GW - 191

PERMITS, RENEWALS, & MODS Application

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

March 23, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3771 7033

CALLED 6/5/01
ABOUT SIGN-OFF SHEET
+ $2600 see.
LW Peters JP

Mr. John Greer
Kinder-Morgan
One Allen Center
500 Dallas Street Suite 1000
Houston, Texas 77002

RE: Discharge Plan Renewal GW-191
Kinder-Morgan
Hobbs Gas Plant Groundwater Remediation Project
Lea County, New Mexico

Dear Mr. Greer:

The groundwater discharge plan renewal GW-191 for the Kinder-Morgan Hobbs Gas Plant Groundwater Remediation Project located in the SE/4 of Section 28, Township 18 South, Range 36 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan application was submitted on April 10, 1995 and approved on October 06, 1995 with an expiration date of October 06, 2000. The discharge plan renewal application dated December 04, 2000 including attachments, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Kinder-Morgan of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Kinder-Morgan of its responsibility to comply with any other governmental authority's rules and regulations.

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

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

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire October 06, 2005** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the Kinder-Morgan. Hobbs Gas Plant Groundwater Remediation Project is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $100.00 ($50.00 if filed before January 15, 2001) plus a flat fee of $2600.00 for Groundwater Remediation Projects. The OCD has not received the $2600.00 flat fee. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval and subsequent installments due on this date of each calendar year.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-473-3487). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachment-1
Xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-191 APPROVAL
Kinder-Morgan, Hobbs Gas Plant Groundwater Remediation Project
DISCHARGE PLAN APPROVAL CONDITIONS
March 23, 2001

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee of $2600.00 for Groundwater Remediation Projects. The flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.

2. Commitments: Kinder-Morgan will abide by all commitments submitted in the discharge plan renewal application dated December 04, 2000 including attachments, and these conditions for approval.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than June 15, 2001 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by July 31, 2001.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June15, 2001 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by July 31, 2001.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. And WQCC 1203. to the OCD Hobbs District Office.

13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

15. Storm Water Plan: Kinder-Morgan will submit a stormwater run-off plan for OCD approval by July 31, 2001.

16. Vadose Zone and Water Pollution: The previously submitted investigation and remediation plans were submitted pursuant to the discharge plan and all future discoveries of contamination will be addressed through the discharge plan process.

    The OCD approves of the monitoring plan submitted in the discharge plan application.

17. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

18. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

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

Conditions accepted by: **Kinder-Morgan**

_____
Company Representative- print name

_____ Date_____
Company Representative- Sign

Title_____

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Conditions accepted by: **Kinder-Morgan**

John M. Greer
Company Representative- print name

_____ Date 6/18/01
Company Representative- Sign

Title Environmental Coordinator

File Copy

KINDER MORGAN INC

December 4, 2000

Mr. Wayne Price
New Mexico Oil Conversation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Former Hobbs Gas Plant – GW-191
Discharge Plan Renewal
Lea County, New Mexico

Dear Mr. Price:

Enclosed please find check number 37411 in the amount of fifty dollars ($50.00) for the Discharge Plan GW-191 Renewal Filing Fee.

In processing GW-191 Discharge Plan Renewal, Kinder Morgan, Inc. (KMI) respectfully requests the following modifications:

1) The name on the existing Discharge Plan GW-191 should be changed from KN Energy, Inc. to Kinder Morgan, Inc. This change represents a name change only as opposed to a change of ownership.

2) Please direct all future correspondence to:

John Greer
Kinder Morgan, Inc.
500 Dallas, Suite 1000
Houston, TX 77002
(713) 369-9193

3) As stated in previous correspondence, the former Hobbs Gas Plant has been dismantled and no longer operates as a gas plant. KMI proposes to change the Discharge Plan to apply as a Remediation facility rather then a gas plant. Therefore, KMI proposes to remit one-half of the Remediation flat fee for the renewal of GW-191.

