAL REGULATIONS.

SECTION VII - STORAGE AND SPECIAL PRECAUTIONS

### HANDLING AND STORAGE PRECAUTIONS:

STORE IN A COOL, DRY LOCATION. KEEP AWAY FROM INCOMPATIBLE MATERIALS (SEE SECTION V). AVOID GENERATING DIL MISTS WHILE HANDLING. AVOID PROLONGED OR REPEATED SKIN CONTACT. WASH THOROUGHLY AFTER HANDLING. FOR USED MOTOR DIL: LAUNDER SATURATED CLOTHING BEFORE WEARING AND DISCARD DIL-SOAKED SHOES AND UNWASHABLE CLOTHING.

	Page	5 of	5
Issue	Date:	6/ 5/	18

SECTION XI - DOCUMENTA	RY INFORMATION
ISSUE DATE: 6/ 5/85	PRODUCT CODE NO. 03650XX30
PREV. DATE: 7/25/84	PREV. PROD. CODE NO.
MSDS NO:	PREV. MSDS NO:

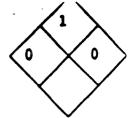
### DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES

The information in this document is believed to be correct as of the date issued. HOHEVER, NO HARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR ANY OTHER HARRANTY IS EXPRESSED OR IS TO BE IMPLIED REGARDING THE ACCURACY OR COMPLETENESS OF THIS INFORMATION, THE RESULTS TO BE OBTAINED FROM THE USE OF THIS INFORMATION OR THE PRODUCT, THE SAFETY OF THIS PRODUCT, OR THE HAZARDS RELATED TO ITS USE. This information and product are furnished on the condition that the person receiving them shall make his own determination as to the suitability of the product for his particular purpose and on the condition that he assume the risk of his use thereof.

_	4505-110
	RODUCT CESE NO. 03659
B	IN NO.
ı	None

# Union Oil Company of California

### union



UNION 76 DIVISION

OS ANGELES, CALIFORNIA 90017  213) 977-7589  Health Emergencies: Call Los Angeles		Call CHEMTREC (800) 424-9300 For AK & HI: (202) 483-7616 Health Emergencies: Call Los Angeles Poison Information Center (24 hrs.)
PRODUCT	JNION HEAVY DUTY MOTOR OIL, 10W/30	
COMMON NAME		
GENERIC NAME	CRANKCASE OIL	
CHEMICAL NAME		
CHEMICAL FAMILY	PETROLEUM LUBE OIL	
OUT PROPER SHIPPING NAME	NOT APPLICABLE	•
WARNING STATE	MENTS	

pration of oil mists and prolonged or repeated skin contact. Do not cut, puncture or weld on or near product container. For industrial use only. PROLONGED OR REPEATED CONTACT WITH USED MOTOR OIL MAY BE A SKIN CANCER HAZARD. WASH SKIN WITH SOAP AND WATER.

SECTION I - INGREDIENTS	*THRESHOLD LIMIT VALUE SET BY: A. OSHA B. ACGIH UNITS ARE IN PPM UNLESS SPECIFIED OTHERWISE.	C. SEE SECTION III D. OTH	ER NE NOT ESTABLISHED TLV*
Oil mist, if generat	ed		5 mg/m <sup>3</sup> A, B
Zinc dialkyldithioph		< 2%	Not Established

identities of ingredients that are trade secrets are ...luded from this list.

