

GW - 137

GENERAL CORRESPONDENCE

YEAR(S):

2005 - 1993

TRC

Customer-Focused Solutions

September 7, 2005

State of New Mexico
Oil Conservation Division
Mr. Jack Ford
P.O. Box 6429
1220 S. St. Francis Dr.
Santa Fe, NM 87504

Project No. E9285

RECEIVED
SEP 12 2005
OIL CONSERVATION
DIVISION

RE: Duke Energy Field Services
Report for East Carlsbad Soil Remediation
East Carlsbad Compressor Stations

Dear Mr. Ford:

Previously, Duke Energy Field Services (DEFS) conducted soil investigations at three compressor stations located in the Carlsbad area. The work plan for these investigations was submitted to you in a letter dated January 18, 2001 which you approved in a letter dated January 22, 2001. The investigation was conducted and the results were submitted to you in a letter dated July 23, 2001. Recommendations in that letter included remediating the soil at Compressor Station CP-1 and delaying remediation at Carrasco Compressor and North Booster Compressor station because the later two compressor stations were active facilities. Station CP-1 was closed and a soil assessment and closure report was submitted on October 2, 2003. A Closure Approval letter was received from you dated October 15, 2003. Recently, DEFS elected to remediate the soil at the two remaining facilities by excavation and disposal. Described below are the results of the remediation.

Prior to excavating the soil, TRC notified the state's utility one-call service. The areas to be excavated were also pre-approved by DEFS. Where possible, a backhoe was used to excavate the soils; hand excavations were also used to remove soil in areas that could not be accessed by the backhoe.

The excavations and backfilling operations were performed by B&H Construction, Inc. The soil was transported and disposed of by Lea Land, Inc. at their New Mexico facility. Lea Land also provided clean backfill material.

Soil was excavated until clean soil was reached or until excavation had to be stopped to maintain the stability of the adjacent above ground storage tanks. At both facilities, the lateral extent of the excavation was limited by above ground storage tanks. After each excavation was completed, confirmation samples were collected from the excavation to document constituent concentrations in the remaining soils.

The analytes at each site were selected based on the results of the soil investigation that was conducted in 2001 and the source of the impacts. For example, soil samples were only analyzed for constituents that previously exceeded the clean-up guidelines. As a result, some locations were analyzed for benzene, toluene, ethylbenzene, and xylene (BTEX) only, while other samples were analyzed for BTEX and total petroleum hydrocarbons (TPH). When samples were

analyzed for both TPH-DRO and TPH-GRO, the results were combined together to determine total TPH concentrations.

Samples were submitted to e-Lab in Houston, Texas for expedited analysis. Laboratory results were compared to the applicable New Mexico Oil Conservation Division clean-up guidelines for each site. The excavations were backfilled with clean imported soil. Presented below are summaries of the work that was performed at each of the sites.

Carrasco Compressor Station

Impacted soils were excavated from around the condensate tanks (sample numbers SS-6 and SS-7, see July 23, 2001 letter) covering an area approximately 40' x 25' x 10' deep, approximately 31.2 tons of soil were excavated and disposed. A sample was collected from the bottom of the excavation. Figure 1 presents a summary of the excavated area and the laboratory results. Laboratory results show that impacted soil remains in the bottom of the excavation above clean-up guidelines that are applicable to this site based on an assumed depth to groundwater of 30 feet. The TPH concentration from the bottom sample was 1,600 ppm which exceeds the TPH clean-up guideline of 100 ppm. Although the total BTEX concentration of 403.8 ppm exceeds the clean-up guideline of 50 ppm the benzene concentration of 3.8 ppm detected in remaining soils is well below the clean-up guideline of 10 ppm. The impacted soil may extend under the tanks. Excavations around and beneath the edge of the tanks were stopped to prevent destabilizing the tanks. A sidewall sample was not collected because visual impacts were evident below the tanks. Additional soil remediation may be warranted at the Carrasco Compressor Station during facility decommissioning.

North Booster Compressor Station

Two areas were excavated at the North Booster Station, around the sump (sample SS-1) and around one of the condensate tanks (sample CS-0302). Impacted soil was excavated from around the sump covering a circular area approximately 8' x 4' x 1' deep, approximately 1.5 tons of soil were excavated and disposed. Samples were collected from the bottom of the excavation and a composite sample from the sidewall. Figure 2 presents a summary of the excavated area and the laboratory results. Laboratory results show that the impacted soil was removed to below the clean-up guideline around the sump. No further soil remediation is warranted at the sump.

Impacted soil was excavated from around the middle condensate tank covering an area approximately 10' x 6' x 6' deep, approximately 18.7 tons of soil were excavated. Samples were collected from the bottom of the excavation. Figure 2 presents a summary of the excavated area and the laboratory results. Laboratory results show that impacted soil remains in the bottom of the excavation above clean-up guidelines. The TPH-GRO and TPH-DRO values were 2,900 ppm and 3,600 ppm respectively, which exceeds the TPH applicable clean-up guideline of 1,000 ppm. The applicable clean-up guideline was determined based on an assumed depth to groundwater of 90 feet. Although the total BTEX concentration of 175.2 ppm exceeds the applicable clean-up guideline of 50 ppm the benzene concentration of 8.2 ppm does not exceed the clean-up guideline of 10 ppm. The impacted soil may extend under the tank. Additional excavations were stopped to prevent the tanks from becoming destabilized. A sidewall sample was not collected because the soil under the tank was visually stained. Additional work may be warranted around and under the condensate tank during facility decommissioning.

Recommendations

TRC recommends that additional soil remediation at both facilities be deferred until the site is closed or the tanks removed. After the tanks are removed, the soil will be sampled to characterize the soil under the tanks and assess if additional remediation is required. You will be notified before additional site characterization is performed.

Please call me at 303-395-4019 if you have any questions.

Sincerely;

TRC ENVIRONMENTAL CORPORATION



Greg Groene, CHMM
Principal Hydrologist

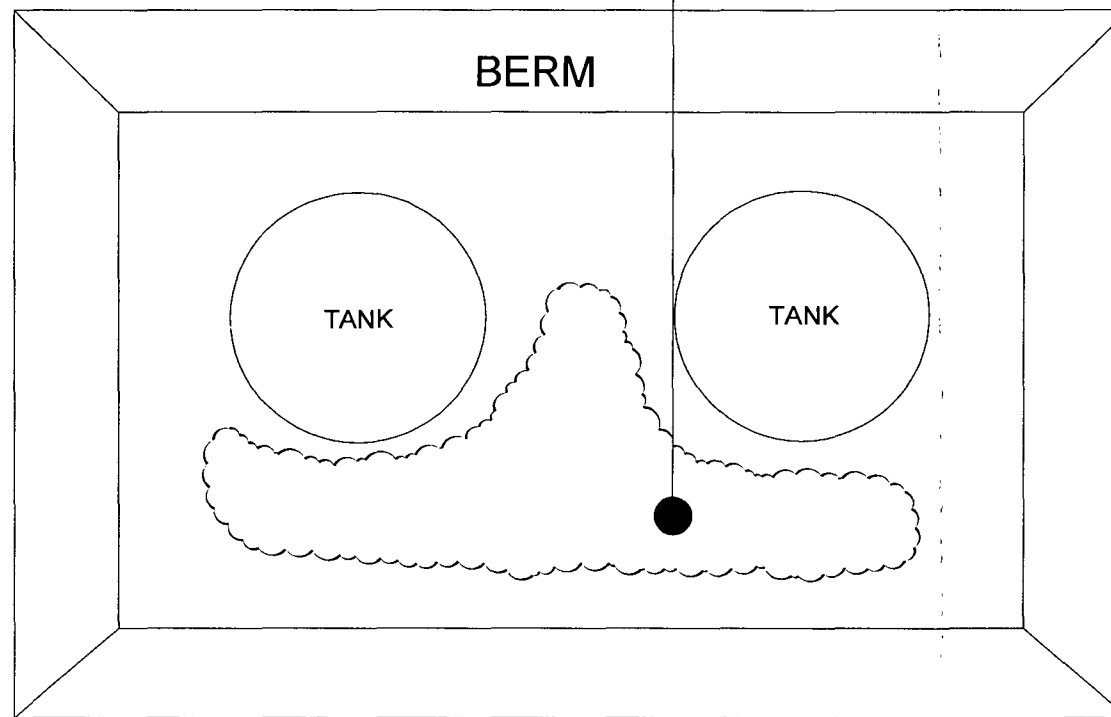
cc: Rusty Frishmuth (DEFS)

SAMPLE ID: Bottom Sample
SAMPLE DEPTH (ft): 10

ANALYTE	CONCENTRATION (mg/kg)
TPH	1,600
Benzene	3.8
Toluene	120
Ethylbenzene	60
Xylenes	220
Total BTEX	403.8

GUIDELINES

ANALYTE	CONCENTRATION (mg/kg)
Total TPH	100
Total BTEX	50



EXCAVATION LIMITS: 40' x 25' x 10' Deep
VOLUME REMOVED: 31.2 tons

NOT TO SCALE

NOTE:

Bold values exceed clean up guidelines.

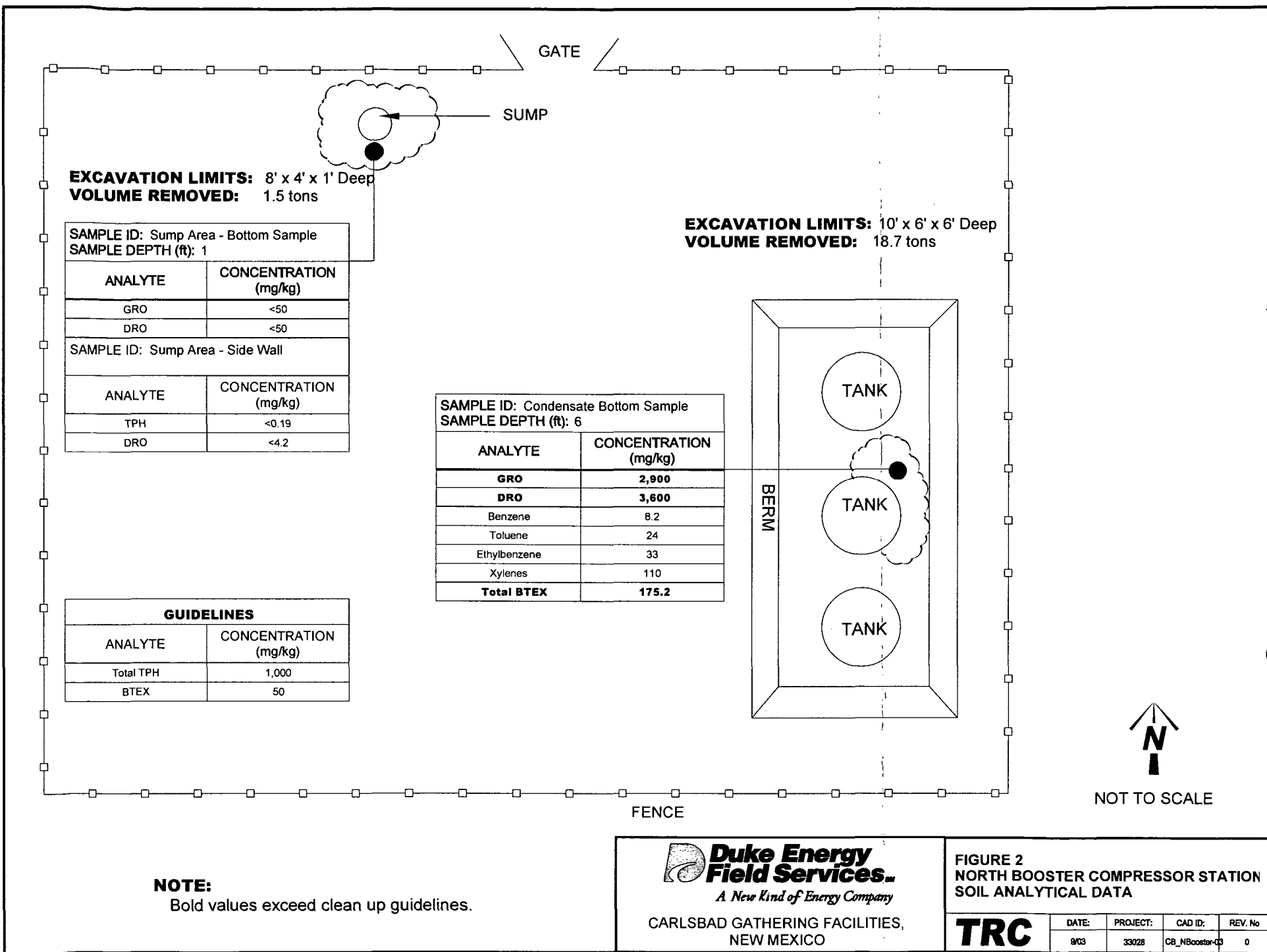
Duke Energy
Field Services
A New Kind of Energy Company

CARLSBAD GATHERING FACILITIES,
NEW MEXICO

FIGURE 1
CARRASCO COMPRESSOR STATION
SOIL ANALYTICAL DATA

DATE:	PROJECT:	CAD ID:	REV. No.:
9/03	33028	CB_Carrasco-03	0

TRC



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

640-137
Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☒

Type of action: Registration of a pit or below-grade tank ☒ Closure of a pit or below-grade tank ☐

Operator: <u>Duke Energy Field Services, LP</u> Telephone: <u>(505) 628-0282</u> e-mail address: _____		
Address: <u>2010 E. Carlsbad Lane, Carlsbad, NM 88220</u>		
Facility or well name: <u>Carrasco Compressor Station</u> API #: _____ U/L or Qtr/Qtr _____ Sec <u>14</u> T <u>23S</u> R <u>28E</u>		
County: <u>Eddy</u> Latitude <u>32.3062379</u> Longitude <u>-104.060667</u> NAD: 1927 <input type="checkbox"/> 1983 <input checked="" type="checkbox"/> Surface Owner Federal <input type="checkbox"/> State <input type="checkbox"/> Private <input checked="" type="checkbox"/> Indian <input type="checkbox"/>		
Pit Type: Drilling <input type="checkbox"/> Production <input type="checkbox"/> Disposal <input type="checkbox"/> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Lined <input type="checkbox"/> Unlined <input type="checkbox"/> Liner type: Synthetic <input type="checkbox"/> Thickness _____ mil Clay <input type="checkbox"/> Pit Volume _____ bbl	Below-grade tank Volume: <u>21</u> bbl Type of fluid: <u>Water, non-hazardous biodegradable detergent, compressor lube oil (incidental volume), antifreeze (incidental volume), storm water</u> Construction material: <u>Fiberglass</u> Double-walled, with leak detection? Yes <input checked="" type="checkbox"/> If not, explain why not: _____ Compressor Skid Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet	(20 points)
	50 feet or more, but less than 100 feet	(10 points)
	100 feet or more	✓ (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes	(20 points)
	No	✓ (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet	(20 points)
	200 feet or more, but less than 1000 feet	(10 points)
	1000 feet or more	✓ (0 points)
Ranking Score (Total Points)		0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if you are burying in place) onsite ☐ offsite ☐ If offsite, name of facility _____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface _____ ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☒, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.

