GW - 185

GENERAL CORRESPONDENCE

YEAR(S):

2006 - 1994

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Wednesday, July 26, 2006 1:52 PM
To: 'jknowlton@ypcnm.com'
Cc: Gum, Tim, EMNRD
Subject: Agave GW-053 and GW-185 modification

Dear Ms. Knowlton:

OCD is in receipt of the GW-53 and GW-185 modification. Please note OCD considers this to be a major modification and will require Agave to submit a $100 filing fee before processing the application. Please make check payable to the Water Quality Management Fund.

AGAVE ENERGY COMPANY

105 South Fourth Street Artesia, New Mexico 88210 (505) 748-4555 Fax (505) 748-4275

Via Certified Mail 7005 2570 0000 8325 6921

January 19, 2006

Ed Martin
New Mexico OCD
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Agave Gas Plant
Discharge Permit GW-053 Renewal

Dear Ed:

As per your December 21, 2005 correspondence to Lisa Norton, included is the renewal application for the above mentioned discharge permit. Agave sincerely apologizes for not submitting this renewal prior to the November 9, 2005 expiration. The Agave Gas Plant was shutdown on November 22, 2005.

As of May 2005, Agave Energy Company has purchased the neighboring Duke Dagger Draw Gas Plant. These two facilities are neighboring and contiguous, sharing a common fenceline. Agave is in the process of modifying and consolidating the two facilities. This project also includes the installation of an acid gas injection system in lieu of a flare or SRU to dispose of the acid gas stream from the amine system. Agave has refurbished the cryogenic skids, removed two large gas fired compressor engines, and installed a new control system. Agave plans on restarting the modified facility at the beginning of February 2006.

The Duke Dagger Draw Gas Plant was issued discharge permit GW-185. However, to the best of our knowledge, this facility has not operated since August 2003.

Once the facility is fully operational and no additional changes are anticipated to the normal operations of the plant, Agave will submit an application for a modified discharge permit which will incorporate operations at the new Agave Dagger Draw Gas Plant. This modification will merge the current discharge permits from the two facilities. The modification application will also include any necessary closure plans for both facilities.

I look forward to working with you when we submit the modified discharge plan for the Agave Dagger Draw Gas Plant. If you have any questions regarding this application, please do not hesitate to contact me at 505-748-4471.

Sincerely,

Jennifer Knowlton
Environmental Engineer

Cc: OCD District office

(corres 011906.doc)

I am working on the renewal application for the Agave Gas Plant and hope to have that to you next week.

I know that we have GW-104 (Foster Ranch Compressor Station), GW-105 (Larue Compressor Station), GW-125 (Penasco Compressor Station) and GW-123 (Seven Rivers Compressor Station). If your database turns up anymore assigned to Agave or Yates, please tell me!

Agave Energy Company purchased the Duke Dagger Draw Gas Plant on May 18, 2005. This purchase included all existing permits such as the discharge plan (GW-185). This facility has been shut down since August 2003. I do not know if Duke provided any notice of shutdown or transfer of ownership to OCD. We are in the process of merging the Agave Gas Plant and the Duke Dagger Draw Gas Plant into the Agave Dagger Draw Gas Plant. These are adjacent facilities which share a common fenceline. Within the next couple of months, I will be submitting a modification application to combine the two discharge permits; there will be no distinction between the two facilities.

Thanks again for your time and help this morning. I have a steep learning curve ahead of me to figure this stuff out so please be patient and excuse my ignorance!

Jennifer Knowlton
Agave Energy Company
Environmental Engineer
105 South Fourth Street
Artesia, New Mexico 88210
Office: 505-748-4471
Fax: 505-748-4275

Ford, Jack

From: Karin Char Kimura [kchar@duke-energy.com]
Sent: Tuesday, September 07, 2004 4:32 PM
To: jwford@state.nm.us
Subject: DEFS Dagger Draw Gas Plant GW-185

Jack,

Per our phone discussion today, DEFS' Dagger Draw Gas Plant has been taken out of service and is currently inactive. DEFS requests to postpone the annual below-grade tank and sump integrity testing as required by the January 21, 2003 Discharge Plan Approval Conditions (Condition #9) until the facility is returned to operation. Prior to returning the facility to operation, DEFS will perform the below-grade tank and sump integrity testing and will notify the OCD at least 72 hours prior to testing in accordance with Condition #9.

If you have any questions, please call me at (303) 605-1717.

Mahalo,

Karin Char Kimura
Senior Environmental Specialist
Office: (303) 605-1717
Mobile: (720) 635-9460
Fax: (303) 605-1957

GW-185

District I
625 N. French Dr., Hobbs, NM 88240
District II
811 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

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: Duke Energy Field Services, LP Telephone: (505) 628-0282 e-mail address:
Address: 2010 E. Carlsbad Lane, Carlsbad, NM 88220
Facility or well name: Dagger Draw Booster Station API #: U/L or Qtr/Qtr L Sec 36 T 19S R 24E
County: Eddy Latitude 32.6126599 Longitude -104.53349 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☑ Private ☐ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 11.9 bbl Type of fluid: Water, non-hazardous biodegradable detergent, compressor lube oil (incidental volume), antifreeze (incidental volume), storm water Construction material: Fiberglass Double-walled, with leak detection? Yes ☐ If not, explain why not. Single-walled fiberglass below-grade tank with an earthen berm around the exposed part of the tank. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Compressor Skid Drain	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (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 No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (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 your 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: 9/28/04
Printed Name/Title Johnny Lamb/Field Supervisor Signature

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:

GW-185

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

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: Duke Energy Field Services, LP Telephone: (505) 628-0282 e-mail address: _____
Address: 2010 E. Carlsbad Lane, Carlsbad, NM 88220
Facility or well name: Dagger Draw Gas Plant API #: _____ U/L or Qtr/Qtr SW/SW Sec 25 T 18S R 25E
County: Eddy Latitude 32.71384 Longitude -104.4440701 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness _____mil Clay ☐ Pit Volume _____bbl	Volume: 5.2 bbl Type of fluid: Excess steam Construction material: Fiberglass Double-walled, with leak detection? Yes ☑ If not, explain why not. Deaerator sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (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 No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet ✔ 1000 feet or more	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	10

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 your 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: 9/28/05
Printed Name/Title Johnny Lamb/Field Supervisor Signature _____

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: _____

GW-185

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

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: Duke Energy Field Services, LP Telephone: (505) 628-0282 e-mail address:
Address: 2010 E. Carlsbad Lane, Carlsbad, NM 88220
Facility or well name: Dagger Draw Gas Plant API #: U/L or Qtr/Qtr SW/SW Sec 25 T 18S R 25E
County: Eddy Latitude 32.71384 Longitude -104.4440701 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☐ Indian ☐

Pit	**Below-grade tank** Molten sulfur
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume _____bbl	Volume: 100LT ~~bbl~~ Type of fluid: _____ Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. In the event of a leak, molten sulfur released will cool and harden immediately acting as a self-sealing agent for the tank. Sulfur pit

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (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 No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet ✔ 1000 feet or more	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	10

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 your 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: 9/28/04
Printed Name/Title Johnny Lamb/Field Supervisor Signature

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: _____

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

November 3, 2004

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

Ms. Karin Char Kimura
Duke Energy Field Services
370 17th Street
Denver, Colorado 80202

RE: Discharge Permit Renewal Notice for Duke Energy Field Services Facilities

Dear Ms. Kimura:

Duke Energy Field Services has the following discharge permits which expire on the dates shown below.

GW-177 expires 3/21/2005 – Maljamar Compressor Station
GW-178 expires 3/21/2005 – Won Ton Compressor Station
GW-185 expires 4/12/2005 – Dagger Draw Gas Plant

WQCC 3106.F. If the holder of an approved discharge permit submits an application for discharge permit renewal at least 120 days before the discharge permit expires, and the discharger is not in violation of the approved discharge permit on the date of its expiration, then the existing approved discharge permit for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge permit continued under this provision remains fully effective and enforceable. An application for discharge permit renewal must include and adequately address all of the information necessary for evaluation of a new discharge permit. 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 permit renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit renewal will be assessed a fee equal to the filing fee of $100.00 plus a flat fee dependent upon horsepower rating for or type of gas processing facilities. The $100.00 filing fee is submitted with the discharge permit renewal applications and is nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge permit 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 permit renewal request.** (Copies of the WQCC regulations and discharge permit application form and guidelines are available on OCD's website at **www.emnrd.state.nm.us/ocd/**).

If any of the above facilities no longer has any actual or potential discharges and a discharge permit is not needed, please notify this office. If the Duke Energy Field Services has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,

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

cc: OCD Artesia District Office

Ford, Jack

From: Ford, Jack
Sent: Wednesday, September 08, 2004 8:36 AM
To: 'Karin Char Kimura'
Subject: RE: DEFS Dagger Draw Gas Plant GW-185

Dear Karin:

Your request to delay the integrity testing of below grade tank and sump and below grade drain lines at the Dagger Draw Gas Plant until such time as the facility again begins operations is hereby approved.

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

Jack Ford
Oil Conservation Division

-----Original Message-----
From: Karin Char Kimura [mailto:kchar@duke-energy.com]
Sent: Tuesday, September 07, 2004 4:32 PM
To: jwford@state.nm.us
Subject: DEFS Dagger Draw Gas Plant GW-185

Jack,

Per our phone discussion today, DEFS' Dagger Draw Gas Plant has been taken out of service and is currently inactive. DEFS requests to postpone the annual below-grade tank and sump integrity testing as required by the January 21, 2003 Discharge Plan Approval Conditions (Condition #9) until the facility is returned to operation. Prior to returning the facility to operation, DEFS will perform the below-grade tank and sump integrity testing and will notify the OCD at least 72 hours prior to testing in accordance with Condition #9.

If you have any questions, please call me at (303) 605-1717.

Mahalo,

Karin Char Kimura
Senior Environmental Specialist
Office: (303) 605-1717
Mobile: (720) 635-9460
Fax: (303) 605-1957

Duke Energy.
Field Services
A New Kind of Energy™

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

4/8/02 Talked w/ Karin modification to domestic septic system only - Refered her to NMED JF

March 27, 2002

RECEIVED
APR 0 1 2002
Environmental Bureau
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Dagger Draw Gas Plant
Discharge Plan GW-185
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) submits the following:

- Discharge Plan Application for Modification (original plus one copy) for the Dagger Draw Gas Plant (GW-185) located in SW/4 SW/4 T 18s, R 25E, Section 25 in Eddy County;
- Modified Discharge Plan (two copies); and
- Check in the amount of $100.00 for the Discharge Plan Application Filing Fee.

If you have any questions regarding this matter, please call me at (303) 605-1717.

4/8/02 Filing fee paid in error. to be applied as filing fee for next DP renewal

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

Enclosures

cc: NMOCD District 2 Office
1301 W. Grand Avenue
Artesia, NM 88210

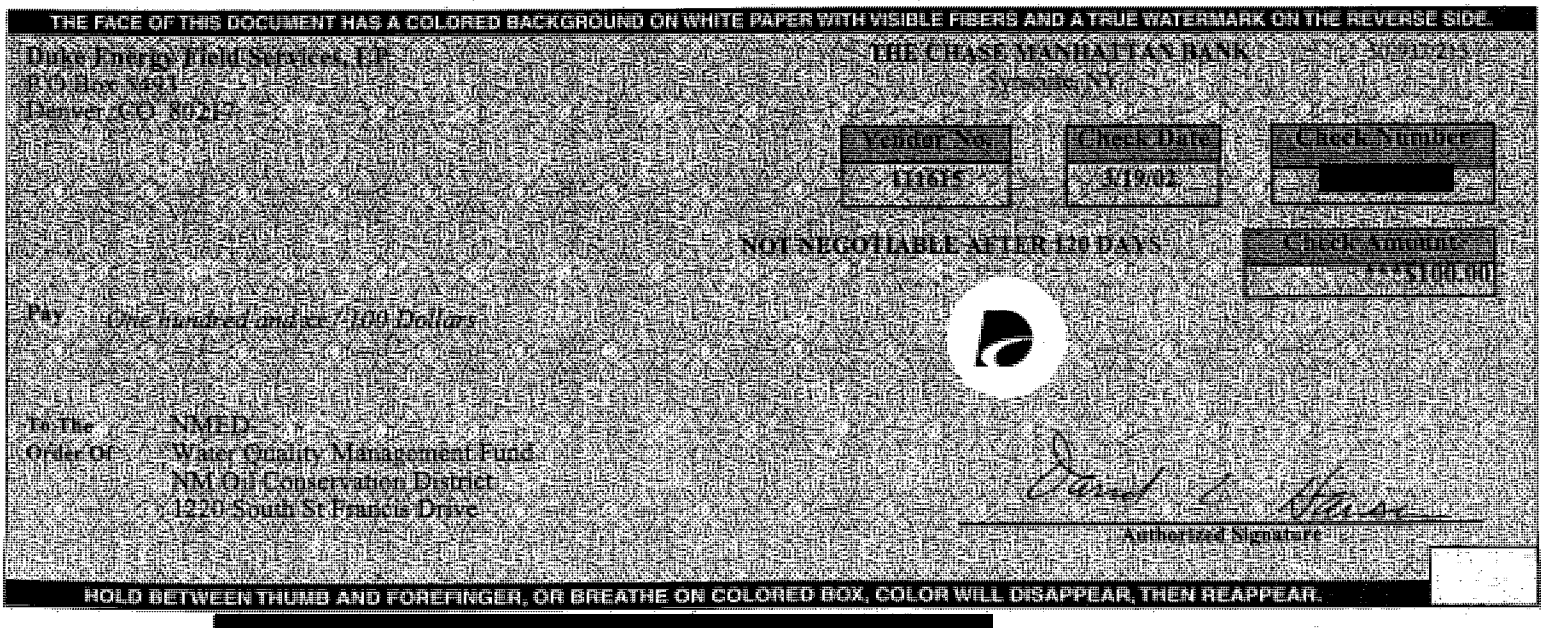
ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/19/02,
or cash received on _____ in the amount of $ 100.00
from Duke Energy Field Services
for Dagger Draw GP GW-185
(Facility Name) (DP No.)
Submitted by: _____ Date: 4/3/02
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
P.O. Box 5493
Denver, CO 80217

THE CHASE MANHATTAN BANK
Syracuse, NY

Vendor No. 111615 | Check Date 3/19/02 | Check Number [redacted]

NOT NEGOTIABLE AFTER 120 DAYS

Check Amount ****$100.00

Pay One hundred and no/100 Dollars

To the Order of NMED
Water Quality Management Fund
NM Oil Conservation District
1220 South St Francis Drive

Authorized Signature

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

[redacted]

Duke Energy Field Services, LP
P O Box 5493
Denver, CO 80217

Vendor Number
111615
Vendor Name
NMED-

Check Number
[redacted]
Check Date
3/19/02

Invoice Number	Invoice Date	Net Amount	Description
	3/13/02	100.00	Accounts Payable Vouchers
	Total Paid	**$100.00**	

Please Detach and Retain for Your Records

Duke Energy. Field Services
A New Kind of Energy™

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

March 28, 2002

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Dagger Draw Gas Plant
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP requests the approval for the installation of a below-grade tank at the Dagger Draw Gas Plant. The enclosed application for below-grade tank installation has been prepared in accordance with the NMOCD "Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks" (revised October 1991).

If you have any questions, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

Enclosure

Duke Energy Field Services, LP
Dagger Draw Gas Plant
Deaerator Below-grade Tank Installation Application

Tank Selection

Bill Murray Services double-walled fiberglass tank (220-gallon capacity) with inspection tube. Refer to Figure 1 for construction and design details. Note: Tank lid has a silicone gasket.

Installation

Refer to the Figure 2 – Facility Plot Plan for the below-grade tank installation location. The below-grade tank was installed in February 2002 to collect excess steam from the deaerator which is part of the boiler system at the facility.

The table below identifies the wastes, quantities, and disposition of effluent that will be collected in this below-grade tank (sump) and the final disposition of the wastes. Refer to Figure 3 – Process Flow Diagram of this below-grade tank system.

Sump	Waste	Quantity	Disposition
Deaerator Sump	Excess steam	200 gal/month	150 bbl aboveground tank.

Maintenance

Plant personnel perform daily visual inspections of the below-grade tank.