	AL PRUIECTION INFORMATION
ION (ION)	If exposure exceed the applicable TLV, a suitable ilter-type respirator should be worn. SEE ADDENDUM
VENTILATION	General mechanical ventilation may be adequate for maintaining airborne concentrations below established exposure limits. If general ventilation is inadequate, supplemental local exhaust may be required. Other special precautions, such as respiratory protection, may be required if airborne concentrations cannot be reduced to below the TLV by ventilation.
PROTECTIVE \	The use of gloves that are impermeable to oils is advised to protect against skin irritation and absorption of zinc dialkyldithiophosphates.
EYE PROTECTION	Safety glasses, chemical goggles, and/or face shields are recommended to safeguard against potential eye contact, irritation, or injury.
OTHER PROTECTIVE EQUIPMENT	Use good personal hygiene practice. Sink and eye wash should be available in work area.
SECTION V - REA	ICTIVITY DATA
STABILITY	STABLE
CONDITIONS TO AVOID	Avoid contact with any source of heat or flame.
ATIBILITY ATERIALS TO AVOID	Avoid contact with strong oxidizing agents such as chlorine, permanganates and dichromates.
HAZARDOUS DECOMPOSITION PRODUCTS	Thermal decomposition in the presence of air may yield major amounts of oxides of carbon and minor amounts of oxides of sulfur and nitrogen.
HAZARDOUS POLYMERIZATION	WILL NOT OCCUR
CONDITIONS TO AVOID	
SECTION VI - SP	ILL OR LEAK PROCEDURES  HIGHWAY OR RAILWAY SPILLS. CALL CHEMTREC 18008 424-8300 FOF AK & HI: (202)483-7616
PRECAUTIONS IN CASE OF RELEASE OR SPILL	Stay upwind and away from spill unless wearing appropriate protective equipment (see Section IV). Stop and/or contain discharge if it can be done safely. Keep all sources of ignition and hot metal surfaces isolated from spill. Use non-sparking tools for cleanup. Keep out of drains, sewers or waterways. Contact fire authorities. Notify local health and pollution control agencies. Notify Coast Guard National Response center (phone number 800—24—8802) if spill of any amount is made into or upon U.S. navigable waters, the contiguous zone, or adjoining shorelines. Consult 40 Code of Federal Regulations Part 110, and state and local law.
WASTE DISPOSAL METHOD	Dispose of product in accordance with local, county, state, and federal regulations.

0.000

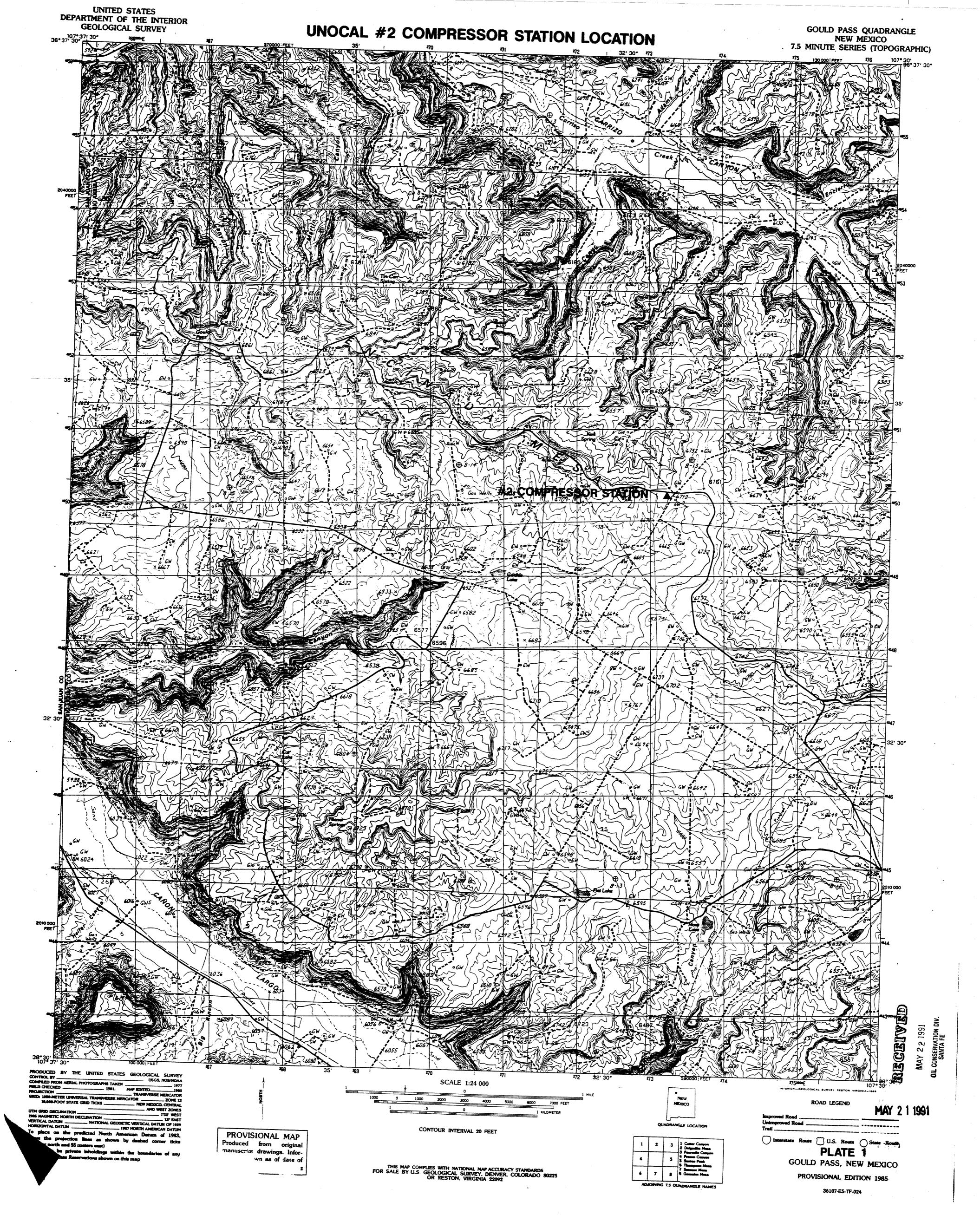
RM I-IL OLINEW 6-62: PRINTED IN U.S.A.

