

**GW - 88**

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**PERMITS,  
RENEWALS,  
& MODS**



# New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**John H. Bemis**  
Cabinet Secretary

**Bret F. Woods, Ph.D.**  
Deputy Cabinet Secretary

**Jami Bailey**  
Division Director  
Oil Conservation Division



**FEBRUARY 21, 2012**

Mr. Jeff Peace  
BP America Production Company  
200 Energy Court  
Farmington, NM 87401

Dear Mr. Peace:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that one of your facilities with an expired or soon to be expired permit does not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for **GW - 088** (Amoco Gallegos Canyon C.S.) is hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will make an inspection of your facility to determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

**Jami Bailey**  
Director

JB/ll

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. \_\_\_\_\_

dated 10/20/08

or cash received on \_\_\_\_\_ in the amount of \$ 400<sup>00</sup>

from BP America Production Co

for GW-088

Submitted by: Lawrence Romero Date: 10/28/08

Submitted to ASD by: Lawrence Romero Date: 10/28/08

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

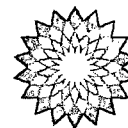
Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal ☒

Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

October 21, 2008

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

Attn: Mr. Wayne Price

RE: Discharge Permit GW 088  
Gallegos Canyon (Highway 64) Compressor Station

Dear Mr. Price:

Please find enclosed a signed copy of the Discharge Permit for the Gallegos Canyon (Highway 64) Compressor Station and a check, number 0801427856, in the amount of \$400.00.

We also would like to extend our appreciation for the excellent guidance and professionalism from Mr. Edward Hansen during this process.

Should you have any additional questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely,

Larry Schlotterback  
Environmental Coordinator

Attachments

## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. *The flat fee for a gas compressor station (0 – 1000 horsepower) is \$400.00. Please submit this amount along with the signed certification item 23. Checks should be made out to the New Mexico Water Quality Management Fund.*
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on January 17, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 27, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

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

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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

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

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

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

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

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

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

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

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

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

## **12. Underground Process/Wastewater Lines:**

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

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

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

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

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

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

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

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

**20. Additional Site Specific Conditions:** N/A

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

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the



department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

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

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

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

BP America Production Inc.

Company Name-print name above

Larry Schlotterback

Company Representative- print name

Larry Schlotterback

Company Representative- Signature

Title Environmental Coordinator

Date: 10/17/08

FED EX OVERNIGHT

RECEIVED


2008 OCT 23 PM 3 29

To:

Mr. Wayne Price

Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

(505) 476 3440



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor

**Joanna Prukop**

Cabinet Secretary

**Reese Fullerton**

Deputy Cabinet Secretary

**Mark Fesmire**

Division Director

**Oil Conservation Division**



September 25, 2008

Larry Schlotterback  
BP America Production Company  
200 Energy Court  
Farmington, New Mexico 87401

Re: Discharge Permit Renewal (GW-88)  
Gallegos Canyon (Highway 64) Compressor Station  
SW/4 NE/4 Section 21, Township 29 North, Range 12 West, NMPM,  
San Juan County, New Mexico


Dear Mr. Schlotterback:

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

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

If you have any questions, please contact Edward J. Hansen of my staff at (505-476-3489) or E-mail [edwardj.hansen@state.nm.us](mailto:edwardj.hansen@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,



Wayne Price  
Environmental Bureau Chief

Attachments-1

xc: OCD District Office

Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>



## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. *The flat fee for a gas compressor station (0 – 1000 horsepower) is \$400.00. Please submit this amount along with the signed certification item 23. Checks should be made out to the New Mexico Water Quality Management Fund.*
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on January 17, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act (Chapter 74, Article 6, NMSA 1978) and civil penalties may be assessed accordingly.*
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- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 27, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
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- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

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

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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

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

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

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

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

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

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

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

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

## **12. Underground Process/Wastewater Lines:**

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

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

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

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

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**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

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

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

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

**20. Additional Site Specific Conditions:** N/A

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

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the

department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

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

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

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

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

Title \_\_\_\_\_

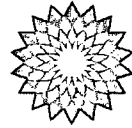
Date: \_\_\_\_\_



bp

RECEIVED

2008 SEP 18 PM 2 10



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

September 16, 2008

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

Attn: Mr. Edward J. Hansen

RE: Discharge Permit GW-088  
Gallegos Canyon (Highway 64) Compressor Station

Dear Mr. Hansen,

In regards to the captioned subject, please find attached notice to land owners documentation submitted on 9/8/08 to the Bureau of Land Management, 1235 La Plata Highway, Farmington, New Mexico.

Should you have any additional questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely,

Larry Schlotterback  
Field Environmental Coordinator

Attachments



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
(505) 326-9200

**CERTIFIED MAIL**  
**RETURN RECEIPT**

**7007 1490 0005 0858 7735**

September 8, 2008

Bureau of Land Management  
1235 La Plata Highway  
Farmington, New Mexico 87401

**Reference: Renewal of Discharge Permit – GW - 088**  
**Gallegos Canyon (Highway 64) Compressor Station**  
**Section 21, Township 29N, Range 12W**

Mr. Mark Kelly:

In accordance with NMOCD requirements, please find enclosed copies of BP's public notice for a renewal of a discharge permit for the Gallegos Canyon (Highway 64) Compressor Station located on a tract of land out of the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. This public notice was published in the Farmington Daily Times on August 30, 2008.

If you have any questions, please feel free to contact me at 326-9425.

Sincerely,

Larry Schlotterback  
Field Environmental Coordinator

Enclosure

# AFFIDAVIT OF PUBLICATION

Ad No. 606750 / BP America

COPY OF PUBLICATION

## STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says:  
That she 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 meaning of  
Chapter 167 of the 1937 Session Laws of the  
State of New Mexico for publication and  
appeared in The Daily Times on the following  
**August 30, 2008**

And the cost of the publication is \$ 344.54

Connie Pruitt

ON 9/04/08 CONNIE PRUITT  
appeared before me, whom I know personally  
to be the person who signed the above  
document.

Christine Sellers  
My Commission Expires 11/05/11

### PUBLIC NOTICE

BP America Production Company - Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schlotterback, Field Environmental Coordinator, (505) 326-9200, has submitted a renewal application for the previously approved discharge plan (GW-088) for their Gallegos Canyon (Highway 64) Compressor Station, located in the SW 1/4 of the NE 1/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 365 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOCD approved Class II disposal well, operated by BP. Additionally, an estimated 300 gallons of used oil and approximately one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak, or accidental discharge is at a depth of approximately 150 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information, submit comments or request to be placed on a facility specific mailing list for future notices by contacting Edward J. Hansen at the New Mexico OGD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, telephone: (505) 476-3469. The OGD will accept comments and statements of interest regarding the renewal and will create a facility specific mailing list for persons who wish to receive future notices.

### ATENCIÓN PÚBLICA

AVISO al público de parte de la compañía BP America producción y operaciones de Farmington Nuevo Mexico localizada en la dirección 200 Energy Court en Farmington, New Mexico 87401, atención al señor Larry Schlotterback, el coordinador del medio ambiente (505) 326-9200, ha presentado una solicitud de la renovación para el plan previamente aprobado de la descarga (GW-088) para su estación del compresor de la baranca de Gallegos (Highway 64), situada en el SW 1/4 del NE 1/4 de la sección 21, el municipio 29 del norte, se extiende 12 del oeste, NMPM, condado de San Juan, Nuevo Mexico, aproximadamente siete millas al este de Farmington, Nuevo Mexico. Aproximadamente 365 galones de agua producida son generados en sitio anualmente, que se recogen y se almacenan temporalmente en un recipiente de la contención antes de transporte a una disposición aprobada NMOCD de la clase II bien, funcionado por BP. Además, los 300 galones estimados de aceite usado y aproximadamente un tambor de 55 galones de filtros de aceite usados se generan anualmente. Estas basuras son cogidas por un reciclador usado del aceite. Los tambors vacíos son retirados por el suministrador del aceite o del producto químico contenido en los tambors del El agua subterránea muy probablemente que se afectará por un derramamiento, un escape o una descarga accidental está en una profundidad de aproximadamente 150 pies con una concentración total de los sólidos en suspensión de aproximadamente 1000 mg/l. Las direcciones del plan de la descarga como los productos y la basura del campo petrolero serán manejados correctamente, almacenado, y dispuesto, incluyendo como los derramamientos, los escapes, y otras descargas accidentales a la superficie serán manejados para proteger el agua dulce. Cualquier persona interesada puede obtener la información, someter comentarios o la petición de ser colocado en una lista de personas a quienes se mandan propaganda específica de la facilidad para los avisos futuros entrando en contacto con Edward J. Hansen en el estado de Nuevo Mexico OGD en 1220 South St. Francis Drive, Santa Fe, Nuevo Mexico 87505, teléfono (505) 476-3469. El OGD aceptará comentarios y declaraciones de interés con respecto a la renovación y creará una lista de personas a quienes se mandan propaganda facilidad específica para las personas que desean recibir los avisos para en el futuro.

**SENDER: COMPLETE THIS SECTION**

- ☐ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BLM  
1235 La Plata Hwy  
Farmington, NM 87401  
Attn: Mr. Kelly

2. Article Number  
(Transfer from service label)

7007 1490 0005 0858 7735

PS Form 3811, February 2004

Domestic Return Receipt

102595-0

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*[Signature]* ☐ AG ☐ AD

B. Received by (Printed Name)

C. Date of

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

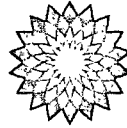
3. Service Type

- ☒ Certified Mail ☐ Express Mail
- ☐ Registered ☒ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

RECEIVED  
2008 SEP 11 PM 2 26

bp



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

September 9, 2008

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

Attn: Mr. Edward J. Hansen

RE: Discharge Permit GW-088  
Gallegos Canyon (Highway 64) Compressor Station

Dear Mr. Hansen,

In regards to the captioned subject, please find attached "The Daily Times" affidavit of publication for the two public notices published on Monday, August 30, 2007. Both English and Spanish versions were published.

Should you have any additional questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely,

Larry Schlotterback  
Field Environmental Coordinator

# AFFIDAVIT OF PUBLICATION

Ad No. 606750 / BP America

## STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says:  
That she 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 meaning of  
Chapter 167 of the 1937 Session Laws of the  
State of New Mexico for publication and  
appeared in The Daily Times on the following  
August 30, 2008

And the cost of the publication is \$ 344.54

Connie Pruitt

ON 9/10/08 CONNIE PRUITT  
appeared before me, whom I know personally  
to be the person who signed the above  
document.

Christine Sellers  
My Commission Expires 11/05/11

# COPY OF PUBLICATION

## PUBLIC NOTICE

BP America Production Company - Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schlotterback, Field Environmental Coordinator, (505) 326-9200, has submitted a renewal application for the previously approved discharge plan (GW-088) for their Gallegos Canyon (Highway 64) Compressor Station, located in the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 365 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOC approved Class II disposal well, operated by BP. Additionally, an estimated 300 gallons of used oil and approximately, one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 150 feet, with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information, submit comments or request to be placed on a facility specific mailing list for future notices by contacting Edward J. Hansen at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3489. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

## ATENCIÓN PÚBLICA

AVISO al público de parte de la compañía BP America producción y operaciones de Farmington, Nuevo México localizada en la dirección 200 Energy Court en Farmington, Nuevo México 87401, atención al señor Larry Schlotterback, el coordinador del medio ambiente, (505) 326-9200, ha presentado una solicitud de la renovación para el plan previamente aprobado de la descarga (GW-088) para su estación del compresor de la barranca de Gallegos (Highway 64), situada en el SW/4 del NE/4 de la sección 21, el municipio 29 del norte, se extiende 12 del oeste, NMPM, condado de San Juan, Nuevo México, aproximadamente siete millas al este de Farmington, Nuevo México. Aproximadamente 365 galones de agua producida son generados en sitio anualmente, que se recogen y se almacenan temporalmente en un recipiente de la contención antes de transporte a una disposición aprobada NMOC de la clase II bien, funcionado por BP. Además, los 300 galones estimados de aceite usado y aproximadamente, un tambor de 55 galones de filtros de aceite usados se generan anualmente. Estas basuras son cogidas por un reciclador usado del aceite. Los tambors vacíos son retirados por el surtidor del aceite o del producto químico contenido en los tambors del. El agua subterránea muy probablemente que se afectará por un derramamiento, un escape o una descarga accidental está en una profundidad de aproximadamente 150 pies, con una concentración total de los sólidos en suspensión de aproximadamente 1000 mg/l. Las direcciones del plan de la descarga cómo los productos y la basura del campo petrolero serán manejados correctamente, almacenado, y dispuesto, incluyendo cómo los derramamientos, los escapes, y otras descargas accidentales a la superficie serán manejados para proteger el agua dulce. Cualquier persona interesada puede obtener la información, someter comentarios o la petición de ser colocado en una lista de personas a quienes se mandan propaganda específica de la facilidad para los avisos futuros entrando en contacto con a Edward J. Hansen en el estado de Nuevo México OCD en 1220 South St. Francis Drive, Santa Fe, Nuevo México 87505, teléfono (505) 476-3489. El OCD aceptará comentarios y declaraciones del interés con respecto a la renovación y creará una lista de personas a quienes se mandan propaganda facilidad-especifica para las personas que desean recibir los avisos para en el futuro.

