

GW - 139

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2007-1993

Chavez, Carl J, EMNRD

To: Chavez, Carl J, EMNRD  
Cc: Price, Wayne, EMNRD  
Subject: Duke Energy Field Services- Note to File

On January 4, 2007, Wayne Price and Carl Chavez of the Oil Conservation Division (OCD) contacted Ruth Lang of Duke Energy Field Services at (303) 605-1713 and left a phone message regarding the large number of expired facilities (see attachment) where the discharge plan was not renewed within 120 or in advance of their expiration. Wayne Price referred to Ms. Lang's December 2, 2006 e-mail message regarding "Duke Energy Field Services Expired Discharge Plan Facilities."

Mr. Price informed Ms. Lang that all discharge plan renewal applications need to be submitted to the OCD for review by March 1, 2007. In addition, she was informed that the OCD will be issuing an Notice of Violation for neglecting to renew its discharge plan permits with the OCD.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJChavez@state.nm.us](mailto:CarlJChavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>  
(Pollution Prevention Guidance is under "Publications")

1/5/2007

Permit ID	Facility	Company	Status	Expired	Contact	phone	e-mail	Comments
150	Pure Gold "28" CS	Duke	A	11/22/03	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
162	Antelope Ridge Gas Plant	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
167	Malaga CS	Duke	A	7/25/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
311	Cotton Draw CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
316	Hat Mesa CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
176	Boot Leg CS	Duke	A	1/20/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
227	Lee CS	Duke	I	12/28/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Submitted correspondence to Ben Stone during meeting in Sept. 2006
168	Feagen Booster Station	Duke	I	12/27/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 2/1/05
177	Maljamar CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
178	Wonton CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
24	Avalon Gas Plant	Duke	A	9/18/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
163	Apex CS	Duke	A	4/29/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
175	Hobbs Gas Process Plant	Duke	A	1/9/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
16	Eunice Gas Plant	Duke	A	4/25/09	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
139	CP-1 CS	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 10/15/03
42	Indian Hills Gas Plant	Duke	I	4/6/2002	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Dismantled



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor  
Joanna Prukop  
Cabinet Secretary

October 15, 2003

Lori Wrotenbery  
Director  
Oil Conservation Division

Mr. Stephen Weathers  
Duke Energy Field Services  
P.O. Box 5493  
Denver, Colorado 80217

**RE: Closure Approval  
CP-1 Compressor Station GW-139  
Duke Energy Field Services**

Dear Mr. Weathers:

The New Mexico Oil Conservation Division (OCD) received the Soil Assessment and Closure Report 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. The closure report, dated October 2, 2003, was submitted by your consultant, BNC Environmental Services, Inc. on behalf of Duke Energy Field Services. **Based upon the information provided in the Soil Assessment and Closure Report the site is hereby approved for closure.**

This OCD decision does not relieve Duke Energy Field Services of liability should operation of the pipeline result in contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve Duke Energy Field Services of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions regarding this matter feel free to call me at (505)-476-3489.

Sincerely,

W. Jack Ford, C.P.G.  
Environmental Engineer  
Environmental Bureau, OCD

cc: OCD Artesia District Office

October 8, 2003

Mr. Jack Ford  
New Mexico Oil Conservation Division  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505

**RE: Soil Assessment and Closure Report  
Duke Energy Field Services  
CP-1 Compressor Station (GW-139)  
Eddy County, New Mexico**

Dear Mr. Ford:

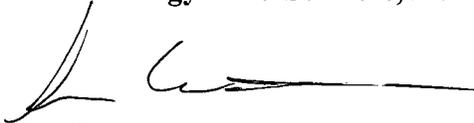
Duke Energy Field Services, LP (DEFS) is pleased to submit for your review, one copy of the Soil Assessment and Closure Report for the DEFS CP-1 Compressor Station.

Based on the results of the closure activities, DEFS would like to request no further action for this site.

If you have any questions regarding the above mentioned closure report, please call me at 303-605-1718.