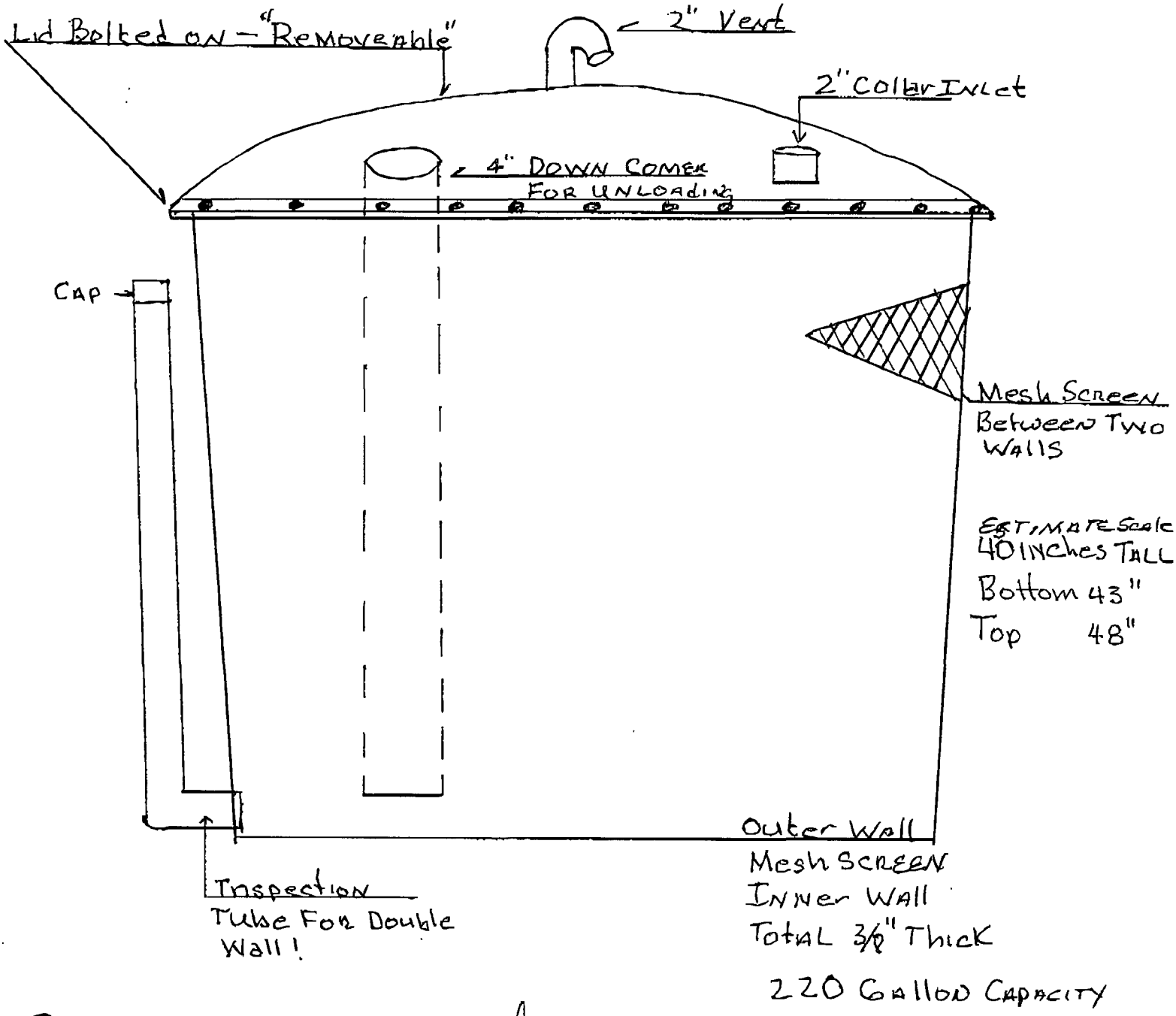
Contingency Plan

In the event of a tank leak, the first on-site responder will contact emergency responders for containment and clean-up if necessary and the below-grade tank will be repaired in the most expeditious manner possible.

Figures

Figure 1. Below-grade tank construction and design details.

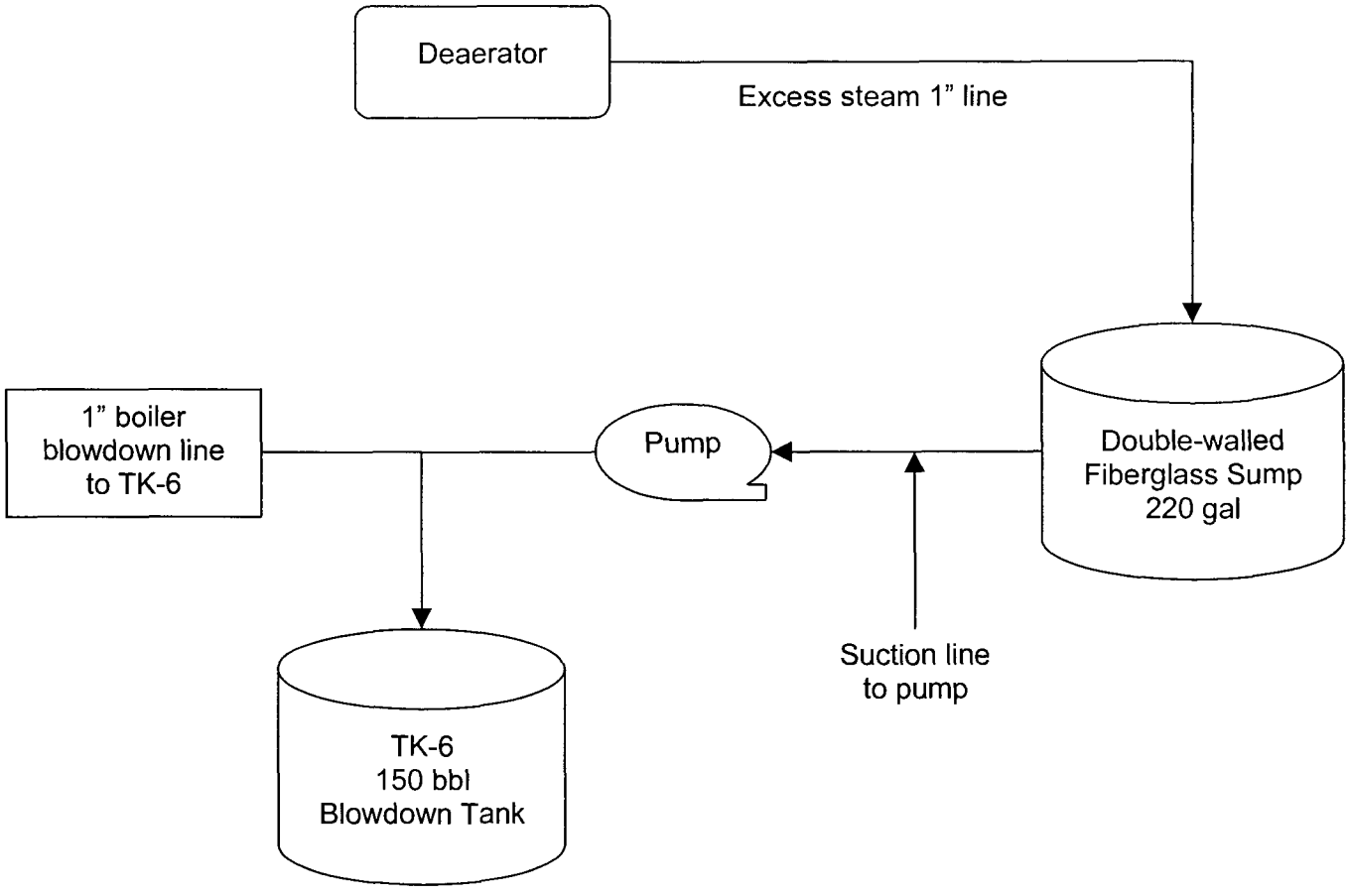
Delivered to Duke Energy Field Services
Dagger Draw Plant, New Mexico
Approxmately January 8, 2002



Bill Murray – Murray Services 405-224-3964
Chickasha, Oklahoma 73018

Figure 2. Facility Plot Plan. Sump (highlighted in yellow) is located in northeast quadrant of the facility east of the Deaerator Building.

Figure 3 – Process Flow Diagram of the Deaerator Below-grade Tank System.



Duke Energy.
Field Services
A New Kind of Energy™

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

February 21, 2002

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Dagger Draw Gas Plant
Discharge Plan GW-185
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) submits the attached Stormwater Run-Off Plan for the Dagger Draw Gas Plant.

If you have any questions regarding this matter, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

Attachment

cc: NMOCD District 2 Office
1301 W. Grand Avenue
Artesia, NM 88210

Duke Energy Field Services
A New Kind of Energy

STORMWATER RUN-OFF PLAN

FOR:

Dagger Draw Gas Plant, Eddy County, New Mexico (GW-185)

Rainwater collected inside containment structures at the facility is lost through evaporation or removed with a vacuum truck for off-site disposal. None of the containment structures at the facility have valves. Good housekeeping is practiced at the facility to help prevent contaminants from leaving the site during a rainstorm.

Duke Energy. Field Services
A New Kind of Energy™

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

February 4, 2002

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Dagger Draw Gas Plant
Discharge Plan GW-185
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) submits the following:

- Enclosed check in the amount of $1,667.50 for the Dagger Draw Gas Plant discharge plan flat fee; and
- A signed copy of the Discharge Plan Approval Conditions for the Dagger Draw Gas Plant.

If you have any questions regarding this matter, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

Enclosures

cc: NMOCD District 2 Office
1301 W. Grand Avenue
Artesia, NM 88210

Duke Energy® Field Services

A New Kind of Energy

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

605-1717

August 16, 2000

HAND DELIVERY

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

SUBJECT: Dagger Draw Gas Plant Discharge Plan (GW-185)
Eddy County, New Mexico

Dear Mr. Anderson:

This letter submits the proposed discharge plan for Duke Energy Field Services, LLC's (DEFS) Dagger Draw Gas Plant (Plant). The proposed plan demonstrates that discharges effluent and leachate from the Plant (the plant is designed to not discharge) will not cause ground water to exceed applicable ground water standards at a place of present or reasonably foreseeable future use.

The proposed plan also is intended to satisfy July 10, 2000 Notice of Violation from NM OCD for failing to submit the discharge plan by April 12, 2000. On August 7, 2000, John Admire, Director of Environmental Protection for DEFS, LLC and Louis W. Rose, Montgomery and Andrews, met with you and other members of NM OCD to discuss the Plant's discharge plan. At the meeting DEFS and NM OCD agreed that a response to NM OCD's July 10th letter would be submitted by August 17, 2000.

DEFS, LLC respectfully submits two copies of the Plant and a check in the amount of $50 for the filing fee.

If you have any questions, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LLC

Karin Char
Environmental Specialist

cc: NM OCD District Office
Corp. Env. Dagger Draw GP File 2.2.3.3
W. Permian Env. Dagger Draw GP File 2.2.3.3
Dagger Draw GP Facility File 2.2.3.3

w/o enclosures.:
John Admire
Stephen McNair
Harley Temple
Greg Hyde
Vicki Gunter
Jack Braun
Paul Tourangeau, Esq.
Louis W. Rose, Esq.
Marilyn S. Hebert, Esq.

NMPRC Corporation Information Inquiry

New Search

Public Regulation Commission

8/8/2000

DUKE ENERGY FIELD SERVICES, INC.

(COLORADO Corporation)

SCC Number: **1370733**
Tax & Revenue Number:
Qualification Date: **NOVEMBER 02, 1987, in NEW MEXICO**
Corporation Type: **IS A FOREIGN PROFIT**
Corporation Status: **IS ACTIVE**
Good Standing: **In GOOD STANDING through 12/15/2001**
Purpose: **NATURAL GAS PROCESSING**

CORPORATION DATES

Taxable Year End Date: 09/30/99
Filing Date: 12/30/99
Expiration Date:

SUPPLEMENTAL POST MARK DATES

Supplemental: 03/14/96
Name Change: 08/26/97
Purpose Change:

MAILING ADDRESS

5400 WESTHEIMER CT. HOUSTON , TEXAS 77056

PRINCIPAL ADDRESS

NEW MEXICO

PRINCIPAL ADDRESS (Outside New Mexico)

5400 WESTHEIMER CT. HOUSTON TEXAS 77056

REGISTERED AGENT

C T CORPORATION SYSTEM

119 EAST MARCY SANTA FE NEW MEXICO 87501

Designation date: 12/30/99
Agent Post Mark Date:
Resignation date:

COOP LICENSE INFORMATION

Number:
Type:
Expiration Year:

OFFICERS

President ***MOGG, JIMMY W.***
Vice President ***BARCROFT, RONALD J.***
Secretary ***MARSH, EDWARD M.***
Treasurer ***HAUSER, DAVID L.***

DIRECTORS

Date Election of Directors: 04/20/00

FOWLER , FRED J	5400 WESTHEIMER CT. HOUSTON , TX 77056
MOGG , JIMMY W	5400 WESTHEIMER CT. HOUSTON , TX 77056
OSBORNE , RICHARD J	5400 WESTHEIMER CT. HOUSTON , TX 77056

NMPRC Corporation Information Inquiry

New Search

Public Regulation Commission

8/8/2000

DUKE ENERGY FIELD SERVICES SOUTHWEST, INC.

(DELAWARE Corporation)

SCC Number: **1890110**
Tax & Revenue Number:
Qualification Date: **OCTOBER03, 1997, in NEW MEXICO**
Corporation Type: **IS A FOREIGN PROFIT**
Corporation Status: **IS ACTIVE**
Good Standing: **In GOOD STANDING through 3/15/2001**
Purpose: **GATHERING & PROCESSING OF NATURAL GAS**

CORPORATION DATES

Taxable Year End Date: 12/31/00
Filing Date: //
Expiration Date:

SUPPLEMENTAL POST MARK DATES

Supplemental: 01/22/98
Name Change: 06/29/99
Purpose Change:

MAILING ADDRESS

5400 WESTHEIMER COURT HOUSTON , TEXAS 77056-5310

PRINCIPAL ADDRESS

NONE

PRINCIPAL ADDRESS (Outside New Mexico)

5400 WESTHEIMER COURT HOUSTON TEXAS 77056-5310

REGISTERED AGENT

CT CORPORATION SYSTEM

123 EAST MARCY SANTA FE NEW MEXICO 87501

Designation date: 01/22/98
Agent Post Mark Date:
Resignation date:

COOP LICENSE INFORMATION

Number:
Type:
Expiration Year:

OFFICERS

President ***MOGG, JIMMY W.***
Vice President ***BORER, MARK A.***
Secretary ***MATHEWS,WILLIAM B.***
Treasurer ***HAUSER, DAVID L.***

DIRECTORS

Date Election of Directors: 02/24/98

MOGG , JIMMY W 5400 WESTHEIMER COURT HOUSTON , NM 77056-53

PRINCIPAL ADDRESS

505 SANDSTONE AVE. FARMINGTON NEW MEXICO 87401

PRINCIPAL ADDRESS (Outside New Mexico)

RT2 BOX 2615 ROOSEVELT UTAH 84066

REGISTERED AGENT

OLIN GLOVER

505 SANDSTONE AVE FRAMINGTON NEW MEXICO 87401

Designation date: 01/10/00
Agent Post Mark Date:
Resignation date:

COOP LICENSE INFORMATION

Number:
Type: 0
Expiration Year:

OFFICERS

President ***WALKER, JIMMY D.***
Vice President ***GLOVER, OLIN***
Secretary ***NONE***
Treasurer ***NONE***

DIRECTORS

Date Election of Directors: 07/01/00

GLOVER , OLIN PO BOX 2288 FARMINGTON , NM 87499
WALKER , JIM PO BOX 2288 FARMINGTON , NM 87499

Duke Energy Field Services Inc.
A Duke Energy Company

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

May 15, 2000

CERTIFIED MAIL
RETURN RECEIPT Z 407 761 468

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Duke Energy Field Services Sites, Lea and Eddy Counties

Dear Mr. Ford:

Duke Energy Field Services is currently preparing environmental compliance and management plan submissions for the Dagger Draw Gas Plant and several compression sites. On February 16, 2000, we notified NMOCD of our intention to submit an application for the renewal of the Discharge Plan for the Dagger Draw Gas Plant (GW-185) by April 12, 2000. We were unable to meet this date and the submission for Dagger Draw Gas Plant is currently in draft form. We have identified several waste management protocols that we wish to change before we submit a final document to NMOCD. After we determine if the proposed changes can be effectively implemented at the Dagger Draw Gas Plant, we will finalize the submittal to NMOCD. Please expect a document for your review by June 30, 2000.

