

**GW - 160**

**PERMITS,  
RENEWALS,  
& MODS  
Application**



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

January 22, 2004

**Lori Wrotenbery**

Director

**Oil Conservation Division**

Ms Joyce Miley  
ConocoPhillips  
P.O. Box 2197, HU3036  
Houston, TX 77252

Re: Termination of Discharge Permit GW-160  
Bright Federal Compressor Station  
NE/4 NW/4 of Section 21, Township 19 South, Range 33 East,  
NMPM, Lea County, New Mexico.

Dear Ms. Miley:

OCD is in receipt of the closure report submitted by Maxim Technologies on behalf of ConocoPhillips dated August 26, 2002, and the photo documentation requested by OCD dated January 21, 2004. The report describes how ConocoPhillips closed the permitted facility and requested termination of the current discharge permit. OCD has reviewed these documents and hereby approves of ConocoPhillips' request to **terminate** the discharge permit.

Please be advised that NMOCD approval of this closure request does not relieve ConocoPhillips of liability should their facility be found to pose a future threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail [WPRICE@state.nm.us](mailto:WPRICE@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this closure review.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson".

Roger C. Anderson  
Environmental Bureau Chief  
RCA/lwp

Xc: OCD Hobbs Office  
Maximum Technologies-via E-mail



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 28, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-357-870-086**

Mr. J. R. Delaney  
Llano, Inc.  
921 West Sanger  
Hobbs, New Mexico 88240

**RE: Discharge Plan Renewal GW-160**  
**Llano, Inc.**  
**Bright Federal Compressor Station**  
**Lea County, New Mexico**

Dear Mr. Delaney:

The ground water discharge plan renewal GW-160 for the Llano, Inc. Bright Federal Compressor Station located in NE/4, NW/4 of Section 21, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the discharge plan as approved January 14, 1994 and the renewal application dated March 1, 1999. 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 renewal application 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 Llano, Inc. 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.

Mr. J. R. Delaney  
GW- 160 Bright Federal Compressor Station  
April 28, 1999  
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Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Llano, Inc. 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 renewal plan is for a period of five years. This renewal will expire on **January 14, 2004**, and Llano, Inc. 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 .

The discharge plan renewal application for the Llano, Inc. Bright Federal Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50. There is no renewal flat fee assessed for compressor station facilities, with horsepower rating less than 1000 horsepower. The OCD has received the filing fee.

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,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-160  
LLANO, INC.  
BRIGHT FEDERAL COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(April 28, 1999)

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is no required flat fee for compressor station facilities with horsepower rating less than 1000 horsepower.
2. Llano, Inc. Commitments: Llano, Inc. will abide by all commitments submitted in the discharge plan renewal application dated March 1, 1999 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

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

LLANO, INC.

by \_\_\_\_\_  
Title

State of New Mexico  
Energy, Minerals and Natural Resources Department  
OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, NM 87501

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,  
OIL REFINERIES AND GAS COMPRESSOR STATIONS**  
(Refer to OCD Guidelines for assistance in completing the application.)

- I. TYPE: Compressor Station (GW-160) Renewal
- II. OPERATOR: LG&E Natural Gathering and Processing Company  
ADDRESS: 921 West Sanger, Hobbs, NM 88240  
CONTACT PERSON: Ed Sloman PHONE: 505-393-2153
- III. LOCATION: NE /4 NW /4 Section 21 Township 19S Range 33E  
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the disposal facility site.
- V. <sup>no Change</sup> Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility. <sub>No Change</sub>
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.  
<sub>No Change</sub>
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. <sub>No Change</sub> Attach a description of current liquid and solid waste disposal procedures.  
<sub>No Change</sub>
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.  
<sub>No Change</sub>
- X. Attach a contingency plan for reporting and clean-up of spills or releases.
- XI. <sub>No Change</sub> Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.  
<sub>No Change</sub>
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.  
See Cover Letter, and revised Item #2
- XIII. CERTIFICATION

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

Name: John R. Delaney

Title: General Manager

Signature: 

Date: 3-1-99

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.