Sincerely

**Duke Energy Field Services, LP**



Stephen Weathers  
Sr. Environmental Specialist

Enclosure

cc: Mike Stubblefield, OCD Artesia District  
Environmental Files



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

April 28, 2003

**Lori Wrotenbery**

Director

**Oil Conservation Division**

Mr. Stephen Weathers  
Duke Energy Field Services  
P.O. Box 5493  
Denver, Colorado 80217

**RE: Closure Work Plan  
C-1 Compressor Station  
Duke Energy Field Services  
Eddy County, New Mexico**

Dear Mr. Weathers:

The New Mexico Oil Conservation Division (OCD) received the Closure Plan for the C-1 Compressor Station located in NE/4 SE/4 of Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. The workplan, dated April 11, 2003, was submitted by your consultant, BNC Environmental Services, Inc. on behalf of Duke Energy Field Services. **The Closure plan is hereby approved, with the following conditions:**

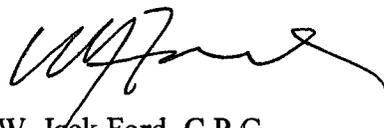
- A notification will be provided to Mr. Stubblefield at least 48 hours prior to commencement of work.
- All of the items listed in the workplan, dated April 11, 2003, from BNC Environmental Services, Inc. on behalf of Duke Energy Field Services shall be adhered with during the closure process.
- Upon completion of the project a final report for the closure of the C-1 Compressor Station shall be submitted to the Santa Fe OCD office for approval within 30 days of final closure.

Note, that OCD approval does not limit Duke Energy Field Services to the work proposed should it later be found that contamination exists which is beyond the scope of this plan, or if Duke Energy Field Services has failed to completely define the extent of contamination. In addition, OCD approval does not relieve Duke Energy Field Services of responsibility for compliance with any other Federal, State, or other Local Laws and Regulations.

Mr. Stephen Weathers  
Duke Energy Field Services  
April 28, 2003  
Page 2

If you have any questions regarding this matter feel free to call me at (505)-476-3489.

Sincerely,



W. Jack Ford, C.P.G.  
Environmental Engineer  
Environmental Bureau, OCD

cc: OCD Artesia District Office  
Mr. Thomas C. Larson, BNC Environmental Services, Inc.



P.O. Box 5493  
Denver, Colorado 80217  
370 17th Street, Suite 900  
Denver, Colorado 80202  
303 595-3331  
Fax: 303 595-0480

April 15, 2003

Mr. Jack Ford  
New Mexico Oil Conservation Division  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505

RECEIVED  
APR 18 2003  
Environmental Bureau  
Oil Conservation Division

**RE: Duke Energy Field Services  
CP-1 Compressor Station (GW-139)  
Eddy County, New Mexico**

Dear Mr. Ford:

Per your letter dated January 13, 2003, Duke Energy Field Services, LP (DEFS) is pleased to submit for your review, two copies of the closure workplan for DEFS CP-1 Compressor Station. The closure workplan was developed as required under Item 14 Attachment of Conditions for the Discharge Permit approved March 2, 1998.

Upon your approval, DEFS will implement the workplan and submit a closure report upon completion of all activities.

If you have any questions regarding the above mentioned workplan, please call me at 303-605-1718.

Sincerely

**Duke Energy Field Services, LP**

A handwritten signature in black ink, appearing to read 'Stephen Weathers', written over a horizontal line.

Stephen Weathers  
Sr. Environmental Specialist

Enclosure

cc: OCD, Artesia District (1 copy)  
Environmental Files



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

January 13, 2003

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 3929 9406**

Ms. Karin Char Kimura  
Duke Energy Field Services  
P.O. Box 5493  
Denver, Colorado 80202

**RE: CP-1 Compressor Station GW-139  
Eddy County, New Mexico**

Dear Ms. Kimura:

The New Mexico Oil Conservation Division is in receipt of your letter, dated January 7, 2003, regarding the discontinuance of operations at the CP-1 Compressor Station located in the NE/4 SE/4 of Section 15, Township 23 South, Range 28 East, Eddy County, New Mexico. If Duke Energy Field Services does not wish to renew the discharge permit (GW-139) for this facility a closure workplan will be required to be submitted for approval as stipulated in Item 14 of Attachment of Conditions of the discharge permit approved March 2, 1998.

Please furnish the New Mexico Oil Conservation Division Santa Fe office with two copies of the workplan and one copy to the Oil Conservation Division Artesia District Office. The closure workplan should be submitted prior to expiration of the current discharge permit of April 28, 2003.

If you have any questions please contact me at (505) 476-3489.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jack Ford".