4) Based on the results of the quarterly groundwater sampling data collected since 10/1996, KMI proposes a reduction in the groundwater monitoring frequency for the year 2001 from the current quarterly monitoring schedule to a semi-annual basis. The following monitor wells should be sampled during the first and third quarter of the year for these analyses:

KINDER MORGAN INC

MW-1	BTEX	
MW-3	BTEX	
MW-5	BTEX	
MW-6	BTEX	Chlorides
MW-7	BTEX	Chlorides
MW-9	BTEX	Chlorides
MW-10	BTEX	Chlorides

In addition, groundwater level measurements from all monitor wells (including MW-2, MW-3, and MW-4) will be collected during each sampling event.

5) Consistent with the current reporting requirements, an Annual Groundwater Monitoring and Sampling report will be submitted to the OCD by February 1 of each year. A review of data from each annual report will be made and recommendations for future groundwater monitoring schedules and frequencies will be made.

I have attached a table summarizing the data collected during the year 2000 (and prior years) to assist you in approving this request for a reduction in groundwater monitoring frequency. This data will be reported in the upcoming 2000 Annual Groundwater Monitoring and Sampling Report.

Thank you for taking time to meet with me on this project in Santa Fe on November 28, 2000. If you have any questions or require additional information, please contact me at (713) 369-9193.

Sincerely,
KINDER MORGAN, INC.

John M. Greer
Environmental Coordinator

cc: Ms. Donna Williams – New Mexico OCD – Hobbs
Mr. Lou Saldano– Transwestern Pipeline Company
Mr, Shane Estep – Eco-logical Environmental Services Inc.

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

KINDER MORGAN

Wachovia Bank, N.A.
Greenville, South Carolina
In Cooperation with & Payable
If Desired at Wells Fargo Bank, N.A.
4759–624067

67–1
532

NO. [redacted]

DATE 11/30/00

PAY THIS AMOUNT
$**********50.00

PAY Fifty and NO/100 Dollars

KINDER MORGAN INC. & AFFILIATES
ACCOUNTS PAYABLE

C Paula S

AUTHORIZED SIGNATURE

TO THE ORDER OF

NEW MEXICO WATER QUALITY MANAGEMENT FUND

OCD SANTA FE OFFICE
2040 SOUTH PACHECO ST
SANTA FE NM 87505

[redacted]

DETACH CHECK AT THE PERFORATION
DETACH BEFORE DEPOSITING CHECK

KINDER MORGAN INC. & AFFILIATES

REMITTANCE ADVICE

11/30/00 0056354 NO. [redacted]

INVOICE DATE	DESCRIPTION	GROSS AMOUNT	CASH DISCOUNT	NET PAYMENT
11/29/00	Payment on Behalf of Kinder Morgan, Inc.	50.00	.00	50.00
	GW-191DISCHARGE PLAN
	INTEROFFICE TO JOHN GREER – HOUSTON, TX
	GW-191
	TOTAL	50.00	.00	$ 50.00

P.O. BOX 281304 LAKEWOOD, CO 80228–8304

Table 11 - MW-1
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
02/14/96	0.081	<0.001	<0.001	0.008	--	--	--
02/29/96	<0.001	<0.001	<0.001	<0.001	--	--	--
04/20/96	0.305	<0.001	0.002	0.032	<0.001	0.017	--
10/23/96	0.352	<0.001	0.026	0.081	0.026	0.01	--
04/10/97	0.268	<0.001	0.012	0.034	<0.001	0.007	--
07/07/97	0.245	--	--	--	--	0.005	--
10/08/97	0.180	<0.001	0.012	<0.001	--	.003	<10
01/06/98	0.138	<0.001	0.008	<0.001	--	0.002	6.2
04/03/98	0.109	<0.001	0.004	0.005	--	0.003	61
08/26/98	0.071	<0.001	0.002	0.003	--	<0.001	7.3
10/02/98	0.076	<0.005	<0.005	<0.005	--	<0.001	14.0
01/06/99	0.005	<0.001	<0.001	<0.001	--	--	--
04/01/99	<0.005	<0.005	<0.005	<0.005	--	--	--
07/14/99	<0.005	<0.005	<0.005	<0.005	--	--	--
10/22/99	<0.001	<0.001	<0.001	<0.001	--	--	--
01/25/00	0.001	<0.001	<0.001	<0.001	--	--	--
04/03/00	<0.005	<0.005	<0.005	<0.005	--	--	--
07/17/00	<0.005	<0.005	<0.005	<0.005	--	--	--
10/24/00	0.055	0.036	0.026	0.09	--	--	--