Along with the above-mentioned Dagger Draw Plan, DEFS has been concurrently working to prepare plans for the compression sites. A draft submittal for the compression sites will arrive on your desk before the Dagger Draw Gas Plant submittal. As you know, Duke acquired several compression sites over the past five years. Some of these sites maintain Discharge Plans while others do not. Although we believe all of Duke's sites comply with the WQCC Regulations, we elected to focus our effort on the compression sites to be certain that NMOCD is fully aware of all of Duke's activities. If this schedule for submission does not meet with your approval, please contact me at (303) 605-1717.

Sincerely,

Karin Char
Environmental Specialist

cc: Jack Braun
Greg Hyde
Mel Driver
Harley Temple
West Permian Env. File 2.2.3.1
Dagger Draw Gas Plant File 2.2.3.1
Corporate Env. File 2.2.3.1

Duke Energy

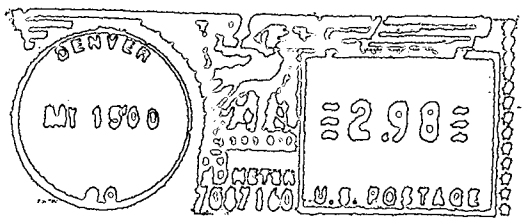
P.O. Box 5493
Denver, CO 80217

Fold at line over top of envelope to the right of the return address

CERTIFIED

Z 407 761 468

MAIL



Mr. Jack Ford
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

87505-5472 57

Duke Energy® Field Services

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
Harley Temple
Grey Hyde
Mel Driver

Facility 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
Region 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
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

Artesia Daily Press

P.O. Box 190, Artesia, NM 88211-0190
Phone: (505) 746-3524
Fax: (505) 746-8795

INVOICE

Invoice Date:	03/18/00
Invoice Number:	1056699
Customer Number:	10005610

Oil Conservation Division
2040 South Pacheco St.
Santa Fe NM 87505

DATE	TYPE	DOC NO	REF NUMBER	DESCRIPTION	# OF INS	DEPTH	RATE	AMOUNT
03/18/00	INV	1056699	A/R:1056699 Ord:10681263	**LEGAL NOTICE NOTICE OF PUBLIC** Artesia Daily Press Legal Section, LEGAL NOTICE 3/16/0 State Sales Tax **This is your First Notice! Thank You!**	 1 1	 13.00 13.00	 45.76 2.83	 45.76 2.83
							TOTAL	48.59

I hereby certify that this is a true and correct statement to the best of my knowledge.

Barbara Boaz
Bookkeeper

Please detach and return this portion with payment. To ensure proper credit to your account, please write your customer number on your check. If you have any questions about your account, please contact Accounts Receivable at (505) 746-3524.

Invoice Date	Invoice Number
03/18/00	1056699
Customer Number	
10005610	

Retail Advertising Legal 16885

PLEASE PAY: 48.59

ARTESIA DAILY PRESS
Attn: Accounts Receivable
P.O. Box 190
Artesia, NM 88211-0190

Oil Conservation Division
2040 South Pacheco St.
Santa Fe NM 87505

Affidavit of Publication

NO. 16885

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 county and state, and that the here to 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/days on the same

day as follows:

First Publication March 16 2000

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this

16th day of March 2000

Barbara Ann Bruns

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 2003

Copy of Publication:

STATE OF
OIL C

S-

LORI WROTE
SEAL
Published in th
Press, Artesia,
2000.

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 New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131.

(GW-185) DUKE ENERGY FIELD SERVICES, INC., P.O. Box 5493, Denver, Colorado 80217 has submitted a renewal applicaiton for their Dagger Draw Gas Plant located in the SW/4 of Section 25, Township 18 South, Range 25 East, Eddy County, New Mexico. Approximately 2 barrels per day of produced water with a dissolved solids concentration in excess of 2,000 mg/l is collected in an above ground closed-top steel tank prior to transport offsite to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth greater than 195 feet with a total dissolved solids concentration of approximately 1535 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the the surface witll 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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of March, 2000.

NEW MEXICO
ONSERVATION
DIVISION
Lori Wrotenbery,
NBERY, Director

e Artesia Daily
N.M. March16,

Legal 16885

Z 559 572 826

OCD

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

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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

SANTA FE NM 87502
MAR 10 2000
USPS

PS Form **3800**, April 1995

(GW-185) JF

The Santa Fe New Mexican

Since 1849 We Read You

RECEIVED
MAR 16 2000
OIL CONSERVATION DIVISION

NM OIL CONSERVATION DIVISION
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 137786 ACCOUNT: 56689
LEGAL NO: 67044 P.O.#: 00199000278
177 LINES 1 time(s) at $ 78.03
AFFIDAVITS: 5.25
TAX: 5.20
TOTAL: 88.48

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 has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-185) - DUKE ENERGY FIELD SERVICES, INC., P.O. Box 5493, Denver, Colorado 80217 has submitted a renewal application for their Dagger Draw Gas Plant located in the SW/4 of Section 25, Township 18 South, Range 25 East, Eddy County, New Mexico. Approximately 2 barrels per day of produced water with a dissolved solids concentration in excess of 2,000 mg/l is collected in an above ground closed-top steel tank prior to transport off-site to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth greater than 195 feet with a total dissolved solids concentration of approximately 1535 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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and 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 based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of March, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY, Director

Legal #67044
Pub. March 15, 2000

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67044 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/15/2000 and 03/15/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 15 day of March, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 15 day of March A.D., 2000

Notary Candace R. Hunton

Commission Expires 11/16/2003

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 renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-185) - DUKE ENERGY FIELD SERVICES, INC., P. O. Box 5493, Denver, Colorado 80217 has submitted a renewal application for their Dagger Draw Gas Plant located in the SW/4 of Section 25, Township 18 South, Range 25 East, Eddy County, New Mexico. Approximately 2 barrels per day of produced water with a dissolved solids concentration in excess of 2,000 mg/l is collected in an above ground closed-top steel tank prior to transport off-site to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth greater than 195 feet with a total dissolved solids concentration of approximately 1535 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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of March, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

LORI WROTENBERY, Director

Duke Energy Field Services Inc.
A Duke Energy Company

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

February 16, 2000

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Dagger Draw Gas Plant Discharge Plan (GW-185)
Eddy County, New Mexico

Dear Mr. Ford:

During our telephone conversation on February 15, 2000, you indicated that the Oil Conservation Division (OCD) does not have the ability to grant extensions for discharge plan renewal applications as requested by Duke Energy Field Services, Inc. (DEFS) on February 7, 2000. Consequently, DEFS submits this letter to notify the OCD that a renewal application and any modifications for the Dagger Draw Gas Plant Discharge Plan (GW-185) will be submitted before the expiration date of the current plan which is April 12, 2000. Also per our telephone conversation, it is my understanding that as long as the renewal process begins prior to the expiration of the current plan, the current plan will remain in effect until the renewal application is approved.

As stated in the February 7, 2000 letter to the OCD, we will be conducting a site visit during the week of February 21, 2000 to Dagger Draw Gas Plant as well as Burton Flats, Carlsbad, and Pecos Diamond Gas Plants to collect data to update the discharge plans. I will keep you informed of our schedule.

If you have any questions, please call me at (303) 605-1717.

Sincerely,

Karin Char
Environmental Specialist

Duke Energy Field Services Inc.
A Duke Energy Company

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

February 7, 2000

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Dagger Draw Gas Plant Discharge Plan (GW-185)
Eddy County, New Mexico

Dear Mr. Ford:

As discussed in our telephone conversation on February 7, 2000, Duke Energy Field Services, Inc. requests a 120-day extension to submit the discharge plan application for Dagger Draw Gas Plant. During the week of February 20, 2000, Environmental Services, Inc. and I will be conducting a site visit to Dagger Draw Gas Plant as well as the other DEFS gas plants in New Mexico (Burton Flats, Carlsbad, and Pecos Diamond) to collect the necessary data to update the discharge plans. As requested, I will keep you informed of our site visit schedule.

We will submit the discharge plan for Dagger Draw Gas Plant before its expiration date, April 12, 2000. The discharge plans for the remaining gas plants will be submitted at least 120 days before their expiration dates.

I will be handling the discharge plans for the DEFS facilities in New Mexico and thus, if you have any questions please call me at (303) 605-1717.

Sincerely,

Karin Char
Environmental Specialist

2-14-2000
Denied by telephone
W Ford

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 11, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-142-564-984

Ms. Kristin M. Koblis
Environmental Scientist
Duke Energy Field Services, Inc.
P.O. Box 5493
Denver, Colorado 80217

RE: Discharge Plan GW-185 Renewal
Dagger Draw Gas Plant
Eddy County, New Mexico

Dear Ms. Koblis:

On April 12, 1995, the groundwater discharge plan renewal, GW-185, for the Duke Energy Field Services, Inc. Dagger Draw Gas Plant located in the SW/4 of Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on April 12, 1999.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, 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 Duke Energy Field Services, Inc. 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 **Dagger Draw Gas Plant** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $50.00 plus a flat fee equal to one-half of the original flat fee for gas plants. The $50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

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.** (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is also available on OCD's website at **www.emnrd.state.nm.us/ocd/**).

If the Dagger Draw Gas Plant 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, Inc. Company has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Artesia District Office

Z 142 564 984 OCD

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

Sent to K. Koblis	
Street & Number Duke	
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Postage	$
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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 GW-185	

PS Form **3800**, April 1995

Duke Energy Field Services Inc.
A Duke Energy Company

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

October 7, 1999

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87502

Re: Molecular Sieve Disposal to the Lea Land Landfill

Dear Jack:

Enclosed is a copy of the letter dated may 21, 1998 to Lea Land, Inc. discussing Duke Energy Field Services, Inc. request for disposal of molecular sieve at the Lea Land Landfill in Hobbs, New Mexico. The letter also contained the Waste Generator's Profile Sheet, MSDS sheet and all analytical data. I have also enclosed the faxed approval number (material profile number) on the profile sheet that Lea Land, Inc. assigned Duke Energy Field Services, Inc. for the disposal.

If you have any questions concerning this information, please feel free to call me at 303-595-3331.

Sincerely,
Duke Energy Field Services, Inc.

Kristin M. Koblis
Environmental Scientist

Duke Energy Field Services Inc.
A Duke Energy Company

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

May 21, 1998

Lea Land Inc.
Attn: Shelley
1300 West Main Street
Oklahoma City, OK 73106

Re: Submission of the Generator's Waste Profile Sheet for the Duke Energy Field Services, Inc. ("Duke Energy") Dagger Draw Gas Plant

Dear Shelley:

Duke Energy requests the disposal of molecular sieve generated at the Duke Energy Dagger Draw Gas Plant. Two 25-yard roll off boxes were filled with 30,000 lbs of spent molecular sieve. Three samples were taken from each roll off box and analyzed for TCLP VOCs, semi-VOCs, and metals; Paint filter test; and characteristic reactivity, ignitability and corrosivity. Sample results are listed in the enclosed laboratory analysis summary report.

Benzene and arsenic were the only constituents that have TCLP standards that were detected in the molecular sieve samples. The maximum concentration of benzene detected was 0.066 mg/l which is below the TCLP standard of 0.5 mg/l. Arsenic was detected at 0.008 mg/l which is below the TCLP standard of 5.0 mg/l. The flashpoint is greater than 60 degrees Celcius and the pH of the molecular sieve is 10. The samples tested negative for cyanide and sulfide reactivity.

The molecular sieve was field tested for Naturally Occurring Radioactive Material (NORM) using a Ludlum Model 19 microR meter. The molecular sieve registered 21 uR/hr. Background soil in the area is 20 uR/hr. Therefore, the molecular sieve does not contain NORM material.

Please find enclosed a copy of the completed Generator's Waste Profile Sheet, a MSDS for the calcium aluminosilicate and the laboratory analysis summary sheets. If you have any questions concerning this information, please feel free to call me at 303-595-3331.

Sincerely,
Duke Energy Field Services, Inc.

Kristin M. Koblis
Environmental Scientist

encl:

LEA LAND, INC.

X NEW ___ AMENDMENT PAGE 1 OF 5

Material Profile No: _____

A. GENERATOR INFORMATION

Generator Name Duke Energy Field Services, Inc. Dagger Draw Plant
Facility Address P.O. Box HH

City/County Artesia / Eddy
State NM Zip Code 88211-7533
State ID# _____
Fed NMR000001412
Technical Contact Kristin Kobles
Telephone (303) 595-3331 Ext. 4524 Fax (303) 629-7822
Billing Name Duke Energy Field Services, Inc.
Billing Address P.O. Box HH

City Artesia State NM Zip Code 88211-7533
Attention Steve Pack
Telephone (505) 457-2497 Ext. —

B. RCRA

RCRA Non Hazardous/Exempt? X Yes ___ No
General Description of Process: molecular sieve for dehydration of natural gas

C. ANNUAL REPORT CODES (see attached lists)

NAME OF WASTE STREAM: molecular sieve

SIC Code: 1321
Source Code: A49
Form Code: 319

Origin Code: 1
System Type: M132 (Landfill)

LEA LAND, INC.

C. ANNUAL REPORT CODES CONT. (see attached lists)

NAME OF WASTE STREAM: ______________________________

SIC Code: _ _ _ _
Source Code: _ _ _
Form Code: _ _ _

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: ______________________________

SIC Code: _ _ _ _
Source Code: _ _ _
Form Code: _ _ _

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: ______________________________

SIC Code: _ _ _ _
Source Code: _ _ _
Form Code: _ _ _

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: ______________________________

SIC Code: _ _ _ _
Source Code: _ _ _
Form Code: _ _ _

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: ______________________________

SIC Code: _ _ _ _
Source Code: _ _ _
Form Code: _ _ _

Origin Code: _
System Type: M 1 3 2 (Landfill)

LEA LAND, INC.

D. OTHER COMPONENTS

PCB's	X No	___ Yes	Total ppm _____ *
Cyanides	X No	___ Yes	Total ppm _____
Sulfides	X No	___ Yes	Total ppm _____
Pesticides	X No	___ Yes	Total ppm _____
Dioxins	X No	___ Yes	Total ppm _____

*If contained in spill media, concentration of original chemical prior to spill.

E. PHYSICAL CHARACTERISTICS

1. Infectious or Biological Waste? ___ Yes X No
2. NRC Regulated Radioactive? ___ Yes X No
3. "Listed" Hazardous Wastes? ___ Yes X No
   (coded in 40 CFR, Part 261)
4. Municipal Waste? ___ Yes X No
5. Asbestos Waste? ___ Yes X No
6. Reactivity? X None ___ Water Reactive
   ___ Cyanides ___ Shock Sensitive
   ___ Sulfides ___ DOT Explosive
   ___ Pyrophoric ___ Other _____
7. Solid 100 %
   Sludges _____ %
   Free Liquids _____ %
   100 %
8. **Weight**
   Density 42.45 lbs./cu. foot
9. **pH** ___ N/A
   ___ 0 - 2 ___ 10.1 - 12.4
   ___ 2.1 - 4 ___ ≥ 12.5
   X 4.1 - 10 Exact _____
10. Is this waste stored in vented drums? ___ Yes X No
    Do these drums contain free liquids? ___ Yes X No
    or Unfilled head space? ___ Yes X No

LEA LAND, INC.

WASTE PROFILE - PAGE 4 OF 5

11. Does this waste contain scrap metal pieces greater than 2 inches in size or any protruding re-bar (from concrete pieces)? ___ Yes X No
Please describe _____

F. METALS

___ NONE X TCLP (mg/L)

	Reg. Limit	Below	Above
Arsenic	5 mg/L	X	
Barium	100 mg/L		
Cadmium	1 mg/L		
Chromium	5 mg/L		
Lead	5 mg/L		
Mercury	0.2 mg/L		
Selenium	1 mg/L		
Silver	5 mg/L		
Others: benzene @	0.0516 mg/L		

G. PHYSICAL/CHEMICAL CONSTITUENTS

Attach all MSDS, Sample Analysis and Additional Information

H. ANTICIPATED VOLUME

Quantity	Container	Quantity	Container
_____	5-gal pail	_____	Cubic Yard Box
_____	15-gal carboy	_____	Super Sack
_____	30-gal drum	2-25yd	Rolloff/Dump Trailer
_____	55-gal drum	_____	Tanker
_____	85-gal drum	_____	Other _____

Per 1 Time — Week — Month 1 Year ___ Other _____

LEA LAND, INC. **WASTE PROFILE - PAGE 5 OF 5**

If empty containers which formerly contained hazardous waste are to be disposed:

Do they contain no more than 1 inch of residue on the bottom of the container?

___ Yes ___ No

Have they been rendered non-reusable (i.e., crushed, punctured, etc.)?