Date: 9-23-04

Printed Name/Title Randy Counts/Field Supervisor

Signature Randy Counts

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:

Printed Name/Title _____

Signature _____

Date: _____



RECEIVED
JUN 12 2003
OIL CONSERVATION
DIVISION

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202
303 595 3331

June 9, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED (Article No. 7002 2030 0006 2400 0402)

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

Subject: Carrasco Compressor Station
Discharge Plan GW-137
Eddy County, New Mexico

Dear Mr. Ford:

As agreed upon in the meeting with Duke Energy Field Services, LP (DEFS) and the New Mexico Oil Conservation Division (NMOCD) on May 5, 2003, DEFS will postpone returning a signed copy of the Discharge Plan Conditions of Approval and discharge plan fee for the recently approved Carrasco Compressor Station Discharge Plan until receiving further instructions from NMOCD.

If you have any questions concerning the Carrasco Compressor Station Discharge Plan, please contact me at (303) 605-1717. Please send all correspondence regarding this North Compressor Station Discharge Plan renewal to me at 370 17th Street, Suite 900, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

cc: NMOCD District 2 Office (via Certified Mail Return Receipt Requested 7002 2030 0006 2400 2338)
1301 W. Grand Ave.
Artesia, New Mexico 88210

January 24, 2003

FEDERAL EXPRESS
PRIORITY OVERNIGHT (Tracking Number 8336 1954 7136)

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

Subject: Carrasco Compressor Station
Discharge Plan GW-137
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has provided public notice, in accordance with the Water Quality Control Commission regulations (20.6.2.3108 NMAC), for the Carrasco Compressor Station discharge plan renewal application.

DEFS submits the following as proof of notice:

- Affidavit of posting in the following newspaper: Carlsbad Current Argus
- Copy the notice and certified mail return receipt for the notice provided to the landowner
- Photograph of the sign posted in English and Spanish on the facility front gate
- Copy of the synopsis of public notice in English and Spanish posted on the facility front gate

If you have any questions concerning the Carrasco Compressor Station discharge plan renewal application, please contact me at (303) 605-1717. Please send all correspondence regarding this Carrasco Compressor Station Discharge Plan renewal to me at 370 17th Street, Suite 900, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP



Karin Char Kimura
Senior Environmental Specialist

Attachments

cc: NMOCD District 2 Office (via FedEx Priority Overnight Tracking No. 8336 1957 7147)
1301 W. Grand Ave.
Artesia, New Mexico 88210

Affidavit of Publication

State of New Mexico,
County of Eddy, ss.

Dawn Higgins,
being first duly sworn, on oath says:

That she is Business Manager
of the Carlsbad Current-Argus, a newspaper published
daily at the City of Carlsbad, in said county of Eddy,
state of New Mexico and of general paid circulation in
said county; that the same is a duly qualified
newspaper under the laws of the State wherein legal
notices and advertisements may be published; that the
printed notice attached hereto was published in the
regular and entire edition of said newspaper and not in
supplement thereof on the date as follows, to wit:

January 15, 2003
 , 2003
 , 2003
 , 2003
 , 2003
 , 2003

That the cost of publication is \$ 189.50
and that payment thereof has been made and will be
assessed as court costs.

Dawn Higgins

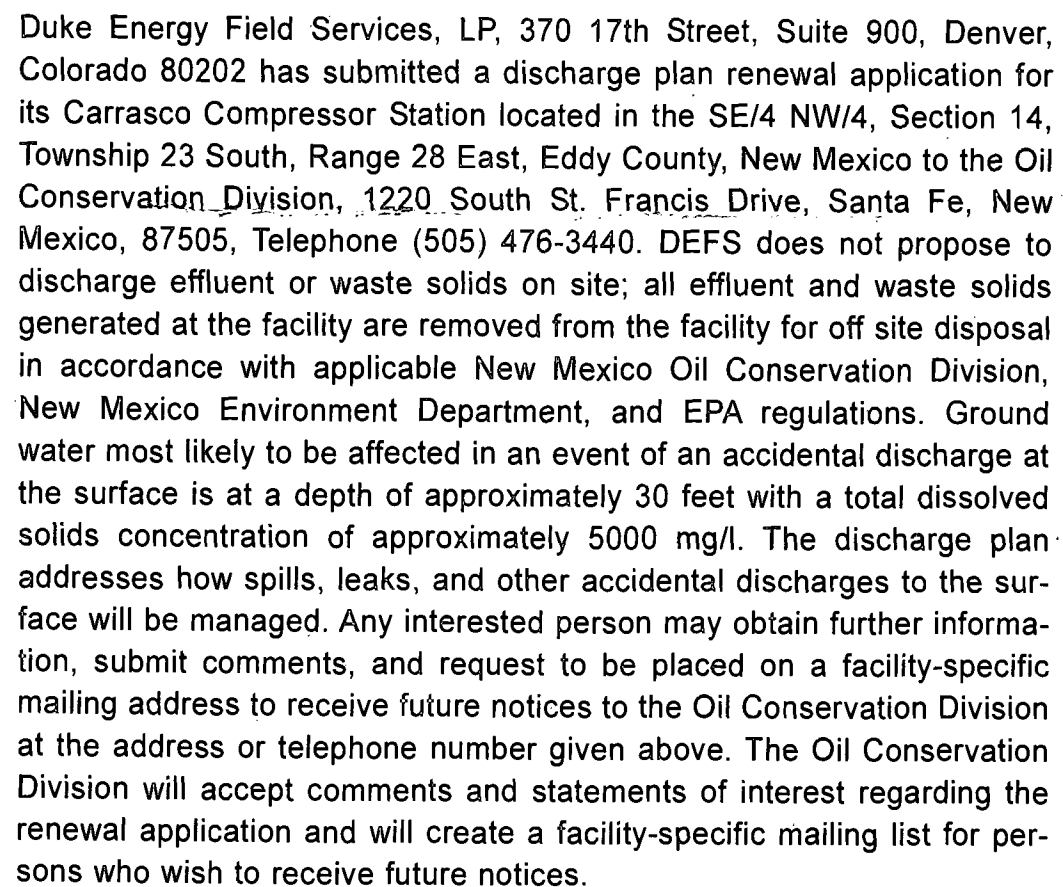
Subscribed and sworn to before me this

16 day of January, 2003
Stephanie Dobson

My commission expires 12/13/05
Notary Public

Duke Energy Field Services, LP, 370 17th Street, Suite 900, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Carrasco Compressor Station located in the SE/4 NW/4, Section 1, Township 23 South, Range 28 East, Eddy County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Groundwater most likely to be affected in an event of an accidental discharge to the surface is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility-specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.







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

January 13, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED (Article No. 7001 1140 0003 5916 6282)

Mr. Lionel and Ms. Nelda Onsurez
P.O. Box 141
Loving, NM 88256

Subject: Duke Energy Field Services, LP
Notice of Carrasco Compressor Station Discharge Plan Renewal Application

Dear Mr. and Ms. Onsurez:

Duke Energy Field Services, LP, 370 17th Street, Suite 900, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Carrasco Compressor Station located in the SE/4 NW/4, Section 14, Township 23 South, Range 28 East, Eddy County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility-specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

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:

Mr. Lionel and Ms. Nelda Onsurez
P.O. Box 141
Loving, NM 88256

2. Article Number
(Transfer from service label)

7001 1140 0003 5916 6282

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-0381

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x *Nelda R Onsurez*☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

11/5/03

D. Is delivery address different from item 1? ☐ YesIf 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

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Duke Energy Field Services, LP
370 17th Street, Suite 900
Denver, CO 80202
Attn: Karin Char Kimura, Senior Environmental Specialist





Synopsis of public notice in English and Spanish posted on the Carrasco Compressor Station front gate.

Duke Energy Field Services, LP, 370 17th Street, Suite 900, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Carrasco Compressor Station located in the SE/4 NW/4, Section 14, Township 23 South, Range 28 East, Eddy County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility-specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.

Duke Energy Field Services, LP, 370 17th Street, Suite 900, Denver, Colorado 80202 se han sometido una aplicación de la renovación del plan de la descarga para su Estación de Compresor de Carrasco localizada en el SE/4 NW/4, la Sección 14, Municipio 23 al sur, Recorren 28 al este, Condado de Eddy, Nuevo México a la División de la Conservación del Aceite, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, el Teléfono (505) 476-3440. DEFS no propone descargar efluente ni los sólidos del desecho locales; todo efluente y los sólidos del desecho engendrados en la facilidad se quitan de la facilidad para de la disposición del sitio de acuerdo con División aplicable de la Conservación de Aceite de Nuevo México, del Departamento del Ambiente de Nuevo México, y de las regulaciones de EPA. El suelo rega muy probable de ser afectado en un acontecimiento de una descarga accidental en la superficie está en una profundidad de aproximadamente 30 pies con un suma la concentración disuelta de sólidos de aproximadamente 5000 mg/L. Las direcciones del plan de la descarga cómo los derramamientos, los escapes, y otras descargas accidentales a la superficie seran manejados. Qualquier persona interesada puede obtener información adicional, someter comentarios, y la petition de ser colocado en una dirección facilidad-especifica del correo para recibir avisos futuros a la División de la Conservación del Aceite en la dirección o el numero de telefono dado arriba. La División de la Conservación del Aceite aceptará los comentarios y las declaraciones del interés con respecto a la aplicación de la renovación y creará una lista de envío específica de la facilidad para personas que desean para recibir notas futuras.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 12/10/02,
or cash received on _____ in the amount of \$ 100.00
from Duke Energy Field Services
for CARRASCO C.S. GW-137
(Facility Name) Submitted by: [Signature] Date: 1-7-03 (OP No.)
Submitted to ASD by: _____ Date: _____
Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal ☒
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER WITH VISIBLE FIBERS AND A TRUE WATERMARK ON THE REVERSE SIDE.

Duke Energy Field Services, LP
Accounts Payable
P.O. Box 5493
Denver, Colorado 80217

THE CHASE MANHATTAN BANK, N.A.
SYRACUSE, NEW YORK

VENDOR NO. 0000078220
CHECK DATE 12/10/02
CHECK NUMBER [REDACTED]

PAY ONLY
TO THE ORDER OF NMED-
Water Quality Management Fund
NM Oil Conservation District
1220 South St Francis Drive
Santa Fe, NM 87504

CHECK AMOUNT
\$100.00

NOT NEGOTIABLE AFTER 120 DAYS

[Signature]
AUTHORIZED SIGNATURE

One hundred and 00/100 Dollars

HOLD BETWEEN THUMB AND FOREFINGER, OR BREATHE ON COLORED BOX, COLOR WILL DISAPPEAR, THEN REAPPEAR.

Duke Energy Field Services, LP
Accounts Payable
P.O. Box 5493
Denver, Colorado 80217

VENDOR NUMBER
0000078220
VENDOR NAME
NMED-

CHECK NUMBER
[REDACTED]
CHECK DATE
12/10/02

INVOICE NUMBER	INVOICE DATE	NET AMOUNT	DESCRIPTION
120302-FILING FE	12/03/02	100.00	GW-137
			TOTAL PAID \$100.00

PLEASE DETACH AND RETAIN FOR YOUR RECORDS

December 23, 2002

FEDERAL EXPRESS
SECOND DAY (Tracking Number 8336 1954 7114)

RECEIVED
JAN 06 2003
Environmental Bureau
Oil Conservation Division

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

Subject: Carrasco Compressor Station
Discharge Plan GW-137
Eddy County, New Mexico

Dear Mr. Ford:

As we have discussed previously, DEFS does not believe that the New Mexico Water Quality Act, NMSA 1978, §§74-6-1 to 17, and the regulations adopted under that act are applicable to compressor stations. Specifically, NMSA 1978, §74-6-12.G (1999) provides that "[t]he Water Quality Act does not apply to any activity or condition subject to the authority of the oil conservation commission pursuant to the provisions of the Oil and Gas Act, Section 70-2-12 NMSA 1978 and other laws conferring power on the oil conservation commission to prevent or abate water pollution." NMSA 1978, §70-2-12.B(21) (1996) provides that the OCC has the authority to regulate "the disposition of nondomestic wastes resulting from the exploration, production or storage of crude oil or natural gas to protect public health and the environment." The language of Section 70-2-12.B(21), DEFS believes, precludes the application of the Water Quality Act to the disposal of wastes from compressor stations. Therefore, DEFS is under no obligation to comply with the discharge plan renewal requirements of the WQCC regulations.