### ADDENDUM

Section II - EMERGENCY AND FIRST AID PROCEDURES

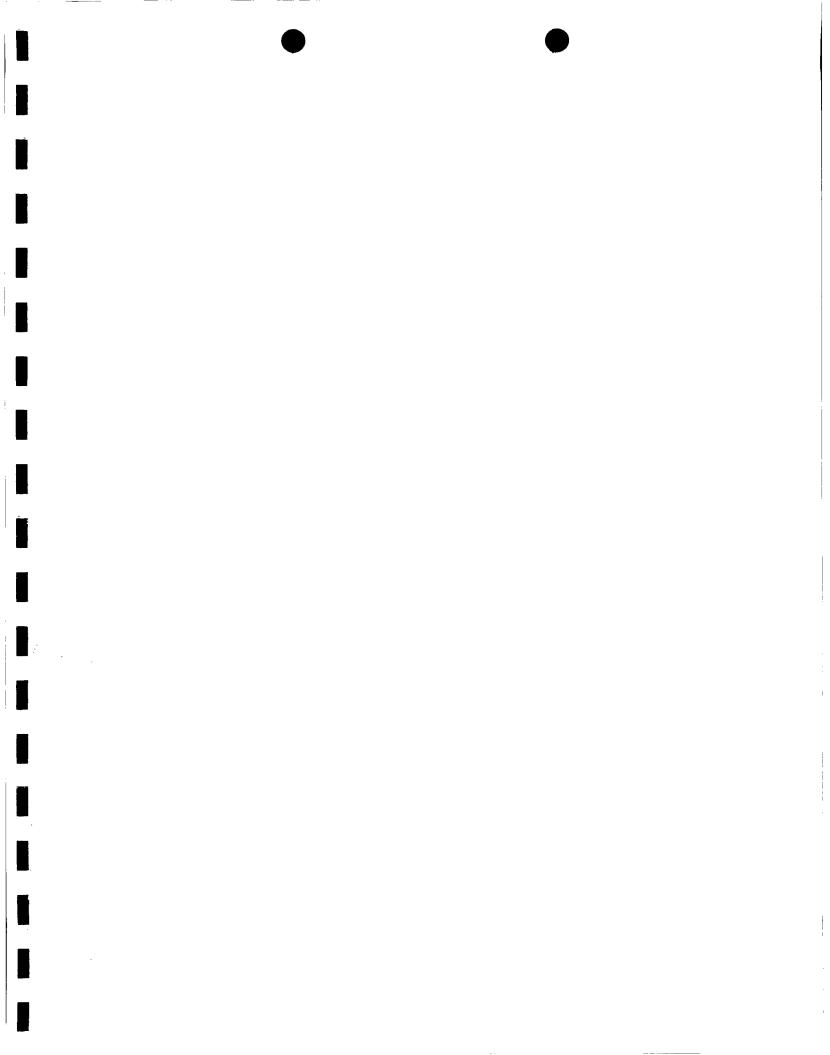
### Ingestion:

TO PHYSICIAN: Emesis or lavage is not recommended for minute quantities or tastes of most hydrocarbons. Medical opinion is divided for larger ingestions. Emesis or lavage have been recommended for those petroleum products which have a high oral toxicity. Gastric lavage with a cuffed endotracheal tube is recommended by some physicians to prevent aspiration.