Order #: 0000606750 BUSN Customer Name: BP AMERICA PRODUCTION  
 Package #: Customer #: F12600 00  
 Ad Matrix #: Ad Description: BP AMERICA NA 8/30

Start Date: 8/30/08 Sales-Print  
 Stop Date: 8/30/08 8/28/08; 12:08:27; LUSISON  
 Scheduled: 1 Net Cost: 322.00  
 Cash Rec'd? TF Ad? N Override Amount:

**SPECIAL INSTRUCTIONS:**

**Order Attributes:**

**RUN SCHEDULE**

Ad Type	Ad Width	Ad Depth	Total Size	SAU Description	Product/Class	Seller ID						
FM RETAIL	4.000	4.500	18.000	N/A	P1389-OIL & GAS FIELD SVCE NOT ELSEW	#7720 LEILANI USISON						
Run	Date	Product	Position	Rate	Sct	Stby	Clr	C/C	Rate\$	Revenue\$	Net\$	Override
1	8/30/08	FM Daily Times	Main	OPEN	N	N	N	Y	17.50	315.00	322.00	

**Appearance Attributes**

Run# - Date

**CHARGE/CREDITS**

Trans# - Type	Description	Amount	Run# - Date
178F - D	FM MANUAL COLOR CHARGE	7.00	1 - 8/30/08
7878 - D	TAX-FARMINGTON (SAN JUAN CNTY)	22.54	1 - 8/30/08

**COLOR**

#Color	Color 1	Color 2	Color 3	Run# - Date

Run	Date	Product	Ex	Position1	Position2	Position3	Clr	Ear	RqTy	Guan	GtBt	IslAd	Late	Only	Rev	Brk	Cpn	Ser	AdTk
1	8/30/08	DLYTIMES	N	MAIN	-----	-----	N	-	-	-	-	-	-	-	-	-	-	N	-

Product	Tagline	#Runs	Cam Rdy	Purchase Order	Pick Up#/Date	Proof Fax#/Email	Proof Cust:Sales	Tear Ad:Bill:Mail
Run Dates								
Notes								
FM Daily Times	BP AMERICA NA 8/30	1					000 : 000	000 : 000 : 000
1 - 8/30/08								

# AFFIDAVIT OF PUBLICATION

Ad No. 60581

## STATE OF NEW MEXICO County of San Juan:

BOB WALLER, being duly sworn says: That he is the CLASSIFIED 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):

Wednesday

August 20, 2008

And the cost of the publication is \$221.86

ON 8/26/08 BOB WALLER appeared before me, whom I know personally to be the person who signed the above document.

*Christine Sellers*

My Commission expires November 05, 2011

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

Para obtener mas informacion sobre esta solicitud en español, sírvase comunicarse por favor. New Mexico Energy, Minerals and Natural Resources Department (Dep'to. Del-Energía, Minerales y Recursos Naturales de Nuevo México), Oil Conservation Division (Dep'to. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New Mexico (Contáctalo: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 14th day of August 2008.

STATE OF NEW MEXICO

## COPY OF PUBLICATION

### NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.2.2106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division (NMOC) 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505. Telephone: (505) 476-3460.

(GW-135) Williams Four Corners, Mr. David Boys, Senior Environmental Specialist, 166 County Road 499, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Arctic Compressor Station located in the SW 1/4 of Section 8, Township 22 North, Range 13 West, NMPM, San Juan County, approximately 13 miles north of Artec, New Mexico. The facility provides materials and compression services for various producers for the gathering of natural gas for treatment and delivery. Approximately 160,000 gallons/year of waste wash down water, 1000-10000 bbl/year of used glycol and 500-1000 gallons/year of used oil are generated and stored in tanks within a bermed area prior to disposal at an NMOC approved facility. Groundwater most likely to be affected by a spill/leak or accidental discharge is of a depth of approximately 30-250 feet, with a total dissolved solids concentration of approximately 200-1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-28) BP America Production Company, Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schifferback, Field Environmental Coordinator, 1661 154-2500, has submitted a renewal application for the previously approved discharge plan (GW-28) for their Gallinas Canyon (Highway 64) Compressor Station located in the SW 1/4 of the NE 1/4 of Section 21, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 265,000 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOC approved Class III disposal well operated by BP. Additionally, an estimated 100,000 gallons of used oil and approximately one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is of a depth of approximately 150 feet, with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOC has determined that the application is administratively complete and has prepared a draft permit. The NMOC will accept comments and suggestions of interest regarding this application and will make a final specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information or submitting comments are requesting to be on the mailing list may contact the Environmental Specialist, Chief of the Oil Conservation Division at the address above. The administrative completeness determination and draft permit may be viewed on the state website between 8:00 a.m. and 5:00 p.m. Monday through Friday, or may also be viewed on the NMOC website at [www.nmocs.state.nm.us](http://www.nmocs.state.nm.us). Persons interested in obtaining a copy of the application and draft permit may contact the NMOC at the address given above. Prior to filing an any proposed discharge permit or minor modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOC hold a public hearing and request for a public hearing shall return the responsibility of a hearing should be held. A hearing will be held if the Director determines that there is a significant public interest.



THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

2008 AUG 23

NMEMNRD Oil Conserv.  
Leonard Lowe  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**NOTICE OF  
PUBLICATION**

**STATE OF NEW  
MEXICO  
ENERGY, MINERALS  
AND NATURAL RE-  
SOURCES  
DEPARTMENT  
OIL CONSERVATION  
DIVISION**

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

(GW-155) Williams Four Corners, Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Aztec compressor station, located in the SW/4 SW/4 of Section 8, Township 32 North, Range 10 West, NMPM, San Juan County, approximately 13 miles north of Aztec, New Mexico. The facility provides metering and compression services to various producers for the gathering of natural gas for treatment and delivery. Approximately 100-5000 gal/year/unit of waste/wash down water; 1000-4000 bbl/year of used glycol; and 500-2000 gal/year/engine of used oil are generated and stored in on-site within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 50-200 feet, with a total dissolved solids concentration

ALTERNATE ACCOUNT: 56689  
AD NUMBER: 00265050 ACCOUNT: 00002212  
LEGAL NO: 85840 P.O. #: 52100-00000137  
325 LINES 1 TIME(S) 282.80  
AFFIDAVIT: 7.00  
TAX: 23.00  
TOTAL: 312.80

**AFFIDAVIT OF PUBLICATION**

**STATE OF NEW MEXICO  
COUNTY OF SANTA FE**

I, L. Paquin, 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 # 85840 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/20/2008 and 08/20/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 20th day of August, 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

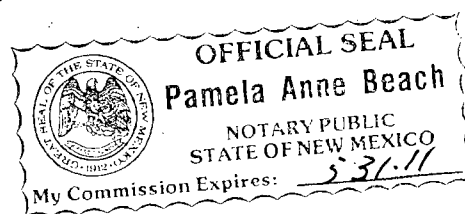
/s/ L. Paquin  
LEGAL ADVERTISEMENT REPRESENTATIVE

GW88  
OK to pay  
Edward Hansen  
8-27-08

Subscribed and sworn to before me on this 21st day of August, 2008

Notary Pamela Anne Beach

Commission Expires: May 31, 2011



www.santafenewmexican.com

of approximately 200 - 2000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-88) - BP America Production Company - Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schlotterback, Field Environmental Coordinator, (505) 326-9200, has submitted a renewal application for the previously approved discharge plan (GW-088) for their Gallegos Canyon (Highway 64) Compressor Station, located in the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 365 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOCD approved Class II disposal well, operated by BP. Additionally, an estimated 300 gallons of used oil and approximately one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 150 feet, with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-382) Reef Services, LLC with a mailing address of 7906 West Highway 80 in Midland, Texas has submitted an application for a new dis-

charge plan with respect to their chemical storage yard in Hobbs, NM, (Lea County) located at 2703 West Marland in the NW of the NE of Section 5, Township 19 South, Range 38 East, NMPM. Materials generated and/or stored at the facility include, but may not be limited to: Hexane, acetic acid, isopropanol, xylene, methanol, toluene, xylene, trimethylbenzene, formic acid, and other oil field-related chemicals. The aquifer beneath this facility lies at an approximate depth of 38 feet below ground surface with a concentration of total dissolved solids varying from 800 to 1,300 milligrams per liter. The discharge plan addresses how chemicals and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this no-

tice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

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

Para obtener más información sobre esta solicitud en español,

servase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energía, Minerales y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New Mexico (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 14th day of August 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION

SEAL  
Mark Fesmire,  
Director  
Legal No. 85840  
Pub. Aug. 20, 2008

**Hansen, Edward J., EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, August 19, 2008 8:08 AM  
**To:** Hansen, Edward J., EMNRD  
**Subject:** FW: Public Notice GW-155, 88

FYI

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**From:** Blackwater, Patricia [mailto:pblackwater@daily-times.com]  
**Sent:** Friday, August 15, 2008 6:32 PM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** RE: Public Notice GW-155, 88

Leonard,

Good Evening, I have completed your request. I scheduled your legal to publish on Wednesday August 20, 2008. The net cost of the ad is \$221.86.

Let me know if you have any questions.

Thank you & have a wonderful weekend.

Sign,

**Patricia Blackwater**  
**Legals/Classifieds Representative**  
*The Farmington Daily Times*  
P.O. Box 450  
Farmington, NM 87401  
(505) 325-4545  
1-800-395-6397  
Direct: (505) 564-4564  
Fax: (505) 564-4567  
[pblackwater@daily-times.com](mailto:pblackwater@daily-times.com)  
[legals@daily-times.com](mailto:legals@daily-times.com)

---

**From:** FAR LEGALS  
**Sent:** Thursday, August 14, 2008 4:59 PM  
**To:** Blackwater, Patricia  
**Subject:** FW: Public Notice GW-155, 88

**Patricia Blackwater**  
**Legals/Classifieds Representative**  
*The Farmington Daily Times*  
P.O. Box 450

8/20/2008

*Farmington, NM 87401  
(505) 325-4545  
1-800-395-6397  
Direct: (505) 564-4564  
Fax: (505) 564-4567  
pblackwater@daily-times.com  
legals@daily-times.com*

---

**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Thursday, August 14, 2008 2:49 PM  
**To:** FAR LEGALS  
**Cc:** Hansen, Edward J., EMNRD; Chavez, Fran, EMNRD  
**Subject:** Public Notice GW-155, 88

Ms. Patricia Blackwater,

Farmington Daily Times P.O. Number: **52100-0000013760**  
Daily Times – OCD Account Number: **781442**

Please publish (one day only), as soon as possible, the attached Public Notice(s) in the classified notice section of your newspaper.  
The PO Number and Account Number for your newspaper are provided above.  
Please mail me an affidavit of proof of publication for the public notice to my mailing address stated below.

**Please address your invoice/affidavit to the state employee requesting ad placement in your paper. This will speed up the processing of invoice payment.**

Thank you for your attention and have a nice day.

llowe

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

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

This inbound email has been scanned by the MessageLabs Email Security System.

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8/20/2008

**Hansen, Edward J., EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Thursday, August 14, 2008 2:45 PM  
**To:** 'legals@sfnewmexican.com'  
**Cc:** Hansen, Edward J., EMNRD; Griswold, Jim, EMNRD; Chavez, Fran, EMNRD  
**Subject:** GW-155, 88, 382 SFNM.doc  
**Attachments:** GW-155, 88, 382 SFNM.doc

To Whom It May Concern:

Santa Fe New Mexican P.O. Number: **52100-0000013759**  
SFNM – OCD Account Number: **56689**

Please publish (one day only), as soon as possible, the attached Public Notice(s) in the classified notice section of your newspaper.

The PO Number and Account Number for your newspaper are provided above.

Please mail me an affidavit of proof of publication for the public notice to my mailing address stated below.