Further, even if the Water Quality Act and regulations applied, the WQCC regulations do not require a discharge plan for this facility. According to the WQCC regulations, 20.6.2.3106B NMAC, a facility must have an approved discharge plan if the facility intends to or has a discharge or discharges that may move directly or indirectly into groundwater.

The Carrasco Compressor Station does not have any discharges that may move directly or indirectly into groundwater. Therefore, DEFS does not believe that a discharge plan is required under the WQCC regulations. Since the WQCC regulations do not require a discharge plan, DEFS is under no legal obligation to renew Discharge Plan GW-128. DEFS disagrees that any discharge plan is required for this facility under the WQCC's regulations.

Although DEFS believes that it is not required to have a discharge plan for Carrasco Compressor Station, DEFS submits the following for Carrasco Compressor Station:

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

Mr. Jack Ford
Page 2 of 2.
December 23, 2002

Pleased be advised that DEFS' submittal of the renewal application and application filing fee does not waive DEFS' objection to the OCD's position regarding applicability of the WQCC regulations.

If you have any questions concerning DEFS' position or the renewal application, please contact me at (303) 605-1717. Please send all correspondence regarding this Carrasco Compressor Station Discharge Plan renewal to me at 370 17th Street, Suite 900, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP



Karin Char Kimura
Senior Environmental Specialist

Enclosures

cc: NMOCD District 2 Office (via FedEx Second Day Tracking No. 8336 1954 7125)
1301 W. Grand Ave.
Artesia, New Mexico 88210

FULBRIGHT & JAWORSKI L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

1301 MCKINNEY, SUITE 5100

HOUSTON, TEXAS 77010-3095

TELEPHONE: 713/651-5151

FACSIMILE: 713/651-5246

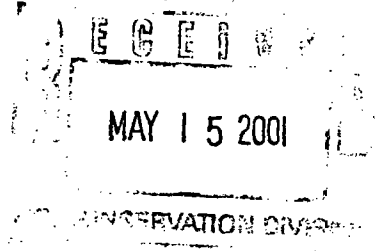
WRITER'S INTERNET ADDRESS:

elewis@fulbright.com

WRITER'S DIRECT DIAL NUMBER:

713/651-3760

HOUSTON
WASHINGTON, D.C.
AUSTIN
SAN ANTONIO
DALLAS
NEW YORK
LOS ANGELES
MINNEAPOLIS
LONDON
HONG KONG



May 10, 2001

Re: Notification of Name Change to Duke Energy Field Services, LP

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

As a result of a recent internal corporate reorganization, New Mexico facilities previously operated under the name of Duke Energy Field Services, LLC are now being operated under the name of Duke Energy Field Services, LP. Please update your records to reflect that Duke Energy Field Services, LP is the permit holder for the following groundwater permits:

- | | | |
|---|--------------------------------------|--------|
| ● | Burton Flats Gas Plant | GW-127 |
| ● | Carlsbad Gas Plant | GW-069 |
| ● | Carrasco Booster Station | GW-137 |
| ● | CP-1 Compressor Station | GW-139 |
| ● | Dagger Draw Gas Plant | GW-185 |
| ● | Pecos Diamond Gas Plant | GW-237 |
| ● | West Fall (North) Compressor Station | GW-144 |

Mr. Roger Anderson

May 10, 2001

Page 2

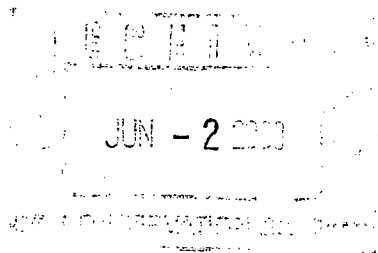
Fulbright & Jaworski L.L.P. is assisting Duke Energy Field Services, LP with various filings and agency notices that relate to the company's recent internal reorganization. Please feel free to call me at (713) 651-3760 if you have any questions.

Very truly yours,

Eddie Lewis

Edward C. Lewis

ECL/jnr



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

May 30, 2000

CERTIFIED MAIL
RETURN RECEIPT Z 407 761 470

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

RE: Request for Name/Plan Holder Change
NM OCD Discharge Plans

Dear Mr. Ford:

Based upon our conversation on May 10, 2000, it is my understanding that this letter suffices to transfer the seven discharge plans, referenced below, due to a change in plan holder status. The change in plan holder status is a result of a recent internal corporate restructuring and convergence, including a name change. The old company was known as Duke Energy Field Services, Inc., which has now been changed, and the new entity is Duke Energy Field Services, LLC. Please transfer the following discharge plans to above-referenced new entity, effective immediately:

- | | |
|--------------------------------------|--------|
| • Burton Flats Gas Plant | GW-127 |
| • Carlsbad Gas Plant | GW-069 |
| • Carrasco Compressor Station | GW-137 |
| • CP-1 Compressor Station | GW-139 |
| • Dagger Draw Gas Plant | GW-185 |
| • Pecos Diamond Gas Plant | GW-237 |
| • Westall (North) Compressor Station | GW-144 |

Duke Energy Field Services, LLC will continue to comply with the terms and conditions of the previously approved discharge plan for each of the above referenced facilities.

If you have any questions or need any additional information, please contact me at (303) 605-1717.

Sincerely,

Karin Char
Environmental Specialist

cc: Jack Braun	Facility Env. File 2.2.3.3:	Burton Flats GP, Carlsbad GP, Carrasco CS, CP-1 CS,
Harley Temple		Dagger Draw GP, Pecos Diamond GP, Westall (North) CS
Grey Hyde	Region Env. File 2.2.3.3:	Burton Flats GP, Carlsbad GP, Carrasco CS, CP-1 CS,
Mel Driver		Dagger Draw GP, Pecos Diamond GP, Westall (North) CS
	Corp. Env. File 2.2.3.3:	Burton Flats GP, Carlsbad GP, Carrasco CS, CP-1 CS,
		Dagger Draw GP, Pecos Diamond GP, Westall (North) CS

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 3/12/98
or cash received on in the amount of \$ 690.00
from Union Pacific
for Carasco CS. GW137
Submitted by: Date:
Submitted to ASD by: RC Anderson Date: 3/27/98
Received in ASD by: Date:
Filing Fee New Facility Renewal X
Modification Other
Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment

THE FACE OF THIS CHECK IS PRINTED IN RED AND BLUE INK ON WHITE PAPER



Union Pacific Resources Company
P. O. Box 7
Fort Worth, TX 76101

NationsBank of Georgia, N. A.
Atlanta, Dekalb County, Georgia

DATE
03/12/98

CHECK NO.

NET AMOUNT
*****690.00

PAY
SIX HUNDRED NINETY DOLLARS AND NO CENTS

OPERATING ACCOUNT 64-1278
NOT VALID AFTER 180 DAYS 611

TO THE
ORDER
OF

NMED-WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
2040 S PACHECO
SANTE FE, NM 87505

TREASURER

THE BACK OF THIS DOCUMENT CONTAINS A FACSIMILE WATERMARK - CAN BE VIEWED AT AN ANGLE



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

March 2, 1998

CERTIFIED MAIL

RETURN RECEIPT NO. P-288-259-039

Ms. Karen Singletary
Union Pacific Resources Company
P.O. Box 7, MS 2807
Fort Worth, Texas 76101-0007

**RE: Discharge Plan GW-137
Carrasco Compressor Station
Eddy County, New Mexico**

Dear Ms. Singletary:

The groundwater discharge plan, GW-137, for the Union Pacific Resources Company (Union) Carrasco Compressor Station located in the SE/4 NW/4 of Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan as approved April 28, 1993, and the discharge plan renewal application dated February 2, 1998. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

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

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

Ms. Karen Singletary
March 2, 1998
Page 2

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

Pursuant to Section 3109.G.4., this plan is for a period of five years. This approval will expire on April 28, 2003, and Union should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the Union Pacific Resources Company Carrasco Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$690 for compressor stations. The OCD received the filing fee. The flat fee is due upon receipt of this approval. 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.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

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

Sincerely,


Lori Wrotenbery
Director

LW/mwa
Attachment

xc: OCD Artesia Office

**ATTACHMENT TO THE DISCHARGE PLAN GW-137 RENEWAL
UNION PACIFIC RESOURCES COMPANY
CARRASCO COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(March 2, 1998)**

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. **Union Commitments:** Union will abide by all commitments submitted in the discharge plan application dated February 2, 1998.
3. **Waste Disposal:** All wastes shall 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 by characteristics 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 facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
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 should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
12. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
13. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia 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 facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

16. **Certification:** Union, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Union 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:

UNION PACIFIC RESOURCES COMPANY

by _____
Title

P 288 259 039

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

PS Form 3800, April 1995

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

VENDOR NO. 515419

UNION PACIFIC RESOURCES COMPANY

CHECK NO. [REDACTED]

Any questions, please call UPR's Automated AP Inquiry System 1-800-370-9867

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
03-AP-9565 X7014 D BRO	CR515419C98 OKSHIRE, CARR 6W-137	ASCO C	03/11/98 OMPR. ST	690.00 ATION	0.00	690.00
TOTALS				690.00	0.00	690.00

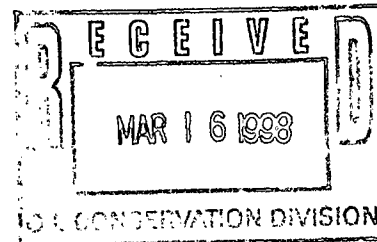


March 12, 1998

CERTIFIED MAIL
P 965 692 697

NMED – Water Quality Management
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

ATTN: Ms. Lori Wrotenbery



RE: Discharge Plan GW-137
Carrasco Compressor Station

Discharge Plan GW-139
CP-1 Compressor Station

Dear Ms. Wrotenbery:

Attached are the signed discharge plan approval conditions for the two above listed compressor stations. Also included is a check (Ck. No. 10270908) in the amount of \$690.00 for the flat fee associated with Discharge Plan GW-137. There is no flat fee associated with Discharge Plan GW-139 because the combined horsepower is less than or equal to 1,000.

If there are any questions, or any further information is needed please contact me at (817) 877-6764.

Sincerely,

Karen Singletary
Karen Singletary
Environmental Specialist

Enclosures (3)

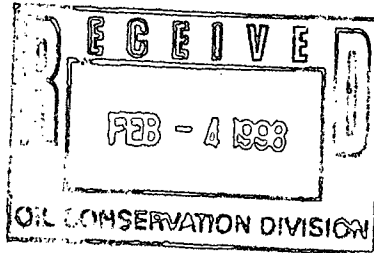
KLS



February 2, 1998

CERTIFIED MAIL
P 965 692 684

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



ATTN: Mr. William J. LeMay, Director

RE: Discharge Plan GW-137 Renewal (Carrasco Compressor Station)
Discharge Plan GW-139 Renewal (CP-1 Compressor Station)

Dear Mr. LeMay,

Enclosed are two copies of each Discharge Plan Renewal for the following sites:
Carrasco Compressor Station (GW-137) and
CP-1 Compressor Station (GW-139).

Also enclosed is a check (# 10259026) in the amount of \$100.00 to cover the OCD filing fee for each application. A single copy of each application is being to the district office located in Artesia.

If any further information is required, please contact me at (817) 877-6764.

Sincerely,

Karen Singletary
Karen Singletary
Environmental Specialist
Environmental Services

cc: OCD, Artesia, New Mexico - enclosure -CERTIFIED P 965 692 685
Mr. Johnny Lamb, Carlsbad Gas Plant

District I - (505) 393-6161

P. O. Box 1980

Hobbs, NM 88241-1980

District II - (505) 748-1247

811 S. First

Artesia, NM 88210

District III - (505) 334-6178

1000 Rio Brazos Road

Aztec, NM 87410

District IV - (505) 827-7131

New Mexico

Energy Minerals and Natural Resources Department

Oil Conservation Division

2040 South Pacheco Street

Santa Fe, New Mexico 87505

(505) 827-7131

Revised 12/1/95

Submit Original

Plus 1 Copies

to Santa Fe

1 Copy to appropriate

District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS
(Refer to the OCD Guidelines for assistance in completing the application)

☐ New

☒ Renewal

☐ Modification

1. Type: Compressor Station Carrasco GLW-137
2. Operator: Union Pacific Resources
- Address: P.O. Box 7 MS2807
- Contact Person: Karen Singletary Phone: (817) 877-6000
3. Location: SE /4 NW /4 Section 14 Township 23 S Range 28 E
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: Karen Singletary Title: Environmental Specialist

Signature: Karen Singletary Date: 2/2/98

**DISCHARGE PLAN RENEWAL
Carrasco Compressor Station
T23S, R28E, Sec. 14
Eddy County, New Mexico
(Discharge Plan GW-137)**

Prepared for
Union Pacific Resources
P.O. Box 7 MS2807
Fort Worth, Texas 76102

HLA Project No. 40247, 1.0

January 28, 1998



Harding Lawson Associates
Engineering and Environmental Services
202 Central Avenue SE, Suite 200
Albuquerque, New Mexico 87102 (505) 248-0017

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PLATES

- 1 Facility Location Map
- 2 Facility Layout Map

1.0 INTRODUCTION

Harding Lawson Associates (HLA), on behalf of Union Pacific Resources (UPR), has prepared this Discharge Plan Renewal for the Carrasco Natural Gas Compressor Station (Station). This Discharge Plan Renewal is for existing Discharge Plan GW-137, which expires on April 28, 1998. Under the regulations of the New Mexico Oil Conservation Division (OCD), a Discharge Plan renewal application is required to be submitted within 120 days of the expiration of the current Discharge Plan. However, UPR recently took ownership of the Station and informed the OCD on December 22, 1997 that further information regarding the Discharge Plan renewal would be forthcoming within thirty days. Thus, the 120 day prior-to-expiration date was preserved and this Discharge Plan Renewal application completes the renewal application process.