W. Jack Ford, C.P.G.  
Environmental Bureau  
Oil Conservation Division

Cc: Artesia OCD District Office

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT** *Form 3800* *OLD*  
(Domestic Mail Only: No Insurance Coverage Provided)

7001 1940 0004 3929 9406

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Restricted Delivery Fee (Endorsement Required)			
Total Postage & Fees	\$		

**Sent To** *K. Kimora*

**Street, Apt. No.;  
or PO Box No.** *Duke*

**City, State, ZIP+4** *GW-139*

PS Form 3800, January 2001 See Reverse for Instructions

January 7, 2003

**FEDERAL EXPRESS**  
**Express Saver** (*Tracking Number 8336 1954 7662*)

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

Subject: CP-1 Compressor Station  
Discharge Plan GW-139  
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has dismantled the CP-1 Compressor Station and currently only a meter run is located on that site. There are no discharges from the facility that may move directly or indirectly into groundwater. Therefore, DEFS does not intend to renew the discharge plan for this facility..

If you have any questions concerning this correspondence, please contact me at (303) 605-1717. Please send all correspondence regarding this discharge plan to me at 370 17<sup>th</sup> Street, Suite 900, Denver, CO 80202.

Sincerely,  
***Duke Energy Field Services, LP***



Karin Char Kimura  
Senior Environmental Specialist

cc: NMOCD District 2 Office (*via FedEx Express Saver Tracking No. 8336 1954 7673*)  
1301 W. Grand Ave.  
Artesia, New Mexico 88210



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Betty Rivera  
Cabinet Secretary

November 22, 2002

Lori Wrotenberg  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 3929 9277**

Ms. Karin Char  
Duke Energy Field Services  
P.O. Box 5493  
Denver, Colorado 80217

**RE: Discharge Plan Renewal Notice for Duke Energy Field Services Facilities**

Dear Ms. Char:

The OCD is providing Duke Energy Field Services a notice that the following discharge plans expire at various dates during the year 2003.

GW-127 expires 2/3/2003 – Burton Flats Gas Plant  
GW-139 expires 4/28/2003 – CP-1 Compressor Station  
GW-142 expires 5/17/2003 – Sand Dunes Compressor Station  
GW-144 expires 8/19/2003 - West Fall (North) Compressor Station  
GW-145 expires 7/6/2003 - Zia Gas Plant

**WQCC 20.6.2.3106.F.** If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20.6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee based upon the horsepower rating or type of facility for gas processing facilities. The \$100.00 filing fee for each facility is to be submitted with the discharge plan renewal application and is nonrefundable.

Ms. Karin Char  
November 22, 2002  
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on OCD's website at [www.emnrd.state.nm.us/oed/](http://www.emnrd.state.nm.us/oed/).

If any of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Duke Energy Field Services has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,



Roger C. Anderson  
Oil Conservation Division

cc: OCD Artesia District Office  
OCD Hobbs District Office

# FULBRIGHT & JAWORSKI L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

1301 MCKINNEY, SUITE 5100

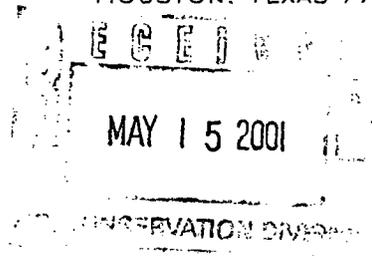
HOUSTON, TEXAS 77010-3095

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





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-288-259-040**

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

**RE: Discharge Plan GW-139  
CP-1 Compressor Station  
Eddy County, New Mexico**

Dear Ms. Singletary:

The groundwater discharge plan, GW-139, for the Union Pacific Resources Company (Union) 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 **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

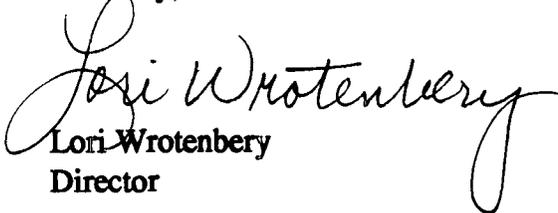
Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. Union is required to notify the Director of any facility expansion, production increase, or process modification 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 CP-1 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. The OCD received the filing fee. No flat fee is charged for compressor stations with a combined horsepower less than or equal to 1,000.

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-139 RENEWAL  
UNION PACIFIC RESOURCES COMPANY  
CP-1 COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(March 2, 1998)

1. **Union Commitments:** Union will abide by all commitments submitted in the discharge plan application dated February 2, 1998.
2. **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.
3. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
4. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. **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.
6. **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.
7. **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.
8. **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.