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Thank you for your attention and have a nice day.

llowe

**Leonard Lowe**

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

## **NOTICE OF PUBLICATION**

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

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

(GW-155) Williams Four Corners., Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Aztec compressor station, located in the SW/4 SW/4 of Section 8, Township 32 North, Range 10 West, NMPM, San Juan County, approximately 13 miles north of Aztec, New Mexico. The facility provides metering and compression services to various producers for the gathering of natural gas for treatment and delivery. Approximately 100-5000 gal/year/unit of waste/wash down water; 1000-4000 bbl/year of used glycol and 500-2000 gal/year/engine of used oil are generated and stored in onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 50-200 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-88) – BP America Production Company – Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schlotterback, Field Environmental Coordinator, (505) 326-9200, has submitted a renewal application for the previously approved discharge plan (GW-088) for their Gallegos Canyon (Highway 64) Compressor Station, located in the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 365 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOCD approved Class II disposal well, operated by BP. Additionally, an estimated 300 gallons of used oil and approximately, one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 150 feet, with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-382) Reef Services, LLC with a mailing address of 7906 West Highway 80 in Midland, Texas has submitted an application for a new discharge plan with respect to their chemical storage yard in Hobbs, NM, (Lea County) located at 2703 West Marland in the NW ¼ of the NE ¼ of Section 5, Township 19 South, Range 38 East, NMPM. Materials generated and/or stored at the facility include, but may not be limited to: Hexane, acetic acid, isopropanol, xylene, methanol, toluene, xylene, trimethylbenzene, formic acid, and other oil field-related chemicals. The aquifer beneath

**this facility lies at an approximate depth of 38 feet below ground surface with a concentration of total dissolved solids varying from 800 to 1,300 milligrams per liter. The discharge plan addresses how chemicals and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

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

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 14<sup>th</sup> day of August 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director



**Hansen, Edward J., EMNRD**

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Thursday, August 14, 2008 2:49 PM  
**To:** FAR LEGALS  
**Cc:** Hansen, Edward J., EMNRD; Chavez, Fran, EMNRD  
**Subject:** Public Notice GW-155, 88  
**Attachments:** GW-155 & 88 FDT.doc

Ms. Patricia Blackwater,

Farmington Daily Times P.O. Number: **52100-0000013760**  
Daily Times – OCD Account Number: **781442**

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The PO Number and Account Number for your newspaper are provided above.

Please mail me an affidavit of proof of publication for the public notice to my mailing address stated below.

**Please address your invoice/affidavit to the state employee requesting ad placement in your paper. This will speed up the processing of invoice payment.**

Thank you for your attention and have a nice day.

llowe

**Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oed/>

## **NOTICE OF PUBLICATION**

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The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m.

and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 14<sup>th</sup> day of August 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director



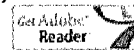
NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

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[Frequently Asked Questions](#)
[Kid's Page](#)
[Development](#)

Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
P: (505) 476-3440  
F: (505) 476-3462

## Applications, Draft Permits, Public Notices and Notification List

(NOTE: ALL DOCUMENTS POSTED IN PDF FORMAT)



### Notification List

List of Rule 19 and WQCC Interested Parties (12/02/05)

### Applications (Recently Filed and Deemed Administratively Complete.)

APPLICANT	PERMIT NUMBER (IF FOR RENEWAL)	FACILITY NAME	DATE FILED

### Draft Permits and Public Notices

NOTE: FOR NEW APPLICATIONS, DRAFT PERMITS MAY NOT BE AVAILABLE UNTIL PUBLIC NOTICE PERIOD HAS EXPIRED.

SPANISH LANGUAGE PUBLIC NOTICE

**BP AMERICA PRODUCTION COMPANY** (8/13/08) Gallegos Canyon Compressor Station (GW-88) Draft Permit, Public Notice, Administrative Completeness

**REEF SERVICES, LLC** (8/13/08) Chemical Storage Yard (GW-382) Draft Permit, Public Notice, Administrative Completeness

**WILLIAMS FOUR CORNERS** (8/5/08) Aztec Compressor Station (GW-155) Draft Permit, Public Notice, Administrative Completeness

**PLAINS PIPELINE, L.P.** (8/4/08) Plains Marketing - Hobbs Station (GW-380) Draft Permit, Public Notice, Administrative Completeness

**BASIC ENERGY SERVICES, LLC** (8/4/08) Eunice Service Facility (GW-378) Draft Permit, Public Notice, Administrative Completeness

**BASIC ENERGY SERVICES, LLC** (8/4/08) Jal Service Facility (GW-297) Draft Permit, Public Notice, Administrative Completeness

**FERGUSON CONSTRUCTION COMPANY** (7/31/08) Lovington Service Facility (GW-305) Draft Permit, Public Notice, Administrative Completeness

**EL PASO NATURAL GAS COMPANY** (7/23/08) Eunice B Compressor Station (GW-151) Draft Permit, Public Notice, Administrative Completeness

**EL PASO NATURAL GAS COMPANY** (7/16/08) Eunice C Compressor Station (GW-379) Draft Permit, Public Notice, Administrative Completeness

**SOUTHERN UNION GAS SERVICES, LTD.** (7/16/08) House Compressor Station (GW-243) Draft Permit, Public Notice, Administrative Completeness

**SOUTHERN UNION GAS SERVICES, LTD.** (7/16/08) AP-14 Compressor Station (GW-385) Draft Permit, Public Notice, Administrative Completeness

**SOUTHERN UNION GAS SERVICES, LTD.** (7/16/08) Jal #4 Compressor Station (GW-107) Draft Permit, Public Notice, Administrative Completeness

**NAVAJO REFINING COMPANY** (7/10/08) Artesia Refinery (GW-28) Draft Permit, Attachment One, Attachment Two, Public Notice, Administrative Completeness

STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

*sent via U.S. Mail*  
~~RECEIVED~~  
AUG 13 2008  
Environmental Bureau  
Oil Conservation Division

Field Supervisor  
US Fish & Wildlife Service  
2105 Osuna Road, Northeast  
Albuquerque, NM 87113-1001

STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

State Historic Preservation Officer  
228 East Palace Avenue  
Villa Rivera Room 101  
Santa Fe, NM 87503

STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

Dr. Harry Bishara  
P.O. Box 748  
Cuba, NM 87013

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, August 13, 2008 4:51 PM  
**To:** Thompson, Bruce C., DGF; Wunder, Matthew, DGF; Warren, Alvin, DIA; Kiger, Stephanie P, DIA; 'ddapr@nmda.nmsu.edu'; 'Linda\_Rundell@nm.blm.gov'; 'psisneros@nmag.gov'; 'lsouthard@nmag.gov'; 'r@rthicksconsult.com'; 'sricdon@earthlink.net'; 'nmparks@state.nm.us'; Dantonio, John, OSE; 'sreid@nmoga.org'; Martinez, Elysia, NMENV; 'lazarus@glorietageo.com'; Stone, Marissa, NMENV; 'ron.dutton@xcelenergy.com'; 'cgarcia@fs.fed.us'; Kieling, John, NMENV; 'bsg@garbhall.com'; Olson, Bill, NMENV; 'claudette.horn@pnm.com'; 'ekendrick@montand.com'; 'staff@ipanm.org'; Williams, Chris, EMNRD; Johnson, Larry, EMNRD; Gum, Tim, EMNRD; Bratcher, Mike, EMNRD; Perrin, Charlie, EMNRD; Powell, Brandon, EMNRD; Martin, Ed, EMNRD; 'dseawright@gmail.com'; 'jharris@rwdhc.com'  
**Subject:** GW-88 Discharge Permit Renewal - Public Notice  
**Attachments:** GW88 Public Notice 8-13-08.pdf

8/13/2008

**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, August 13, 2008 4:50 PM  
**To:** 'Schlotterback, Larry N.'  
**Subject:** Discharge Permit (GW-88) Renewal Application Administratively Complete  
**Attachments:** GW88\_AdminCompLetter8-13-08.pdf; GW88 Public Notice 8-13-08.pdf; GW88 DRAFT PERMIT 8-13-08.pdf

Dear Mr. Schlotterback:

The submitted discharge permit application for the Gallegos Canyon Compressor Station has been determined to be **administratively complete**.

I have attached the **Administratively Complete Letter**, **Draft Permit**, and **OCD Public Notice** for your records. The Administratively Complete Letter has also been sent to you via U.S. Mail.

Please see the Administratively Complete Letter for instructions for the public notice you are required to give.

Let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

8/13/2008



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**  
Governor  
**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



September 22, 2008

Larry Schlotterback  
BP America Production Company  
200 Energy Court  
Farmington, New Mexico 87401

Re: **DRAFT** Discharge Permit Renewal (GW-88)  
Gallegos Canyon (Highway 64) Compressor Station  
SW/4 NE/4 Section 21, Township 29 North, Range 12 West, NMPM  
San Juan County, New Mexico

Dear Mr. Schlotterback:

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

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

*The final permit should be issued in approximately 45 days.* If you have any questions, please contact Edward J. Hansen of my staff at (505-476-3489) or E-mail [edwardj.hansen@state.nm.us](mailto:edwardj.hansen@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price  
Environmental Bureau Chief

Attachments-1  
xc: OCD District Office





## **ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS**

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. *The flat fee for a gas compressor station (0 – 1000 horsepower) is \$400.00. Please submit this amount along with the signed certification item 23. Checks should be made out to the New Mexico Water Quality Management Fund.*
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on January 17, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 27, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-

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

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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

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

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

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

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

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

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

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

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

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

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

## **12. Underground Process/Wastewater Lines:**

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

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

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

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

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

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

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

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

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

**20. Additional Site Specific Conditions:** N/A

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

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

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

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

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

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

Title \_\_\_\_\_

Date: \_\_\_\_\_

## **NOTICE OF PUBLICATION**

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

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

**(GW-88) – BP America Production Company – Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schlotterback, Field Environmental Coordinator, (505) 326-9200, has submitted a renewal application for the previously approved discharge plan (GW-088) for their Gallegos Canyon (Highway 64) Compressor Station, located in the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 365 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOCD approved Class II disposal well, operated by BP. Additionally, an estimated 300 gallons of used oil and approximately, one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 150 feet, with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

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

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13<sup>th</sup> day of August 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor

**Joanna Prukop**  
Cabinet Secretary

**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



August 13, 2008

Larry Schlotterback  
Field Environmental Coordinator  
BP America Production Company  
200 Energy Court  
Farmington, New Mexico 87401

**RE: Discharge Permit (GW-88) Renewal  
Gallegos Canyon (Highway 64) Compressor Station  
San Juan County, New Mexico  
Determination of Administratively Complete**

Dear Mr. Schlotterback:

The New Mexico Oil Conservation Division (OCD) has received the BP America Production Company, dated February 27, 2008, to renew the discharge permit, GW-88, for the Gallegos Canyon (Highway 64) Compressor Station in the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, Lea County, New Mexico. The application was received on March 3, 2008, and the filing fee was received on March 3, 2008. The application and a follow-up correspondence, which proposed the newspaper to publish the public notice, provided the required information in order to deem the application "administratively" complete.

Now that the submittal is deemed "administratively" complete, the New Mexico Water Quality Control Commission regulations (WQCC) public notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The OCD hereby approves your submitted draft version of the public notice for translation into Spanish and publication in the specified newspaper in both English and Spanish.

Oil Conservation Division \* 1220 South St. Francis Drive  
\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>



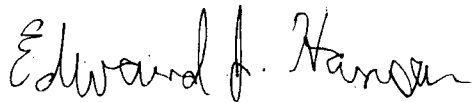


The public notice must be given no later than September 12, 2008. Once the notice has been given, then please submit to the OCD within 15 days of public notice:

- 1) proof that the notice was published in the newspaper in both English and Spanish (affidavit of publication from the newspaper) (the notice must be published as a **display ad** and not in the legal or classified ad section) and
- 2) proof that the notice was sent via certified mail to each landowner [signed certified mail receipt (green card) by each landowner – *this is not required if you are the landowner*].

If you have any questions regarding this matter, please do not hesitate to contact me at (505) 476-3489 or [edwardj.hansen@state.nm.us](mailto:edwardj.hansen@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit renewal review.

Sincerely,



Edward J. Hansen  
Hydrologist  
Environmental Bureau

EJH:ejh



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

June 26, 2008

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

Attn: Mr. Edward J. Hansen

RE: Discharge Permit GW 088  
Gallegos Canyon (Highway 64) Compressor Station

Dear Mr. Hansen,

Please find requested information in regards to the three (3) vessels identified in your email of 5/16/2008:

- (BP T-104) - Above-grade 12' diameter tank (see photo)
- (BP T-103) - Above-grade 12' diameter tank "pit" (surface tank – see photo)
- (BP T-101) - Below-grade 12' diameter tank pit (see photo)

#### **Secondary Containment & Geo-membrane Liners**

All vessels have earthen berms as secondary containment. Containment volumes include 110% of the largest vessel volume.

Proposed upgrades will include:

- (BP T-104) – Construction of a metal sided berm that will be large enough to contain 133% of the largest vessel volume. (See attached example photo). This metal berm will provide secondary containment for (BP T-103). As part of the berm system, a 60 mil liner will be attached to the side walls and extend under existing vessels. Anticipated completion of construction will be by 12/2011.



(BP T-101) – Below-grade tank pit is constructed with a double wall thickness of ¼" steel and has a leak detection system installed. The containment will hold 133% of the largest sized vessel. According to Pit Rule 17, a double bottom construction does not require additional geo-membrane liners. In addition, a cellar construction will allow for continuous monitoring of the side wall of the vessel. A new double walled / double bottom vessel with leak detection will be installed by 12/2011.