1.1 History and Current Status

The Discharge Plan application for the current Discharge Plan was submitted to the OCD during early 1993. The current Discharge Plan was approved on April 28, 1993. Discharge Plans are in effect for a five year period from the date of approval. UPR recently purchased the Station and is now the responsible party for compliance with the requirements of the Discharge Plan. Prior to purchase of the Station by UPR, several modifications were made to the equipment, and these changes are not referenced in the existing Discharge Plan. Since UPR did not perform the modifications to the Station, this Discharge Plan Renewal application only discusses the equipment currently present at the Station.

2.0 DISCHARGE PLAN GUIDELINES

2.1 Type of Operation

The Carrasco Compressor Station (Station) is operated by UPR as a natural gas compression station. Two 1,000-horsepower Caterpillar 3516 compressor engines are used to compress natural gas from various production sources. Following compression, the natural gas is discharged to the UPR gathering system. Total horsepower at the Station is 2,000.

2.2 Operator Information

Union Pacific Resources operates the Station as part of its oil and gas production operations. The contact person is Karen Singletary. Karen can be reached at (817) 877-6764 or at the corporate address.

Corporate Address

Union Pacific Resources
P.O. Box 7 MS2807
Fort Worth, TX 76102-6803

Field Address

Union Pacific Highlands Gathering and Processing
Company
260 Potash Mines Road
P.O. Box 269
Loving, NM 88256

2.3 Location of Facility

The Station is located in the SE 1/4 of NW 1/4 of Section 14, T23S, R28E, Eddy County, New Mexico. Plate 1 presents the Station location on the United States Geological Survey (USGS) Loving Quadrangle map.

2.4 Landowner

The landowner is:

Mr. Lionel Onsurez
P.O. Box 141
Loving, NM 88256

2.5 Facility Description

The Station encompasses a ground surface area of approximately 200' by 350'. Plate 2 shows the site layout. The equipment currently located at the Station consists of:

- two 1,000-horsepower Caterpillar 3516 natural gas compressor engines on skids with collection sumps;
- one 210-barrel (bbl) above-ground steel tank;
- one 100-bbl above-ground steel tank;
- two inlet separators; and
- one 500-gallon above-ground storage tank used for engine oil storage.

A containment levee is constructed to contain 1-1/3 (133%) of the storage tank contents in case of a release. The entire Station is surrounded by a six-foot high cyclone fence with a double gate suitable for vehicle entry on the east side and personnel entrance gates on the west and south sides.

2.6 Materials Stored or Used at the Facility

Engine lubricating oil is stored at the Station for use in the natural gas compressor engines. The engine oil is stored in the 500-gallon above ground storage tank.

2.7 Sources and Quantities of Effluent and Waste Solids

The two inlet separators and the compressor engines generate liquid condensate which is collected and transferred into a 2-inch diameter buried steel pipeline which then transfers the condensate into the two above ground steel tanks. The condensate accumulates at a rate of approximately 300-bbls per month. Once per month the compressor engines are washed using approximately 3-bbls of fresh water for washdown and rinsing. The compressor engines are mounted on skids which have angle iron around their bases and a small drain in the bottom of the skid. The wash water is collected by the drain located in the bottom of the compressor engine skid and is transferred to a concrete sump located between the two compressor engines. Fresh water for the washdown activities is provided by ARI Trucking, which obtains the water from the City of Loving's municipal water supply. Limited precipitation is received annually at the Station, however, any precipitation that falls on the compressor engine skids is transferred to the central sump and is also pumped out by ARI Trucking with the wash water.

2.8 Liquid and Solid Waste Collection/Storage/Disposal Procedures

The two inlet separators and the compressor engines generate liquid condensate which is collected and transferred into a 2-inch diameter buried steel pipeline which then transfers the condensate into the two above ground steel tanks. Scurlock-Permian picks up the condensate when the tanks are full and transports it to a tank farm in Loving, New Mexico.

ARI Trucking pumps out the sump and disposes of the collected fluids at an approved commercial surface waste management facility.

Used engine lubricating oil is changed every 30 days and is disposed of twice per year. The used engine lubricating oil is hauled for recycling from the Station by Brewer Oil of Carlsbad.

2.9 Proposed Modifications

UPR currently has plans to install one additional compressor engine at the Carrasco Compressor Station. The engine is a White Superior 8G-825 with approximately 825 horsepower. The compressor engine will be mounted on a skid with

angle iron curbing around the base and a small drain in the bottom of the skid leading to the sump. The approximate location of the proposed engine is shown on Plate 2.

2.10 Inspection, Maintenance, and Reporting

UPR personnel visit the Station daily and perform a visual inspection of the equipment. The daily visits are to observe any leaks in the separators, tanks, containment berms, or compressor engine skids.

2.11 Spill/Leak Prevention and Reporting

The compressor engines are mounted on skids which have collection sumps in the base of the skids. Wash water and precipitation are collected in the compressor engine skids and flow by gravity into the central collection sump where they are transferred by pumping into tanker trucks from ARI Trucking. The condensate liquids removed by the inlet separators and at the compressor engines are pumped directly into either the 210-bbl or 100-bbl storage tanks.

UPR monitors the Station daily and any potential discharges are observed and reported as part of the visit. Since the Station handles relatively small volumes of condensate removed from the natural gas during inlet separation and compression processes, any significant discharge would be limited to the overflow or failure of the above ground storage tanks. Any spills or leaks from the above ground storage tanks would be contained by the containment berm, which has a capacity 1-1/3 times the volume of the above ground storage tanks. UPR personnel strap the above ground storage tanks daily. Any minor or major discharge which is reportable under OCD Rule 116 would be reported to the OCD by the UPR Manager of Operations and if necessary, corrective action would be taken to remediate the spill. If a major release were to occur, initial corrective action would include the collection and removal of spilled liquids with a vacuum truck and disposal of the recovered liquids at the facility described in Section 2.8.

2.12 Site Characteristics

The Station is located on a level pad constructed of compacted caliche. The Station is located at an approximate ground surface elevation of approximately 3000 feet above mean sea level (MSL).

The nearest surface water feature is the Pecos River, located approximately 0.3 miles east of the Station.

Based on a review of the USGS Loving Quadrangle and a file review performed at the New Mexico State Engineers office in Santa Fe the following well information was obtained:

- Four irrigation or livestock watering wells are potentially located within 0.25-miles of the Station, depths to water or total well depths were not reported however, the depth to water is assumed to be less than 125 feet, based on depths to water reported in the vicinity but not within 0.25-miles of the Station.

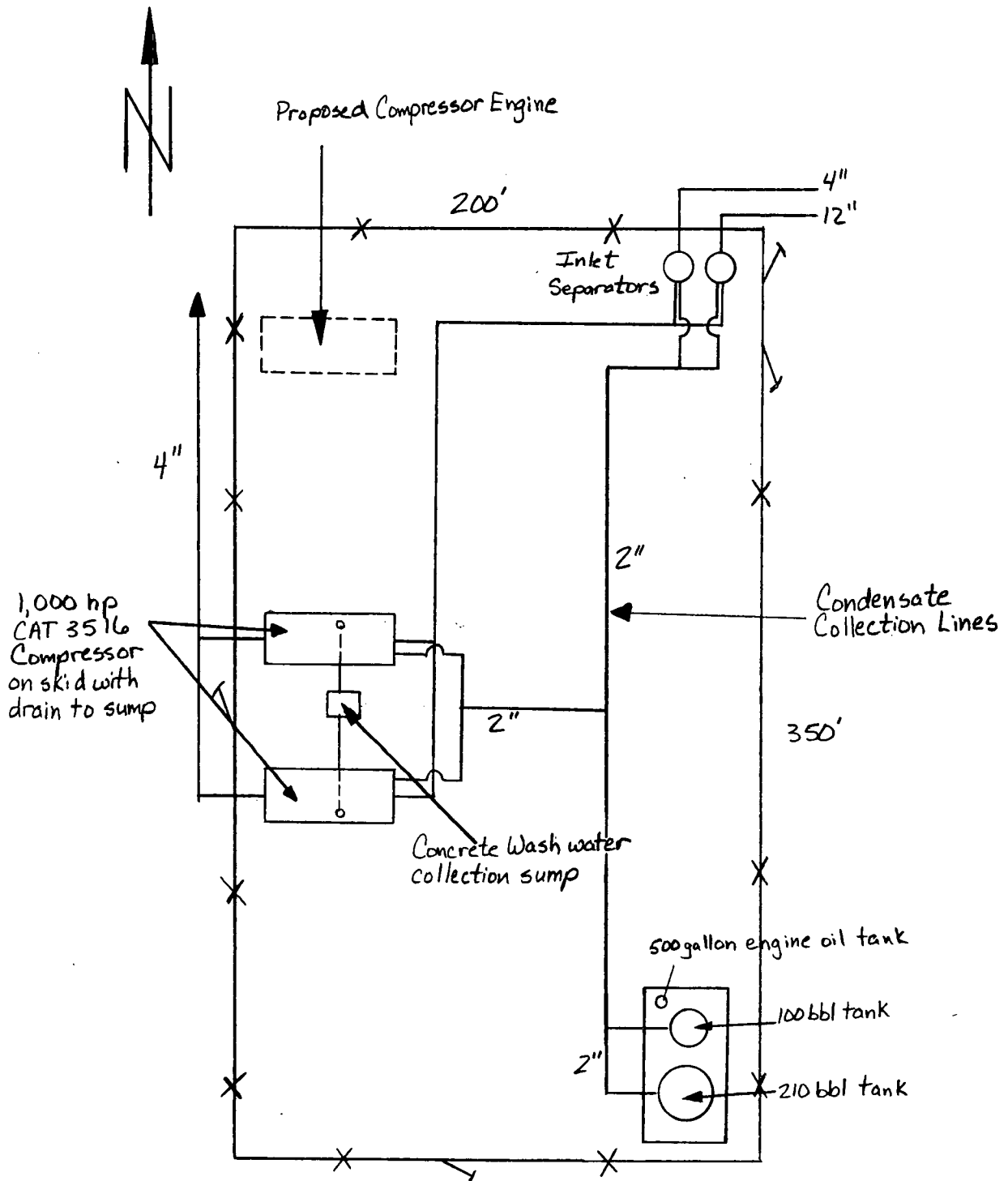
2.13 Other Compliance Information

The berms around the above ground storage tanks have a capacity of 1-1/3 of the liquids held in the storage tanks to prevent the release of liquids should a tank failure or overflow condition occur. UPR does not maintain or operate any underground process or storage tanks at this Station.

UPR will comply with the provisions of OCD Rule 116 for major and minor releases from the Station.

UPR has not prepared a closure plan for this facility at this time. UPR currently has no plans to discontinue operations at the Station. It has been UPR's experience that a comprehensive closure plan can be prepared at the time Station closure becomes necessary. This is a more cost effective and environmentally responsible process which allows for preliminary site visits by both UPR representatives and regulatory agency personnel to observe any potential impacts to the environment from the Station and to determine the extent of remedial actions, if any, which will be required to properly close the Station. UPR is committed to the protection of the environment and when necessary will follow accepted OCD Guidelines for Station closure, including submission of a closure plan prior to final Station closure.

PLATES



Harding Lawson Associates

Engineering and
Environmental Services
202 Central SE Suite 102
Albuquerque, New Mexico 87102

DRAWN LDS PROJECT NUMBER 39481-10

Site Plan

Carasco Compressor Station
Union Pacific Resources

PLATE

2

APPROVED

DATE
12/97

REVISED DATE

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 2/2/98

or cash received on _____ in the amount of \$ 100.00

from Union Pacific

for Carasco CS GW 137
CP-1 CS GW 139

Submitted by: _____ Date: _____

Submitted to ASD by: R. Clauda Date: 2/10/98

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

THE FACE OF THIS CHECK IS PRINTED IN RED AND BLUE INK ON WHITE PAPER



Union Pacific Resources Company
P. O. Box 7
Fort Worth, TX 76101

NationsBank of Georgia, N. A.
Atlanta, Dekalb County, Georgia

DATE
02/02/98

CHECK NO.

NET AMOUNT

*****100.00

PAY

ONE HUNDRED DOLLARS AND NO CENTS

OPERATING ACCOUNT 64-1278
NOT VALID AFTER 180 DAYS 611

TO THE
ORDER
OF

NMED-WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
2040 S PACHECO
SANTE FE, NM 87505

TREASURER

THE BACK OF THIS DOCUMENT CONTAINS A FACSIMILE WATERMARK - CAN BE VIEWED AT AN ANGLE

VENDOR NO. 515419

UNION PACIFIC RESOURCES COMPANY

CHECK NO. [REDACTED]

Any questions, please call UPR's Automated AP Inquiry System **1-800-370-9867**

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
02-AP-233 X7014 D BRO	CR515419A8 OKSHIRE		01/30/98	100.00	0.00	100.00
		TOTALS		100.00	0.00	100.00

Affidavit of Publication

State of New Mexico,
County of Eddy, ss.