9. **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.
10. **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.
11. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
12. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 3 to the OCD Artesia District Office.
13. **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.
14. **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.
15. **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 288 259 040

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided.  
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Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

District I - (505) 393-6161  
P. O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
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 CP-1 GLW-139
2. Operator: Union Pacific Resources
- Address: P.O. Box 7 MS2807
- Contact Person: Karen Singletary Phone: (817) 877-6000
3. Location: NE /4 NE /4 Section 15 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  
CP-1 Compressor Station  
T23S, R28E, Sec. 15  
Eddy County, New Mexico  
(Discharge Plan GW-139)**

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 CP-1 Natural Gas Compressor Station (Station). This Discharge Plan Renewal is for existing Discharge Plan GW-139, 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.

## 2.0 DISCHARGE PLAN GUIDELINES

### 2.1 Type of Operation

The CP-1 Compressor Station (Station) is operated by UPR as a natural gas compression station. One 1,000-horsepower Caterpillar 3516 compressor engine is 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 1,000.

### 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 NE 1/4 of SE 1/4 of Section 15, T23S, R28E, Eddy County, New Mexico. Plate 1 shows the Station location on the United States Geological Survey (USGS) Loving Quadrangle map.

### 2.4 Landowner

The landowner is:

Western Commerce Bank  
P.O. Box 1358  
Carlsbad, NM 88220

### 2.5 Facility Description

The Station encompasses a ground surface area of approximately 150' by 50'. Plate 2 shows the site layout. The equipment currently located at the Station consists of:

- one 1,000-horsepower Caterpillar 3516 natural gas compressor engine on a skid with a collection sump;
- one 100-barrel (bbl) above-ground steel tank;
- one inlet separator; 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 Station is not fenced due to the remoteness of the Station location.

## 2.6 Materials Stored or Used at the Facility

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

## 2.7 Sources and Quantities of Effluent and Waste Solids

The inlet separator and the compressor engine generate liquid condensate which is collected and transferred into a 1-inch diameter buried steel pipeline which then transfers the condensate into the 100-bbl above ground steel tank. The condensate accumulates at a rate of approximately 150-bbls per month. Once per month the compressor engine is washed using approximately 3 bbls of fresh water for washdown and rinsing. The compressor engine is mounted on a skid which has angle iron curbing around the skid perimeter and a small sump in the bottom of the skid which collects the wash water. 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. Any precipitation which falls on the compressor engine skid is also collected on the skid and in the skid sump.

## 2.8 Liquid and Solid Waste Collection/Storage/Disposal Procedures

Condensate liquids are collected at the inlet separator and the compressor engine and are then transferred into the 100-bbl above ground storage tank. Scurlock Permian picks up the condensate when the tank is 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 has tentative plans to shutdown the Caterpillar 3516 compressor engine, remove it from the Station, and install a small compressor engine within the next six months. 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.

## 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 separator, tanks, containment berms, or compressor engine skid.

### 2.11 Spill/Leak Prevention and Reporting

The compressor engine is mounted on a skid which has a collection sump in the skid base. Any liquids which are collected in the compressor engine sump are transferred by pumping into a tanker truck two to three times per year. The condensate liquids removed by the inlet separator and compressor engine are transferred directly into the 100-bbl storage tank.

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 0.85 miles northeast 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:

- One domestic water well is located within 0.25-miles of the Station, the total depth of this well was reported to be 125 feet, the depth to water was not reported however, it can be assumed to be less than 125 feet; and
- three irrigation or livestock watering wells were reported to be 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.