___ Yes ___ No

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature: _____ Date 5/21/98

ZEOCHEM®
Chemie Uetikon
and United Catalysts Inc.
Joint Venture

P.O. Box 35940
Louisville, KY 40232 USA
Telephone: 502-634-7600
Telex: 204190, 204239
Fax: 502-634-8133

MATERIAL SAFETY DATA SHEET

I. PRODUCT IDENTIFICATION

PRODUCT Z3-01, 02, 03, 04; Z4-01, 02; Z5-01, 02; Z10-01; Molecular Sieve 3A-Z8, 3A-Z8-02, 4A-Z8, 5A-Z8, 13X-Z8

FORMULA $Mx/n[AlO_2)x(SiO_2)y]+wH_2O$

CHEMICAL NAME Synthetic Sodium Potassium or Calcium Aluminosilicate

CHEMICAL FAMILY Molecular Sieve Zeolite

II.(A) INGREDIENTS

COMPONENT	CAS No.	Zeolite Type
Zeolite, NaA	1344-00-9	4A
Zeolite, KA	12736-96-8	3A
Zeolite, CaA	1344-01-0	5A
Zeolite, NaX	1344-00-9	13X
Mg Aluminosilicate	1327-43-1	Clay

II. (B) PRODUCT ANALYSES & EXPOSURE LIMITS

COMPONENT	CAS NO.	%	OSHA/PEL	ACGIH/TLV
Zeolite	See above	75-85	10mg/m^3	10mg/m^3
Mg Aluminosilicate	1327-43-1	23-15	10mg/m^3	10mg/m^3
Quartz	14808-60-7	2-0	0.1mg/m^3	0.1mg/m^3

III. PHYSICAL DATA

MELTING POINT ^oF >2900

MELTING POINT ^oC >1600

BULK DENSITY 0.68 g/cc

PERCENT VOLATILES BY WEIGHT <5%

DATE OF ISSUE: January 1, 1986
DATE OF REVISION: August 29, 1990

PRODUCT Z3-01, 02, 03, 04; Z4-01, 02; Z5-01, 02; Z10-01; Molecular Sieve 3A-Z8, 3A-Z8-02, 4A-Z8, 5A-Z8,13X-Z8

APPEARANCE AND ODOR Product may appear as light tan bead, cake or powder.

IV. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT Nonflammable

FIREFIGHTING MEDIA Dry chemical, water spray or foam.

FIRE AND EXPLOSION HAZARD - Negligible fire and explosion hazard when exposed to heat or flame by reaction with incompatible substances.

FIREFIGHTING - Nonflammable solids, liquids or gases: Cool containers that are exposed to flames with water from the side until well after fire is out. For massive fire in enclosed area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or discoloration of the tank due to fire.

V. HEALTH HAZARD DATA

Health hazards may arise from ingestion, inhalation and contact with the skin and eyes. Ingestion may result in damage to throat, esophagus, and/or gastro-intestinal tract. Inhalation may cause burning of the upper respiratory tract and/or temporary or permanent lung damage. Prolonged or repeated contact with the skin, in the absence of proper hygiene, may cause dryness, irritation, and/or dermatitis. Contact with eye tissue may result in irritation, burns or conjunctivitis. This product contains a small amount of crystalline silica which may cause delayed respiratory disease if inhaled over a prolonged period of time. IARC Monographs on the evaluation of the Carcinogenic Risk of Chemicals to Humans (volume 42, 1987) concludes that there is "limited evidence" of the carcinogenicity of crystalline silica to humans. IARC classification 2A.

First Aid (Inhalation) - Remove to fresh air immediately. If breathing has stopped, give artificial respiration. Keep affected person warm and at rest. Get medical attention immediately.

First Aid (Ingestion) - If large amounts have been ingested, give emetics to cause vomiting. Stomach siphon may be applied as well. Milk and fatty acids should be avoided. Get medical attention immediately.

PRODUCT Z3-01, 02, 03, 04; Z4-01, 02; Z5-01, 02; Z10-01; Molecular Sieve 3A-Z8, 3A-Z8-02, 4A-Z8, 5A-Z8, 13X-Z8

First Aid (Eyes) - Wash affected areas immediately and carefully for 15 to 20 minutes with running water. Get prompt medical attention.

First Aid (Skin) - Wash with soap and water.

NOTE TO PHYSICIAN - This product is a desiccant and generates heat as it absorbs water. The used product can contain material of hazardous nature. Identify that material and treat accordingly.

VI. REACTIVITY DATA

Reactivity - Is stable under normal temperatures and pressures in sealed containers. Hazardous polymerization will not occur. Moisture can cause rise in temperature which may result in burn. Avoid sudden contact with high concentrations of chemicals having high heats of adsorption such as olefins, HCl, etc.

VII. SPILLS OR LEAK PROCEDURES

Notify safety personnel of spills or leaks. Cleanup personnel need protection against inhalation of dusts or fumes. Eye protection is required. Vacuuming or wet methods of cleanup are preferred. Place in appropriate containers for disposal keeping airborne particulate at a minimum.

Disposal Method - In selecting the method of disposal, applicable local, state and federal regulations should be consulted.

VIII. SPECIAL PROTECTION INFORMATION

Respiratory Protection - Provide a NIOSH/MSHA jointly approved respirator in the absence of proper environmental control or where TLV for crystalline silica may be exceeded. Contact your safety equipment supplier for proper mask type.

Ventilation - Provide general and/or local exhaust ventilation to keep exposures below the threshold limit value. Ventilation used must be designed to prevent spots of dust accumulation or recycling of dusts.

Protective Clothing - Wear protective clothing, including gloves, to prevent repeated or prolonged skin contact.

PRODUCT Z3-01, 02, 03, 04; Z4-01, 02; Z5-01, 02; Z10-01; Molecular Sieve 3A-Z8, 3A-Z8-02, 4A-Z8, 5A-Z8, 13X-Z8

Eye Protection - Chemical splash goggles designed in compliance with OSHA regulations are recommended. Consult your safety equipment supplier.

IX. REGULATORY INFORMATION

The information presented herein is believed to be accurate but is not warranted. Recipients are advised to confirm in advance that the information is current and applicable to meet their circumstances.

This product contains substances which appear on lists of the indicated act or agency.

XX American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substance in the Work Environment

XX California Proposition 65

____ Clean Air Act 40 CFR 61

____ Clean Water Act 40 CFR 116

____ Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) 40 CFR 302

XX International Agency for Research on Cancer (IARC) Monographs on the Evaluation of Carcinogenic Risks to Humans Volumes 1-42

____ NTP Annual Report on Carcinogens

XX Occupational Safety and Health Administration (OSHA) 29 CFR 1910

____ Resource Conservation and Recovery Act (RCRA) 40 CFR 261 Subpart C

____ Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III Section 313 40 CFR 372

XX Toxic Substances Control Act (TSCA) 40 CFR 700

ASSAIGAI ANALYTICAL LABORATORIES, INC.
7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 • (505) 345-8964 • FAX (505) 345-7259
3332 Wedgewood, E-5 • El Paso, Texas 79925 • (915) 593-6000 • FAX (915) 593-7820

* explanation of codes	
B	analyte detected in Method Blank
E	result is estimated
H	analyzed out of hold time
N	tentatively identified compound
S	subcontracted
1-9	see footnote

RT HICKS CONSULTING, LTD
attn: RANDY HICKS
4665 INDIAN SCH. NE 106
ALBUQUERQUE, NM 87110

Assaigai Analytical Laboratories, Inc.

Certificate of Analysis

Client: **RT HICKS CONSULTING, LTD**
Project: **9804161 DAGGER DRAW**

William P. Biava: President of Assaigai Analytical Laboratories, Inc.

Client Sample ID: ***DAGGER DRAW MOL SIEVE*** Sample Matrix: ***SOIL*** Sample Collected: ***04/16/98 11:40:00***

Fraction	QC Group	CAS #		Result	Units	Dilution Factor	Detection Limit	*	Sequence	Run Date
			TCLP SW846-8240 Volatiles							
9804161-01A	X98235	75-35-4	1,1 Dichloroethene	ND	mg / L	10	0.001		XG.1998.404-11	04/29/98
	X98235	107-06-2	1,2 Dichloroethane	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	106-46-7	1,4 Dichlorobenzene	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	78-93-3	2-Butanone (MEK)	0.092	mg / L	10	0.001		XG.1998.404-11	
	X98235	71-43-2	Benzene	0.064	mg / L	10	0.001		XG.1998.404-11	
	X98235	56-23-5	Carbon tetrachloride	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	106-90-7	Chlorobenzene	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	67-66-3	Chloroform	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	127-18-4	Tetrachloroethene	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	79-01-6	Trichloroethene	ND	mg / L	10	0.001		XG.1998.404-11	
	X98235	75-01-4	Vinyl chloride	ND	mg / L	10	0.001		XG.1998.404-11	
			TCLP SW846-8270 Semi-Volatiles							
9804161-01B	X98227	106-46-7	1,4-Dichlorobenzene	ND	mg / L	1.72	0.001		XG.1998.376-5	04/25/98
	X98227	95-95-4	2,4,5-Trichlorophenol	ND	mg / L	1.72	0.01		XG.1998.376-5	
	X98227	88-06-2	2,4,6-Trichlorophenol	ND	mg / L	1.72	0.01		XG.1998.376-5	
	X98227	121-14-2	2,4-Dinitrotoluene	ND	mg / L	1.72	0.01		XG.1998.376-5	
	X98227	95-46-7	2-Methylphenol	0.006	mg / L	1.72	0.001		XG.1998.376-5	
	X98227		3+4 Methylphenol	0.020	mg / L	1.72	0.001		XG.1998.376-5	
	X98227	118-74-1	Hexachlorobenzene	ND	mg / L	1.72	0.001		XG.1998.376-5	
	X98227	87-68-3	Hexachlorobutadiene	ND	mg / L	1.72	0.001		XG.1998.376-5	
	X98227	67-72-1	Hexachloroethane	ND	mg / L	1.72	0.001		XG.1998.376-5	
	X98227	98-95-3	Nitrobenzene	ND	mg / L	1.72	0.001		XG.1998.376-5	

Certificate of Analysis

Client: **RT HICKS CONSULTING, LTD**

Project: **9804161 DAGGER DRAW**

9804161-01B	X98227	87-86-5	Pentachlorophenol	ND	mg / L	1.72	0.01		XG.1998.376-5	04/25/98
	X98227	110-86-1	Pyridine	ND	mg / L	1.72	0.01		XG.1998.376-5	
			SW846-1010							
9804161-01C	SFL98009		Flashpoint	> 60	Deg C	1	20		MT.1998.998-3	04/20/98
			SW846-7.3							
9804161-01C	W98157		Cyanide, Reactive	ND	mg / Kg	1	250		MW.1998.612-5	05/08/98
	W98157		Sulfide, Reactive	ND	mg / Kg	1	500		MT.1998.1202-4	
			SW846-9045B							
9804161-01C	SPH98009		pH	10.0	units	1	0.1		MT.1998.997-1	04/20/98
			SW846-9095							
9804161-01C	MT.1998.1025		Paint Filter Liquids	No free liquid	NA	1		1	MT.1998.1025-1	04/21/98
			TCLP SW846-6010							
9804161-01D	MT.1998.1053		Arsenic	ND	mg/L	1	0.5	S	MT.1998.1053-1	04/22/98
	MT.1998.1053		Barium	ND	mg/L	1	1	S	MT.1998.1053-1	
	MT.1998.1053		Cadmium	ND	mg/L	1	0.25	S	MT.1998.1053-1	
	MT.1998.1053		Chromium	ND	mg/L	1	0.25	S	MT.1998.1053-1	
	MT.1998.1053		Lead	ND	mg/L	1	0.5	S	MT.1998.1053-1	
	MT.1998.1053		Selenium	ND	mg/L	1	0.5	S	MT.1998.1053-1	
	MT.1998.1053		Silver	ND	mg/L	1	0.5	S	MT.1998.1053-1	
			TCLP SW846-7470							
9804161-01D	MT.1998.1054		Mercury	ND	mg/L	1	0.002	S	MT.1998.1054-1	04/23/98

**** Sample specific analytical Detection Limit is determined by multiplying the sample Dilution Factor by the listed method Detection Limit. ****

footnote [1] Please note,the analytical batch ID is SMSCWC-98-002.

ASSAIGAI ANALYTICAL LABORATORIES, INC.
7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 • (505) 345-8964 • FAX (505) 345-7259
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* explanation of codes	
B	analyte detected in Method Blank
E	result is estimated
H	analyzed out of hold time
N	tentatively identified compound
S	subcontracted
1-9	see footnote

RT HICKS CONSULTING, LTD
attn: RANDY HICKS
4665 INDIAN SCH. NE 106
ALBUQUERQUE, NM 87110

Assaigai Analytical Laboratories, Inc.

Certificate of Analysis

Client: **RT HICKS CONSULTING, LTD**
Project: **9805041 DAGGER DRAW**

William P. Biava, President of Assaigai Analytical Laboratories, Inc.

Client Sample ID: ***EAST BOT*** | Sample Matrix: ***SOIL*** | Sample Collected: ***04/28/98 09:00:00***

Fraction	QC Group	CAS #		Result	Units	Dilution Factor	Detection Limit	*	Sequence	Run Date
			TCLP SW846-8240 Volatiles							
9805041-01A	X98253	75-35-4	1,1 Dichloroethene	ND	mg / L	5	0.001		XG.1998.444-2	05/08/98
	X98253	107-06-2	1,2 Dichloroethane	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	106-46-7	1,4 Dichlorobenzene	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	78-93-3	2-Butanone (MEK)	0.061	mg / L	5	0.001		XG.1998.444-2	
	X98253	71-43-2	Benzene	0.066	mg / L	5	0.001		XG.1998.444-2	
	X98253	56-23-5	Carbon tetrachloride	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	108-90-7	Chlorobenzene	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	67-66-3	Chloroform	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	127-18-4	Tetrachloroethene	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	79-01-6	Trichloroethene	ND	mg / L	5	0.001		XG.1998.444-2	
	X98253	75-01-4	Vinyl chloride	ND	mg / L	5	0.001		XG.1998.444-2	
			TCLP SW846-8270 Semi-Volatiles							
9805041-01B	X98250	106-46-7	1,4-Dichlorobenzene	ND	mg / L	1.68	0.001		XG.1998.443-3	05/08/98
	X98250	95-95-4	2,4,5-Trichlorophenol	ND	mg / L	1.68	0.01		XG.1998.443-3	
	X98250	88-06-2	2,4,6-Trichlorophenol	ND	mg / L	1.68	0.01		XG.1998.443-3	
	X98250	121-14-2	2,4-Dinitrotoluene	ND	mg / L	1.68	0.01		XG.1998.443-3	
	X98250	95-48-7	2-Methylphenol	0.007	mg / L	1.68	0.001		XG.1998.443-3	
	X98250		3+4 Methylphenol	0.016	mg / L	1.68	0.001		XG.1998.443-3	
	X98250	118-74-1	Hexachlorobenzene	ND	mg / L	1.68	0.001		XG.1998.443-3	
	X98250	87-68-3	Hexachlorobutadiene	ND	mg / L	1.68	0.001		XG.1998.443-3	
	X98250	67-72-1	Hexachloroethane	ND	mg / L	1.68	0.001		XG.1998.443-3	
	X98250	98-95-3	Nitrobenzene	ND	mg / L	1.68	0.001		XG.1998.443-3	

Certificate of Analysis

Client: **RT HICKS CONSULTING, LTD**

Project: **9805041 DAGGER DRAW**

9805041-01B	X98250	87-86-5	Pentachlorophenol	ND	mg / L	1.68	0.01		XG.1998.443-3	05/08/98
	X98250	110-86-1	Pyridine	ND	mg / L	1.68	0.01		XG.1998.443-3	
			TCLP SW846-6010 ICP							
9805041-01B	M98358	7440-39-3	Barium	ND	mg / L	1	0.5		MW.1998.615-80	05/08/98
	M98358	7440-43-9	Cadmium	ND	mg / L	1	0.02		MW.1998.615-80	
	M98358	7440-47-3	Chromium	ND	mg / L	1	0.02		MW.1998.615-80	
	M98358	7782-49-2	Selenium	ND	mg / L	1	0.05		MW.1998.615-80	
			TCLP SW846-7000 series AA-FL							
9805041-01B	M98358	7439-92-1	Lead	ND	mg / L	1	0.1		MW.1998.619-20	05/09/98
	M98358	7440-22-4	Silver	0.02	mg / L	1	0.01		MW.1998.618-12	
			TCLP SW846-7000 series AA-GF							
9805041-01B	M98367	7440-38-2	Arsenic	0.010	mg / L	1	0.005		MW.1998.626-12	05/11/98
			TCLP SW846-7470							
9805041-01B	M98363	7439-97-6	Mercury	ND	mg / L	1	0.002		MW.1998.622-12	05/09/98
			SW846-1010							
9805041-01C	SFL98010		Flashpoint	> 60	Deg C	1	20		MT.1998.1209-3	05/11/98
			SW846-7.3							
9805041-01C	W98157		Cyanide, Reactive	ND	mg / Kg	1	250		MW.1998.612-6	05/08/98
	W98157		Sulfide, Reactive	ND	mg / Kg	1	500		MT.1998.1202-5	
			SW846-9045B							
9805041-01C	SPH98010		pH	10.0	units	1	0.1		MT.1998.1211-1	05/08/98
			SW846-9095							
9805041-01D	MT.1998.1221		Paint Filter Liquid	No Free Liquid	NA	1	1		MT.1998.1221-1	05/12/98