Should you have any additional questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely,

Larry Schlotterback  
Field Environmental Coordinator

Attachments

**Hansen, Edward J., EMNRD**

---

**From:** Schlotterback, Larry N. [Larry.Schlotterback@bp.com]  
**Sent:** Thursday, August 07, 2008 3:23 PM  
**To:** Hansen, Edward J., EMNRD  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal  
**Attachments:** gw088discharge(08052008).doc

Mr. Hansen,

In regards to your email of July 31, 2008, please accept the attached revision to my letter of June 26, 2008 regarding the discharge permit application (GW-88):

Thank you,

**Larry Schlotterback**

Field Environmental Coordinator  
Farmington Operations Center  
(505) 326-9425 (Office)  
(505) 330-4937 (Mobile)  
schlln@bp.com

---

**From:** Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]  
**Sent:** Thursday, July 31, 2008 10:44 AM  
**To:** Schlotterback, Larry N.  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,  
Thanks for your letter of June 26, 2008 regarding the additional information for the application for the discharge permit (GW-88).  
Please make one amendment to the letter (it can be made by replying to this email):

The berm around T-103 and T-104 must be 133% of the combined volume of the two tanks.

Please submit the above information to me within 10 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

**From:** Schlotterback, Larry N. [mailto:Larry.Schlotterback@bp.com]  
**Sent:** Thursday, June 19, 2008 10:57 AM  
**To:** Hansen, Edward J., EMNRD  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

8/12/2008

Mr. Hansen:

In regards to the permit renewal for the Gallegos Canyon (Highway 64) Compressor Station, BP America Production Company respectfully requests additional time (July 1, 2008) to complete the engineering diagram for this facility.

Thank you,

**Larry Schlotterback**

Field Environmental Coordinator

Farmington Operations Center

(505) 326-9425 (Office)

(505) 330-4937 (Mobile)

schlln@bp.com

---

**From:** Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]  
**Sent:** Friday, May 16, 2008 12:48 PM  
**To:** Schlotterback, Larry N.  
**Cc:** Schlotterback, Larry N.  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Thank you for the additional information provide below. However, one additional item must be addressed prior to deeming the application (GW-088) complete:

Please indicate how secondary containment will be installed for the above-grade 12' diameter production tank, the above-grade 12' diameter tank pit, and the sub-grade 12' diameter tank pit. Please note that the tank and "pits" must be lined underneath with a means for leak detection. Please submit a schedule, including completion prior to the next renewal of your permit (January 17, 2012), for implementation of secondary containment for the tank and "pits".

Please submit the above information to me within 30 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

**From:** Schlotterback, Larry N. [mailto:Larry.Schlotterback@bp.com]  
**Sent:** Friday, May 16, 2008 9:58 AM  
**To:** Hansen, Edward J., EMNRD  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Mr. Hansen:

As requested, please find attached revisions to the application and a site specific Public Notice document.

8/12/2008

Please let me know if you have any questions...

Thank you,

**Larry Schlotterback**

Field Environmental Coordinator

Farmington Operations Center

(505) 326-9425 (Office)

(505) 330-4937 (Mobile)

schlln@bp.com

---

**From:** Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]

**Sent:** Wednesday, May 07, 2008 1:19 PM

**To:** Schlotterback, Larry N.

**Subject:** FW: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Sorry about the incorrect email address. Therefore, the OCD hereby extends the submittal date for the information below until Friday, May 16, 2008.

To address Item #6 below, please describe the "new" tank in Item 8 of your application.

P.S.: The application indicates that the landowner for this site is the BLM.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

**From:** Hansen, Edward J., EMNRD

**Sent:** Tuesday, April 22, 2008 2:17 PM

**To:** 'Schlotterback, Larry N.'

**Subject:** GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Thank you for submitting your application for the renewal of discharge permit (GW-088).

I need a few items before I can deem the application complete:

- 1) Attached is an example public notice. Please fill in the high-lighted portions as they pertain to your facility and return it to me for approval (prior to publication – I'll give you further publication details once the notice has been approved).
- 2) In addition, please submit the name of the newspaper that you propose to publish the public notice. (The *Farmington Daily Times* would be an acceptable newspaper for your public notice.)
- 3) Under Item 5 of your application please indicate the horsepower rating of each compressor at the site.
- 4) Under Item 8 of your application please indicate all wastes that may be generated at the site, including waste storage and disposal methods; e.g., gas condensate filters (if you generate waste gas condensate filters at the site, please indicate how OCD Rule 712 is followed, i.e., testing frequency and parameters).

8/12/2008

- 5) Also, under Item 8 of your application you indicate that petroleum contaminated soils (*from small spills*) are land farmed on site. Please indicate that this will occur only as a spill-specific remediation approved by the OCD.
- 6) Under Item 9 of your application you indicate that a 21 barrel "environmental pit" will be installed. It is my understanding that the "environmental pit" has been installed as a minor modification under your current permit. If this is correct, please move the information regarding the "environmental pit" to Item 8 of your application.

Please submit the above information to me within 10 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

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This inbound email has been scanned by the MessageLabs Email Security System.

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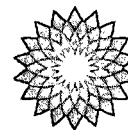
8/12/2008





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2008 JUL 3 PM 12 33



**BP America Production Company**  
200 Energy Court  
Farmington, NM 87401  
Phone: (505) 326-9200

June 26, 2008

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

Attn: Mr. Edward J. Hansen

RE: Discharge Permit GW 088  
Gallegos Canyon (Highway 64) Compressor Station

Dear Mr. Hansen,

Please find requested information in regards to the three (3) vessels identified in your email of 5/16/2008:

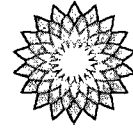
- (BP T-104) - Above-grade 12' diameter tank (see photo)
- (BP T-103) - Above-grade 12' diameter tank "pit" (surface tank – see photo)
- (BP T-101) - Below-grade 12' diameter tank pit (see photo)

#### **Secondary Containment & Geo-membrane Liners**

All vessels have earthen berms as secondary containment. Containment volumes include 110% of the largest vessel volume.

Proposed upgrades will include:

(BP T-104) – Construction of a metal sided berm that will be large enough to contain 120% of the largest vessel volume. (See attached example photo). This metal berm will provide secondary containment for (BP T-103). As part of the berm system, a 60 mil liner will be attached to the side walls and extend under existing vessels. Anticipated completion of construction will be by 12/2011.



(BP T-101) – Below-grade tank pit is constructed with a double wall thickness of ¼” steel and has a leak detection system installed. According to Pit Rule 17, a double bottom construction does not require additional geo-membrane liners. In addition, a cellar construction will allow for continuous monitoring of the side wall of the vessel. A new double walled / double bottom vessel with leak detection will be installed by 12/2011.

Should you have any additional questions, please feel free to contact me at 326-9425 in our Farmington office.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Larry Schlotterback'.

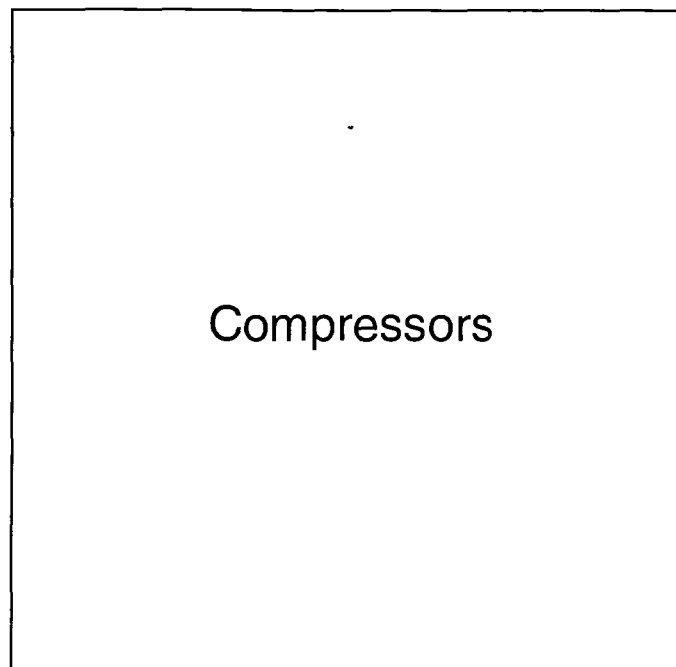
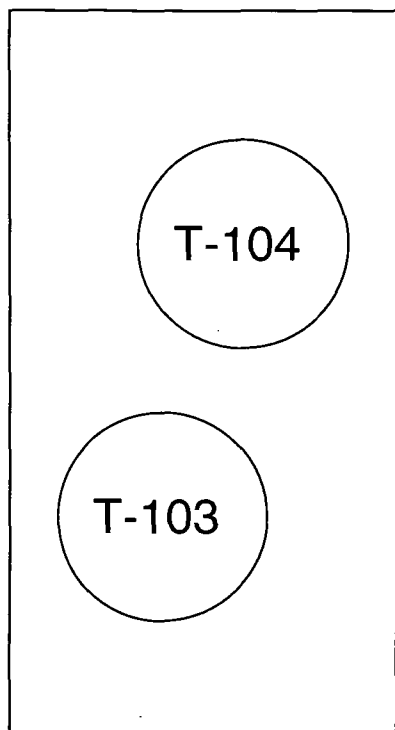
Larry Schlotterback  
Field Environmental Coordinator •

Attachments

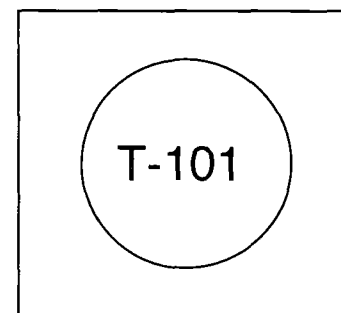
# BP America Production Company

Gallegos Canyon  
(Highway 64) Compressor Station  
GW-088

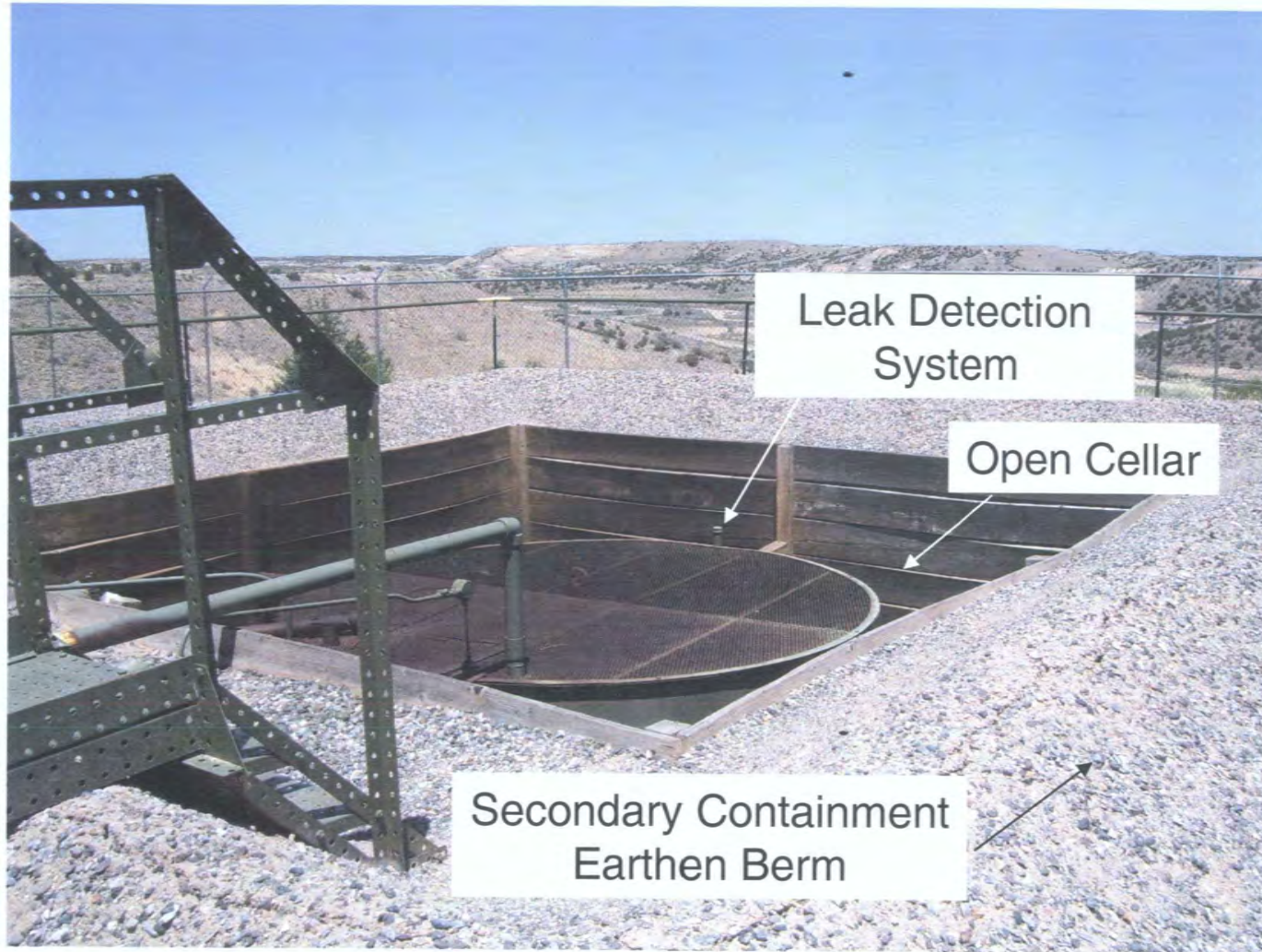
As of June 26, 2008



BP America Production Company  
Gallegos Canyon  
( Highway 64) Compressor Station  
GW-088