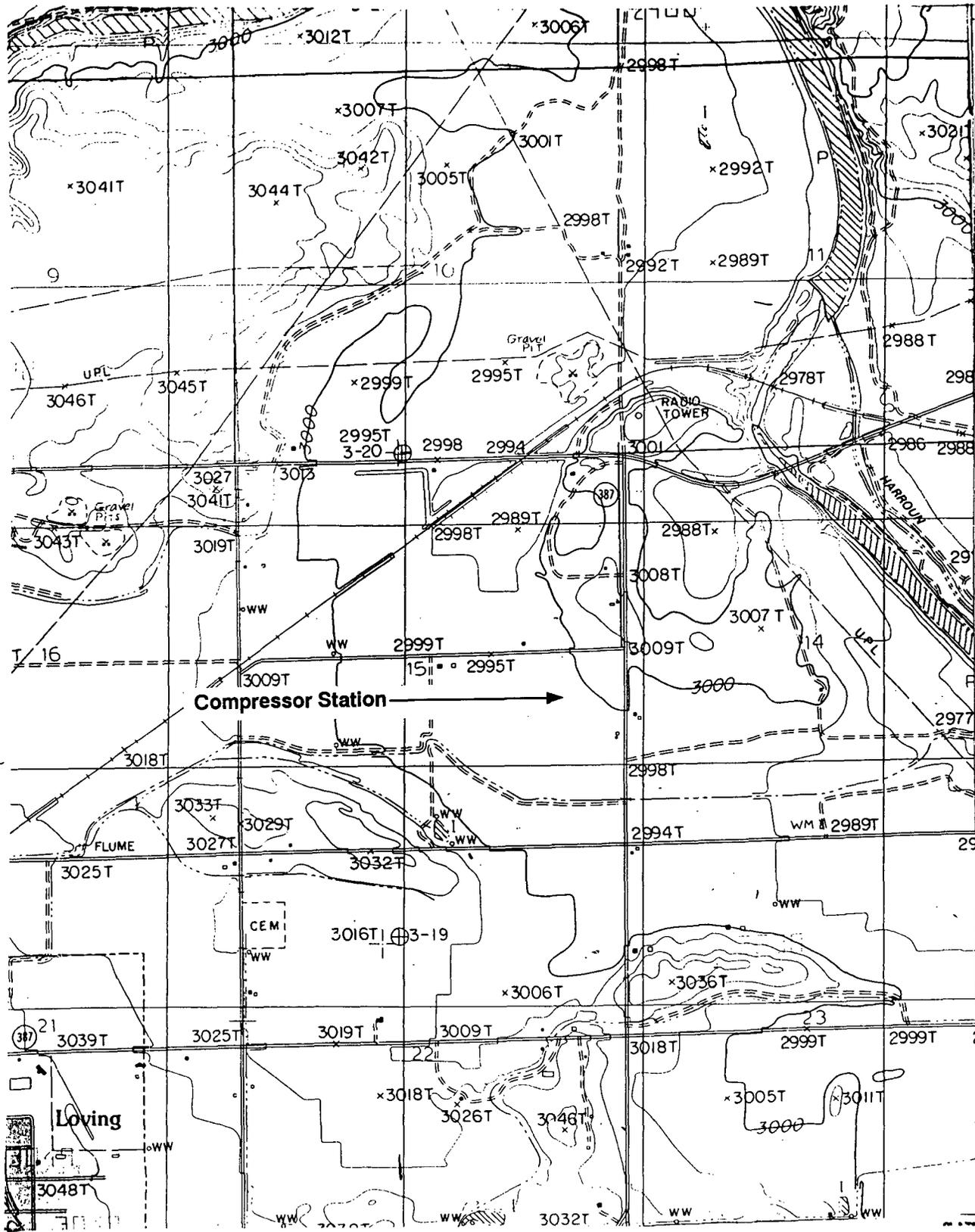
### 2.13 Other Compliance Information

The berms around the above ground storage tanks have a capacity of 1-1/3 (133%) 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**



**Compressor Station** →



**Harding Lawson Associates**

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

DRAWN  
LDS

PROJECT NUMBER

APPROVED

**Site Location Map**

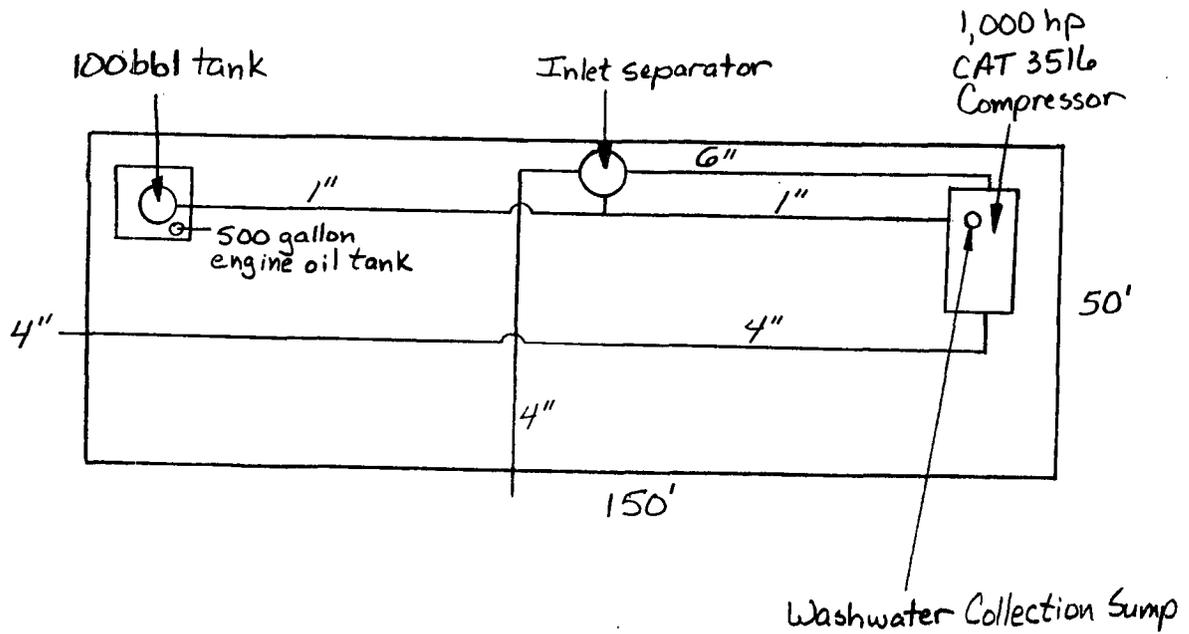
CP - 1 Compressor Station  
From USGS 7.5 Minute Quadrangle  
Loving, New Mexico 1985  
Union Pacific Resources