Client Sample ID: ***WEST MIDDLE*** Sample Matrix: ***SOIL*** Sample Collected: ***04/28/98 11:30:00***

Fraction	QC Group	CAS #		Result	Units	Dilution Factor	Detection Limit	*	Sequence	Run Date
			TCLP SW846-8240 Volatiles							
9805041-02A	X98253	75-35-4	1,1 Dichloroethene	ND	mg / L	5	0.001		XG.1998.444-3	05/08/98
	X98253	107-06-2	1,2 Dichloroethane	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	106-46-7	1,4 Dichlorobenzene	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	78-93-3	2-Butanone (MEK)	0.088	mg / L	5	0.001		XG.1998.444-3	
	X98253	71-43-2	Benzene	0.046	mg / L	5	0.001		XG.1998.444-3	
	X98253	56-23-5	Carbon tetrachloride	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	108-90-7	Chlorobenzene	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	67-66-3	Chloroform	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	127-18-4	Tetrachloroethene	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	79-01-6	Trichloroethene	ND	mg / L	5	0.001		XG.1998.444-3	
	X98253	75-01-4	Vinyl chloride	ND	mg / L	5	0.001		XG.1998.444-3	
			TCLP SW846-8270 Semi-Volatiles							
9805041-02B	X98250	106-46-7	1,4-Dichlorobenzene	ND	mg / L	1.42	0.001		XG.1998.443-4	05/08/98

Certificate of Analysis

Client: **RT HICKS CONSULTING, LTD**

Project: **9805041 DAGGER DRAW**

9805041-02B	X98250	95-95-4	2,4,5-Trichlorophenol	ND	mg / L	1.42	0.01		XG.1998.443-4	05/08/98
	X98250	88-06-2	2,4,6-Trichlorophenol	ND	mg / L	1.42	0.01		XG.1998.443-4	
	X98250	121-14-2	2,4-Dinitrotoluene	ND	mg / L	1.42	0.01		XG.1998.443-4	
	X98250	95-48-7	2-Methylphenol	0.003	mg / L	1.42	0.001		XG.1998.443-4	
	X98250		3+4 Methylphenol	0.010	mg / L	1.42	0.001		XG.1998.443-4	
	X98250	118-74-1	Hexachlorobenzene	ND	mg / L	1.42	0.001		XG.1998.443-4	
	X98250	87-68-3	Hexachlorobutadiene	ND	mg / L	1.42	0.001		XG.1998.443-4	
	X98250	67-72-1	Hexachloroethane	ND	mg / L	1.42	0.001		XG.1998.443-4	
	X98250	98-95-3	Nitrobenzene	ND	mg / L	1.42	0.001		XG.1998.443-4	
	X98250	87-86-5	Pentachlorophenol	ND	mg / L	1.42	0.01		XG.1998.443-4	
	X98250	110-86-1	Pyridine	ND	mg / L	1.42	0.01		XG.1998.443-4	
			TCLP SW846-6010 ICP							
9805041-02B	M98358	7440-39-3	Barium	ND	mg / L	1	0.5		MW.1998.615-83	05/08/98
	M98358	7440-43-9	Cadmium	ND	mg / L	1	0.02		MW.1998.615-83	
	M98358	7440-47-3	Chromium	ND	mg / L	1	0.02		MW.1998.615-83	
	M98358	7782-49-2	Selenium	ND	mg / L	1	0.05		MW.1998.615-83	
			TCLP SW846-7000 series AA-FL							
9805041-02B	M98358	7439-92-1	Lead	ND	mg / L	1	0.1		MW.1998.619-23	05/09/98
	M98358	7440-22-4	Silver	ND	mg / L	1	0.01		MW.1998.618-15	
			TCLP SW846-7000 series AA-GF							
9805041-02B	M98367	7440-38-2	Arsenic	0.008	mg / L	1	0.005		MW.1998.626-15	05/11/98
			TCLP SW846-7470							
9805041-02B	M98363	7439-97-6	Mercury	ND	mg / L	1	0.002		MW.1998.622-15	05/09/98
			SW846-1010							
9805041-02C	SFL98010		Flashpoint	> 60	Deg C	1	20		MT.1998.1209-4	05/11/98
			SW846-7.3							
9805041-02C	W98157		Cyanide, Reactive	ND	mg / Kg	1	250		MW.1998.612-7	05/08/98
	W98157		Sulfide, Reactive	ND	mg / Kg	1	500		MT.1998.1202-6	
			SW846-9045B							
9805041-02C	SPH98010		pH	9.9	units	1	0.1		MT.1998.1211-3	05/08/98
			SW846-9095							
9805041-02D	MT.1998.1221		Paint Filter Liquid	No Free Liquid	NA	1	1		MT.1998.1221-2	05/12/98

**** Sample specific analytical Detection Limit is determined by multiplying the sample Dilution Factor by the listed method Detection Limit. ****

LEA LAND, INC.

X NEW ___ AMENDMENT PAGE 1 OF 5
Material Profile No: 059823

A. GENERATOR INFORMATION

Generator Name Duke Energy Field Services, Inc. Dagger Draw Plant
Facility Address P.O. Box HH
City/County Artesia / Eddy
State NM Zip Code 88211-7533
State ID# ___
Fed NMR000001412
Technical Contact Kristin Kobus
Telephone (303) 595-3331 Ext. 4524 Fax (303) 629-7822
Billing Name Duke Energy Field Services, Inc.
Billing Address P.O. Box HH
City Artesia State NM Zip Code 88211-7533
Attention Steve Pack
Telephone (505) 457-2497 Ext. —

B. RCRA RCRA Non Hazardous/Exempt? X Yes ___ No
General Description of Process: molecular sieve for dehydration of natural gas

C. ANNUAL REPORT CODES (see attached lists)

NAME OF WASTE STREAM: molecular sieve

SIC Code: 1321
Source Code: A49
Form Code: 319

Origin Code: 1
System Type: M132 (Landfill)

Rev. 05-08-97

Duke Energy Field Services Inc.
A Duke Energy Company

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

May 12, 1998

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87502

Re: Addendum to the Duke Energy Field Services, Inc. ("Duke Energy") Dagger Draw Gas Plant Discharge Plan

Dear Jack:

Duke Energy requests that OCD add the following addendum to the Dagger Draw Gas Plant Discharge Plan:

ATTACHMENT VI

A. 12. OTHER LIQUID AND SOLID WASTES

Calcium aluminosilicate is replaced from the four molecular sieve vessels every four years. Each vessel contains 7,500 lbs of the molecular sieve totaling 30,000 lbs for the complete removal of waste from the vessels. The wastes are stored on-site in 2-25 yard roll off boxes until disposal. Freemeyer Company, Inc. will transport the waste to the Hobbs/Lea County Landfill for disposal. Laboratory analysis was conducted on the molecular sieve to demonstrate that it is a nonhazardous material and below NORM concentrations specified in 20 NMAC 3.1 subpart 1403.C and D. In addition, Waste Management has certified that the molecular sieve is nonhazardous and is accepted for disposal at the Hobbs/Lea County Landfill.

If you have any questions concerning this information, please feel free to call me at 303-595-3331.

Sincerely,
Duke Energy Field Services, Inc.

Kristin M. Koblis
Environmental Scientist

Duke Energy Field Services Inc.
A Duke Energy Company

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

March 30, 1998

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87502

Re: Facility Name Change for the PanEnergy Field Services, Inc. Pecos Diamond Gas Plant and the Liquid Energy Dagger Draw Gas Plant

GW-185

Dear Jack:

Effective July 1, 1997 the name PanEnergy Field Services, Inc. was changed to Duke Energy Field Services, Inc. for the Pecos Diamond Gas Plant. In addition, Duke Energy acquired the Dagger Draw Gas Plant from Liquid Energy Corp. on December 1995. The name should be changed to the Duke Energy Field Services, Inc. Dagger Draw Gas Plant.

If you have any questions concerning this information, please feel free to call me at 303-595-3331.

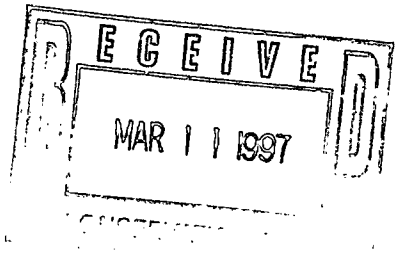
Sincerely,
Duke Energy Field Services, Inc.

Kristin M. Koblis
Environmental Scientist

PanEnergy™

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

March 10, 1997



OCD Santa Fe Office
Attn: Roger Anderson
2040 South Pacheco Street
Santa Fe, NM 87505

RE: Discharge Plant Fees GW-185
Dagger Draw Gas Plant
Eddy County, New Mexico

Dear Mr. Anderson,

As per your request, enclosed is a check in the amount of $2,618.00 for the Discharge Plan Fee for PanEnergy Field Services, Inc. Dagger Draw Gas Plant located in Eddy County, New Mexico.

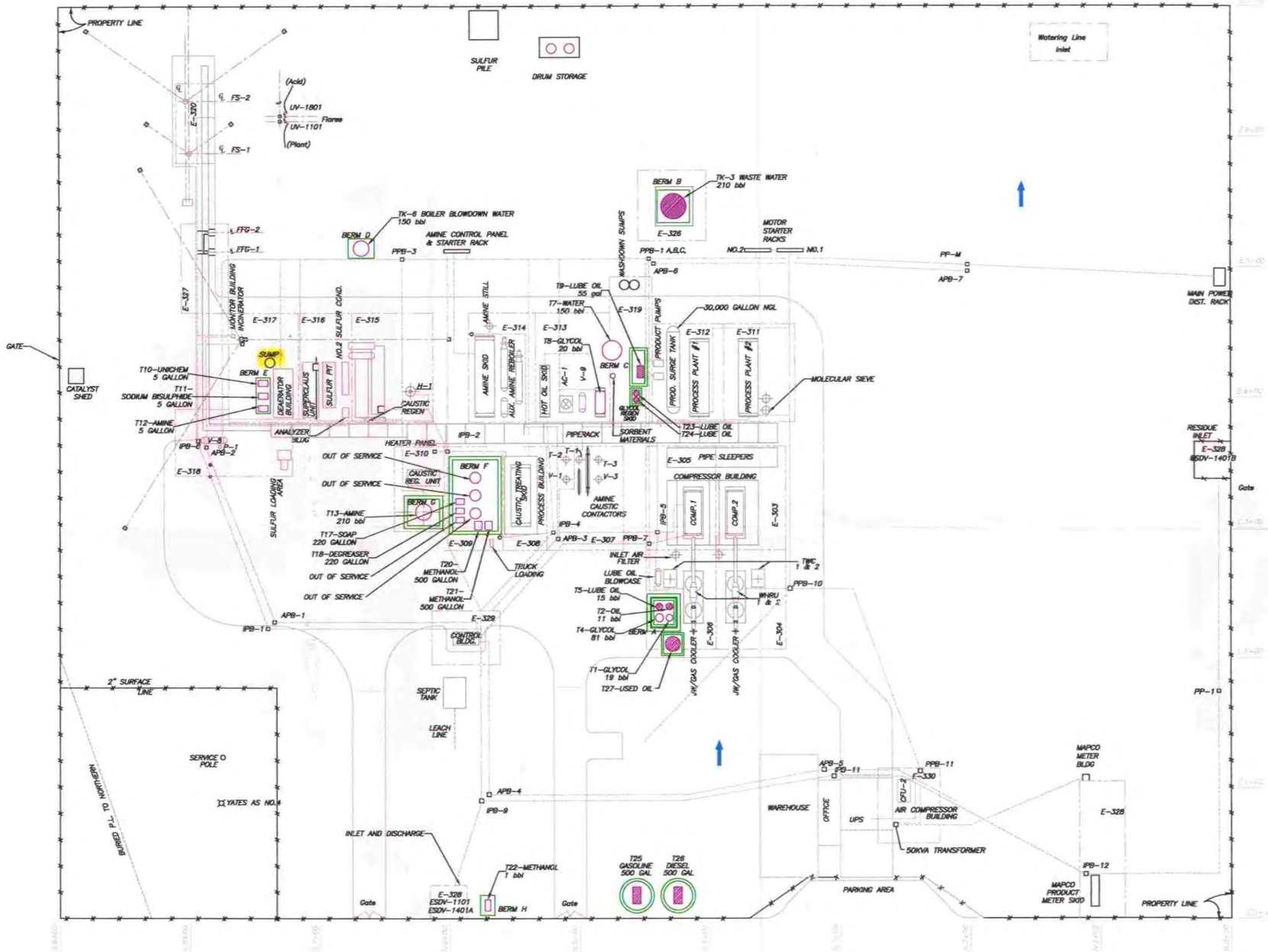
Your cooperation in this matter is greatly appreciated. Should you have any questions regarding this matter, please do not hesitate to contact me at (303) 595-3331.

Sincerely,

Robert L. Pearson
Manager of Environmental Affairs

Enclosure

RLP/mv



LEGEND

- SURFACE WATER FLOW DIRECTION
- FENCE LINE
- CONTAINMENT BERM
- ABOVEGROUND STORAGE TANK (AST) OR DRUM
- SPCC-REGULATED AST OR DRUM

40 0 20 40
SCALE IN FEET

NOT TO SCALE
NOTE: SCALE IS APPROXIMATE. DRAWING IS BASED ON A FIELD SKETCH; ACTUAL FACILITIES MAY VARY IN SIZE AND POSITION FROM THOSE REPRESENTED HERE.

SPCC PLOT PLAN

REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.
0	3-22-02	DRAWN FROM SECOR SKETCH (4-13-00)	J.R.E.	K.C.		

REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.

Duke Energy® Field Services
A New Kind of Energy™

DAGGER DRAW GAS PLANT
DAGGER DRAW GATHERING SYSTEM
Eddy County
NEW MEXICO

DWG. NO. I:DEFS_EHS\SPCC_Plans\NewMexico\DaggerDraw_Plot

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 29, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-752

Mr. Greg Lewis
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, TX 77387-4000

RE: Discharge Plan Fees GW-185
Dagger Draw Gas Plant
Eddy County, New Mexico

Dear Mr. Lewis:

On April 17, 1995, Liquid Energy Corporation, received, via certified mail, an approval dated April 12, 1995 from the New Mexico Oil Conservation Division (OCD) for discharge plan GW-185. Each discharge plan has a filing fee and a flat fee as described in WQCC Section 3114 (see **attachment**). The OCD has not as of this date (January 29, 1997) received the annual incremental amount of $717. The last check submitted by Liquid Energy Corporation was dated April 28, 1995. The total flat fee amount remaining is $2,618 of the original $3,335 flat fee for discharge plan GW-185.

Liquid Energy Corporation will submit the remaining $2,618 flat fee in full by March 3, 1997 in order to be in compliance with Water Quality Control Commission Regulation 3114.B.6, or the OCD may initiate enforcement actions which may include fines and/or an order to cease all operations at the facility. Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

If you have any questions regarding this matter, please contact me at (505)-827-7152 or Mr. Patricio Sanchez at (505) 827-7156.

Sincerely,

Roger Anderson
Environmental Bureau Chief

RCA/pws

xc: Artesia OCD district office
attachment

PS Form 3800, April 1995

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

Sent to Mr Lewis - GW-185
Street & Number LIQUID ENERGY Corp.
Post Office, State, & ZIP Code Plant

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	

P 288 258 752

Chris Eustice

From: Chris Eustice
To: Tim Gumm
Cc: Ray Smith
Subject: Liquid Energy - Dagger Draw Gas Plant Discharge Plan Approval
Date: Tuesday, March 14, 1995 10:07AM
Priority: High

Please review and provide me with a written copy of any technical comments you have about the above referenced facility. This operator submitted to the OCD Santa Fe Office their discharge plan in January and it is ready for approval.

Please respond by 4pm March 16, 1995. Thank you.