Sales . Orifice Meter Run Pressure Reducing Regulator - Discharge Block Valve Discharge Check Valve Compressor Station Number 2 Installation Details evipV (nwobwolg) sneV Unit Discharge Relief Valve Field Gas Compressor Package See inlet Drip Pot Or Filter And/Or Starting To Uned Pit W/LD Waste Lube Oil Brain(s) And Washdown Drain(s) Relief Volve(s) Vent Starter Vent Line To Lined Pit W/LD Unit Suction Tank Skid Mounted Lube Oil Make--Up Tank Scrubber(s) Drain(s) Suction Block Valve J Suction Pressure Regulator From Wellhead Or Gathering System

Plate 2



### Geoscience Consultants, Ltd.

500 Copper Avenue N.W. Suite 200 Albuquerque, New Mexico 87102 (505) 842-0001 FAX (505) 842-0595



May 21, 1991

### RECEIVED

MAY 22 1991

OIL CONSERVATION DIV. SANTA FE

Mr. Roger Anderson Oil Conservation Division P.O. Box 2088, RM #206 Santa Fe, NM 87504

RE:

COMPRESSOR STATION NUMBER TWO NOTICE OF INTENT TO

**DISCHARGE** 

Dear Mr. Anderson:

Enclosed is a Notice of Intent to Discharge for Unocal's compressor station number two located in Section 13, Township 27 North, Range 7 West, NMPM, Rio Arriba County.

The construction of the compressor station number two is scheduled to start in October, 1991.

We look forward to working with you as you review the Notice of Intent and your determination as for need of a Discharge Plan for compressor station number two.

Sincerely,

GEOSCIENCE GONSULTANTS, LTD.

Gary **L.** Yordan Senior Engineer

GLJ/llb/0540/OCD002.LTR

Enclosure

cc: Steven W. Gregory, Unocal

150

### NOTICE OF INTENT

### 1) Name and address of person making the discharge:

Unocal Oil and Gas Division Unocal Corporation 3300 North Butler Avenue Suite 200 Farmington, NM 87401 ATTN: Steven W. Gregory

### 2) <u>Location of the discharge</u>:

Compressor Station Number 2, Section 13, Township 27 North, Range 7 West, NMPM (Plate 1).

### 3) <u>Type of discharge</u>:

- (1) Used lubricating oil, which is changed out from the compressor.
- (2) Ambitrol (Dow Chemical glycol), is used as a coolant for the compressors and is added as evaporation takes place.
- (3) Fresh water is used for wash down water to clean or wash down the compressors and engines.

### 4) The means of discharge:

- (1) The used lubricating oil is stored in an above ground tank and picked up by Mesa Oil for recycling.
- (2) Ambitrol (glycol) is not changed out, and is only added as needed.
- Wash down water is held in a double-lined storage tank and then transported to an approved wastewater disposal site.

### 5) The type of operation from which the discharge is derived:

Compressor station number 2 is a field compression facility for compressing of "pipeline quality" gas.

### 6) The estimated flow to be discharged per day:

- (1) Used lubricating oil is collected at a rate of 15-20 gallons per month.
- (2) Make up Ambitrol is added at a rate of 4-5 gallons per year.
- (3) Wash down water is collected at a rate of 10 gallons per month.