Shaded areas indicate over OCD Limits

Table 12 - MW-2
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	<0.001	<0.001	<0.001	<0.001	<0.001	<0.01	--
04/10/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	--
07/07/97	<0.001	--	--	--	--	--	--
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	19
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	27
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	96
06/25/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	25.0
10/02/98	0.002	<0.001	<0.001	<0.001	--	<0.001	--
01/06/99	Sampling discontinued as approved by OCD						

Table 13 - MW-3
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	0.001	<0.001	<0.001	<0.001	<0.001	<0.01	--
04/10/97	0.016	<0.001	<0.001	0.006	<0.001	<0.001	--
07/07/97	0.003	--		--	--	--	--
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	64
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	58
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	130
06/25/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	12
10/02/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	46
01/05/99	<0.001	<0.001	<0.001	<0.001	--	--	--
04/01/99	<0.001	<0.001	<0.001	<0.001	--	--	--
07/14/99	<0.001	<0.001	<0.001	<0.001	--	--	--
10/22/99	<0.001	<0.001	<0.001	<0.001	--	--	--
01/25/00	<0.001	<0.001	<0.001	<0.001	--	--	--
04/03/00	<0.005	<0.005	<0.005	<0.005	--	--	--
07/17/00	0.01	<0.005	<0.005	<0.005	--	--	--
10/24/00	0.02	0.008	<0.005	0.014	--	--	--

Shaded areas indicate over OCD Limits

Table 14 - MW-4
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	<0.001	<0.001	<0.001	<0.001	<0.001	<0.01	--
04/10/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	--
07/07/97	<0.001	--	--	--	--	--	--
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	<10
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	10
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	58
06/26/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	11
10/02/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	18
01/05/99	Sampling discontinued as approved by OCD						

Table 15 - MW-5
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	0.136	<0.001	0.006	0.071	<0.001	<0.01	--
04/10/97	0.043	<0.001	<0.001	0.063	<0.001	0.001	--
07/07/97	0.016	--	--	--	--	<0.001	--
10/08/97	0.06	<0.001	<0.001	<0.001	--	0.001	24
01/06/98	0.031	<0.001	<0.001	0.010	--	<0.001	27
04/03/98	0.037	<0.001	0.002	0.019	--	0.001	69
06/26/98	0.017	<0.001	<0.001	0.006	--	<0.001	23
10/02/98	0.01	<0.001	<0.001	<0.001	--	<0.001	87
01/06/99	0.006	<0.001	<0.001	<0.001	--	--	--
04/01/99	0.003	<0.001	<0.001	<0.001	--	--	--
07/14/99	<0.001	<0.001	<0.001	<0.001	--	--	--
10/22/99	<0.001	<0.001	<0.001	<0.001	--	--	--
01/25/00	<0.001	<0.001	<0.001	<0.001	--	--	--
04/20/00	<0.005	<0.005	<0.005	<0.005	--	--	--
07/17/00	<0.005	<0.005	<0.005	<0.005	--	--	--
10/24/00	<0.005	<0.005	<0.005	<0.005	--	--	--