Chris Eustice

From: Tim Gumm
Date sent: Tuesday, March 14, 1995 10:18AM
To: Chris Eustice
Subject: Registered: Tim Gumm

Your message
To: Tim Gumm
Subject: Liquid Energy - Dagger Draw Gas Plant Discharge Plan Approval
Date: Tuesday, March 14, 1995 10:07AM
was accessed on
Date: Tuesday, March 14, 1995 10:18AM

Chris Eustice

From: Ray Smith
Date sent: Monday, March 20, 1995 2:58PM
To: Chris Eustice
Subject: Registered: Ray Smith

Your message
To: Ray Smith
Subject: Liquid Energy - Dagger Draw Gas Plant Discharge Plan Approval
Date: Tuesday, March 14, 1995 10:07AM
was accessed on
Date: Monday, March 20, 1995 2:58PM

Affidavit of Publication

No. 14983

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 days consecutive weeks on the same day as follows:

First Publication February 8, 1995

Second Publication

Third Publication

Fourth Publication

[signature]

Subscribed and sworn to before me this 14th day of February 1995

[signature]

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Publication

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, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-60)- Williams Field Services, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a request to modify their existing discharge plan for the Milagro Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. This modification proposal addresses the addition of a fourth boiler, a forth amine train and installation of a cogeneration facility. Approximately 1500 gallons per day of process wastewater will be disposed of in an evaportaion pond double-lined with a synthetic impervious liner with a leak detection system. Groundwater most likely to be affected by an accidental discharge is at a depth of 60 feet with a total dissolved solids concentrations of approximately 5800 mg/1. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-186) - Liquid Energy Corporation, Greg Lewis, Manager, Environmental and Safety, P.O. Box 4000, The Woodlands, Texas, 77387-4000, has submitted a discharge plan application for their Dagger Draw Gas Processing Plant located in the SW/4 SW/4, Section 25, Township 18 South, Range 23 East, NMPM, Eddy County, New Mexico. Approximately 2 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/1 is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental dischareg is at a depth of 195 feet with a total dissolved solids concentrations of approximately 1535 mg/1. The discharge plan addresses how spill, 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 [illegible] the address given [illegible] discharge plan application may be viewed at the above address between 8:00 [illegible] and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed dis[...] modification [...] the Oil Con[...] shall allow [...] days after th[...] tion of thi[...] which comm[...] mitted to him[...] ing may be[...] interested p[...] public heari[...] the reason[...] shall be hel[...] be held if [...] mines that [...] public intere[...] If no hearin[...] rector will [...] prove the pl[...] formation [...] lic hearing [...] rector will [...] based on [...] the plan an[...] ented at the[...] GIVEN und[...] Mexico Co[...] sion at San[...] on this 1s[...] 1995. [...] STATE [...] OIL [...] WI[...]

SEAL

Published [...] Press, Art[...] 8, 1995.

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

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(GW-60) - Williams Field Services, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10068, Salt Lake City, Utah 84158-0900, has been submitted a request to modify their existing discharge plan for the Ellinger Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. This modification proposal addresses the addition of a fourth boiler, a forth amine train and installation of a cogeneration facility. Approximately 1500 gallons per day of process wastewater will be disposed of in an evaporation pond double-lined with a synthetic impervious liner with a leak detection system. Ground water most likely to be affected by an accidental discharge is at a depth of 90 feet with a total dissolved solids concentrations of approximately 5800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-186) - Liquid Energy Corporation, Greg Lewis, Manager, Environmental and Safety, P.O. Box 4000, The Woodlands, Texas 77387-4000, has submitted a discharge plan application for their Dagger Draw Gas Processing Plant located in the SW/4 SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 2 barrel per day of produced water with a total dissolved solids concentration (tds) exceed of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 195 feet with a total dissolved solids concentrations of approximately 1553 mg/l. The discharge plan addresses how spill, 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 4:00 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 intersted 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. 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 1st day of February, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/William J. Lemay, Director

Journal: February 12, 1995

STATE OF NEW MEXICO
County of Bernalillo SS

RECEIVED
MAR 08 1995
Environmental Bureau
Oil Conservation Division

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being of the 12th day of February, 1995, and the subsequent consecutive publications on _____, 1995

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 13th day of, Feb. 1995

OFFICIAL SEAL
Megan Millage
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires 5-20-98

PRICE $42.28
Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

OK to
CC

NOTICE OF PUBLICATION

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

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(GW-186) - Liquid Energy Corporation, Greg Lewis, Manager, Environmental and Safety, P.O. Box 4000, The Woodlands, Texas, 77387-4000, has submitted a discharge plan application for their Dagger Draw Gas Processing Plant located in the SW/4 SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 2 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 195 feet with a total dissolved solids concentrations of approximately 1535 mg/l. The discharge plan addresses how spill, 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 4:00 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 1st day of February, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

January 6, 1995

OCD Environmental Bureau
PO Box 2088
Santa Fe, NM 87504-2088

Re : Ground Water Discharge Plan
Dagger Draw Gas Processing Plant
Liquid Energy Corp.

Dear Sirs:

Enclosed is a permit application for a discharge plan for the Dagger Draw gas processing plant in Eddy County. We have received an extension to file this application until January 7th of 1995. This application is complete and accurate to the best of our knowledge.

If you have any questions, please call me at (713)-377-7148.

Yours Truly,

Greg Lewis
Manager, Environmental and Safety
Liquid Energy Corporation

LIQUID ENERGY CORPORATION 2001 TIMBERLOCH PLACE
P.O. BOX 4000, THE WOODLANDS, TEXAS 77387-4000 713/363-5500
A subsidiary of Mitchell Energy & Development Corp.

ATTACHMENT IV

The landowner is :

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210
Phone - 505-748-1471

ATTACHMENT V

A plot plan of the facility is enclosed, which shows all equipment on the site.

ATTACHMENT VI

The following sources and quantities of effluent are present at our facility. Please note that all effluent sources are contained within the facility and properly disposed of. Other than non-contact rainwater, we do not have any surface discharge from this facility. Since these sources of effluent are properly discharged, we do not have detailed analyses of all effluent.

A. 1. Separators

NAME	MATERIAL	AMOUNT	COMMENTS
Inlet Separator	Saltwater & Hydrocarbons	0-5 Bbls/mo.	
Inlet Filter Separator	Saltwater, Hydrocarbons and Particulates	0-5 Bbls/mo.	
Amine Contactor	Amine and Hydrocarbons	0-5 Gals/mo.	
Caustic Afterscrubber	10% Sodium Hydroxide Solution	0-15 Gal/mo.	This liquid goes to TK2A&B for disposal to CRI.
Cryo Plant #1 Inlet Separator	Water, Glycol and Hydrocarbon	25-50 Gal/mo.	
Cryo Plant #2 Inlet Separator	Water, Glycol & Hydrocarbon	25-50 Gal/mo.	

Cryo Plant #1 Regen Gas Scrubber	Sour Liquids	400-500 Bbls/mo.	
Cryo Plant #2 Regen Gas Scrubber	Sour Liquids	400-500 Bbls/mo.	
Plant Fuel Scrubber	Water and Hydrocarbon	0-15 Gal/mo.	
MEP #1 Suction Scrubber	Hydrocarbons	0-5 Gal/mo.	
MEP #2 Suction Scrubber	Hydrocarbons	0-5 Gal/mo.	
MEP #1 Interstage Scrubber	Hydrocarbons	0-5 Gal/mo.	
MEP #2 Interstage Scrubber	Hydrocarbons	0-5 Gal/mo.	

A. 2. BOILERS

NAME	MATERIAL	AMOUNT	COMMENTS
Waste Heat Reclaimer 350# Steam	Water and Particulates	20-40 Bbls/mo.	
Auxiliary Boiler	Water	0-5 Gal/mo.	

A. 3. ENGINE COOLING WATER

Any engine cooling water that may leak from the system are captured in the compressor building sump and transferred thru a 4" drain line to the sumps on the east side of the plant. From the sumps, the liquids are sent to Yates Petroleum through a 2" sour liquids line. Estimated volume = 0-5 gallons/month.

A. 4. COOLING TOWER

The Dagger Draw gas plant does not incorporate the use of cooling towers in the treatment or processing of natural gas.

A. 5. SEWAGE

The Dagger Draw plant has two separate septic tanks/leach lines - one for the office/warehouse area and one for the operator control building. No other wastes from the facility are commingled with this septic system waste.

A. 6. WASTE LUBRICATION AND MOTOR OILS

Waste lubrication and oil that may leak from the compressors or engines is caught in a cement lined containment system. From this cement containment, the waste oil is transferred to the sumps and on to Yates Petroleum through a 2" liquid line for disposal.

A. 7. WASTE AND SLOP OIL

Waste and slop oil is handled in a similar manner to the waste lubrication/motor oils discussed above.

A. 8. USED FILTERS

All filters (amine, glycol, caustic, engine oil and vehicle) are drained at the sumps and the liquid is pumped to Yates Petroleum for disposal. The filters are picked up on a monthly basis by:

Pro-Cycle Metals, Inc.
320 Scroggins Rd.
Springtown, Tx 76068

Pro-Cycle recycles the filters in accordance with all applicable laws and regulations.

A. 9. SOLIDS AND SLUDGES FROM TANKS

Sludge from our sump tanks is cleaned on a yearly basis by OK Hot Oil Company. All sludge is disposed at their disposal facilities in Loco Hills. All sumps are visually inspected at the time of cleaning. We estimate 10-20 barrels of sludge per year from each sump.

A. 10. CLEANING OPERATIONS USING SOLVENTS AND DEGREASERS

We use a hydrocarbon based solvent in our parts washer located inside the warehouse. We use a biodegradable cleaning soap in conjunction with a high pressure washer to wash down our plant skids and cement drainage areas. We estimate usage of 0-2 gallons of solvent per month for the parts washer.

A. 11. TRUCK, TANK AND DRUM WASHING

We do not do any commercial type washing of drums, tanks or trucks. Drums are normally returned to the distributor, but if they are cleaned it is done within our cement containment area.

A. 12. OTHER LIQUID AND SOLID WASTES

Our amine, caustic, hot oil, glycol and cryogenic plant skids are all cleaned on a regular basis. All of these skids, as well as the engine room, have concrete containment areas that prevent any contaminants from discharging onto the ground. All washwater, along with any chemicals that may have leaked or spilled, are drained through a 4" PVC drain system to the sump system on the east side of the pant. This sump system collects this material (along with rainwater that may fall within these contained areas) for pumping to Yates through a 2" liquid line.

Caustic storage (3 tanks at 400 barrels each) is located within a cement containment wall. Any spillage is contained and disposed of properly.

We have an earthen diked area which contains the following tanks

1. Amine storage tank (150 barrels)
2. Water blow down (150 barrels)
3. Oil storage (75 barrels and 500 gallons)
4. Engine coolant (500 and 1000 gallons)

We have a second earthen dike which contains the 210 barrel slop oil tank. All of these dikes are designed to contain at least 133 % of the contents of the largest tank within the dike. We inspect these dikes routinely and clean up any spills/leaks which occur. We do not drain water from these dikes due to the possibility of contaminants being mixed in with the water.

B. 1. Since all of this material is contained within cement containment areas and disposed of properly, we do not have analyses for these different materials. All of our major sources of effluent are RCRA exempt material which can be disposed of in a Class II disposal well. The only sources noted above which have to be handled differently are filters and solvent cleaning materials. Filters are handled by Pro-Cycle Metals, Inc (a filter recycling company) and our solvents are handled by Safety-Kleen.

We do have an analysis of our waste heat Reclaimer water. However, this test is only performed for operational purposes. Since this water is mixed with most of our other waste, I have not included the analysis on this water.

As mentioned in B.1., we do not have analyses for these wastes since they are exempt from RCRA and they are all being properly disposed of without any surface discharge. Many of these waste streams are commingled prior to being sent off for disposal.

ATTACHMENT VII

A. The following items are sent to Yates Petroleum through a 2" sour liquids line, without entering the sump system.

1. Inlet Separator
2. Inlet Filter Separator
3. Amine Contactor
4. #1 & #2 Inlet Separators
5. #1 & #2 Regen Gas Scrubbers
6. Plant Fuel Scrubber
7. #1 & #2 MEP Inlet and Interstage Scrubbers
8. Plant Flare Knockout

The following items are collected through an atmospheric drain system to a sump and are then pumped to Yates Petroleum through the 2" sour liquids line.

1. Amine Skid
2. Hot Oil Skid
3. Glycol Skid
4. Product Pumps
5. #1 & #2 Cryogenic Plant Skids
6. Engine Room

The following items are collected through a separate drain system and sent to Tanks 2A and 2B. These materials are picked up for disposal by Controlled Recovery Inc. in Carlsbad.

1. Caustic After Scrubber
2. Caustic Regeneration Skid
3. Caustic Wash Building

B. Drawings for all drain systems are enclosed.

C. All tanks, separators, scrubbers and similar vessels are above ground. The only belowground pieces of equipment are the 2" pressurized sour liquids line, the sumps located in the east part of the plant, and the atmospheric drain lines. Complete drawings and descriptions of the drain systems are shown in the attached drawings.

D. All of our tanks have berms around them to contain at least 133% of the volume of the largest tanks.

All process areas are curbed and drained. Drums are stored within the concrete containment areas around the caustic skid.

The only sumps we have are inspected annually during cleanout.

All of our above ground tanks are either situated on a gravel pad or they will be visually inspected every five years.

E. All underground lines are less than 25 years old. They were pressure tested when they were originally installed. The 2" sour liquids line is schedule 80 coated and wrapped pipe, and it is under cathodic protection. The atmospheric drain system is 4" schedule 40 high temperature PVC. All drain systems are approximately three years old.

ATTACHMENT VIII

A. Since all effluents are shipped off-site, this section does not apply.

B. Off-site Disposal

ITEM	SHIPPING AGENT	DISPOSAL AGENT
Spent Caustic, composed of 3 to 4% sodium hydroxide and the rest water.	Martin Gas Transport PO Box 191 Kilgore, Texas 75663	Controlled Recovery 5600 Carlsbad Hwy. PO Box 756 Hobbs, NM 88241
Sour Liquids, composed of boiler blowdown water, diethanolamine, triethylene glycol, lubricating oil, water from separators/scrubbers, sour liquids/hydrocarbons from regeneration system on cryogenic plants, inlet separator liquids, inlet filter separator liquids, flare knock-out liquids.	Not applicable since the liquid is sent via 2" pipeline to Yates Petroleum.	Yates Petroleum 105 South Fourth St. Artesia, NM 88210

ATTACHMENT IX

INSPECTION, MAINTENANCE AND REPORTING

The SPCC plan for the Dagger Draw plant has a section on the inspection procedure required for all equipment at the site. The drawings on the drain system show the curbing, drainage and disposition of all rainwater that may contact process areas. The reporting system in case of leaks or spills is also documented in the SPCC plan within the reporting section. The applicable sections are included.

ATTACHMENT X

The attachment from our SPCC plan describes how we plan to prevent leaks/spills, how these spills will be contained to minimize the threat to soil and groundwater and how we react if there is a spill/leak at the facility.

YATES PETRO
TENNECO OS
26-18-25
1951 1535 TDS

ATTACHMENT XI

Since no oil field wastes are being disposed onto the surface, this section does not apply.

ATTACHMENT XII

There are no other specific OCD rules, regulations or orders which are applicable to our facility.

ATTACHMENT 2A

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN FOR LIQUID ENERGY FACILITIES

Any Liquid Energy Corporation employee or contractor working for the company shall maintain a constant visual alertness while at the gas processing facility for the purpose of early spill detection. When a spill of any size is observed, the employee will immediately follow the requirements below.

Notification Procedure

1. It is the primary responsibility of the reporting employee to eliminate the source of the spill. All action to prevent further contamination to the environment should be taken, as long as the safety of the employee is not jeopardized.
2. If the initial attempt is being made to report a spill, first attempt to contact the plant superintendent, or alternate, as shown in Attachment #2B.
3. Contents of the telephone report shall include, but not be limited to, the following:
   a. Reporting employee name, location, and telephone number where employee may be reached if necessary.
   b. The exact location of the spill or discharge, including the name of the waters involved.
   c. Time and type of incident (fire, explosion, etc.).
   d. Type of material spilled or discharged, rate of release, and description (size, color, etc.).
   e. Extent of actual area polluted. For water pollution, mention wind speed, wind direction, water condition, and current conditions.
   f. Is the spill or discharge source eliminated?
   g. Steps being taken to contain and clean-up the spilled or discharged material.
   h. Possible hazards to human health, safety and the environment.
   i. Extent of injuries, if any.
4. The plant superintendent or alternate will complete LEC spill report (section 2).
5. The plant superintendent or alternate will be responsible to organize the transfer of injured personnel and notify local authorities as needed. See attachment #2B for ambulance, fire, and police numbers.
6. The plant superintendent or alternate will then telephone the area manager or the area superintendent (or the manager of operations if neither the area manager nor the area superintendent can be reached). Both individuals will then discuss the situation to determine what further action is required.
7. The area manager or alternate will notify the Director of operations (see Attachment #2B).