DATE  
12/87

REVISED DATE

PLATE

**1**



**Harding Lawson Associates**

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

DRAWN  
LDS

PROJECT NUMBER  
39481-10

APPROVED

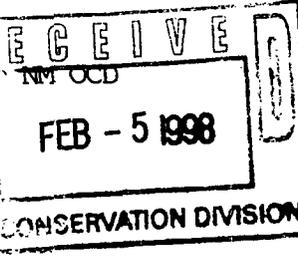
**Site Plan**  
CP - 1 Compressor Station  
Union Pacific Resources

DATE  
12/87

REVISED DATE

PLATE

**2**



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

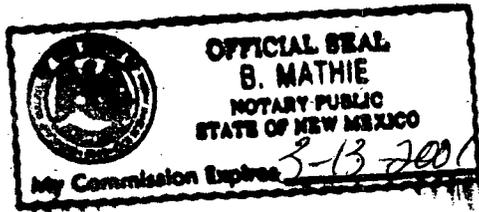
I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly 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.

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

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

Notary B. Mathie
Commission Expires 3-13-2001

OK MA
2-6-98



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.

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
Legal #62954
Pub. January 29, 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) 827-7311.

(GW-137) - Union Pacific Resources, Karen Singletary, (817) 877-6764, 801 Cherry Street, Fort Worth, Texas 76102-6802, 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, NMAPM, 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 OGD 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 76102-6802, has submitted a discharge application for its previously approved discharge plan for the CP-4 Compressor Station located in the NE/4 SE/4 of Section 15, Township 23 South, Range 28 East, NMAPM, 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 OGD



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

RECEIVED  
DEC 11 1997  
Environmental Bureau  
Oil Conservation Division

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  
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-288-258-990**

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

**RE: Discharge Plan GW-139 Renewal  
CP-1 Compressor Station  
Eddy County, New Mexico**

Dear Ms. Singletary:

On April 28, 1993, the groundwater discharge plan, GW-139, for the Union Pacific Resources Company (Union) 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, 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 CP-1 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. 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.** A complete copy of the regulations is also available on the OCD's website at [www.emnrd.state.nm.us/ocd/](http://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 288 258 990

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

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Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
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

*-CP-1 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

MEMORANDUM OF MEETING OR CONVERSATION

Telephone  Personal

Time  
2:10 PM

Date  
3-15-93

Originating Party

Other Parties

WAYNE CHANG  
CONTINENTAL NAT. GAS (CNG)

C. EUSTICE (OCD)

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





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



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-111-334-193**

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

**Re: Discharge Plan (GW-139)  
CP-1 Compressor Station  
Eddy County, New Mexico**

Dear Mr. Chang:

The groundwater discharge plan GW-139 for the Continental Natural Gas Inc. CP-1 Compressor Station located in the NE/4, SE/4, Section 15, 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.

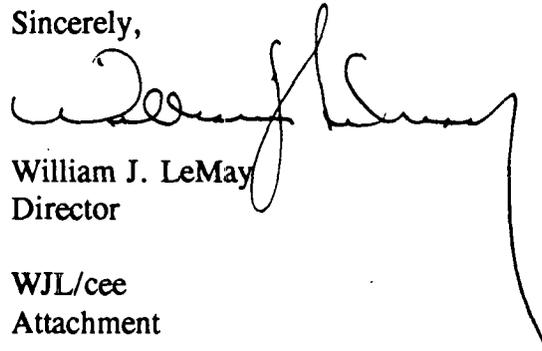
Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire April 28, 1998 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the Continental Natural Gas Inc. CP-1 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. No flat rate fee is charged for compressor stations less than 1000 horsepower.