Shaded areas indicate over OCD Limits

Table 16 - MW-6
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	0.192	<0.001	<0.001	0.013	<0.001	<0.01	--
04/10/97	0.277	<0.001	<0.001	0.014	<0.001	<0.001	--
07/07/97	0.106	--		--	--	--	--
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	30
01/06/98	0.102	<0.001	<0.001	0.004	--	<0.001	31
04/03/98	0.166	<0.001	<0.001	0.008	--	<0.001	98
08/25/98	0.141	<0.001	<0.001	0.009	--	<0.001	28
10/02/98	0.162	<0.005	<0.005	0.012	--	<0.001	31
01/05/99	0.123	<0.001	<0.001	0.004	--	--	56
04/01/99	0.120	<0.001	<0.001	<0.005	--	--	31
07/14/99	0.093	<0.005	<0.005	<0.005	--	--	34
10/22/99	0.090	<0.001	<0.001	<0.001	--	--	31.5
01/25/00	0.105	<0.001	<0.001	<0.001			35.0
04/03/00	0.167	<0.005	<0.005	<0.005	--	--	33
07/17/00	0.128	<0.005	<0.005	<0.005	--	--	33
10/24/00	0.031	<0.005	<0.005	0.006	--	--	30

Shaded areas indicate over OCD Limits

Table 17 - MW-7
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
01/09/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	--
04/10/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	--
07/07/97	<0.001	--	--	--	--	--	--
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	33
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	37
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	120
06/26/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	33
10/02/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	36
01/05/99	<0.001	<0.001	<0.001	<0.001	--	--	74
04/01/99	<0.001	<0.001	<0.001	<0.001	--	--	38
07/14/99	<0.001	<0.001	<0.001	<0.001	--	--	35
10/22/99	<0.001	<0.001	<0.001	<0.001	--	--	35.2
01/26/00	<0.001	<0.001	<0.001	<0.001	--	--	32.0
04/03/00	<0.001	<0.001	<0.001	<0.001	--	--	31
07/17/00	<0.001	<0.001	<0.001	<0.001	--	--	32
10/24/00	<0.001	<0.001	<0.001	<0.001	--	--	33

Table 18 - MW-8
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	Well Not Installed						
04/10/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	--
07/07/97	<0.001	--	--	--	--	--	--
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	16
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	27
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	160
06/26/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	26
10/02/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	27
01/05/99	Sampling discontinued as approved by OCD						

Table 19 - MW-9
Historic Groundwater Analytical Results (mg/l)

Date	B	T	E	X	Phenol	Naphthalene	Chloride
10/23/96	Well Not Installed						
04/10/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	320
07/07/97	<0.001	--	--	--	--	--	41
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	580
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	490
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	480
06/25/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	290
10/02/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	200
01/05/99	<0.001	<0.001	<0.001	<0.001	--	--	620
04/01/99	<0.001	<0.001	<0.001	<0.001	--	--	280
07/14/99	<0.001	<0.001	<0.001	<0.001	--	--	264
10/22/99	<0.001	<0.001	<0.001	<0.001	--	--	178
01/25/00	<0.005	<0.005	<0.005	<0.005	--	--	300
04/03/00	<0.005	<0.005	0.012	<0.005	--	--	250
07/17/00	<0.001	<0.001	<0.001	<0.001	--	--	96
10/24/00	<0.001	<0.001	<0.001	<0.001	--	--	40

Shaded areas indicate over OCD Limits

Table 20 - MW-10
Historic Groundwater Analytical Results (mg/l)

Date	B			X	Phenol	Naphthalene	Chloride
10/23/96	Well Not Installed						
04/10/97	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	--
07/07/97	<0.001	--	--	--	--	--	8.8
10/08/97	<0.001	<0.001	<0.001	<0.001	--	<0.001	110
01/06/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	101
04/03/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	180
06/25/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	140
10/02/98	<0.001	<0.001	<0.001	<0.001	--	<0.001	160
01/06/99	<0.001	<0.001	<0.001	<0.001	--	--	140
04/01/99	<0.001	<0.001	<0.001	<0.001	--	--	128
07/14/99	<0.001	<0.001	<0.001	<0.001	--	--	124
10/22/99	<0.001	<0.001	<0.001	<0.001	--	--	122
01/25/00	<0.001	<0.001	<0.001	<0.001	--	--	120
04/03/00	<0.001	<0.001	<0.001	<0.001	--	--	130
07/17/00	<0.005	<0.005	<0.005	<0.005	--	--	130
10/24/00	<0.001	<0.001	<0.001	<0.001	--	--	150

DETACH CHECK AT THE PERFORATION
*DETACH BEFORE DEPOSITING CHE

KINDER MORGAN INC. & AFFILIA S

REMITTANCE ADVICE

06/12/01 0056354 **NO.** [redacted]