T- 101 (12' x 5' – 95 bbls)  
Single Sided / Double Bottom Vessel

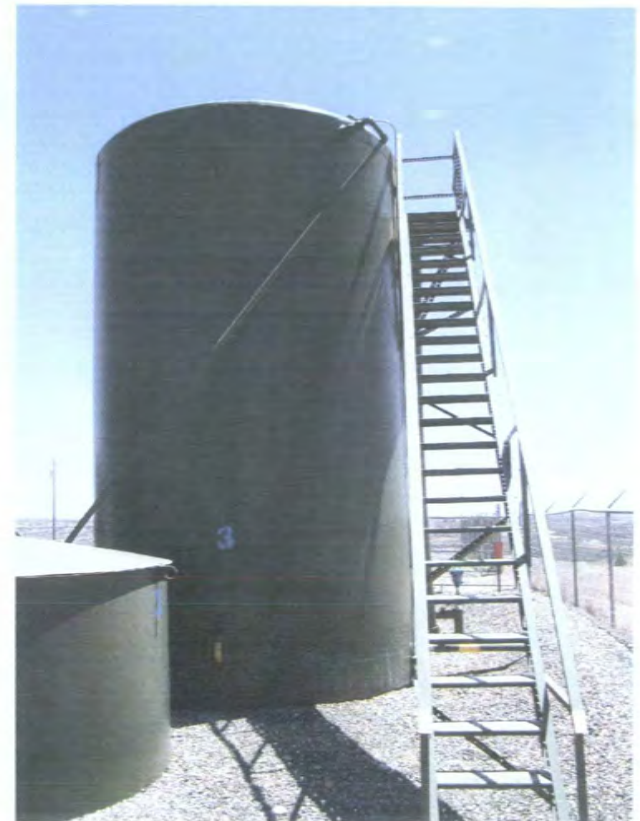




## Surface Produced Water Tanks

T-103 (12' x 20' – 400 bbls)

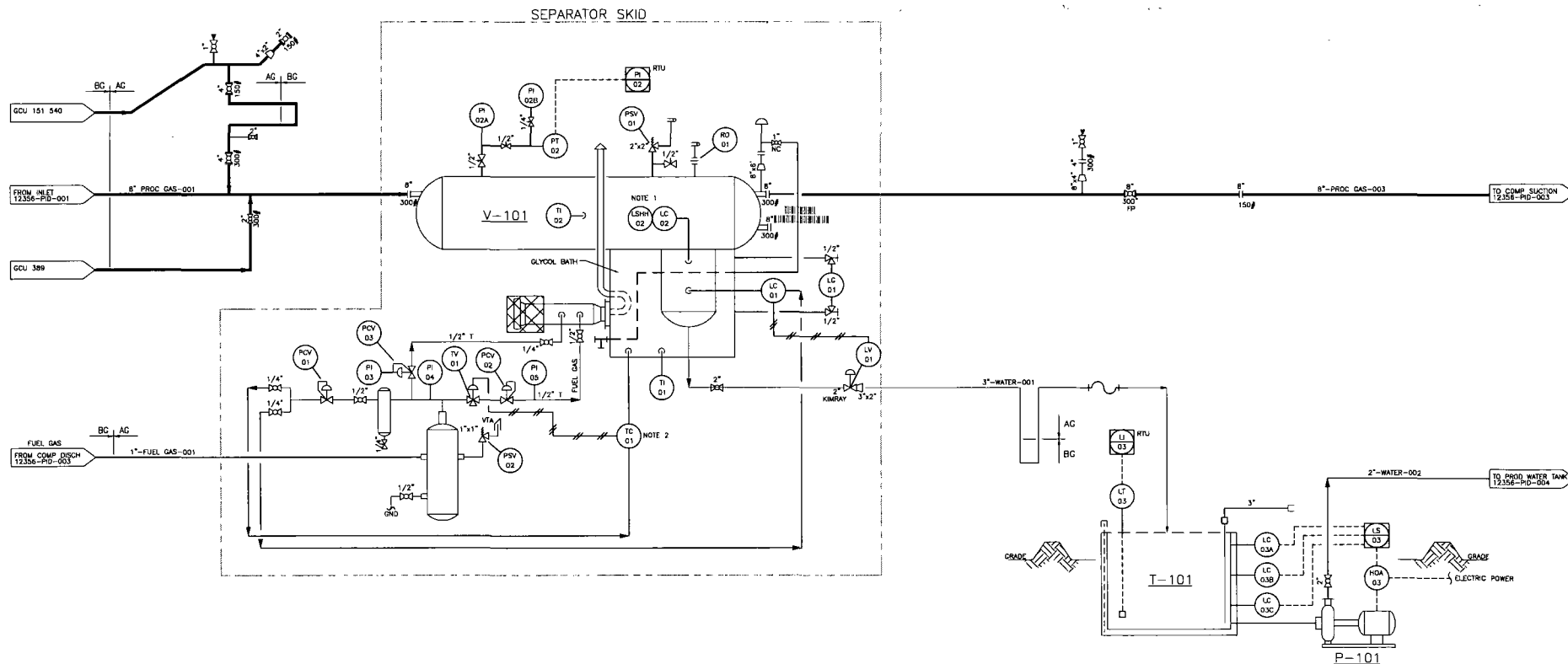
T- 104 (12' x 5' – 95 bbls)



V-101  
2 PHASE HORIZ. SEPARATOR  
SIZE: 38" x 16'-0" S/S  
SERIAL #: 203292  
VESSEL WORKING PRESSURE: 500 PSIG  
BUILT: 1996

T-101  
PRODUCED WATER PIT  
SIZE: 12' x 5' HT.  
CAPACITY: 55 BBL

P-101  
SERVICE  
CAPACITY:  
DISCHARGE:  
HPI:  
HP:



# NOTES:

1. LSHN-02 IS DISCONNECTED.
2. TC-01 IS PHYSICALLY INTEGRAL TO KIMRAY TEMPERATURE CONTROLLER TV-01.

FORERUNNER  
211 N. Highway 100, Suite 100  
Durango, Colorado 81301  
(970) 733-7781

REV	BY	DATE	REVISION	CONTR. CHECK	DATE	BY	DATE

BP America  
San Juan North  
Durango, Colorado

**SOUTH HWY 64  
COMPRESSOR STATION  
PIPING & INSTRUMENT DIAGRAM**

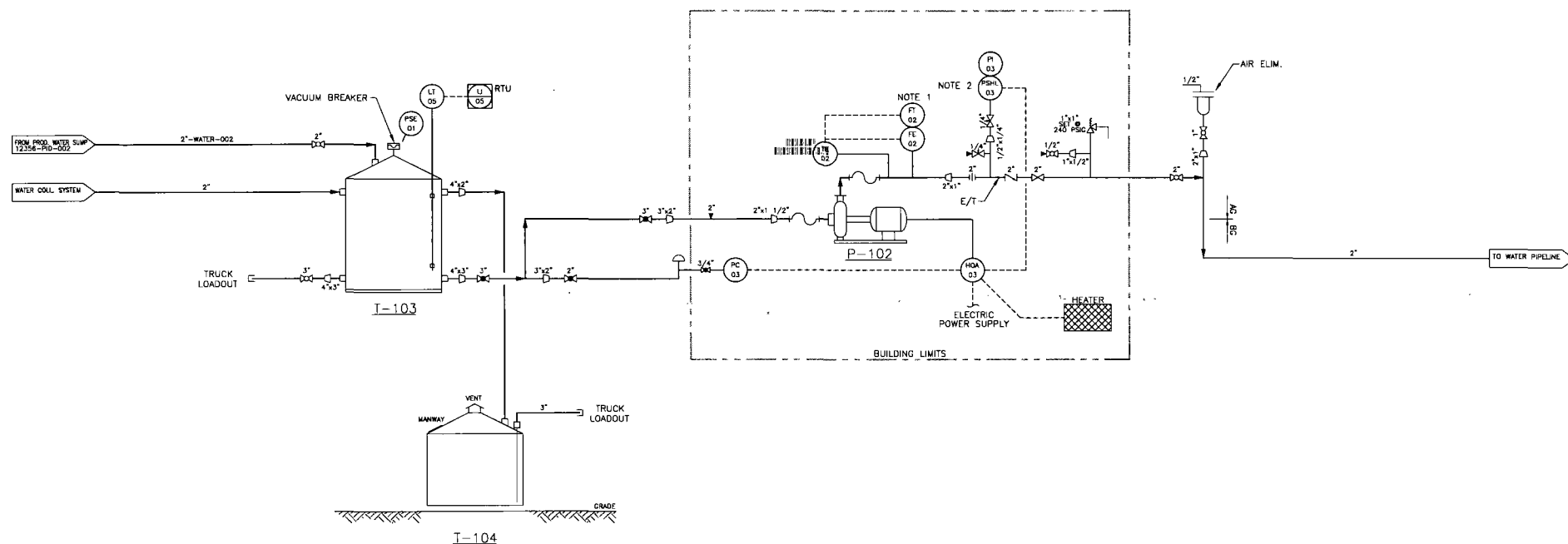
DATE: 08/27/07  
DRAWN BY: M. HANSEN  
CHECKED BY: L. J. LANE  
SCALE: AS SHOWN  
SHEET: 12356-PID-002  
REV: 0

Drawing: 12356-PID-004.DWG Plotted by: LDU Date: 01/28/2008 08:42:49 AM R:\Project Files\BP America\12356-A BP South Hwy 64 Comp\04 Design Drawings\04

T-103  
PRODUCED WATER TANK  
SIZE: 12'-0" x 20'-0" HT.  
CAPACITY: 400 BBL  
DESIGN: ATMOS

T-104  
PRODUCED WATER TANK  
SIZE: 12'-0" x 5'-0"  
CAPACITY: 95 BBL  
DESIGN: ATMOS

P-102  
PRODUCED WATER PUMP



# NOTES:

1. FT-02 IS A HALIBURTON MC-II THAT HAS BEEN REMOVED FROM SERVICE.
2. WARNING FROM PSH-03 IS ASSUMED TO BE DIRECT TO HQA-03.

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**Forerunner**  
213 Sandstone Drive, #105  
Durango, Colorado 81301  
970-253-7347

REV	BY	DATE	REVISION
1	WH	8/07	ISSUED AS BUILT

CHECKED	DATE	BY	DATE

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**BP America**  
San Juan North  
Durango, Colorado

**SOUTH HWY 64  
COMPRESSOR STATION  
PIPING & INSTRUMENT DIAGRAM**

DATE: 08/07/07  
SCALE: NONE  
FILE: 12356-A  
SHEET: 1  
TOTAL: 1  
DRAWN BY: LDU  
CHECKED BY: LDU  
12356-PID-004.DWG

**12356-PID-004**



**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Monday, June 23, 2008 7:03 PM  
**To:** 'Schlotterback, Larry N.'  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Dear Mr. Schlotterback:

The New Mexico Oil Conservation Division (NMOCD) has reviewed your request for the extension of the submittal date of the additional information for the Permit (GW-088) Renewal Application [Gallegos Canyon (Highway 64) Compressor Station]. The NMOCD hereby approves the extension for the amended plan submittal date. The additional information must be submitted to the NMOCD by Tuesday, July 1, 2008.

Please be advised that NMOCD approval of this extension does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any NMOCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen  
Hydrologist  
Environmental Bureau

---

**From:** Schlotterback, Larry N. [mailto:Larry.Schlotterback@bp.com]  
**Sent:** Thursday, June 19, 2008 10:57 AM  
**To:** Hansen, Edward J., EMNRD  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Mr. Hansen:

In regards to the permit renewal for the Gallegos Canyon (Highway 64) Compressor Station, BP America Production Company respectfully requests additional time (July 1, 2008) to complete the engineering diagram for this facility.

Thank you,

**Larry Schlotterback**  
Field Environmental Coordinator  
Farmington Operations Center  
(505) 326-9425 (Office)  
(505) 330-4937 (Mobile)  
schlln@bp.com

---

**From:** Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]  
**Sent:** Friday, May 16, 2008 12:48 PM  
**To:** Schlotterback, Larry N.

6/23/2008

**Cc:** Schlotterback, Larry N.

**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Thank you for the additional information provide below. However, one additional item must be addressed prior to deeming the application (GW-088) complete:

Please indicate how secondary containment will be installed for the above-grade 12' diameter production tank, the above-grade 12' diameter tank pit, and the sub-grade 12' diameter tank pit. Please note that the tank and "pits" must be lined underneath with a means for leak detection. Please submit a schedule, including completion prior to the next renewal of your permit (January 17, 2012), for implementation of secondary containment for the tank and "pits".