The OCD has received your \$50 filing fee.

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

ATTACHMENT TO THE DISCHARGE PLAN GW-139 APPROVAL  
CONTINENTAL NATURAL GAS, INC  
CP-1 COMPRESSOR STATION  
DISCHARGE PLAN REQUIREMENTS  
(April 28, 1993)

1. Drum Storage: All drums will be stored on pad and curb type containment.
2. Sump Inspection: Any new sumps or below-grade tanks will incorporate leak detection in their designs.
3. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
4. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
5. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.



RECEIVED  
'93 APR 1 11 04

**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.

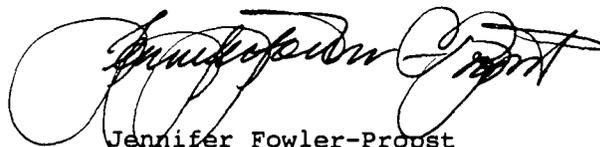
Natural gas pipeline condensates contain many organic constituents including benzene, C1 to C5 alkylated benzenes, toluene, and/or polychlorinated bi-phenyls (PCBs) which may be incorporated into the condensate through some compressor lubricants. The Service is concerned that the process waste water 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

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-106) 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 DoLay, 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

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.

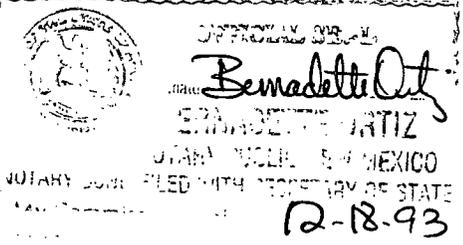
*Dianne Berglund*

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)

# Affidavit of Publication

Copy of Publ

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

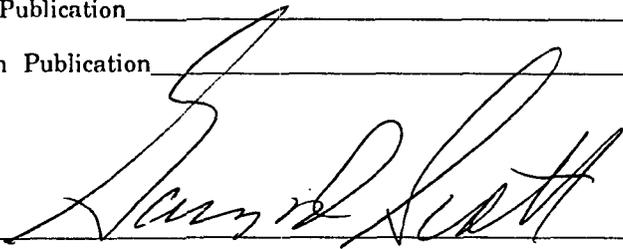
was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

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 Beans  
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

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 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.

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### LEGAL NOTICE

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

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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.

NOTICE OF PUBLICATION

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

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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 CP-1 Compressor Station GW-139  
(Facility Name) (DP No.)

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Submitted to ASD by: Kathy Brown Date: 2/26/93

Received in ASD by: A. Alire Date: 2/26/93

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



CONTINENTAL NATURAL GAS, INC.

1400 Boston Building  
1412 So. Boston, Suite 900  
Tulsa, Oklahoma 74119

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

1-392/280

CHECK NO.	CHECK DATE	VENDOR NO.
[redacted]	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

BY  
OF THE  
ORDER OF

[Handwritten Signature]

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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CP-1 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

**RECEIVED**

FEB 26 1993

OIL CONSERVATION DIV.  
SANTA FE

Dear Mr. LeMay:

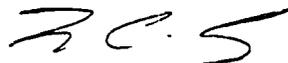
Continental Natural Gas, Inc. (CNG) respectfully submits the following groundwater discharge plan applications for the following compressor stations in Eddy County, New Mexico:

- o Carrasco Station - NW 1/4 of Section 14, T23S, R28E *GW 137*
- o Trachta Station - SW 1/4 of Section 14, T23S, R28E *GW 138*
- o CP-1 Station - SE 1/4 of Section 15, T23S, R28E *GW 139*

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

February 24, 1993

FEB 25 1993 9 34

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

RECEIVED

CNG PROPOSED DISCHARGE PLAN - CP-1 COMPRESSOR STATION  
SECTION 15, T23S, R28E, EDDY COUNTY, NM  
OIL CONSERVATION DIV.  
SANTA FE

I. TYPE OF OPERATION

One 400 hp compressor is used for gas compression. This unit compresses 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

NE 1/4 of SE 1/4 of Section 15, T23S, R28E, Eddy County  
(Geological survey map attached)

IV. LANDOWNERS

Western Commerce Bank  
P.O. Box 1358  
Carlsbad, NM 88220

V. FACILITY DESCRIPTION

The compressor site is approximately 150' x 50' equipped with one 400 hp compressor, one 100 bbl steel tank (atmospheric pressure) equipped with a containment levee built to contain 133% of the tank capacity and one 55 gallon drum for engine oil (see drawing). The site is not fenced since the station is located in a remote location where children are not likely to be present.