Amy McKay

being first duly sworn, on oath says:

That she is Business Manager
of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the state wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

February 1, 1998
_____, 19____
_____, 19____
_____, 19____
_____, 19____
_____, 19____

That the cost of publication is \$ 65.20,
and that payment thereof has been made and will
be assessed as court costs.

Amy McKay
Subscribed and sworn to before me this

4th day of February, 1998

Donna Crump

My commission expires 8/1/98
Notary Public

OK MM
2-10-98

February 1, 1998

NOTICE OF PUBLICATION

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

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

(GW-137) - Union Pacific Resources, Karen Singletary, (817) 877-6764, 801 Cherry Street, Fort Worth, Texas 76102-6803, has submitted a discharge application for its previously approved discharge plan for the Carrasco Compressor Station located in the SE/4 NW/4 of Section 14, Township 23 South,

Range 28 East, NMPM, Eddy County, New Mexico. Approximately 4 gallons per day of wash down water is stored in an above ground steel tank prior to disposal at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-139) - Union Pacific Resources, Karen Singletary, (817) 877-6764, 801 Cherry Street, Fort Worth, Texas 76102-6803, has submitted a discharge application for its previously approved discharge plan for the CP-1 Compressor Station located in the NE/4 SE/4 of Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of wash down water is stored in an above ground steel tank prior to disposal at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

No 18212

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of January 1998.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION

KATHLEEN A. GARLAND,
Acting Director

NM State Energy, Mineral

505-827-7131

CARLSBAD CURRENT-ARGUS

620 South Main • P.O. Box 1629
Carlsbad, New Mexico 88220
(505) 887-5501

CLASSIFIED ADVERTISING INVOICE

START DATE	02/01/98	STOP DATE	02/01/98
NO. INSERTIONS	1	NO. LINES	146
CLASSIFICATION	100	AD NO.	235508

RETURN POSTAGE GUARANTEED

NM State Energy, Mineral
Oil Conservation Division
2040 South Pacheco St
Santa Fe
NM 87505

AMOUNT DUE

IF PAID AFTER

\$ 65.20

02/01/98

\$

YOUR AD READ:

FEBRUARY11998ND

PLEASE RETURN WITH YOUR REMITTANCE

ADNUM: 235508

STOP DAY: 02/01 100

02/01/98 65.20

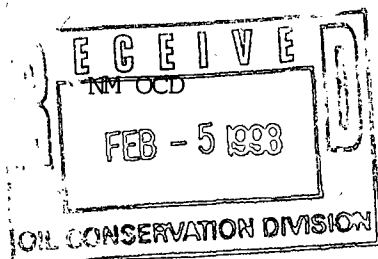
Thank You

First Notice

No.

The Santa Fe New Mexican

Since 1849 We Read You



AD NUMBER: 9293

ACCOUNT: 56689

LEGAL NO: 62954

P.O. #: 98-199-00257

214

LINES

ONCE

at

\$ 85.60

Affidavits:

5.25

Tax:

5.68

Total:

\$ 96.53

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper 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 # 62954 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 29 day of JANUARY 1998 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

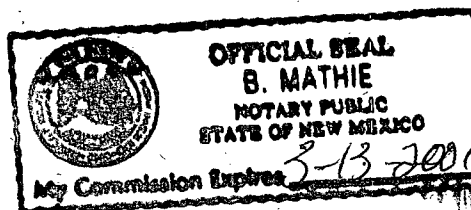
IS/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
29 day of JANUARY A.D., 1998

Notary

Commission Expires 3-13-2001



APPROVED SITE. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of January 1998.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
KATHLEEN A. GARLAND,
Acting Director
Legal #62954
Pub. January 29, 1998

NOTICE OF PUBLICATION

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

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(GW-137) - Union Pacific Resources, Karen Singletary, (817) 877-6764, 801 Cherry Street, Fort Worth, Texas 76102-6803, has submitted a discharge application for its previously approved discharge plan for the Carrasco Compressor Station located in the SE/4 NW/4 of Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 4 gallons per day of wash down is stored in an above ground steel tank prior to disposal at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-139) - Union Pacific Resources, Karen Singletary, (817) 877-6764, 801 Cherry Street, Fort Worth, Texas 76102-6803, has submitted a discharge application for its previously approved discharge plan for the CP-1 Compressor Station located in the NE/4 SE/4 of Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of wash down water is stored in an above ground steel tank prior to disposal at an OCD

P.O. Box 2048 • Santa Fe, New Mexico 87501

505-983-3303



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 26, 1998

Carlsbad Current Argus
Attention: Advertising Manager
Post Office Box 1629
Carlsbad, New Mexico 88221

Re: Notice of Publication

P 269 262 843

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Carlsbad Current</i>	
Street & Number <i>Argus</i>	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

(mark)

PS Form 3800, April 1995

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit in duplicate.
2. Statement of cost (also in duplicate).
3. Certified invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than February 2, 1998.

Sincerely,

Sally Martinez
Sally Martinez
Administrative Secretary

Attachment



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 26, 1998

THE NEW MEXICAN
202 E. Marcy
Santa Fe, New Mexico 87501

RE: NOTICE OF PUBLICATION

PO #96-199-002997

ATTN: Betsy Perner

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

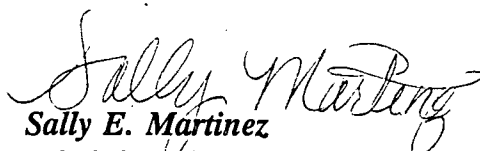
Immediately upon completion of publication, please send the following to this office:

1. *Publisher's affidavit.*
2. *Invoices for prompt payment.*

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice on Thursday, January 29, 1998

Sincerely,


Sally E. Martinez
Administrative Secretary

Attachment

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of January 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



KATHLEEN A. GARLAND, Acting Director

SEAL

NOTICE OF PUBLICATION

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

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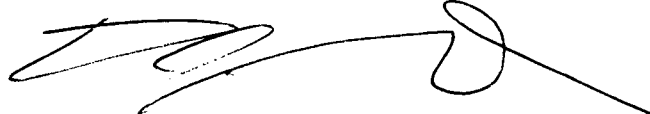
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of January 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



KATHLEEN A. GARLAND, Acting Director

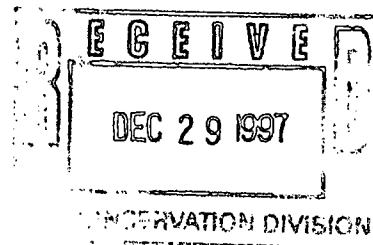
S E A L



December 22, 1997

FEDERAL EXPRESS

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



ATTN: Mr. William J. LeMay, Director

RE: Discharge Plan GW-137 Renewal (Carrasco Compressor Station)
Discharge Plan GW-139 Renewal (CP-1 Compressor Station)
Discharge Plan GW-138 Renewal (Trachta Compressor Station)

Dear Mr. LeMay:

This letter serves as notification of renewal for Discharge Plan GW-137 (Carrasco Booster Station) and Discharge Plan GW-139 (CP-1 Compressor Station). Both of these plans are due to expire on April 28, 1998. Further information will follow within 30 days.

Discharge Plan GW-138 (Trachta Compressor Station) will not be renewed. This facility was shutdown by a previous owner in late 1992 or early 1993. The compressor engine on the site was a rental and was returned to the owner. The tanks on site belonged to Bird Creek and are still in use. Union Pacific Resources just recently purchased this property and a file search will have to be conducted for more detailed information concerning the shutdown.

If any further information is required, please notify me at (817) 877-6764.

Sincerely,

Karen Singletary
Karen Singletary
Environmental Specialist
Environmental Services

cc: Mr. Jeffrey Minchak, Harding Lawson Associates, Albuquerque, NM

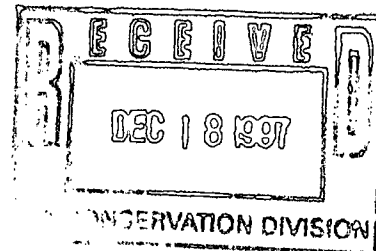
Fax Transmittal - 505-248-0021 Dec 22, 1997



December 17, 1997

FEDERAL EXPRESS

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



ATTN: Mr. William J. LeMay, Director

RE: Discharge Plan GW-137 Renewal (Carrasco Compressor Station)
Discharge Plan GW-139 Renewal (CP-1 Compressor Station)
Discharge Plan GW-138 Renewal (Trachta Compressor Station)

Dear Mr. LeMay,

At this time, I would like to request a 30 day extension on submitting the application for renewal for Discharge Plan GW-137 and Discharge Plan GW-139. Both of these plans are due to expire on April 28, 1998 and the renewal application is due December 28, 1998 (120 days prior to expiration). Union Pacific Resources just recently purchased these facilities.

Discharge Plan GW-138 for the Trachta Compressor Station will not be renewed. This facility has been shutdown. Based on information from Mr. Harley Temple, all equipment has been removed from the site and remediation has taken place.

If any further information is required, please notify me at (817) 877-6764.

Sincerely,

Karen Singletary
Karen Singletary
Environmental Specialist
Environmental Services

cc: Mr. Jeffrey Minchak, Harding Lawson Associates, Albuquerque, NM

FedEx. USA Airbill

FedEx
Tracking
Number

000632628930

0200

Form
I.D. No.

SLA22

Recipient's Copy

1 From **12/17/97**

Sender's Name **Karen Singletary** Phone **(817) 877-7014**

Company **UNION PACIFIC RESOURCES**

Address **801 CHERRY ST**

City **FORT WORTH** State **TX** ZIP **76102**

2 Your Internal Billing Reference Information **29-05925**

3 To Recipient's Name **William J. LeMay** Phone ()

Company **Oil Conservation Division**
New Mexico Energy, Minerals & Natural Resources

Address **2040 South Pacheco Street**
(To "HOLD" at FedEx location, print FedEx address here)

City **Santa Fe, NM 87505** State **NM** ZIP **87505**

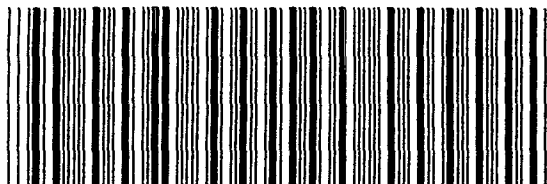
For HOLD at FedEx Location check here

☐ Hold Weekday
(Not available with
FedEx First Overnight)

☐ Hold Saturday
(Available for FedEx Priority Overnight
and FedEx 2Day only)

For Saturday Delivery check here

☐ (Extra Charge, Not available to all locations)
(Available for FedEx Priority Overnight
and FedEx 2Day only)



8 0 0 6 3 2 6 2 8 9 3 0

4a Express Package Service Packages under 150 lbs. Delivery commitment may be later in some areas.

☐ FedEx Priority Overnight (Next business morning) ☒ FedEx Standard Overnight (Next business afternoon) ☐ FedEx 2Day* (Second business day)

☐ FedEx Express Saver* (Third business day)

☐ FedEx First Overnight (Earliest next business morning delivery to select locations) (Higher rates apply) * FedEx Letter Rate not available. Minimum charge: One pound rate.

4b Express Freight Service Packages over 150 lbs. Delivery commitment may be later in some areas.

☐ FedEx Overnight Freight (Next business day) ☐ FedEx 2Day Freight (Second business day) ☐ FedEx Express Saver Freight (Up to 3 business days)

(Call for delivery schedule. See back for detailed descriptions of freight services.)

5 Packaging ☒ FedEx Letter (Declared value limit \$500) ☐ FedEx Pak ☐ FedEx Box ☐ FedEx Tube ☐ Other Pkg.

6 Special Handling

Does this shipment contain dangerous goods? ☐ Yes (As per attached Shipper's Declaration) ☐ Yes (Shipper's Declaration not required)

☐ Dry Ice (Dry Ice, 9, UN 1845 III) x kg. 904 CA ☐ Cargo Aircraft Only

7 Payment ☐ Obtain Recipient FedEx Account No.

Bill to: ☒ Sender (Account no. in section 1 will be billed) ☐ Recipient (Enter FedEx account no. or Credit Card no. below) ☐ Third Party ☐ Credit Card ☐ Cash/Check

Total Packages Total Weight Total Declared Value* Total Charges

\$.00 \$

* When declaring a value higher than \$100 per shipment, you pay an additional charge. See SERVICE CONDITIONS, DECLARED VALUE, AND LIMIT OF LIABILITY section for further information.

Credit Card Auth.

8 Release Signature

Your signature authorizes Federal Express to deliver this shipment without obtaining a signature and agrees to indemnify and hold harmless Federal Express from any resulting claims.

Questions?

Call 1-800-Go-FedEx (800)463-3339

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002789197 9

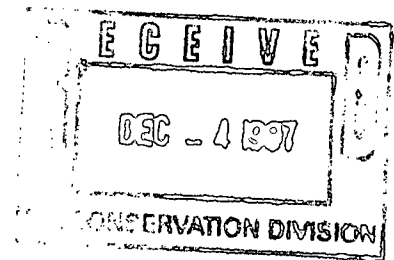
WCSL 0797
Rev. Date 5/97
Part #150364
©1994-97 FedEx
PRINTED IN U.S.A.