The area manager or alternate, after evaluating the reported information, will contact the following agencies by phone : New Mexico Oil Conservation Division

** Note, for approval to burn oil because of an oil spill emergency clean-up problem, contact the New Mexico Environmental Division (NMED). If there are any other air pollution problems, call the NMED, Office of Air Quality, either local or main office (See Attachment #2B).

8. The regional manager will notify the manager of operations, who will appoint a spokesman to represent the company and an insurance claims advisor, both of whom may be dispatched to the scene of the spill at his discretion. The manager of operations is to outline procedures and policies for the above group.
9. Provisions have been made for well-defined and specific actions to be taken after discovery and notification of an oil spill, including the following.

   a. Liquid Energy personnel will respond to small spills, but larger spills will be handled by outside contractors. A list of outside personnel available to help in spill response is included in Attachment #2C.
   b. Disposal of recovered spill materials will be made in accordance with applicable federal, state and local laws. These materials are to be disposed of in such a manner that it will not pollute or have any adverse effect on the environment.

ATTACHMENT #6

SPILL PREVENTION INSPECTION

Date of Inspection 10-19-94 Facility Dagger Draw Gas Plant
Inspected by Neil Gordon & Steve Pack. YY

TANK INSPECTION

TANK ID	SIZE (BBLS)	TYPE	USE	ROOF CONDITION	SIDES CONDITION	BOTTOM CONDITION
TK-1	TK-1 400	FA	50% Caustic	G F P	G F P	G F P
TK-2A+B	400 eq.	FA	Spent Caustic 4%	G F P	G F P	G F P
TK-3	210	FA	Slop-waste	G F P	G F P	G F P
TK-4	210	FA	Fresh water	G F P	G F P	G F P
TK-5	100	FA	Treated water	G F P	G F P	G F P
TK-6	150	FA	Boiler Blowdown	G F P	G F P	G F P
TK-12	150	FP	Amine	G F P	G F P	G F P
TK-9	12	FA	Lube oil	G F P	G F P	G F P
TK-10	12	FA	coolant	G F P	G F P	G F P
TK-10A	24	FA	coolant	G F P	G F P	G F P

Type - WS = welded seam, B = bolted, F = fiberglass, P = pressurized, A = atmospheric
Use - Saltwater, condensate, oil, water, glycol, methanol, etc.
Conditions - G = good, F = fair, P = poor

Gauge Hatches -	Latches Condition	G F P
	Gaskets Condition	G F P
Clean out Hatches-	Bolts Condition	G F P
	Gaskets Condition	G F P
Vents	Condition	G F P
Outlets/Inlets	Condition	G F P
Equipped with Hi Level Shut-In Device		Yes No
Is Device Operational		Yes No
Dike Condition		G F P
Is Dike Correctly Sized		Yes No

ATTACHMENT #6

SPILL PREVENTION INSPECTION

Date of Inspection 10-19-94 Facility Dagger Draw Gas Plant
Inspected by David Gordon & Steve Pack

TANK INSPECTION						
TANK ID	SIZE (BBLS)	TYPE	USE	ROOF CONDITION	SIDES CONDITION	BOTTOM CONDITION
TK-9A	75	WS, A	oil	(G) F P	(G) F P	(G) F P
TK-13	24	F, A	water	(G) F P	(G) F P	(G) F P
TK-8	2	WS, P	oil	(G) F P	(G) F P	(G) F P
TK-7	2	WS, A	oil	(G) F P	(G) F P	(G) F P
				G F P	G F P	G F P
				G F P	G F P	G F P
				G F P	G F P	G F P
				G F P	G F P	G F P
				G F P	G F P	G F P
				G F P	G F P	G F P

Type - WS = welded seam, B = bolted, F = fiberglass, P = pressurized, A = atmospheric
Use - Saltwater, condensate, oil, water, glycol, methanol, etc.
Conditions - G = good, F = fair, P = poor

Gauge Hatches -	Latches Condition	(G) F P
	Gaskets Condition	(G) F P
Clean out Hatches-	Bolts Condition	(G) F P
	Gaskets Condition	(G) F P
Vents	Condition	(G) F P
Outlets/Inlets	Condition	(G) F P
Equipped with Hi Level Shut-In Device		Yes (No)
Is Device Operational		Yes No
Dike Condition		(G) F P
Is Dike Correctly Sized		(Yes) No

PIPING AND VALVES

Aboveground Piping
- Condition — (G) F P
- Properly Supported — (G) F P

Valves : Overall Condition — (G) F P

Flange Joints and Connections Condition — (G) F P

Drip Pans Installed at Loading/Unloading — (Yes) No

Drip Pans Condition and Cleanliness — (G) F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
9309056	(G) F P	(G) F P	(G) F P	(G) F P
9309048	(G) F P	(G) F P	(G) F P	(G) F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
#2 Cryo Plt. Product Pump A	(G) F P	(G) F P	(G) F P	(G) F P
Product Pump B	(G) F P	(G) F P	(G) F P	(G) F P
Lube. oil A	(G) F P	(G) F P	(G) F P	(G) F P
Lube. oil B	(G) F P	(G) F P	(G) F P	(G) F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
#1 Cryo Plt. Product Pump A	(G) F P	(G) F P	(G) F P	(G) F P
Product Pump B	(G) F P	(G) F P	(G) F P	(G) F P
Lube oil A	(G) F P	(G) F P	(G) F P	(G) F P
Lube oil B	(G) F P	(G) F P	(G) F P	(G) F P
Raw water storage P-5A	(G) F P	G F P	G F P	(G) F P
P-5B	(G) F P	G F P	G F P	(G) F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
P-13 sumps	(G) F P	(G) F P	(G) F P	(G) F P
P-14 sumps.	(G) F P	(G) F P	(G) F P	(G) F P
Glycol-Electric	(G) F P	(G) F P	(G) F P	(G) F P
Glycol-Gas	(G) F P	(G) F P	(G) F P	(G) F P
P4A Hot oil	(G) F P	(G) F P	(G) F P	(G) F P
P4B Hot oil	(G) F P	(G) F P	(G) F P	(G) F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
Amine Sd. A	(G) F P	(G) F P	(G) F P	(G) F P
Amine Sd. B	(G) F P	(G) F P	(G) F P	(G) F P
Amine Sd. C	(G) F P	(G) F P	(G) F P	(G) F P
Booster A	(G) F P	(G) F P	(G) F P	(G) F P
Booster B	(G) F P	(G) F P	(G) F P	(G) F P
Reflux A	(G) F P	(G) F P	(G) F P	(G) F P

Amine skid

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
Amine Reflux B	(G) F P	(G) F P	(G) F P	(G) F P
Sour Liquids A	(G) F P	G F (P)	G F P	(G) F P
Sour Liquids B	(G) F P	G F (P)	G F P	(G) F P
Booster Pump A	(G) F P	G (F) P	G F P	(G) F P
Booste Pump B	(G) F P	G (F) P	G F P	(G) F P
BFW Pump A	(G) F P	G (F) P	G F P	(G) F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
Reactor BFW Pump B	(G) F P	G (F) P	G F P	(G) F P
P-1 Flare knock-out	(G) F P	G F (P)	G F P	G (F) P
Sulfur Pit Sulfur load pump A	(G) F P	G (F) P	(G) F P	(G) F P
Sulfur load pump B	(G) F P	G (F) P	(G) F P	(G) F P
Liquid Mercap - P-5	(G) F P	(G) F P	G F P	(G) F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
Caustic Regen Skid Solution Pump A	(G) F P	(G) F P	G F P	(G) F P
Solution pump B	(G) F P	(G) F P	(G) F P	(G) F P
Booster Pump A	(G) F P	(G) F P	G F P	(G) F P
Booster pump B	(G) F P	(G) F P	G F P	(G) F P
Reflux Pump A	(G) F P	(G) F P	G F P	(G) F P
Reflux Pump B	(G) F P	(G) F P	G F P	(G) F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping
- Condition — G F P
- Properly Supported — G F P

Valves : Overall Condition — G F P

Flange Joints and Connections Condition — G F P

Drip Pans Installed at Loading/Unloading — Yes No
- Drip Pans Condition and Cleanliness — G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
caustic soda-wash building P-6	(G) F P	(G) F P	G F P	(G) F P
P-7	(G) F P	(G) F P	(G) F P	(G) F P
P-11 A	(G) F P	(G) F P	G F P	(G) F P
P-11 B	(G) F P	(G) F P	G F P	(G) F P
P-2A	(G) F P	(G) F P	G F P	(G) F P
P-2B	(G) F P	(G) F P	G F P	(G) F P

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
P 3A	G F P	G F P	G F P	G F P
P 3B	G F P	G F P	G F P	G F P
P 3C	G F P	G F P	G F P	G F P
P 3D	G F P	G F P	G F P	G F P
CFU-1A	G F P	G F P	G F P	G F P
CFU-1B	G F P	G F P	G F P	G F P

Caustic water wash building

Conditions - G = good, F = fair, P = poor

PIPING AND VALVES

Aboveground Piping	
Condition	G F P
Properly Supported	G F P
Valves : Overall Condition	G F P
Flange Joints and Connections Condition	G F P
Drip Pans Installed at Loading/Unloading	Yes No
Drip Pans Condition and Cleanliness	G F P

ENGINES AND COMPRESSORS				
ENGINE NUMBER	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR COMPRESSOR
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

PUMPS				
PUMP ID OR USAGE	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR PUMP
P-8 safety shower	(G) F P	G F P	G F P	(G) F P
	G F P	G F P	G F P	G F P
P-9 oil	(G) F P	(G) F P	G F P	G (F) P
P-10 coolant	(G) F P	(G) F P	G F P	G (F) P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions - G = good, F = fair, P = poor

Static water with Building

GLYCOL/AMINE UNITS

Drainage & Containment System for Leaks/Spills (G) F P
Sump Pump Condition, if applicable (G) F P
Is drainage adequate (G) F P
Glycol Vent Condensate contained within tank or dike (Yes) No
Amine or Glycol Storage Tank Conditions (G) F P
Drip Pan in place where chemical transferred to/from tank (Yes) No

GAS PROCESSING SKIDS				
SKID NO.	GENERAL CONDITION	CONTAINMENT SYSTEM FOR SPILLS/LEAKS	SUMP PUMP CONDITION	CONDITION OF SOIL NEAR SKID
Cryo Plt #1	(G) F P	(G) F P	G F P	(G) F P
Cryo Plt #2	(G) F P	(G) F P	G F P	(G) F P
	G F P	G F P	G F P	G F P
	G F P	G F P	G F P	G F P

Conditions : G = Good, F = Fair, P = Poor

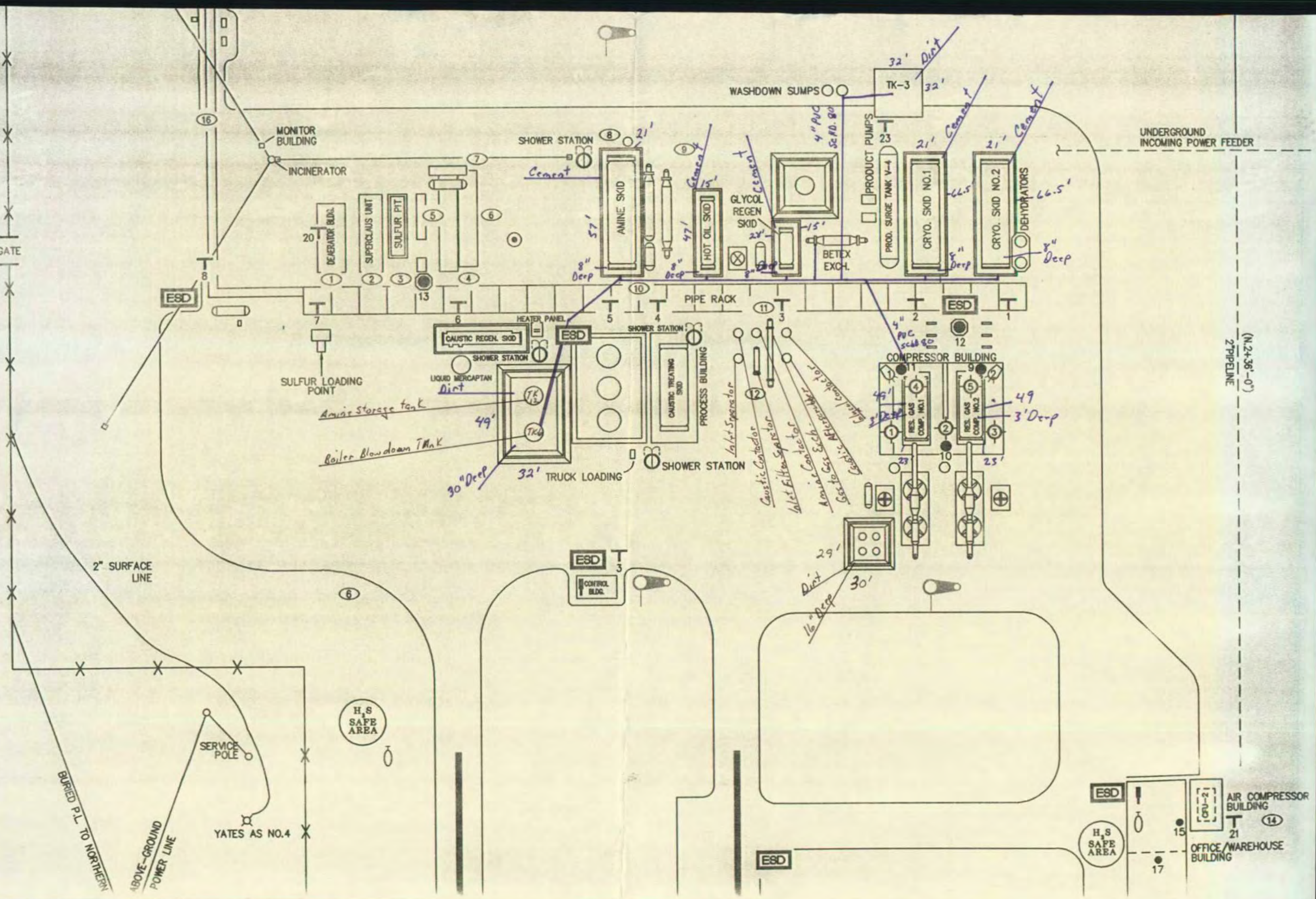
PITS

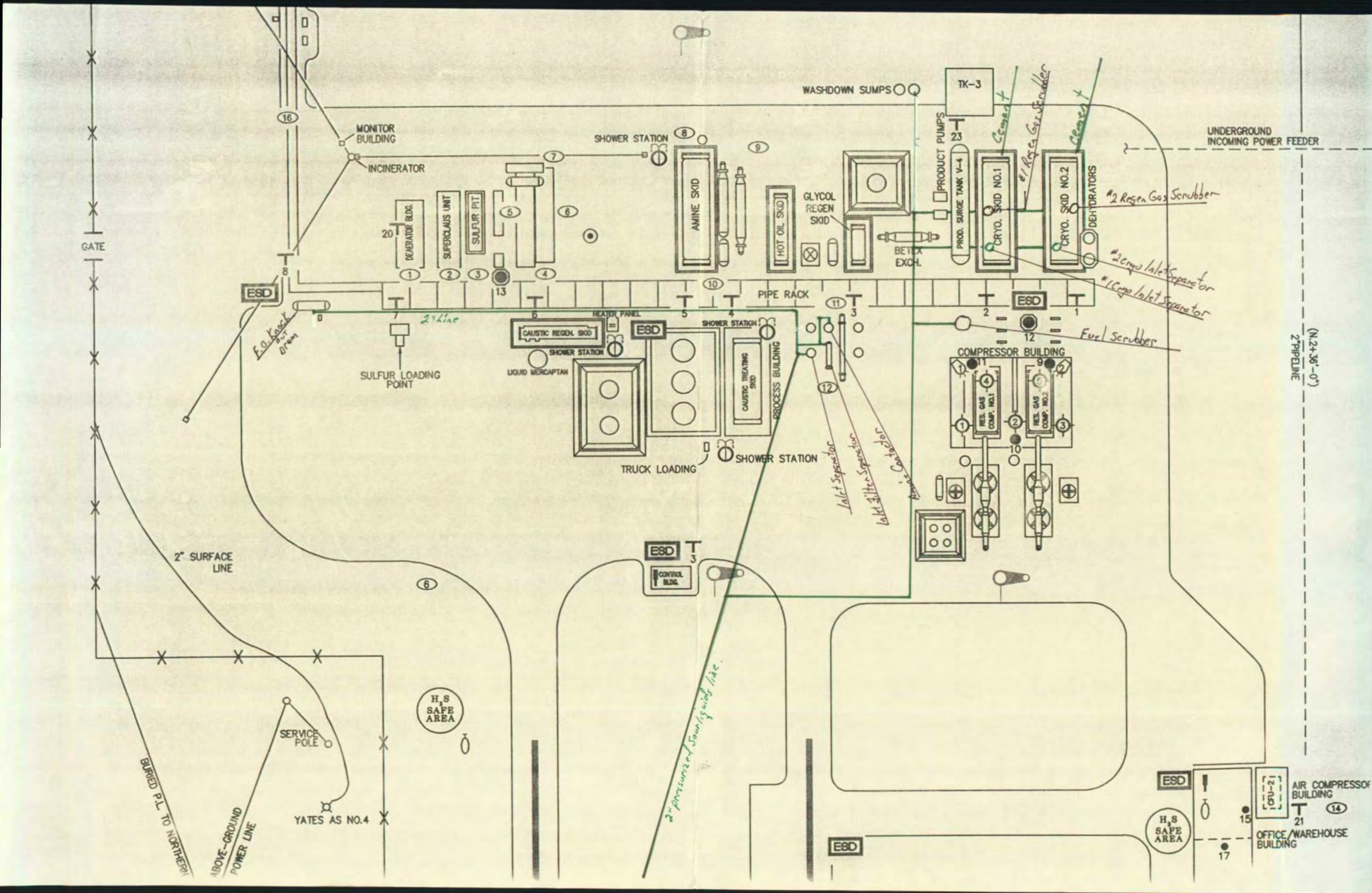
Pit permit signs posted Yes No
Pit levels are within permitted levels Yes No Not Applicable
Oil sheen on Pit Contents Yes No

OTHER

Describe any repairs done to improve spill prevention, any line or valve replacements done to repair leaks, any other equipment which has the possibility of having large leaks, or any incidents which may be relevant to this SPCC plan.