INVOICE DATE	DESCRIPTION	GROSS AMOUNT	CASH DISCOUNT	NET PAYMENT
06/11/01	Payment on Behalf of Kinder Morgan, Inc. CKREQ061101 interoffice to John Greer – Houston, TX GW-191 Renewal - 5 years	2600.00	.00	2600.00
	TOTAL	2600.00	.00	$ 2600.00

P.O. BOX 281304 LAKEWOOD, CO 80228-8304

DETACH CHECK AT THE PERFORATION
DETACH BEFORE DEPOSITING CHECK

KINDER MORGAN INC. & AFFILIATES

REMITTANCE ADVICE

11/30/00 0056354 **NO.** [redacted]

INVOICE DATE	DESCRIPTION	GROSS AMOUNT	CASH DISCOUNT	NET PAYMENT
11/29/00	Payment on Behalf of Kinder Morgan, Inc. GW-191 DISCHARGE PLAN INTEROFFICE TO JOHN GREER – HOUSTON, TX GW-191	50.00	.00	50.00
	TOTAL	50.00	.00	$ 50.00

P.O. BOX 281304 LAKEWOOD, CO 80228-8304

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

KINDER MORGAN

Wachovia Bank, N.A.
Greenville, South Carolina
In Cooperation with & Payable
If Desired at Wells Fargo Bank, N.A.
4759-624067

67-1
532

NO. [redacted]

DATE 11/30/00

PAY THIS AMOUNT
$**********50.00

PAY Fifty and NO/100 Dollars

TO THE ORDER OF

NEW MEXICO WATER QUALITY MANAGEMENT FUND

OCD SANTA FE OFFICE
2040 SOUTH PACHECO ST
SANTA FE NM 87505

KINDER MORGAN INC. & AFFILIATES
ACCOUNTS PAYABLE

C Paula R

AUTHORIZED SIGNATURE

[redacted]

DETACH CHECK AT THE PERFORATION
DETACH BEFORE DEPOSITING CHECK

KINDER MORGAN INC. & AFFILIATES

REMITTANCE ADVICE

11/30/00 0056354 NO. [redacted]

INVOICE DATE	DESCRIPTION	GROSS AMOUNT	CASH DISCOUNT	NET PAYMENT
11/29/00	Payment on Behalf of Kinder Morgan, Inc.	50.00	.00	50.00
	GW-191 DISCHARGE PLAN			
	INTEROFFICE TO JOHN GREER - HOUSTON, TX			
	GW-191			
	TOTAL	50.00	.00	$ 50.00

P.O. BOX 281304 LAKEWOOD, CO 80228-8304

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 15, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-044

Mr. Hayden C. Truscott
Environmental Manager
KN-Energy, Inc.
P.O. Box 281304
Lakewood, CO 80228-8304

RE: Groundwater Monitoring
Hobbs Gas Plant GW-191
Lea County, New Mexico

Dear Mr. Truscott:

The New Mexico Oil Conservation Division (OCD) has reviewed the "Quarterly Sampling and Monitoring Annual Report" for the Hobbs Gas Plant GW-191 as submitted by Eco-logical Environmental Services Inc (Dated January 6, 1998, ECO Project No. 279-512). **Upon review of the Conclusions and Recommendations the OCD hereby approves of the groundwater modification sampling and monitoring program recommended by Eco-Logical Environmental Services with the following conditions:**

1. As outlined in Part IV, page 24 of the report dated January 6, 1998 from Eco-Logical Environmental Services, all groundwater samples will be analyzed for BTEX (benzene, Ethylbenzene, Toluene and Xylenes) constituents and chloride concentrations in the selected monitoring wells. Analyses for Napthlene will be discontinued.

2. Sampling and analyses will be reported on an annual basis only. The annual report shall be due in the OCD Santa Fe office by February 1 of each year.