December 1, 1997

CERTIFIED MAIL
P 965 692 248

Mr. William J. LeMay, Director
Oil Conservation Division
New Mexico Energy and Minerals Department
2040 South Pacheco Street
Santa Fe, New Mexico 87505



RE: Discharge Plan GW-137
Discharge Plan GW-139
Discharge Plan GW-138
Discharge Plan GW-144

Dear Mr. LeMay:

This letter is a follow-up to a letter dated October 8, 1997 informing the Oil Conservation Division (OCD) that ownership of the Carlsbad Gas Plant had transferred from Highlands Gathering and Processing Company to Union Pacific Highlands Gathering and Processing Company (UPHGP). In that letter I failed to include the following:

Westall Compressor Station - Discharge Plan GW-144
Carrasco Compressor Station - Discharge Plan GW-137
CP-1 Compressor Station - Discharge Plan GW-139
Trachta Compressor Station - Discharge Plan GW-138

These facilities were transferred to UPHGP in a telephone conversation with Mr. Mark Ashley in late October. This letter is written confirmation that the transfer of these facilities was requested. The new contact person and responsible party for the affected facilities is:

Ms. Karen L. Singletary
Environmental Specialist
Union Pacific Resources Company
Environmental Services
P.O. Box 7, MS 2807
Fort Worth, Texas 76101-0007
(817) 877-6764 phone
(817) 877-6316 fax

I have received the renewal notices for three of these facilities and will be submitting applications in a timely manner. If you have any questions concerning this transfer of ownership or require further information, please contact me at (817) 877-6764. Thank You.

Sincerely,

Karen Singletary
Karen Singletary
Environmental Specialist

xc: Roger Anderson, Oil Conservation Division, Santa Fe, NM
CERTIFIED MAIL - P 965 692 249
Mark Ashley, Oil Conservation Division, Santa Fe, NM
CERTIFIED MAIL - P 965 692 250



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

October 28, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-988

Ms. Karen Singletary
Union Pacific Resources Company
P.O. Box 7, MS 2807
Fort Worth, Texas 76101-0007

**RE: Discharge Plan GW-137 Renewal
Carrasco Compressor Station
Eddy County, New Mexico**

Dear Ms. Singletary:

On April 28, 1993, the groundwater discharge plan, GW-137, for the Union Pacific Resources Company (Union) Carrasco Compressor Station located in the SE/4 NW/4 of Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulation 3106 and was approved pursuant to section 3109 for a period of five years. The approval will expire on April 28, 1998.

If the facility continues to have potential or actual effluent or leachate discharges and Union wishes to continue operations, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Union has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the Carrasco Compressor Station is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$690 for compressor stations. The \$50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single

Ms. Karen Singletary
October 28, 1997
Page 2

payment due at the time of approval, or in equal annual installments over the duration of the discharge plan with the first payment due the at the time of approval.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Artesia District Office. **Note that the completed and signed application form must be submitted with the discharge plan renewal request.** Copies of the WQCC regulations and discharge plan application form and guidelines have been enclosed. If Union requires additional copies of these items notify the OCD at (505) 827-7152. A complete copy of the regulations is also available on the OCD's website at www.emnrd.state.nm.us/ocd/.

If Union no longer have any actual or potential discharges and a discharge plan is not needed, please notify this office. If Union has any questions, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Artesia Office

P 288 258 988	
US Postal Service Receipt for Certified Mail No Insurance Coverage Provided. Do not use for International Mail (See reverse)	
Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800 April 1995

Highlands Gas Corporation

OIL CONSERVATION DIVISION
RECEIVED

'95 JAN 17 AM 8 52

5613 DTC Parkway, Suite 850
Englewood CO 80111
303 850-1827
303 850-1136 FAX

January 9, 1994

Director
Oil Conservation Division
2040 S. Pacheco Street
Santa Fe, NM 87505

CARRASCO CS

RE: Discharge Plans GW-69, GW-137, GW-138, GW-139, GW-144
Carlsbad Plant, Eddy County, New Mexico

Director:

By letter to your office dated December 15, 1994, Highlands Gas Corporation notified the Division of our purchase of the Carlsbad Gas Gathering and Processing Facility (Sec.10-T23S-R28E, Eddy County). Per our recent telephone conversation with Mr. Roger Anderson in your office, please allow this letter to serve as our notification to the Division that Highlands Gas Corporation has received the above referenced Discharge Plans from Continental Natural Gas and will abide by the Discharge Plans Terms and Conditions.

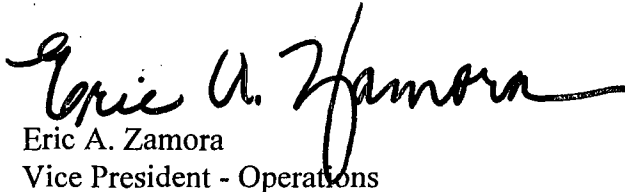
Highlands requests the Division to make the necessary changes to their records to recognize Highlands as the new operator of the Plant and Gathering Facilities and all appurtenances thereto.

All future notification should regarding the plant should be directed to Highlands at the above address.

Should you require any further information, filings or requirements from Highlands, please contact us at your convenience.

Sincerely,

HIGHLANDS GAS CORPORATION


Eric A. Zamora
Vice President - Operations

RECEIVED

GW-137

CNG PROPOSED DISCHARGE ~~PLAN 6 1998~~ ^{FEB 26 1998} PRASCO COMPRESSOR STATION
SECTION 14, T23S, R28E, EDDY COUNTY, NM
OIL CONSERVATION DIV.
SANTA FE

I. TYPE OF OPERATION

Three 750 hp compressors and two 400 hp compressors are used for gas compression. These units compress gas from various producers to enable the gas to enter CNG's gathering system.

II. OPERATOR

Continental Natural Gas, Inc.
1400 S. Boston, Suite 500
P.O. Box 21470
Tulsa, OK 74119

Field Address
260 Potash Mines Rd
P.O. Box 458
Loving, NM 88256

III. LOCATION OF DISCHARGE/FACILITY

SE 1/4 of NW 1/4 of Section 14, T23S, R28E, Eddy County
(Geological survey map attached)

IV. LANDOWNERS

Lionel Onsurez
P.O. Box 141
Loving, NM 88256

V. FACILITY DESCRIPTION

3 @ 750
2 @ 375
The compressor site is approximately 200' x 350' equipped with five compressors and two steel tanks (one 210 bbl and one 100 bbl). A containment levee is built to contain 133% of the combined tank capacities. Two gas separators and three oil tanks used for engine oil (one 500 gallon and two 300 gallon) are also located on site. The site is fenced with t-posts and three strands of barbed wire.

VI. SOURCES, QUANTITIES AND QUALITY OF EFFLUENT AND WASTE SOLIDS

The two separators and the compressor separators transfer condensate into a 2" buried steel line which transfers the condensate to the two steel tanks. Typical accumulation is 300 bbls per month.

VII. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS

The three larger units sit on a concrete pad built with containment curbing. The two smaller units sit on a caliche base pad. The smaller units are equipped with angle iron curbing around the skid perimeter.

The large units are washed once a month and the smaller units once every two months with approximately 3 barrels of fresh

water during each washing. B&E Trucking provides this fresh water from the City of Loving's water supply. Any accumulation of hydrocarbon and water resulting from either washes or storm water are directed into a concrete sump. The sump has a 6" floor and 6" walls. A small pump transfers any accumulation to the steel tanks. No below grade tanks are located on site.

A 12" buried steel pipeline operating at 400 psig provides the gas to the suction side of the larger compressors. The compressors discharge the gas through a 6" buried steel pipeline operating at 1000 psig. A 4" buried steel pipeline operating at 300 psig provides gas to the suction side of the smaller compressors. The compressors discharge the gas through the same 6" buried steel pipeline operating at 1000 psig. All pipelines have been pressure tested to 1.5 times the maximum allowable operating pressures.

disposal

VIII. EFFLUENT DISPOSAL

Enron Gas Liquids transports the condensate for CNG.

IX. INSPECTION, MAINTENANCE AND REPORTING

CNG personnel visit the site daily for visual inspection of any separator, tank, dike or compressor skid leaks.

X. SPILL/LEAK PREVENTION AND REPORTING

CNG monitors the site daily and would be able to detect any discharge. Any significant discharge would be limited to the overflow of the tank which is unlikely since the containment is oversized and company personnel strap the tanks daily.

If a significant leak were to occur, CNG's Manager of Operations would notify the OCD Director immediately.

XI. SITE CHARACTERISTICS

The compressor station is located on a level site. The soil type is predominantly caliche. For aquifer information, please reference the two local water wells located in the SW 1/4 of Section 10 (Mr. Kenneth Urquidez) and the one located in the NW 1/4 of Section 15 (Mr. Lawrence Nymyer).

XII. ADDITIONAL INFORMATION

CNG operates the Carlsbad Gas Plant located in the SW 1/4 of Section 10, T23S, R28E under discharge plan, GW-69. Mr. Roger Anderson has made a site inspection during the early part of last year. Please consult the existing permit for any additional information regarding soil and water tests.

(CARRASCO)



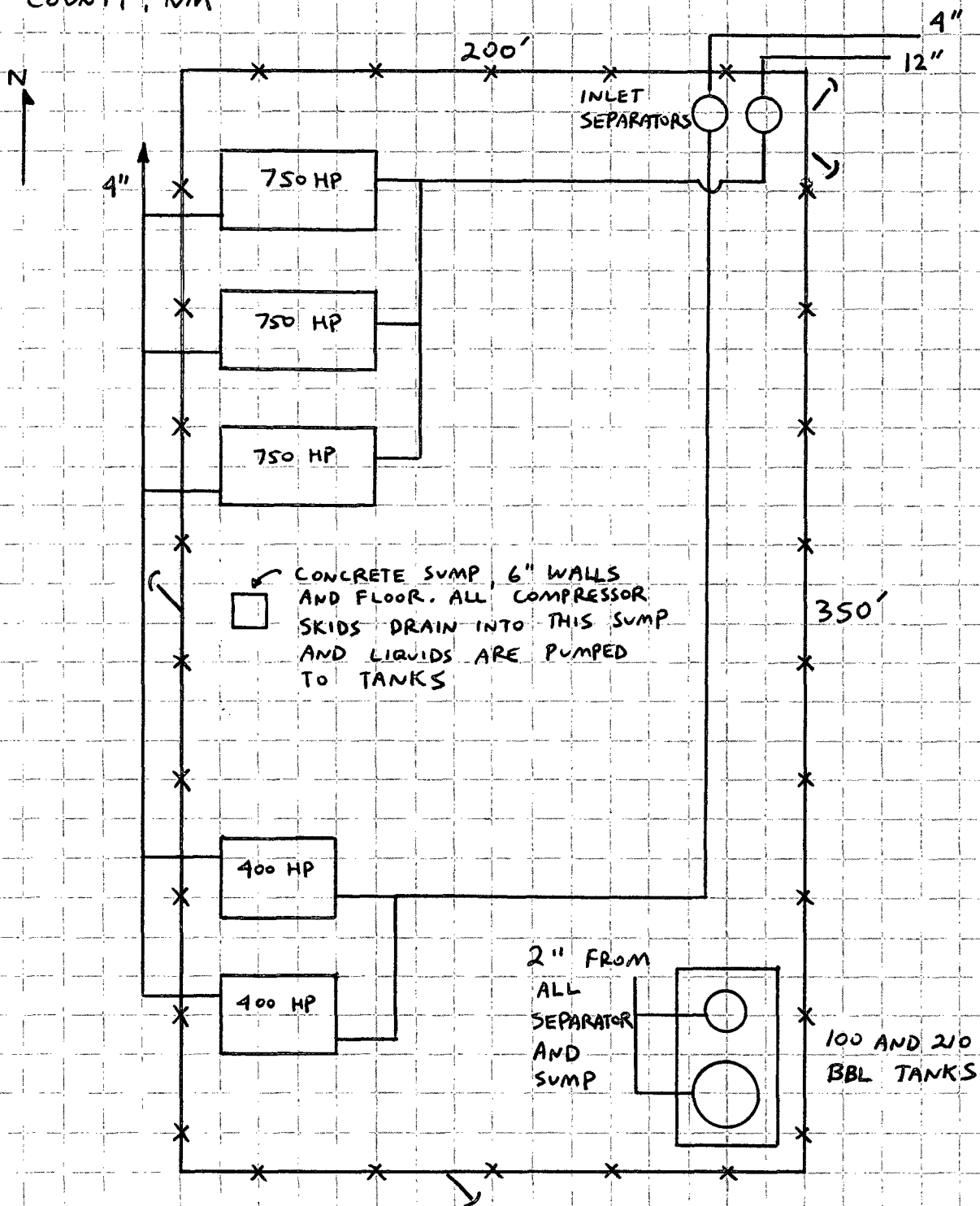
BISHOP

FOR CARRASCO STATION

ENGINEERING AND CONSTRUCTION SERVICES

PAGE 2-23-93
DATE WCC
BY

SEC. 14 - T23S - R28E
EDDY COUNTY, NM



VENDOR: State of New Mexico

CONTINENTAL NATURAL GAS, INC.

CHECK NO.

OUR REF. NO.	YOUR INV. NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
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Carroasco Station Application Fee

\$50.00 ✓



CONTINENTAL NATURAL GAS, INC.

1400 Boston Building
1412 So. Boston, Suite 500
Tulsa, Oklahoma 74119

Fifty dollars and 00/100 ✓

CHRISTIANIA BANK

1-392/260

NEW YORK BRANCH
630 Fifth Avenue
New York, New York 10111

CHECK NO.	CHECK DATE	VENDOR NO.
-----------	------------	------------

2-23-93

CHECK AMOUNT

50.00 ✓

PAY
TO THE
ORDER OF

State of New Mexico ✓
Oil Conservation Division
State Land Office Building
PO Box 2088
Santa Fe, NM 87504 ✓

NON - NEGOTIABLE

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time
2:10 pm

Date
3-15-93

Originating Party

Other Parties

WAYNE CHANG

C. EUSTICE (OCD)

CONTINENTAL NAT. GAS (CNG)

Subject

PROPOSED DISCHARGE PLANS FOR CP-1, CARRASCO, TRACHTA
COMPRESSOR STATIONS

Discussion

I had tried to contact Wayne earlier to ask what CNG planned to do with their washdown water because it was not stated in the submitted plan and the (OCD) needed this info for issuance of Public Notice.