Moved all chemical barrels to cement wall embankment.


GATE
MONITOR BUILDING
INCINERATOR
SHOWER STATION
WASHDOWN SUMPS
TK-3
32'
Dirt
4" PVC Sch. 80
PRODUCT PUMPS
UNDERGROUND INCOMING POWER FEEDER
DEAERATOR BLDG.
SUPERCLAUS UNIT
SULFUR PIT
AMINE SKID
HOT OIL SKID
GLYCOL REGEN SKID
BETEX EXCH.
PROD. SURGE TANK V-4
CRYO. SKID NO.1
CRYO. SKID NO.2
DEHYDRATORS
Cement
8" Deep
ESD
PIPE RACK
HEATER PANEL
CAUSTIC REGEN. SKID
LIQUID MERCAPTAN
SULFUR LOADING POINT
Amine Storage tank
Boiler Blowdown Tank
30" Deep
TRUCK LOADING
PROCESS BUILDING
CAUSTIC TREATING SKID
COMPRESSOR BUILDING
REC. GAS COMP. NO.1
REC. GAS COMP. NO.2
3' Deep
Inlet Separator
Caustic Contactor
Inlet Filter Separator
Amine Gas Exchanger
Gas to Gas Exchanger
Caustic Aftercooler
2" SURFACE LINE
BURIED P.L TO NORTHERN
ABOVE-GROUND POWER LINE
SERVICE POLE
YATES AS NO.4
H2S SAFE AREA
CONTROL BLDG.
AIR COMPRESSOR BUILDING
OFFICE/WAREHOUSE BUILDING
(N.2+36'-0") 2" PIPELINE


GATE
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SHOWER STATION
LIQUID MERCAPTAN
CAUSTIC TREATING SKID
PROCESS BUILDING
SULFUR LOADING POINT
TRUCK LOADING
SHOWER STATION
COMPRESSOR BUILDING
RES. GAS COMP. NO.1
RES. GAS COMP. NO.2
2" PIPELINE
(N.24+36'-0")
2" SURFACE LINE
CONTROL BLDG.
H2S SAFE AREA
SERVICE POLE
YATES AS NO.4
BURIED P.L. TO NORTHERN
ABOVE-GROUND POWER LINE
AIR COMPRESSOR BUILDING
OFFICE/WAREHOUSE BUILDING
CPU-2
F.O. Knock out Drum
2" Line
Cement
#1 Regen Gas Scrubber
#2 Regen Gas Scrubber
#2 Cryo Inlet Separator
#1 Cryo Inlet Separator
Fuel Scrubber
Inlet Separator
Inlet Filter Separator
Amine Contactor
2" pressurized Sour liquids line

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

DRUG FREE

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 7, 1994

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-253

Mr. Greg Lewis
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, Texas 77387-4000

Re: Dagger Draw Gas Plant
Eddy County, New Mexico

Dear Mr. Lewis:

The Oil Conservation Division (OCD) has received your request dated August 3, 1994 for a 120 day extension to submitt the required discharge plan applicaton for the above referenced facility. The Dagger Draw Gas Plant is located in Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

Pursuant to Section 3-106.A. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, Liquid Energy Corporation (LEC) is hereby granted an extension for submittal of the previously requested discharge plan application until January 7, 1995. Pursuant to Section 3-106.B. of the WQCC regulations LEC is hereby granted an extension to discharge at the Dagger Draw Gas Plant without an approved discharge plan until May 7, 1995. These extensions are granted to allow LEC time to compile and formulate the discharge plan for the above referenced facility.

Please be advised these extensions do not relieve LEC of liability should their operation result in actual pollution of surface waters, ground waters or the environment actionable under other laws and/or regulations.

Sincerely,

William J. LeMay
Director

WJL/cee
xc: OCD Artesia Office

OIL CONSERVATION DIVISION
RECEIVED
'94 AUG 8 AM 8 50

August 3, 1994

Roger Anderson
Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504

Re : Extension for Discharge Plans
Liquid Energy Corporation (LEC)

Dear Mr. Anderson:

Based on your notification on April 18, LEC will submit discharge plans for the Dagger Draw and Pecos Diamond gas processing plants. While we have been working on these plans, we do not feel that they will be complete by the deadline noted in your letter. Therefore, LEC requests an extension for each of these discharge plans until December 1, 1994. At that time, we will submit complete discharge plans for both of these facilities.

If you have any questions or do not feel that you can grant this extension, please call me at (713)-377-7148.

Yours Truly,

Greg Lewis
Manager, Environmental and Safety
Liquid Energy Corporation

LIQUID ENERGY CORPORATION 2001 TIMBERLOCH PLACE
P.O. BOX 4000, THE WOODLANDS, TEXAS 77387-4000 713/377-5500
A subsidiary of Mitchell Energy & Development Corp.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

April 18, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-071

Mr. Greg Lewis
Environmental Coordinator
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, TX 77387-4000

DP application due 8/18/94

RE: Discharge Plan Requirement
Dagger Draw Gas Processing Plant
Eddy County, New Mexico

Dear Mr. Lewis,

Under the provision of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for the Dagger Draw Gas Processing Plant located in Eddy County, New Mexico.

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

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

A copy of the regulations is enclosed for your convenience. Also enclosed is an OCD guideline for the preparation of discharge plans at gas processing plants. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan 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 three thousand, three hundred and thirty-five ($3335) dollars for gas processing plants. The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

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

If there are any questions on this matter, please feel free to contact Bobby Myers at 827-4080 or Roger Anderson at 827-5812.

Sincerely,

William J. LeMay
Director

WJL/rlm

enclosures

XC: OCD Artesia Office

3-16-94

rev. 9-93

DISCHARGE PLAN INSPECTION

Operator LIQUID ENERGY

Facility Name DAGGER DRAW GP
GW-#
Type Gas Plant

Location
County EDDY

BELOW GRADE

Tanks
None

Sumps
Collects all runoff
SINGLE CONTAINMENT CEMENT VAULT

Piping
below grade piping to below grade sumps (above)

CONTAINMENT

Berms
Amine tank inside berm and above ground
Same w/ lube oil & glycol tanks.

Pad & Curb
Under and around skid scrubbers.
Caustic regeneration skind on P&C
* 'Saddle drums' need to be placed on P&C containment

WASTE STREAMS

Liquid
all goes to sump, belowgrade, then pump to an above grade 210 tank.

Solids
Oil Filters are drained into a vat that goes to waste sump, then tanks

Miscellaneous
Safety Kleen used in shop. Personell says solvent never leaves vat and is recycled.

GENERAL

Drips

Stains
Spill occured inside

— OVER —

JOEL STEPHEN
Assistant Superintendent
Dagger Draw Plant

LIQUID ENERGY CORPORATION
DAGGER DRAW GAS PROCESSING PLANT
Post Office Box HH / Artesia, NM 88211-7533
Phone (505) 457-2497
A Subsidiary of Mitchell Energy & Development Corporation

DAVID GORDON
Superintendent
Dagger Draw Plant

LIQUID ENERGY CORPORATION
DAGGER DRAW GAS PROCESSING PLANT
Post Office Box HH / Artesia, NM 88211-7533
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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

DRUG FREE

BRUCE KING
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CABINET SECRETARY

MEMORANDUM

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

TO: Roger C. Anderson, Environmental Bureau Chief

FROM: William C. Olson, Hydrogeologist

DATE: March 11, 1994

RE: **POSSIBLE ILLEGALLY OPERATING NATURAL GAS PROCESSING AND COMPRESSING FACILITIES**

The OCD has been informed by the NMED Air Quality Bureau that the Liquid Energy Corporation has been issued construction permits for the natural gas plants and compressor stations listed below. The Air Quality Bureau indicated that, with the exception of the Diamond Pecos Gas Plant, all these construction permits were issued within the last two years.

1. Diamond Pecos Gas Plant - 9 miles southeast of Artesia
2. Dagger Draw Amine Plant - Sec 25, T18S, R25E, Eddy County
3. Comanche Compressor Station - Sec 17, T21S, R33E, Lea County
4. McKittrich 30 Federal #1 Compressor Station - Sec 30, T22S, R26E, Eddy County
5. Geronimo Compressor Station - Sec 31, T19S, R33E, Lea County
6. Top Hat Compressor Station - Sec 26, T20S, R33E, Lea County

A review of my records shows that you, myself and Chris Eustice met with Liquid Energy company officials at the Dagger Draw Amine Plant on March 17, 1992 at 1:00 pm for a discharge plan inspection of that facility. At that time, OCD did not inspect the facility because of the hazard of ongoing construction. However, company officials were verbally notified of the WQCC's requirement for submission and approval of a discharge plan prior to operation of a post 1979 facility with an active discharge. Liquid Energy stated that they understood this requirement and would submit a discharge plan to OCD for approval prior to operation. To date, Liquid Energy has not submitted a discharge plan application for this facility.

The OCD has no record of Liquid Energy applying for or receiving approval for a discharge plan for any of these facilities as required under WQCC regulations. OCD should conduct inspections of these facilities to determine compliance with WQCC regulations.

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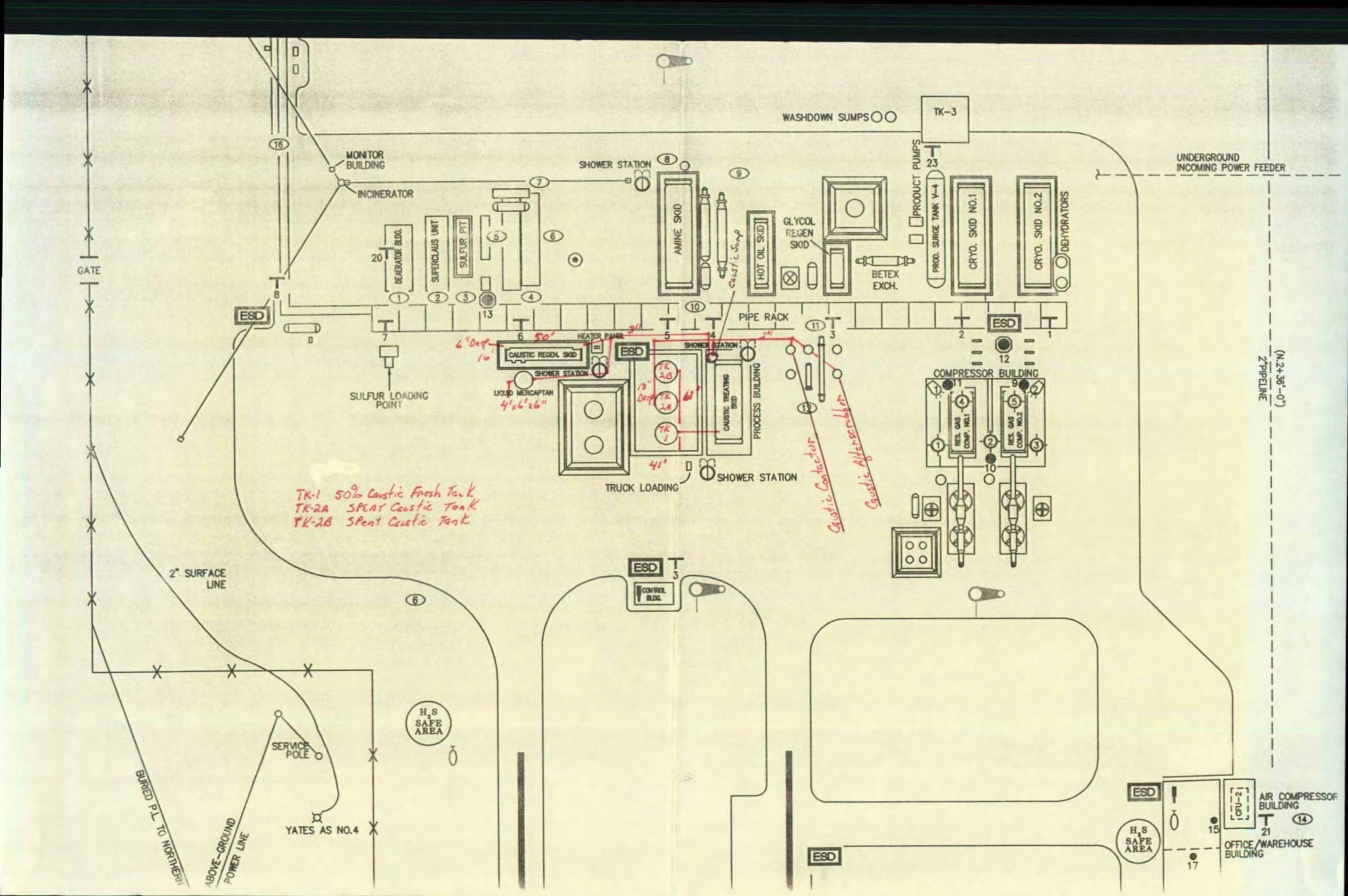
WASHDOWN SUMPS
TK-3
MONITOR BUILDING
INCINERATOR
SHOWER STATION
PRODUCT PUMPS
PROD. SURGE TANK V-4
CRYO. SKID NO.1
CRYO. SKID NO.2
DEHYDRATORS
UNDERGROUND INCOMING POWER FEEDER
GATE
DEAERATOR BLDG.
SUPERCLAUS UNIT
SULFUR PIT
AMINE SKID
HOT OIL SKID
GLYCOL REGEN SKID
BETEX EXCH.
ESD
PIPE RACK
CAUSTIC REGEN. SKID
HEATER PANEL
SHOWER STATION
LIQUID MERCAPTAN
4'x6'x6"
SULFUR LOADING POINT
TK-2B
TK-2A
TK-1
CAUSTIC TREATING SKID
PROCESS BUILDING
TRUCK LOADING
SHOWER STATION
COMPRESSOR BUILDING
RES. GAS COMP. NO.1
RES. GAS COMP. NO.2
(N.2+36'-0")
2"PIPELINE
TK-1 50% Caustic Fresh Tank
TK-2A SPENT Caustic Tank
TK-2B Spent Caustic Tank
2" SURFACE LINE
BURIED P.L. TO NORTHERN
ABOVE-GROUND POWER LINE
SERVICE POLE
YATES AS NO.4
H₂S SAFE AREA
ESD
CONTROL BLDG.
AIR COMPRESSOR BUILDING
OFFICE/WAREHOUSE BUILDING