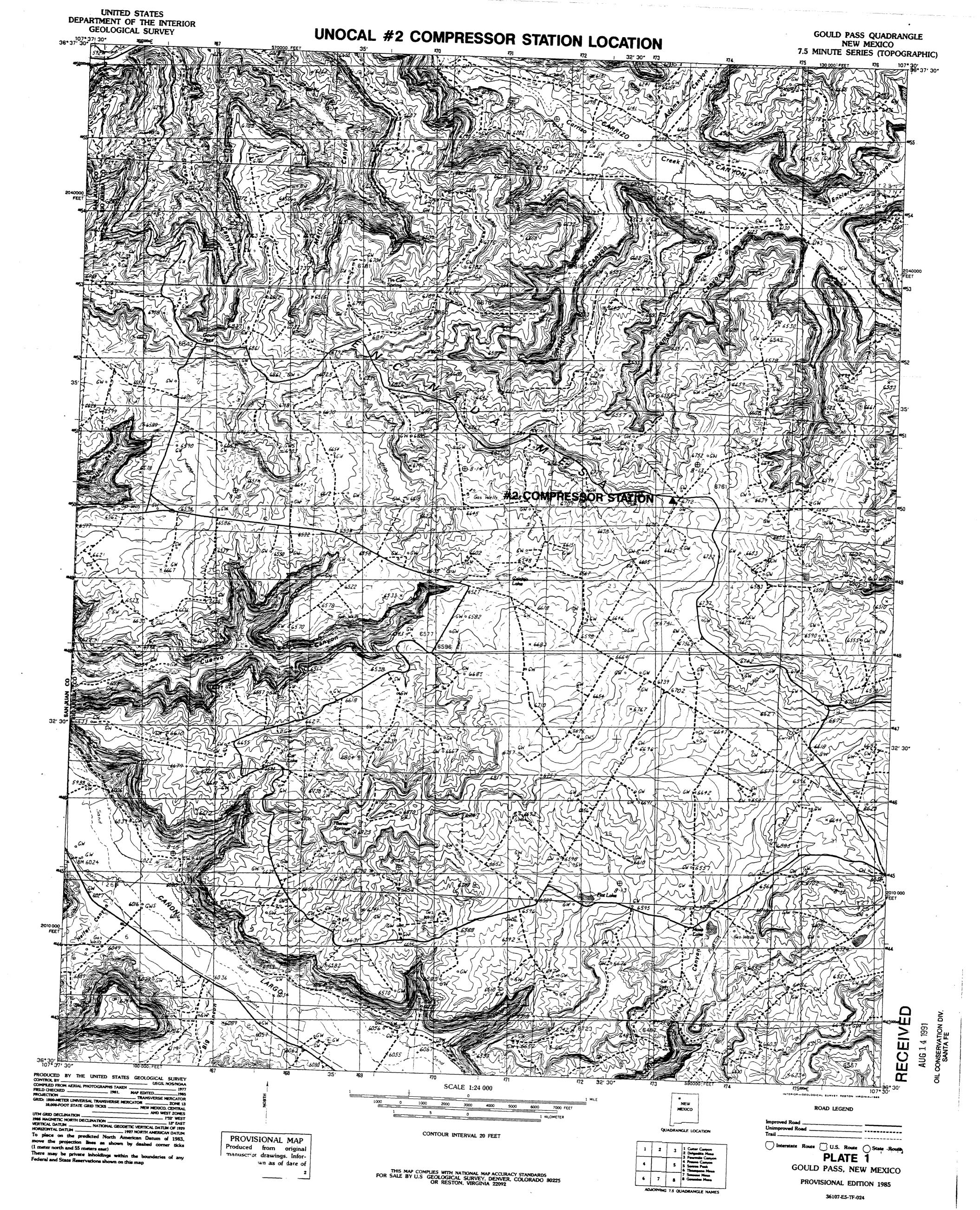
### 7) The estimated depth to ground water:

Based on well information from nearby water wells owned by Unocal, estimated depth to ground water is 300 ft.

Signed:

Date: 5/17/91

0450/INTENT2.FRM



### Geoscience Consultants, Ltd.

500 Copper Avenue N.W. Suite 200 Albuquerque, New Mexico 87102 (505) 842-0001 FAX (505) 842-0595



August 14, 1991



AUG 1 4 1991

OIL CONSERVATION DIV. SANTA FE

Mr. Roger Anderson Oil Conservation Division P.O. Box 2088, RM #206 Santa Fe, NM 87504

RE: COMPRESSOR STATION NUMBER TWO DISCHARGE PLAN

Dear Mr. Anderson:

Enclosed are three copies of the Discharge Plan for Unocal's compressor station number two located in Section 13, Township 27 North, Range 7 West, NMPM, Rio Arriba County.

Construction of the compressor station number two is scheduled to start in October 1991.

If you have any questions or comments regarding this plan please contact me at 842-0001.