WAYNE called me back stating CNG's intention to take the washdown water to Dakota Resources' BIG EDDY 100 SWD, hauled there by B&E.

Conclusions or Agreements

I told Wayne I would incorporate this into the proposed plans

Distribution

Signed

C. Eustice

RECEIVED

CNG PROPOSED DISCHARGE PLAN - CARRASCO COMPRESSOR STATION
SECTION 14, T23S, R28E, EDDY COUNTY, NM

FEB 26 1993

OIL CONSERVATION DIV.

I. SAMPLE OF OPERATION

Three 750 hp compressors and two 400 hp compressors are used for gas compression. These units compress gas from various producers to enable the gas to enter CNG's gathering system.

II. OPERATOR

Continental Natural Gas, Inc.
1400 S. Boston, Suite 500
P.O. Box 21470
Tulsa, OK 74119

Field Address
260 Potash Mines Rd
P.O. Box 458
Loving, NM 88256

III. LOCATION OF DISCHARGE/FACILITY

SE 1/4 of NW 1/4 of Section 14, T23S, R28E, Eddy County
(Geological survey map attached)

IV. LANDOWNERS

Lionel Onsurez
P.O. Box 141
Loving, NM 88256

V. FACILITY DESCRIPTION

The compressor site is approximately 200' x 350' equipped with five compressors and two steel tanks (one 210 bbl and one 100 bbl). A containment levee is built to contain 133% of the combined tank capacities. Two gas separators and three oil tanks used for engine oil (one 500 gallon and two 300 gallon) are also located on site. The site is fenced with t-posts and three strands of barbed wire.

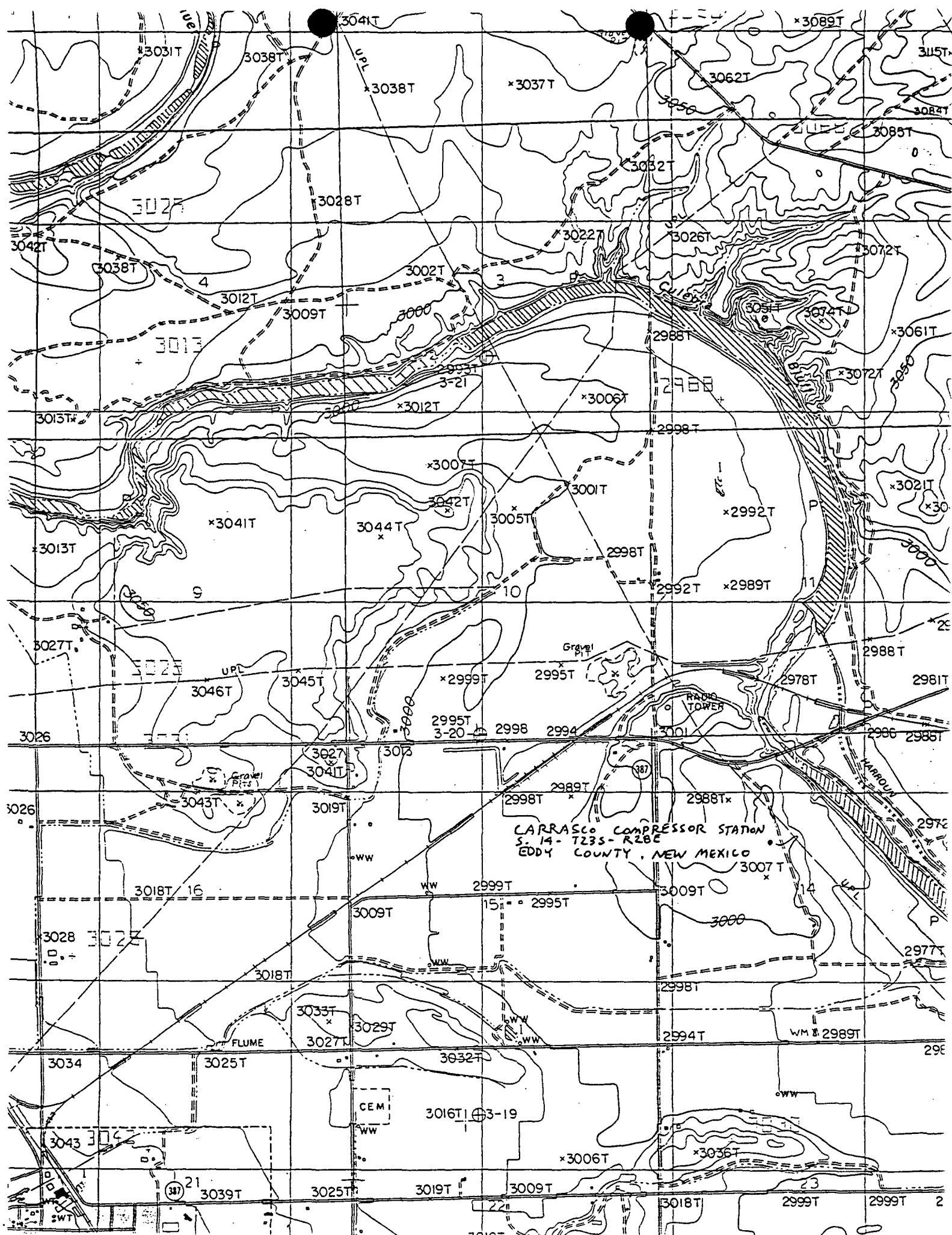
VI. SOURCES, QUANTITIES AND QUALITY OF EFFLUENT AND WASTE SOLIDS

The two separators and the compressor separators transfer condensate into a 2" buried steel line which transfers the condensate to the two steel tanks. Typical accumulation is 300 bbls per month.

VII. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS

The three larger units sit on a concrete pad built with containment curbing. The two smaller units sit on a caliche base pad. The smaller units are equipped with angle iron curbing around the skid perimeter.

The large units are washed once a month and the smaller units once every two months with approximately 3 barrels of fresh



BISHOP

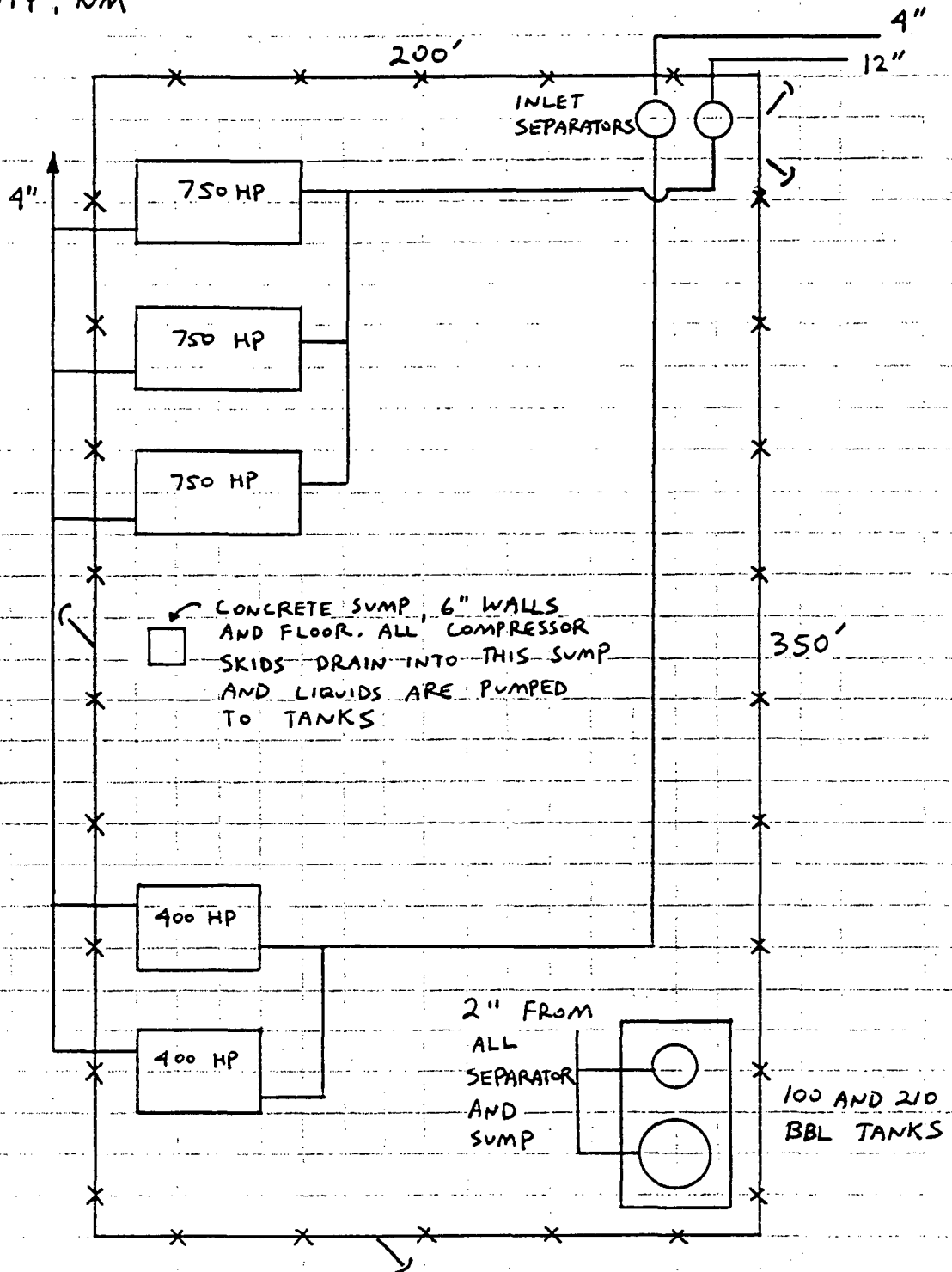
FOR CARRASCO STATION

SEC. 14 - T23S - R28E

EDDY COUNTY, NM

ENGINEERING AND CONSTRUCTION SERVICES

PAGE _____
DATE 2-23-93
BY WCC



ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 1-19-95,

or cash received on _____ in the amount of \$ 1104⁰⁰

from Continental Natural Gas, Inc.

for GW-137 CARRASCO COMPRESSOR STATION

Submitted by: _____ (Facility Name) Date: _____ (DP No.)

Submitted to ASD by: Chris Eustice Date: 2-15-95

Received in ASD by: Carlton F. Asabold Date: 2/15/95

Filing Fee _____ New Facility ☒ Renewal _____

Modification _____ Other _____ (specify)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____



CONTINENTAL NATURAL GAS, INC.

1400 Boston Building
1412 So. Boston, Suite 500
Tulsa, Oklahoma 74119

CHRISTIANIA BANK
NEW YORK BRANCH
630 Fifth Avenue
New York, New York 10111

1-392/260 [REDACTED]

CHECK DATE	CHECK NUMBER
1-19-95	[REDACTED]

AMOUNT
\$1,104.00

ONE THOUSAND ONE HUNDRED FOUR DOLLARS AND 00/100

NMED-WATER QUALITY MANAGEMENT
P.O. BOX 2088
SANTA FE, NM 87504

ORDER
OF

[Handwritten signature]

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



January 9, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-085

Mr. Wayne Chang
Operations Manager
Continental Natural Gas Inc.
P.O. Box 21470
Tulsa, Oklahoma 74119

Re: Discharge Plan (GW-144)
Carrasco Compressor Station
Eddy County, New Mexico

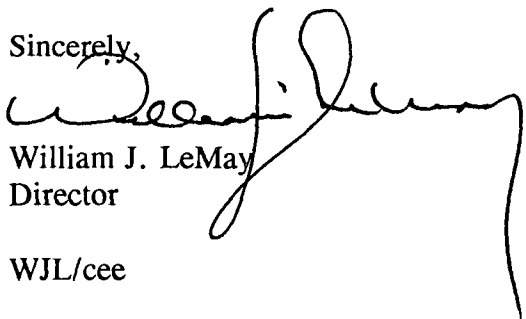
Dear Mr. Chang:

A review of the file for discharge plan GW-137 for the Continental Natural Gas Inc. Carrasco Compressor Station located in the SE/4 NW/4, Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico has revealed that the 1994 incremental installment for the payment of the April, 1993 discharge plan flat fee has not been submitted to the Oil Conservation Division (OCD). These fees were due in April, 1994 and were not received.

In order to be in compliance with Water Quality Control Commission (WQCC) Regulation 3-114 B.6, please remit the remaining balance in full to the OCD immediately. The remaining balance on the flat fee for the above referenced facility is one thousand four dollars (\$1104.00). All checks should be made payable to: NMED-WATER QUALITY MANAGEMENT and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please contact Chris Eustice (505) 827-7153.

Sincerely,


William J. LeMay
Director

WJL/cee

VILLAGRA BUILDING - 408 Gallisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7485

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 5/4/93,
or cash received on 5/7/93 in the amount of \$ 276.00
from Continental Natural Gas, Inc.
for Carrasco Compressor Station GW-137
(Facility Name) (OP No.)

Submitted by: _____ Date: _____
Submitted to ASD by: Kathy Brown Date: 5/7/93
Received in ASD by: Ange Moore Date: 5/7/93

Filing Fee _____ New Facility X Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment X-1
#1 of 5; #276 of #1380



CONTINENTAL NATURAL GAS, INC.