Please submit the above information to me within 30 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

**From:** Schlotterback, Larry N. [mailto:Larry.Schlotterback@bp.com]

**Sent:** Friday, May 16, 2008 9:58 AM

**To:** Hansen, Edward J., EMNRD

**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Mr. Hansen:

As requested, please find attached revisions to the application and a site specific Public Notice document.

Please let me know if you have any questions...

Thank you,

**Larry Schlotterback**

Field Environmental Coordinator  
Farmington Operations Center  
(505) 326-9425 (Office)  
(505) 330-4937 (Mobile)  
schlln@bp.com

---

**From:** Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]

**Sent:** Wednesday, May 07, 2008 1:19 PM

**To:** Schlotterback, Larry N.

**Subject:** FW: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Sorry about the incorrect email address. Therefore, the OCD hereby extends the submittal date for the information below until Friday, May 16, 2008.

To address Item #6 below, please describe the "new" tank in Item 8 of your application.

6/23/2008

P.S.: The application indicates that the landowner for this site is the BLM.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Tuesday, April 22, 2008 2:17 PM  
**To:** 'Schlotterback, Larry N.'  
**Subject:** GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Thank you for submitting your application for the renewal of discharge permit (GW-088).

I need a few items before I can deem the application complete:

- 1) Attached is an example public notice. Please fill in the high-lighted portions as they pertain to your facility and return it to me for approval (prior to publication – I'll give you further publication details once the notice has been approved).
- 2) In addition, please submit the name of the newspaper that you propose to publish the public notice. (The *Farmington Daily Times* would be an acceptable newspaper for your public notice.)
- 3) Under Item 5 of your application please indicate the horsepower rating of each compressor at the site.
- 4) Under Item 8 of your application please indicate all wastes that may be generated at the site, including waste storage and disposal methods; e.g., gas condensate filters (if you generate waste gas condensate filters at the site, please indicate how OCD Rule 712 is followed, i.e., testing frequency and parameters).
- 5) Also, under Item 8 of your application you indicate that petroleum contaminated soils (*from small spills*) are land farmed on site. Please indicate that this will occur only as a spill-specific remediation approved by the OCD.
- 6) Under Item 9 of your application you indicate that a 21 barrel "environmental pit" will be installed. It is my understanding that the "environmental pit" has been installed as a minor modification under your current permit. If this is correct, please move the information regarding the "environmental pit" to Item 8 of your application.

Please submit the above information to me within 10 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

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6/23/2008

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This inbound email has been scanned by the MessageLabs Email Security System.

---

6/23/2008

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Friday, May 16, 2008 12:48 PM  
**To:** 'Schlotterback, Larry N.'  
**Cc:** 'schlln@bp.com'  
**Subject:** RE: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Thank you for the additional information provide below. However, one additional item must be addressed prior to deeming the application (GW-088) complete:

Please indicate how secondary containment will be installed for the above-grade 12' diameter production tank, the above-grade 12' diameter tank pit, and the sub-grade 12' diameter tank pit. Please note that the tank and "pits" must be lined underneath with a means for leak detection. Please submit a schedule, including completion prior to the next renewal of your permit (January 17, 2012), for implementation of secondary containment for the tank and "pits".

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Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

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**To:** Hansen, Edward J., EMNRD  
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Mr. Hansen:

As requested, please find attached revisions to the application and a site specific Public Notice document.

Please let me know if you have any questions...

Thank you,

**Larry Schlotterback**

Field Environmental Coordinator  
Farmington Operations Center  
(505) 326-9425 (Office)  
(505) 330-4937 (Mobile)  
schlln@bp.com

---

**From:** Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]  
**Sent:** Wednesday, May 07, 2008 1:19 PM

5/16/2008

**To:** Schlotterback, Larry N.

**Subject:** FW: GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

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Sorry about the incorrect email address. Therefore, the OCD hereby extends the submittal date for the information below until Friday, May 16, 2008.

To address Item #6 below, please describe the "new" tank in Item 8 of your application.

P.S.: The application indicates that the landowner for this site is the BLM.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

---

**From:** Hansen, Edward J., EMNRD

**Sent:** Tuesday, April 22, 2008 2:17 PM

**To:** 'Schlotterback, Larry N.'

**Subject:** GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal

Larry,

Thank you for submitting your application for the renewal of discharge permit (GW-088).

I need a few items before I can deem the application complete:

- 1) Attached is an example public notice. Please fill in the high-lighted portions as they pertain to your facility and return it to me for approval (prior to publication – I'll give you further publication details once the notice has been approved).
- 2) In addition, please submit the name of the newspaper that you propose to publish the public notice. (The *Farmington Daily Times* would be an acceptable newspaper for your public notice.)
- 3) Under Item 5 of your application please indicate the horsepower rating of each compressor at the site.
- 4) Under Item 8 of your application please indicate all wastes that may be generated at the site, including waste storage and disposal methods; e.g., gas condensate filters (if you generate waste gas condensate filters at the site, please indicate how OCD Rule 712 is followed, i.e., testing frequency and parameters).
- 5) Also, under Item 8 of your application you indicate that petroleum contaminated soils (*from small spills*) are land farmed on site. Please indicate that this will occur only as a spill-specific remediation approved by the OCD.
- 6) Under Item 9 of your application you indicate that a 21 barrel "environmental pit" will be installed. It is my understanding that the "environmental pit" has been installed as a minor modification under your current permit. If this is correct, please move the information regarding the "environmental pit" to Item 8 of your application.

Please submit the above information to me within 10 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

5/16/2008

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5/16/2008



## Discharge Plan (GW-088)

### Gallegos Canyon (Highway 64) Compressor Station

#### Item 4- Facility Site Landowner

Bureau of Land Management  
1235 La Plata Hwy.  
Farmington, NM 87401  
(505) 599-8900

#### Item 5 – Facility Diagram

The facility diagram is attached.

Horsepower ratings for compressors located at the Facility are:

Waukesha H24GL – serial number 74830 – 530 horsepower @ 1800 rpm  
Caterpillar G3412C LE – serial number 76727 – 637 horsepower @ 1800 rpm  
Waukesha H24GL – serial number 76859 – 530 horsepower @ 1800 rpm

#### Item 6 – Materials Stored/Used:

Lube Oil	200 Gallons
Antifreeze	200 Gallons
Sub-grade Pit – Produced Water	95 Barrels
Tank - Produced Water/Oil Emulsion	300 Barrels
“Environmental” Pit	21 Barrels

#### Item 7 – Effluent Sources and Waste Solids

##### Sources of effluent

- 1) Produced water from gas stream
- 2) Compressor scrubber liquids
- 3) Compressor skid “runoff”

##### Waste Solids

- 1) Petroleum contaminated soil (very small amounts)

#### Item 8 – Waste Collection/Treatment/Disposal Systems

##### Sources of Effluent

- 1) Produced water from the gas stream is separated before the compressor and is piped to the sub-grade tank at the southeast corner of the location; from there the produced water is piped to the tank along the western fence. The tank contents are





pipled to the Gallegos Canyon Unit 13-1 Underground Injection Well. The volume of this produced water is approximately 1 barrel/day.

- 2) Produced water from the compressor scrubber is piped directly to the tank on the western fence from which it is also piped to the GCU 13-1 Underground Injection Well. The volume of this water is less than 1 barrel/day.
- 3) Compressor skid liquids are piped to an "environmental" steel pit. The liquids from this pit are transferred by truck to one of three oil-skimming facilities and then the produced water is injected and the skimmed oil is sold. The three facilities are the Gallegos Canyon Unit #259, #328, or #306. The amount of fluid is generally very small, less than a gallon per day will be discharged to the pit. When the compressors are washed the amount increases slightly.

#### **Waste Solids**

- 1) In the event of a small spill, the NMOCD will be notified and permission will be requested to land farm the petroleum contaminated soils on site. If a large spill were to occur, again the NMOCD will be immediately notified and the contaminated soil would be excavated and hauled to our Crouch Mesa Centralized Waste Management Facility (permitted by the OCD).
- 2) Oil filters and other maintenance refuse is deposited in a closed and labeled waste bin. All waste is hauled to the San Juan Regional Landfill by Waste Management under a special waste permit that is renewed annually by analytically testing the filters for TCLP and metals, as required by the NMOCD.
- 3) A 21-barrel "environmental" pit has been installed to capture discharges from the compressor skids. This fluid, which can contain lube oil and wash water is transferred by truck to an oil-skimming facility and then the produced water is disposed of in the Underground Injection Wells, GCU #259, #328, or #306

#### **Item 9 – Proposed Modifications**

#### **Item 10 – Inspection and Maintenance Plan**

The compressors at the facility are a part of the Hanover Company's rental fleet. As a result, Hanover handles all callouts and they perform compressor preventative maintenance on a 45-day schedule. BP maintains the total facility and visits the site at least weekly. In addition, BP formally inspects and documents the inspection for each facility using the attached checklist, entitled Green Day/SPCC Inspection Guidelines.

#### **Item 11 – Release Reporting and Cleanup**

All releases greater than 1 gallon are reported internally to the Field Environmental Coordinator (FEC). The FEC will then determine our reporting responsibilities using the regulations. All spills greater than 5 barrels, greater than the CERCLA Reportable Quantity and/or that leave the location will be reported to the NMOCD and the BLM. BP also utilizes the attached procedure, Spill Cleanup and Remediation, to guide our response.

#### **Item 12 – Geological/Hydrological Information**

This item has not changed and is attached to our most recent renewal (10/31/2001).



Item 13 – Facility Closure Plan

When the facility is no longer in use, the rental compressors will be removed to The Hanover Company and the tanks and steel pits will be reused at other sites. All stained soils will be remediated on site, unless the contamination is extensive, then it will be removed to our Crouch Mesa Centralized Waste Management Facility. The site will be revegetated per BLM guidelines and requirements.

## PUBLIC NOTICE

BP America Production Company – Farmington Operations Center, 200 Energy Court, Farmington, New Mexico 87401, Attention: Mr. Larry Schlotterback, Field Environmental Coordinator, (505) 326-9200, has submitted a renewal application for the previously approved discharge plan (GW-088) for their Gallegos Canyon (Highway 64) Compressor Station, located in the SW/4 of the NE/4 of Section 21, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately seven miles east of Farmington, New Mexico. Approximately 365 gallons of produced water are generated on site annually, which are collected and temporarily stored in a containment vessel prior to transport to an NMOCD approved Class II disposal well, operated by BP. Additionally, an estimated 300 gallons of used oil and approximately, one 55-gallon drum of used oil filters are generated annually. These wastes are picked up by a used oil recycler. Empty drums are taken back by the supplier of the oil or chemical contained in the drums. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 150 feet, with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Any interested person may obtain information, submit comments or request to be placed on a facility specific mailing list for future notices by contacting Edward J. Hansen at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3489. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

EXAMPLE

{This public notice is proposed to be published in the *Farmington Daily Times*.}

**Hansen, Edward J., EMNRD**

---

**From:** Hansen, Edward J., EMNRD  
**Sent:** Tuesday, April 22, 2008 2:17 PM  
**To:** 'Schlotterback, Larry N.'  
**Subject:** GW-088 [Gallegos Canyon (Highway 64) Compressor Station] Permit Renewal  
**Attachments:** Public Notice Example for DP Renewal.doc

Larry,

Thank you for submitting your application for the renewal of discharge permit (GW-088).

I need a few items before I can deem the application complete:

- 1) Attached is an example public notice. Please fill in the high-lighted portions as they pertain to your facility and return it to me for approval (prior to publication – I'll give you further publication details once the notice has been approved).
- 2) In addition, please submit the name of the newspaper that you propose to publish the public notice. (The *Farmington Daily Times* would be an acceptable newspaper for your public notice.)
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- 6) Under Item 9 of your application you indicate that a 21 barrel "environmental pit" will be installed. It is my understanding that the "environmental pit" has been installed as a minor modification under your current permit. If this is correct, please move the information regarding the "environmental pit" to Item 8 of your application.

Please submit the above information to me within 10 days.

Thank you for your cooperation in this matter. Please let me know if you have any questions regarding this matter.

Edward J. Hansen  
Hydrologist  
Environmental Bureau  
505-476-3489

4/22/2008

**Ford, Jack**

---

**From:** Benko, Brittany D [BenkoBD@bp.com]  
**Sent:** Monday, January 13, 2003 4:39 PM  
**To:** 'JWFORD@state.nm.us'  
**Subject:** Discharge Plan - Gallegos Canyon (Hwy 64) Compressor Station

Jack,

The 21-barrel "environmental" pit is double-bottomed and double-walled at the Gallegos Canyon (Hwy 64) Compressor Station. Please let me know if you have further questions.