Sincerely, H+GCL

Patrice 1.0' Coundle for

Gary L. Jordan Senior Engineer

GLJ/llb/0540/ANDER002.LTR

Enclosure

cc: Steven W. Gregory, Unocal (with enclosure)

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

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

phone (505) 827-5800:
(GW-70)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico, 87401, has submitted a discharge plan application for its Compressor Station Number 1 located in the NW/4, NW/4, Section 1 Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washfown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 400 feet with a total dissolved solids concentration ranging from 500 mg/1 to 1500 mg/1. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

GW-81)-Union Oil company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 300 North Burler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 2 located in the SW/4, SW/4, Section 13, Township 27 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 550 feet with a total dissolved solids concentration ranging from 500 mg/l to 1500mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

managed.

(GW-82)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 3 located in the NE/4, NE/4, Section 27, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 galions per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal facility.

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

for	times, the first publication being on theday
of lep	, 1991, and the subsequent consecutive
publications on	Comment of South and
BOYNACHTE DATIZ  AL -UULIC-NEW MEXICO  WITH SECRETARY OF STATE	Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this
zoires 12-18:43	Statement to come at end of month.
CLA-22-A (R-12/91)	ACCOUNTNUMBER C81184

(GW-83)-Union Off-Company of California, DBA UNDGAL, Glen O. Papp, District Production Engineer, 3300 North Batter, Suite 200, Farmington, Now Messice 67401, his submitted a discharge plan application for its Compressor Station Number 4 located in the SW/4, SE/4, Section 20, Towniship 27 North, Range 8 West, NMPM, Rio Arriba, County, New Messico. Approximately 4 gallons per day of washdown; water and a double lined pond equipped with leak dection prior to disposal at an OCD approved offsite disposal facility. Groundwater, most ilicely to affected by an accidental discharge is

leak dection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to affected by an accidental discharge is at a depth in excess or 450 feet with a total dissolved solids concentration ranging from 500 mg/t to 1500 mg/t. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

discharges to the surface will be managed.

(GW-35)-Conoco Inc., Rick McCallp, Director, Safety and Environmental Services, Natural Gas and Gas Products Department, P.O. Box 2197, HU 3034, Houston, Texas, 77252, has submitted an application for discharge plan renewal for its San Juan Basin Gas Processing Plant located in the NW/4, NW/4, Section 14, Township 29 North, Range 11 West, NPMP, San Juan Courty, New Mexico. Approximately 180,000 gallons per day of cooling tower wastwater is discharged to the City of Bloomfield Wastewater Treatment Facility. Groundwater most likely to be affected by an accidental discharge is at a depth of from 15 feet to 55 feet with a total dissolved solids concentration is excess of 4400 mg/. The discharge plan addresses how spills, leeks and other accidental discharges to the surface will be managed.

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

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.

on information in the pain and information submitted at the hearing.
GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of August, 1991.

STATE OF NEW MEXICO

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Journal: September 12, 1991.

#### AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO,
County of San Juan:
CHRISTINE HILL being duly
CHRISTINE HILL being duly sworn, says: "That she is the
NATIONAL AD MANAGER of The Farmington Daily Times, a daily
The Farmington Daily Times, a daily
newspaper of general circulation
published in English in Farmington ,
said county and state, and that the
hereto attached LEGAL NOTICE
was published in a regular and entire
issue of the said Farmington Daily
Times, a daily newspaper duly quali-
fied for the purpose within the
meaning of Chapter 167 of the 1937
Session Laws of the State of New
Mexico for ONE consecutive
(days) (////) on the same day as
follows:
First Publication THURSDAY, SEPTEMBER 5, 1991
Second Publication
Third Publication
Fourth Publication
and that payment therefore in the amount of \$ 77.12 has been made.
Christine Idillo
Subscribed and sworn to before me

No.

28272

### COPY OF PUBLICATI

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

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

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(GW-81)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 2 located in the SW/4, SW/4, Section 13, Township 27 North, Range 7 West, NMPM, Rio Arriba County, New Mexico Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 550 feet with a total dissolved solids concentration ranging from 500 mg/l to 1500 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of August, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAN, Director

SEAL



## UNITED STATES DEPARTMENT OF THE INTERIOR 51.03

:7 8 40

### FISH AND WILDLIFE SERVICE

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

October 9, 1991

Mr. William J. Lemay
Director, New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the Public Notice dated August 30, 1991, regarding the effects of granting State of New Mexico groundwater discharge permits on fish, shellfish, and wildlife resources in New Mexico.

The U.S. Fish and Wildlife Service (Service) has determined there are no wetlands or other environmentally sensitive habitats that will be adversely affected by the following discharges. Our data indicate no listed species would be affected by the proposed action.