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

The compressor has a skid mounted separator which dumps liquids into a 1" buried steel line which transfers the condensate into a 100 bbl tank. The condensate consists of hydrocarbons and water.

VII. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS

The compressor sits on a caliche base pad. The unit is equipped with angle iron curbing around the skid perimeter. The unit is washed about 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. The only other run-off would occur from storm water.

A 4" buried polyethylene pipeline operating at 100 psig provides the gas to the suction side of the compressor. The compressor discharges the gas through a 4" buried steel pipeline operating at 300 psig. The pipelines have been pressure tested to 1.5 times the maximum allowable operating pressures.

This site generates approximately 100 bbls of condensate per month. The steel tank is bermed with a containment capacity of 133%. No sumps or below grade tanks are located on site.

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 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.

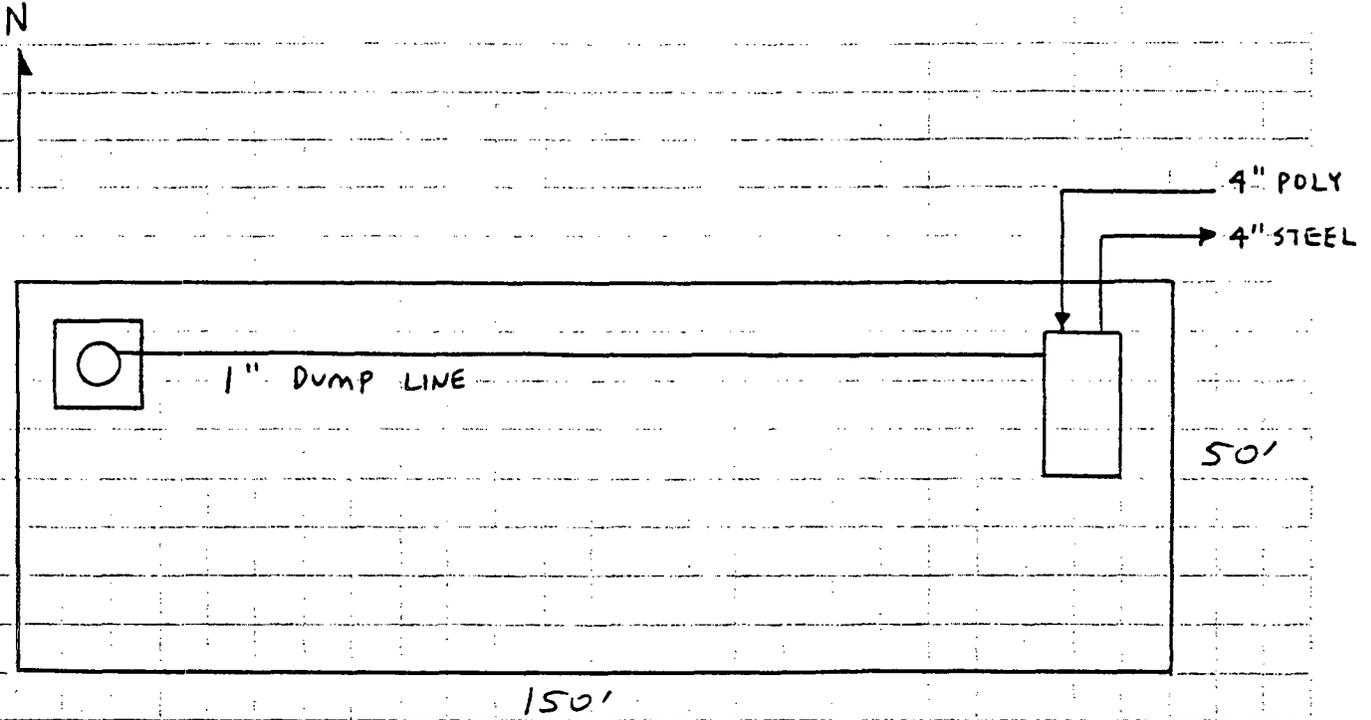


# BISHOP

ENGINEERING AND CONSTRUCTION SERVICES

PAGE \_\_\_\_\_  
DATE 2-23-93  
BY WCC

FOR CP-1 STATION  
SEC. 15-T235-R28E  
EDDY COUNTY, NM



SCALE 1"  $\cong$  25 FEET