Thanks,  
Brit

Brittany D Benko  
Field Environmental Coordinator  
SJPU HSE, Farmington, NM  
Office (505) 326-9235  
Cell (505) 486-4424  
benkobd@bp.com

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No: \_\_\_\_\_ dated 2/26/08

or cash received on \_\_\_\_\_ in the amount of \$ 100<sup>00</sup>

from BP America Production Co.

for GW-88

Submitted by: LAWRENCE RONCIB Date: 3-4-08

Submitted to ASD by: LAWRENCE RONCIB Date: 3-4-08

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

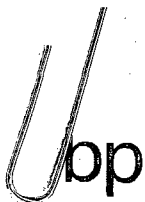
Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



**BP America Production Company**

200 Energy Court  
Farmington, NM 87401

Phone: (505) 326-9200

February 26, 2008

Mr. Edward Hansen  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Re: Discharge Plan Renewal (GW-088)  
BP America Production Company  
Highway 64 Compressor Station  
San Juan County, New Mexico

RECEIVED  
2008 FEB 26 PM 1:12

Dear Mr. Hansen:

BP America Production Company requests the approval to renew the above referenced discharge plan. The site configuration has not changed.

I have not included Item 12 – geological/hydrological information as it has already been submitted.

The required fees are enclosed and if you have any further questions please contact me at (505) 326-9425.

Sincerely,



BP America Production Company  
509 South Boston  
Tulsa, OK 74103

62-20  
311

CHECK NO. [REDACTED]

02/26/08

PAY TO THE  
ORDER OF

NEW MEXICO OIL CONSERVATION DIV  
1220 S ST FRANCIS DR  
SANTA FE, NM 87505 US

\*\*\*\*\*\$100.00

NOT VALID AFTER 6 MONTHS

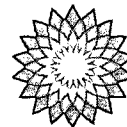
One hundred and 00/100 Dollars

TRACE NUMBER: 2000104719

CITIBANK DELAWARE, A SUBSIDIARY OF CITICORP  
ONE PENN'S WAY, NEW CASTLE, DE 19720

Authorized Signature





**BP America Production Company**

200 Energy Court  
Farmington, NM 87401

Phone: (505) 326-9200

February 26, 2008

Mr. Edward Hansen  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Re: Discharge Plan Renewal (GW-088)  
BP America Production Company  
Highway 64 Compressor Station  
San Juan County, New Mexico

RECEIVED  
2008 FEB 27 PM 1:12

Dear Mr. Hansen:

BP America Production Company requests the approval to renew the above referenced discharge plan. The site configuration has not changed.

I have not included Item 12 – geological/hydrological information as it has already been submitted.

The required fees are enclosed and if you have any further questions please contact me at (505) 326-9425.

Sincerely,

Larry Schlotterback  
Environmental Coordinator

cc: OCD Aztec Office



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 January 24, 2001

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 FACILITIES AND CRUDE OIL PUMP STATIONS

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

☐ New      ☒ Renewal      ☐ Modification

1. Type: Compressor Station (Highway 64)

2. Operator: BP America Production Company

Address: 200 Energy Court, Farmington, NM 87401

Contact Person: Larry Schlotterback

Phone: (505) 326-9425

3. Location: SW/4 NE/4 Section 21 Township 29N Range 12W

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

Name: Larry Schlotterback

Title: Environmental Coordinator

Signature: \_\_\_\_\_

Date: 2/27/2008



## Discharge Plan (GW-088)

### Gallegos Canyon (Highway 64) Compressor Station

#### Item 4- Facility Site Landowner

Bureau of Land Management  
1235 La Plata Hwy.  
Farmington, NM 87401  
(505) 599-8900

#### Item 5 – Facility Diagram

The facility diagram is attached.

#### Item 6 – Materials Stored/Used:

Lube Oil	200 Gallons
Antifreeze	200 Gallons
Sub-grade Pit – Produced Water	95 Barrels
Tank - Produced Water/Oil Emulsion	300 Barrels
“Environmental” Pit	21 Barrels

#### Item 7 – Effluent Sources and Waste Solids

Sources of effluent

- 1) Produced water from gas stream
- 2) Compressor scrubber liquids
- 3) Compressor skid “runoff”

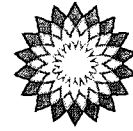
Waste Solids

- 1) Petroleum contaminated soil (very small amounts)

#### Item 8 – Waste Collection/Treatment/Disposal Systems

Sources of Effluent

- 1) Produced water from the gas stream is separated before the compressor and is piped to the sub-grade tank at the southeast corner of the location; from there the produced water is piped to the tank along the western fence. The tank contents are piped to the Gallegos Canyon Unit 13-1 Underground Injection Well. The volume of this produced water is approximately 1 barrel/day.
- 2) Produced water from the compressor scrubber is piped directly to the tank on the western fence from which it is also piped to the GCU 13-1 Underground Injection Well. The volume of this water is less than 1 barrel/day.
- 3) Compressor skid liquids are piped to an “environmental” steel pit. The liquids from this pit are transferred by truck to one of three oil-skimming facilities and then the



produced water is injected and the skimmed oil is sold. The three facilities are the Gallegos Canyon Unit #259, #328, or #306. The amount of fluid is generally very small, less than a gallon per day will be discharged to the pit. When the compressors are washed the amount increases slightly.

#### Waste Solids

- 1) Petroleum contaminated soils are land farmed on site. If a large spill were to occur, the contaminated soil would be taken to our Crouch Mesa Centralized Waste Management Facility (permitted by the OCD).

#### Item 9 – Proposed Modifications

There will be an addition of a 21-barrel “environmental” pit to capture discharges from the compressor skids. This fluid, which can contain lube oil and wash water is transferred by truck to an oil-skimming facility and then the produced water is disposed of in the Underground Injection Wells, GCU #259, #328, or #306.

#### Item 10 – Inspection and Maintenance Plan

The compressors at the facility are a part of the Hanover Company’s rental fleet. As a result, Hanover handles all callouts and they perform compressor preventative maintenance on a 45-day schedule. BP maintains the total facility and visits the site at least weekly. In addition, BP formally inspects and documents the inspection for each facility using the attached checklist, entitled Green Day/SPCC Inspection Guidelines.

#### Item 11 – Release Reporting and Cleanup

All releases greater than 1 gallon are reported internally to the Field Environmental Coordinator (FEC). The FEC will then determine our reporting responsibilities using the regulations. All spills greater than 5 barrels, greater than the CERCLA Reportable Quantity and/or that leave the location will be reported to the NMOCD and the BLM. BP also utilizes the attached procedure, Spill Cleanup and Remediation, to guide our response.

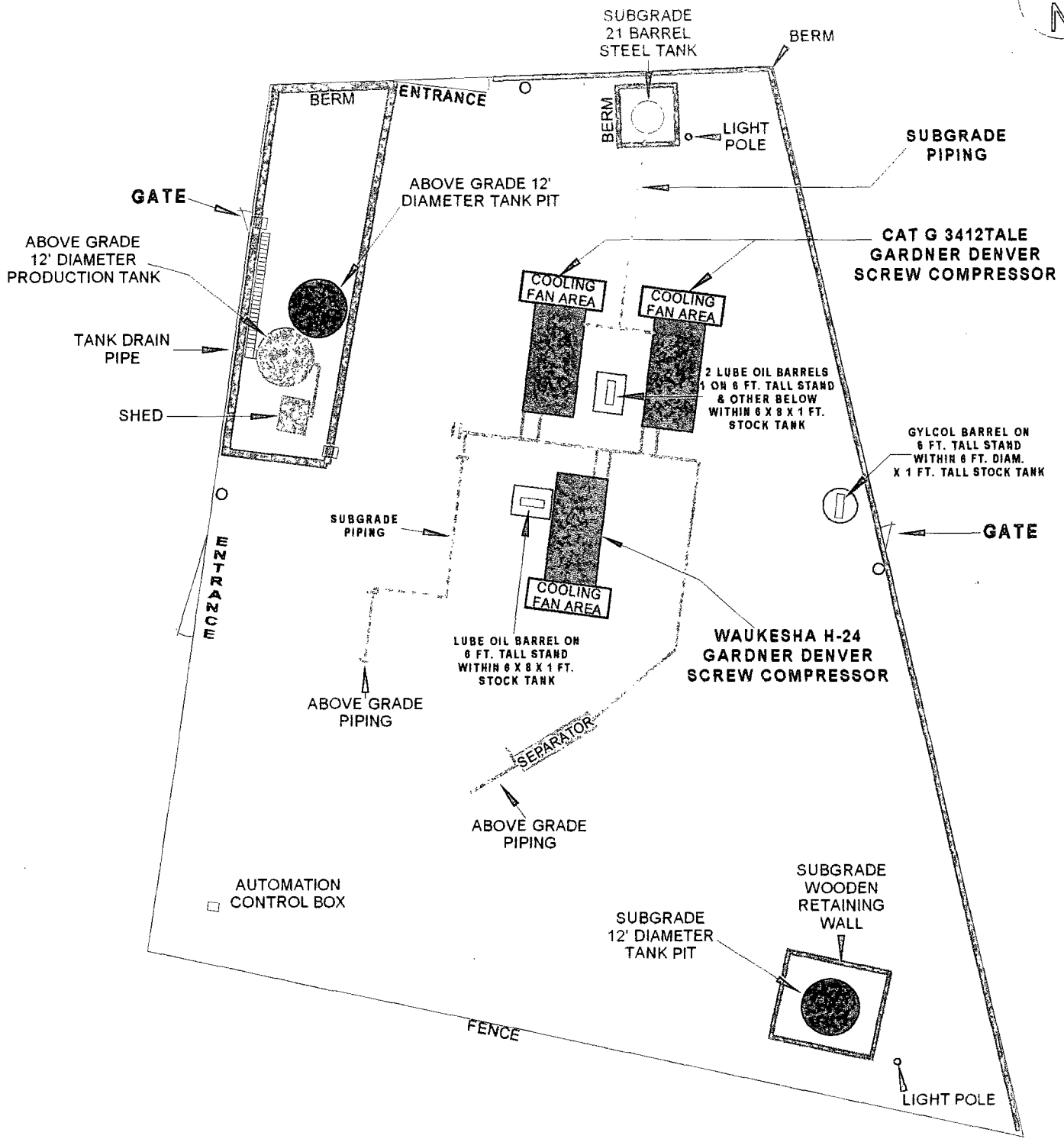
#### Item 12 – Geological/Hydrological Information

This item has not changed and is attached to our most recent renewal (10/31/2001).

#### Item 13 – Facility Closure Plan

When the facility is no longer in use, the rental compressors will be removed to The Hanover Company and the tanks and steel pits will be reused at other sites. All stained soils will be remediated on site, unless the contamination is extensive, then it will be removed to our Crouch Mesa Centralized Waste Management Facility. The site will be revegetated per BLM guidelines and requirements.

# FIGURE 1



○ - INDICATES FIRE EXTINGUISHER LOCATION

SURFACE EQUIPMENT & SUBSURFACE PIPING POSITIONS ARE ONLY AS ACCURATE AS THE INSTRUMENTS USED IN OBTAINING THEIR FOOTAGE & BEARING (LASER RANGE FINDER, TAPE MEASURE, & BRUNTON COMPASS).

1 INCH = 30 FT.


0 30 60 FT.

BP AMERICA PRODUCTION CO.  
GALLEGOS CANYON COMPRESSOR STATION  
SW/4 NE/4 SEC. 21, T29N, R12W, NMPM  
SAN JUAN COUNTY, NEW MEXICO


BLAGG ENGINEERING, INC.  
CONSULTING PETROLEUM / RECLAMATION SERVICES  
P.O. BOX 87  
BLOOMFIELD, NEW MEXICO 87413  
PHONE: (505) 632-1199

PROJECT: DISCHARGE PLAN  
DRAWN BY: NJV  
FILENAME: GCOCS-SM.SKF  
REVISED: 03/02/04 NJV

SITE  
MAP  
03/04

	<p align="center"><b>ENVIRONMENTAL PROCEDURE</b></p> <p align="center"><b>SPILL CLEANUP AND REMEDIATION</b></p>	<p>Proc #: ENV-8301</p> <p>Revision #: 2</p> <p>Printed on: 2/26/2008</p>
<p align="center"><b>SAN JUAN OPERATIONS CENTER</b></p>	<p align="center"><b>REVISED 08/06/2006</b></p>	<p align="center"><b>Page 1 of 3</b></p>

<b>SCOPE</b>	This procedure outlines the steps to clean up and remediate spills of oil, diesel, produced water and chemicals.
<b>REQUIREMENTS</b>	Cleanup personnel are required to remain in contact with the Field Environmental Coordinator (FEC).
<b>APPLICABLE DOCUMENTS</b>	<ul style="list-style-type: none"> <li>• Material Safety Data Sheets (MSDS)</li> <li>• Green Rules for Operations - San Juan (HSSE Environmental Website)</li> <li>• Waste Data Sheets (HSSE Environmental Website)</li> </ul>
<b>MATERIALS AND EQUIPMENT</b>	<ul style="list-style-type: none"> <li>• Rags, pads or other absorbent materials</li> <li>• Shovels, rakes</li> <li>• Vacuum truck</li> <li>• Backhoe</li> <li>• Dump truck</li> <li>• Oil Hawg or other approved bio-remediation product</li> </ul>
<b>SAFETY</b>	This is a <b>safety critical</b> procedure.
<b>ENVIRONMENT</b>	This is an <b>environmental critical</b> procedure.
<b>QUALITY</b>	Failure to adhere to this procedure may violate environmental policies and regulations.