1400 Boston Building
1412 So. Boston, Suite 500
Tulsa, Oklahoma 74119

CHRISTIANIA BANK
NEW YORK BRANCH
630 Fifth Avenue
New York, New York 10111

1-392/260

CHECK NO.	CHECK DATE	VENDOR NO.
-----------	------------	------------

5-4-93

CHECK AMOUNT

276.00

Two hundred seventy-six dollars and 00/100

State of New Mexico
Energy, Minerals, & Natural Resources
PO Box 2088
State Land Office Bldg
Santa Fe, NM 87504

AY
O THE
ORDER OF

2204
0849



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

1993 MAY 5 AM 8 45
DRUG FREE

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

April 28, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-196

Check
276,00

Mr. Wayne Chang
Operations Manager
Continental Natural Gas Inc.
P.O. Box 21470
Tulsa, Oklahoma 74119

Re: Discharge Plan (GW-137)
Carrasco Compressor Station
Eddy County, New Mexico

Dear Mr. Chang:

The groundwater discharge plan GW-137 for the Continental Natural Gas Inc. Carrasco Compressor Station located in the SE/4, NW/4, Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated February 26, 1993.

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

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

Please note that section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase,

Mr. Wayne Chang
April 28, 1993
Page 2

or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire April 28, 1998 and you should submit an application for renewal in ample time before that date.

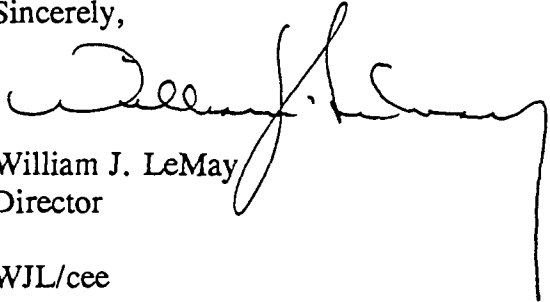
The discharge plan application for the Continental Natural Gas Inc. Carrasco Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen-hundred eighty (1380) dollars for compressor facilities of 3000 horsepower.

The OCD has received your \$50 filing fee. The flat fee for an approved discharge plan 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.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

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

Sincerely,



William J. LeMay
Director

WJL/cee
Attachment

xc: OCD Artesia Office

VENDOR: State of New Mexico

CONTINENTAL NATURAL GAS, INC.

CHECK NO.

OUR REF. NO.	YOUR INV. NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
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Groundwater Discharge Plan
Carrasco Compressor Station
SE/4, NW/4, Sec. 14, T23S, R28E,
NMPM Eddy County, NM
1st of 5 payments

\$276.00



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time
4:05 pm

Date
4-27-93

Originating Party

CHRIS EUSTICE

Other Parties

WAYNE CHANG

CONTINENTAL NATURAL GAS

Subject

CARRASCO C.S. (GW-137)

Discussion

DISCHARGE PLAN APPLICATION FOR CARRASCO C.S. (GW-137)
DID NOT SPECIFICALLY STATE THE HORSEPOWER OF
THE FACILITY

Conclusions or Agreements

WAYNE TOLD ME 3 COMPRESSOR WILL BE
750 HP and TWO WILL BE 375 HP
COMBINED HORSEPOWER WILL BE 3000.

Distribution

Signed

Chris Eustice

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

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

(GW-137) Continental Natural Gas Inc., Wayne Chang, Operations Manager, PO Box 21470, Tulsa, Oklahoma 74119, has submitted a discharge plan application for their Carrasco Compressor Station located in the SE/4 NW/4, Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 4 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-109) Continental Natural Gas Inc., Wayne Chang, Operations Manager, PO Box 21470, Tulsa, Oklahoma 74119 has submitted a discharge application for their Trachta Compressor Station located in the NW/4 SW/4 Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of washdown water with total dissolved solids concentration of 1100 mg/l is stored in above ground steel tanks prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-139) Continental Natural Gas Inc., Wayne Chang, Operations Manager, PO Box 21470, Tulsa, Oklahoma 74119 has submitted a discharge plan application for their CP-1 Compressor Station located in the NE/4 SE/4 Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of washdown water with total dissolved solids concentrations of 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-141) - Parker & Parsley Gas Processing, Lonnie DeLay, Engineering Manager, 600 W. Illinois, Midland, Texas 79701, has submitted a discharge plan application for their Loving Gas Processing plant located in the S/2 NE/4 Section 3, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 210 gallons per day of produced water will be stored in above ground steel tanks prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 18' with a total dissolved solids concentration of approximately 2850 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit the Director of

STATE OF NEW MEXICO
County of Bernalillo

OIL CONSERVATION DIVISION
RECEIVED

'93 MAR 31 AM 9:20

Dianne Berglund being duly sworn declares and says that she is National Advertising Sales Supervisor of the **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for.....1.....times, the first publication being on the.....26.....day

of.....Mar....., 1993, and the subsequent consecutive

publications on....., 1993.

Dianne Berglund

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this.....26.....day of.....Mar....., 1993.

PRICE.....

\$ 44.57

Statement to come at end of month.

ACCOUNT NUMBER.....C81184.....

CLA-22-A (R-1/93)

Bernadette Ortiz
NOTARY PUBLIC
STATE OF NEW MEXICO
12-18-93



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

March 31, 1993

GW 93011

Mr. William J. LeMay
New Mexico Energy, Minerals, and
Natural Resources Department
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. LeMay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on March 19, 1993, regarding the Oil Conservation Division (OCD) discharge plan applications submitted by Christie Gas Corporation and El Paso Natural Gas Company on fish, and wildlife resources in New Mexico.

The Service has the following comments on the issuance of the following discharge permits:

GW-137 Continental Natural Gas Inc., Carrasco Compressor Station located in the SE/4, NW/4, Section 14, T23S, R28E, NMPM, Eddy County, New Mexico. Approximately 4 gallons per day of washdown water will be stored in an above ground steel tank prior to transport to an OCD approved Class II injection well for disposal.

GW-138 Continental Natural Gas Inc., Trachta Compressor Station located in the NW/4, SW/4 Section 14, T23S, R28E, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of washdown water will be stored in above ground steel tanks prior to transport to an OCD approved Class II injection well for disposal.

GW-139 Continental Natural Gas Inc., CP-1 Compressor Station located in the NE/4, SE/4, Section 15, T23S, R28E, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of washdown water will be stored in an above ground steel tank prior to transport to an OCD approved Class II injection well for disposal.

GW-141 Parker & Parsley Gas Processing, Loving Gas Processing Plant located in the S2 NE/4, Section 3 T24S, R28E, NMPM Eddy County, New Mexico. Approximately 210 gallons per day of produced water will be stored in above ground steel tanks prior

Mr. William J. LeMay

2

to transport to an OCD approved Class II injection well for disposal.

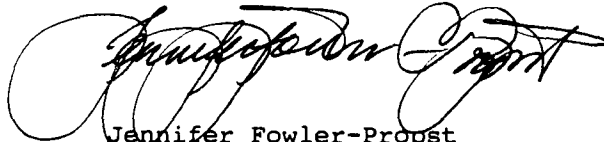
Natural gas pipeline condensates contain many organic constituents including benzene, C1 to C5 alkylated benzenes, toluene, and/or polychlorinated bi-phenyls (PCBs) which may be incorporated into the condensate through some compressor lubricants. The Service is concerned that the process waste water may contain any or all of these organic constituents and that accidental spills could result in potential toxicity to Department of the Interior Trust Resources over time.

The above ground steel tanks capacities should be able to contain all the water produced during periods of inclement weather when it is not possible to drain the tank on a regular schedule. The tanks should also exhibit strong corrosion resistance to those fluids the tank will store. The tanks should be exposed entirely to visually detect leaks. If leaks are detected surface soil monitoring should be implemented and runoff prevention measures should be installed thereby preventing toxic constituents reaching streams, or the Pecos and Black Rivers. The permit requests also did not disclose whether the tanks were completely closed. If the top is open, the tank should be netted so as to not present a potential threat to endangered species or to migratory birds that may be found in the area.

The Class II disposal wells should be equipped with a leak detection sumps and groundwater monitoring wells. Inspection should be done on a routine basis at a minimum of once every thirty days. A surface soil monitoring program should also be implemented.

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,



Jennifer Fowler-Propst
Field Supervisor

cc:

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

Affidavit of Publication

No. 14255

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication March 25, 1993

Second Publication _____

Third Publication _____

Fourth Publication _____

Subscribed and sworn to before me this 25th day of March 19 93

Barbara Ann Beane

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Pub

(GW-141) - Parker & Parole Gas Processing, Lennie Delay, Engineering Manager, 600 W. Illinois, Midland, Texas 79701, has submitted a discharge plan application for their Loving Gas Processing plant located in the S/2 NE/4 Section 3, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 210 gallons per day of produced water will be stored in above ground steel tanks prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 18' with a total dissolved solids concentration of approximately 2950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing. GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 17th day of March, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY
Director

SEAL
Published in the Artesia Daily Press, Artesia, N.M. March 25, 1993.

LEGAL NOTICE

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

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

(GW-137) - Continental Natural Gas Inc., Wayne Chang, Operations Manager, P.O. Box 21470, Tulsa, Oklahoma 74119, has submitted a discharge plan application for their Carrasco Compressor Station located in the SE/4 NW/4, Section 14, Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico.

NOTICE OF PUBLICATION

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

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

(GW-137) - Continental Natural Gas Inc., Wayne Chang, Operations Manager, P.O. Box 21470, Tulsa, Oklahoma 74119, has submitted a discharge plan application for their Carrasco Compressor Station located in the SE/4 NW/4, Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 4 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentrations of approximately 5000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-138) - Continental Natural Gas Inc., Wayne Chang, Operations Manager, P.O. Box 21470, Tulsa, Oklahoma 74119, has submitted a discharge application for their Trachta Compressor Station located in the NW/4 SW/4 Section 14, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of washdown water with total dissolved solids concentration of 1100 mg/l is stored in above ground steel tanks prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-139) - Continental Natural Gas Inc., Wayne Chang, Operations Manager, P.O. Box 21470, Tulsa, Oklahoma 74119 has submitted a discharge plan application for their CP-1 Compressor Station located in the NE/4 SE/4 Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 2 gallons per day of washdown water with total dissolved solids concentrations of 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-141) - Parker & Parsley Gas Processing, Lonnie DeLay, Engineering Manager, 600 W. Illinois, Midland, Texas 79701, has submitted a discharge plan application for their Loving Gas Processing Plant located in the S/2 NE/4 Section 3, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 210 gallons per day of produced water will be stored in above ground steel tanks prior to transport to an OCD approved Class II injection well for disposal. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 18' with a total dissolved solids concentration of approximately 2950 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 17th day of March, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

William J. Lemay
WILLIAM J. LEMAY,
Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 2/23/93,
or cash received on 2/26/93 in the amount of \$ 50.00
from Continental Natural Gas Inc.
for Carroasco Compressor Station GW-137
(Facility Name) (DP No.)

Submitted by: _____ Date: _____
Submitted to ASD by: Kathy Brown Date: 2/26/93
Received in ASD by: A. Alere Date: 2/26/93

Filing Fee ☒ New Facility _____ Renewal _____
Modification _____ Other _____
(specify)

Organization Code 52107 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____



CONTINENTAL NATURAL GAS, INC.

1400 Boston Building
1412 So. Boston, Suite 500
Tulsa, Oklahoma 74119

CHRISTIANIA BANK
NEW YORK BRANCH
630 Fifth Avenue
New York, New York 10111

1-392/280

CHECK NO.	CHECK DATE	VENDOR NO.
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2-23-93

CHECK AMOUNT

50.00

Fifty dollars and 00/100

State of New Mexico
Oil Conservation Division
State Land Office Building
PO Box 2088
Santa Fe, NM 87504

Meloy
9-28-93

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RDER OF

CHECK NO.

VENDOR: State of New Mexico

CONTINENTAL NATURAL GAS, INC.

OUR REF. NO.	YOUR INV. NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
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Carroasco Station Application Fee

\$50.00

CONTINENTAL NATURAL GAS, INC.

February 23, 1993

Mr. William J. LeMay
State of New Mexico
Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, NM 87504

Dear Mr. LeMay:

Continental Natural Gas, Inc. (CNG) respectfully submits the following groundwater discharge plan applications for the following compressor stations in Eddy County, New Mexico:

- o Carrasco Station - NW 1/4 of Section 14, T23S, R28E
- o Trachta Station - SW 1/4 of Section 14, T23S, R28E
- o CP-1 Station - SE 1/4 of Section 15, T23S, R28E

Enclosed are three (3) application fees in the amount of \$50 for each station. I have spoken to Mr. Roger Anderson regarding the applications. Please call me if you have any questions or require additional information. Thanks for your assistance.

Sincerely,

CONTINENTAL NATURAL GAS, INC.



Wayne C. Chang
Operations Manager

enclosures
wcc.513

cc: R. Anderson, OCD
T. Spencer
H. Temple

CONTINENTAL NATURAL GAS, INC.

OIL CONSERVATION DIVISION
RECEIVED

FEB 24 AM 9 34

February 24, 1993

Mr. William J. LeMay
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
State Land Office Building
P.O. Box 2088
Santa Fe, NM 87504

Dear Mr. LeMay:

Attached are three (3) applications as per the attached letter. By mistake the application fees left our office via Express Mail on February 23, 1993 without the applications. I have attached a copy of the checks for your convenience. If you have any questions please feel free to contact me at (918) 582-4700. Thank you for your time and consideration in this matter.

Sincerely,

CONTINENTAL NATURAL GAS, INC.



Cassondra Wynn
Secretary - Operations