GW-70 Union Oil Company of California, Compressor Station No. 1, Section 1, T26N, R7W, Rio Arriba County, New Mexico

GW-81 Union Oil Company of California, Compressor Station No. 2, Section 13, T27N, R7W, Rio Arriba County, New Mexico

GW-82 Union Oil Company of California, Compressor Station No. 3, Section 27, T27N, R6W, Rio Arriba County, New Mexico

GW-83 Union Oil Company of California, Compressor Station No. 4, Section 20, T27N, R6W, Rio Arriba County, New Mexico

GW-35 Conoco Inc., Section 14, T29N, R11W, San Juan County, New Mexico

Direct adverse impacts to migratory birds will occur from petroleum hydrocarbon contamination if the birds gain access to oil that is present on the ponds. Migratory birds that become covered by or ingest oil typically suffer mortality due to hypothermia or poisoning. The Service recommends that all tanks and ponds, regardless of size, be netted to prevent access by migratory birds.

Mr. William J. Lemay

Migratory birds are protected under the Migratory Birds Treaty Act (MBTA). If migratory birds become exposed to or accumulate harmful levels of contaminants, this constitutes "take" under the MBTA. The MBTA makes it unlawful for anyone at any time or in any manner to ". . . kill . . . " any migratory birds unless permitted by regulations promulgated under the Act. The courts have stated that the MBTA can be constitutionally applied to impose penalties to persons, associations, partnerships, or corporations that did not intend to "kill" migratory birds and that the MBTA includes poisoning by any means. The MBTA holds that the unlawful killing of even one migratory bird is an offense.

These comments represent the views of the Fish and Wildlife Service. If you have any questions, please contact Scott Hamilton-McLean at (505) 883-7877.

Sincerely,

Jennifer Fowler-Propst Field Supervisor

Shichael Donalis

cc:

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



**OIL CONSERVATION DIVISION** 

BRUCE KING GOVERNOR June 5, 1991

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

### CERTIFIED MAIL RETURN RECEIPT NO. P-327-278-145

Mr. Steven W. Gregory
Unocal Oil and Gas Division
3300 North Butler Avenue
Farmington, New Mexico 87401

RE: Discharge Plan Requirements

Dear Mr. Gregory:

The Oil Conservation Division (OCD) has received your Notice of Intent to Discharge, dated May 21, 1991, for four proposed compressor stations.

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of discharge plans is required for the following compressor stations:

- 1. <u>Compressor Station Number One</u> Section 1, Township 26 North, Range 7 West, Rio Arriba County, New Mexico.
- Compressor Station Number Two
   Section 13, Township 27 North, Range 7 West, Rio Arriba County, New Mexico.
- 3. <u>Compressor Station Number Three</u> Section 27, Township 27 North, Range 6 West, Rio Arriba County, New Mexico.
- 4. <u>Compressor Station Number Four</u> Section 20, Township 27 North, Range 6 West, Rio Arriba County, New Mexico.

This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in Section 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping).

Mr. Steven W. Gregory
June 5, 1991
Page -2-

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. The guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Three copies of your discharge plan should be submitted.

If there are any questions on this matter, please feel free to call David Boyer at 827-5812, or Roger Anderson at 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,

William J. LeMay

Director

WJL/RCA/sl

**Enclosure** 

cc: OCD Aztec Office

# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT



OIL CONSERVATION DIVISION

BRUCE KING GOVERNOR October 11, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-265

Mr. Glen O. Papp UNOCAL Corporation 3300 North Butler Ave Suite 200 Farmington, New Mexico 87401

RE: Discharge Plan GW-81

Compressor Station Number 2 Rio Arriba County, New Mexico

Dear Mr. Papp:

The groundwater discharge plan GW-70 for the UNOCAL Compressor Station Number 2 located in the SW/4 SW/4, Section 13, Township 27 North, Range 7 West, NMPM, Rio Arriba County, New Mexico is hereby approved. The discharge plan consists of the application dated August 2, 1991.

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

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

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

Mr. Glen O. Papp October 11, 1991 Page -2-

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire October 11, 1996 and you should submit an application for renewal in ample time before that date.

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

Sincerely,

William J. LeMay

Director

WJL/rca

xc: OCD Aztec Office