	<p align="center"><b>ENVIRONMENTAL PROCEDURE</b></p> <p align="center"><b>SPILL CLEANUP AND REMEDIATION</b></p>	<p>Proc #: ENV-8301</p> <p>Revision #: 2</p> <p>Printed on: 2/26/2008</p>
<p align="center"><b>SAN JUAN OPERATIONS CENTER</b></p>	<p align="center"><b>REVISED 08/06/2006</b></p>	<p align="center"><b>Page 2 of 3</b></p>

## PROCEDURE

### 1.0 NOTIFICATION

- 1.1 All spills greater than 1 gallon, greater than reportable quantity or that reach Waters of the US must be reported to the Asset Team Leader or Field Environmental Coordinator (FEC) **immediately**.

### 2.0 PLAN THE CLEAN UP

- 2.1 Conduct an on site inspection to estimate the amount and severity of the spill.

**NOTE:** Use the back page of the Green Rules for Operations book to estimate the spill volume; or let the Team Leader or FEC know spill dimensions so they can calculate.


- 2.2 Determine if free liquids can be recovered. If so, schedule a vacuum truck.
- 2.3 Consult with the FEC to determine if specialized on site treatment (i.e. air, bug, revegetation, etc.) is needed.
- 2.4 Submit a workorder if work needs to go beyond the immediate work done by field tech on site.

### 3.0 CLEAN UP OF SPILLS LESS THAN ONE BARREL

**NOTE:** Minor spills can be left for natural attenuation with approval from the FEC.

- 3.1 Soak and clean up minor spills with absorbent pads or rags.
- 3.2 Rake in clean fill dirt and apply Oil Hawg or other bio-remediation treatment that has been approved by the FEC.

**E ENVIRONMENTAL:** Leave no free liquids on location.

	<p align="center"><b>ENVIRONMENTAL PROCEDURE</b></p> <p align="center"><b>SPILL CLEANUP AND REMEDIATION</b></p>	<p>Proc #: ENV-8301</p> <p>Revision #: 2</p> <p>Printed on: 2/26/2008</p>
<p align="center"><b>SAN JUAN OPERATIONS CENTER</b></p>	<p align="center"><b>REVISED 08/06/2006</b></p>	<p align="center"><b>Page 3 of 3</b></p>

**4.0 CLEAN UP OF SPILLS  
MORE THAN ONE BARREL**

4.1 Recover standing liquids for recycle and reuse.



**WARNING:** Ensure that One Call has been completed and locator flags are evident on location before proceeding.

4.2 Excavate the affected area. Landfarm the soil on the well pad or transport to the Crouch Mesa site based on consultation with the FEC.

**5.0 DISPOSAL OF MATERIALS**

5.1 Transport rags, pads or other absorbent materials to the SJOC yard for drying.

5.2 Recycle and reuse recovered chemicals.

***Consult New Mexico Waste Data Sheets for Waste Handling Requirements***

- Rags, pads or other absorbent materials should be taken to the Operation Center yard to be dried out and then composted at the Crouch Mesa Central Soil Site or disposed of in a special waste dumpster (no free liquids!)
- Methanol, antifreeze, glycol, lube oil and diesel should be recovered and recycled by an approved vendor
- Affected soils should be composted on the well pad or transported to the Crouch Mesa Central Soil Site. Soil removal may be required by the Bureau of Land Management, New Mexico Oil Conservation Division or the Field Environmental Coordinator.

## Green Day/SPCC Inspection Guidelines

<b>Tank(s)</b>	<b>Visual Level Check and Float Condition/Position Where Applicable</b> <b>Manway Gasket – Leaks/Seeps/Stains</b> <b>Valves Sealed – Load, Drain and Equalize(Condensate Tanks Only)</b> <b>Load Line and Valve – Bulged/Warped/Cracked/Capped</b> <b>Drain Valve – Bulged/Warped/Cracked</b> <b>Vent Lines – Unobstructed</b> <b>Thief Hatch Gasket – Cracked or Brittle</b> <b>Berm Condition – Low Spots/Holes/Erosion</b> <b>Tank(s) and Equalize Lines - Free of Corrosion, Erosion, or Leaks</b> <b>Tank Foundation – Erosion, Signs of Leakage, or Deterioration</b>
<b>Dehy and Separator</b>	<b>Glycol System – Leaks/Seeps</b> <b>Sight Glasses – Cracked, Broken or Isolated for cold weather operations</b> <b>Valves (Dump and Hi/Lo) Leaks in trim or Packing</b> <b>Piping/Vessel – Leaks/Seeps of Fluids/Gas</b> <b>PSV Block Valves - Sealed in OPEN position</b> <b>Open Ended Valves Plugged</b>
<b>Pit(s)</b>	<b>Visual Level Check and Float Condition/Position</b> <b>Excessive Oil/Condensate on Water</b> <b>Fencing/Netting in Good Condition and Adequate</b> <b>Visual for Leaks/Staining</b> <b>Load Line Valve Capped or Piped to Prevent Drainage</b> <b>Visual for Leaks/Seeps/Staining from Fluids and Gas</b>
<b>Lines</b>	<b>Open Ended Valves Plugged</b> <b>Lines Installed Allow for Proper Drainage (Freeze Potential)</b>
<b>Other</b>	<b>Compressor – Leaks/Seeps of Fluids and Gas</b> <b>Compressor - PSV Block Valves - Sealed in OPEN position</b> <b>Long Run Drums – Leaks/Seeps and Sight Glass Condition</b> <b>Engines – Leaks/Seeps/Stains of Oil or Antifreeze</b> <b>Pumping Unit – Stuffing Box Condition</b> <b>Open Ended Valves Plugged</b> <b>Hoses Weathered or Cracked</b> <b>Fences – Good Condition and Adequate</b> <b>Hazcom Signs/Labels are present (vessels/tanks/meter runs) and legible.</b> <b>Well sign at entrance of or on location and legible.</b> <b>Drums/Containers are labeled or correctly identified. (No mystery drums!)</b> <b>Drums/Totes have bungs/plugs/lids in place.</b> <b>Cattlegaurds (those closest to BP Well) – Clean from dirt and fill</b>
<b>Actions</b>	<b>Repaired</b> <b>Shut in</b> <b>Reported (Called in or Work Order)</b> <b>Cleaned Up</b>

This guideline is to be followed when performing monthly inspections.

Mark appropriate SPCC Inspection box showing that the inspection was performed.

Record any actions taken on attached exception report, and enter applicable work orders into Maximo or local spreadsheets for tracking purposes.



## Green Day/SPCC Exception Report

List well name and action required/general comments. Piece of equipment, repaired, cleaned or work order submitted. Example: Hi/Lo valve leaking – repaired. Float not working – submitted work order, Mystery Drum on location – notified FEC, Well sign is missing – notified Team Leader.

Well Name: \_\_\_\_\_ Meter #: \_\_\_\_\_

Action/Comments:

Work order #:

Well Name: \_\_\_\_\_ Meter #: \_\_\_\_\_

Action/Comments:

Work order #:

Well Name: \_\_\_\_\_ Meter #: \_\_\_\_\_

Action/Comments:

Work order #:

Well Name: \_\_\_\_\_ Meter #: \_\_\_\_\_

Action/Comments:

Work order #:

Well Name: \_\_\_\_\_ Meter #: \_\_\_\_\_

Action/Comments:

Work order #:

Well Name: \_\_\_\_\_ Meter#: \_\_\_\_\_

Action/Comments:

Work order #:

Name (Inspector): \_\_\_\_\_

Run or Area Number: \_\_\_\_\_

Date (Month/Year): \_\_\_\_\_

**Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Thursday, March 06, 2008 11:09 AM  
**To:** Ricardo.Duarte@ElPaso.com  
**Cc:** 'Marco Wikstrom'; Craig Corey  
**Subject:** GW-092, Administratively Complete  
**Attachments:** GW-092, Admin Complete Letter.pdf; GW-092, Draft Permit.pdf; GW-092 OCD PN.pdf; Renewal WQCC PN Rules.pdf; Renewal PN Flow Chart.pdf

Mr Richard Duarte,

The submitted Discharge Plan renewal application for the El Paso Natural Gas Company, Rio Vista Compressor Station has been determined to be **Administratively Complete**.

Attached are the **Administratively Complete Letter**, **Draft Permit** and **OCD version of the public notice** for your records.

I have also attached the WQCC public notice rules and the renewal application process for your interest.

Mr. Marco Wikstrom and I are working on the applicant public notice that has yet to be approved.


If you have any questions please feel free to contact me.

llowe

**Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oed/>

*"If there is no such thing as a stupid question, what kind of questions do stupid people ask?"*



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# New Mexico Energy, Minerals and Natural Resources Department

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**Bill Richardson**

Governor  
Joanna Prukop  
Cabinet Secretary  
Reese Fullerton  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



March, 6<sup>th</sup>, 2008

Mr. Richard Duarte

**Re: Discharge Plan Renewal Permit GW-092  
El Paso Natural Gas Company  
Rio Vista Compressor Station  
San Juan County, New Mexico**

Dear Mr. Richard Duarte:

The New Mexico Oil Conservation Division (NMOCD) has received El Paso Natural Gas Company's request and initial fee, dated February 15, 2008, to renew GW-092 for the El Paso Natural Gas Company's Rio Vista Compressor Station located in the SE/4 SW/4 of Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

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

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

Sincerely,

Leonard Lowe  
Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec

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Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>





# New Mexico Energy, Minerals and Natural Resources Department

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**Bill Richardson**  
Governor  
**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



March 6<sup>th</sup>, 2008

Mr. Richard Duarte  
El Paso Natural Gas Company  
3801 Atrisco Blvd., NW Albuquerque, N.M. 87120

Re: **DRAFT** Discharge Permit Renewal  
Rio Vista Compressor Station (GW-092)  
SE/4 SW/4 Section 27, Township 29 North, Range 11 West, NMPM,  
San Juan County, New Mexico,

Dear Mr. Duarte:

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

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

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

Sincerely,

Wayne Price  
Environmental Bureau Chief

LWP/lrl

Attachments-1  
xc: OCD District Office

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Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>



## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. *The flat fee for a compressor station with a horsepower rating zero to 1000 horsepower is \$400.00. Please submit this amount along with the signed certification item 23 of this document after the final permit is issued in approximately 45 days. Checks should be made out to the New Mexico Water Quality Management Fund.*
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on January 17, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-

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

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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

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

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

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

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

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

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

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

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

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

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

## **12. Underground Process/Wastewater Lines:**

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

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

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

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

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

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

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

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

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

**20. Additional Site Specific Conditions:** N/A

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



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

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

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

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

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

Title \_\_\_\_\_

Date: \_\_\_\_\_

## NOTICE OF PUBLICATION

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

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

**(GW-092) El Paso Natural Gas Company's Richard Duarte, Senior Environmental Engineer, 3801 Atrisco Blvd. NW, Albuquerque, NM 87120 has submitted a renewal discharge plan application for their Rio Vista compressor station, located in the SE/4 SW/4 of Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The facility is located south of Bloomfield, N.M., approximately 0.38 miles south of the San Juan River and ½ mile east of highway 550. The facility provides compression of pipeline quality natural gas via the San Juan cross-over pipeline. Approximately 8000 gallons of used lube oil, 1000 gallons of oil/waste water and 400 gallons of new oil will be stored onsite in above storage tanks (AST). These containers shall be placed upon cemented, bermed areas. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 30 feet, with a total dissolved solids concentration of approximately 1,200 – 4,775 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

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

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6<sup>th</sup> day of March 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-088  
BP AMOCO  
GALLEGOS CANYON COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(February 12, 2002)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$400.00 for compressor stations with less than 1,000 horsepower rating. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval.
2. BP Amoco Commitments: BP Amoco will abide by all commitments submitted in the discharge plan renewal application dated October 30, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Closure: The OCD will be notified when operations of the Gallegos Canyon Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Gallegos Canyon Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
16. Certification: BP Amoco, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. BP Amoco further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

BP AMOCO

*Buddy Shaw*

by

*Enviro. Coordinator*

Title

ATTACHMENT TO THE DISCHARGE PLAN GW-088 RENEWAL  
AMOCO PRODUCTION COMPANY  
GALLEGOS CANYON COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(January 16, 1997)

# 345 BAS

1. Payment of Discharge Plan Fees: The ~~\$690~~ flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Amoco Commitments: Amoco will abide by all commitments submitted in the discharge plan application dated October 11, 1996.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
3. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
4. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
5. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
6. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
7. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of

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

Accepted:

AMOCO PRODUCTION COMPANY

by B.S. Shaw

Title

Environmental Coordinator