3. The Hobbs office must be notified 72 hours prior to any field work beginning at the site (Phone: (505)-393-6161).

Please be advised that the OCD approval does not relieve **KN-Energy, Inc.** of liability should **KN-Energy, Inc.** fail to adequately determine the extent of contamination. Also, this OCD approval does not relieve **KN-Energy, Inc.** from responsibility to comply with other federal, state, and local rules/regulations that may apply to this project.

If KN-Energy, Inc. has any questions regarding this matter please feel free to give me a call at (505)-827-7156.

Sincerely,

W. Jack Ford, C.P.G.
Water Resources Engineering Specialist,
Environmental Bureau

cc: OCD Hobbs District Office
Ms. Carrie Eick - Eco-logical Environmental Services

Z 357 870 044

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

Sent to Hayden Truscott	
Street & Number KN	
Post Office, State, & ZIP Code Lakewood	
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 GW-191	

PS Form **3800**, April 1995

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/25/98,

or cash received on _____ in the amount of $ 2001.00

from KN Energy

for Hobbs Gas Plant GW 191
(Facility Name) (OGP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R Chavez Date: 3/12/98

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal ___

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment X

?

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

KN ENERGY

NORWEST BANK
GRAND JUNCTION, CO

82-91
1021

NO. [redacted]

DATE 02/25/98

PAY THIS AMOUNT
$**********2001.00

PAY Two Thousand One and NO/100 Dollars

TO THE ORDER OF
NEW MEXICO WATER QUALITY MANAGEMENT FUND
OCD SANTA FE OFFICE
2040 SOUTH PACHECO ST
SANTA FE NM 87505

K N ENERGY, INC. & AFFILIATES
ACCOUNTS PAYABLE
E.W. Lundgren
AUTHORIZED SIGNATURE

[redacted]

K N ENERGY, INC. & AFFILIATES

DETACH CHECK AT THE PERFORATION

DETACH BEFORE DEPOSITING CHECK

REMITTANCE ADVICE

02/25/98 005635

NO. [redacted]

INVOICE DATE	DESCRIPTION	GROSS AMOUNT	CASH DISCOUNT	NET PAYMENT
02/24/98	Payment on Behalf of American Processing L. P. CKREQ 022498 FINAL PAYMENT OF DISCHARGE PLAN FEES GW-191 FOR HOBBS GAS PL	2001.00	.00	2001.00
	TOTAL	2001.00	.00	$ 2001.00

GW-191
Hobbs Gas Plant

P.O. BOX 281304 LAKEWOOD, CO 80228-8304

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

KN ENERGY

NORWEST BANK
GRAND JUNCTION, CO

91
1021

NO. [redacted]

DATE 02/25/98

PAY THIS AMOUNT
$**********2001.00

PAY Two Thousand One and NO/100 Dollars

TO THE ORDER OF
NEW MEXICO WATER QUALITY MANAGEMENT FUND
OCD SANTA FE OFFICE
2040 SOUTH PACHECO ST
SANTA FE NM 87505

K N ENERGY, INC. & AFFILIATES
ACCOUNTS PAYABLE
E. W. Lundhagen
AUTHORIZED SIGNATURE

[redacted]

K N ENERGY, INC. & AFFILIATES

DETACH CHECK AT THE PERFORATION

REMITTANCE ADVICE

02/25/98 0056354 NO. [redacted]

INVOICE DATE	DESCRIPTION	GROSS AMOUNT	CASH DISCOUNT	NET PAYMENT
02/24/98	Payment on Behalf of American Processing L. P.	2001.00	.00	2001.00
	CKREQ 022498			
	FINAL PAYMENT OF DISCHARGE PLAN FEES GW-191 FOR HOBBS GAS PL			
	TOTAL	2001.00	.00	$ 2001.00

MAR 2 1998

P.O. BOX 281304 LAKEWOOD, CO 80228-8304

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 26, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-621

Mr. Hayden C. Truscott
Environmental Manager
KN-Energy, Inc.
P.O. Box 281304
Lakewood, CO 80228-8304

RE: "STAGE 1 ABATEMENT UPDATE" - APPROVAL
HOBBS GAS PLANT
DISCHARGE PLAN GW-191
LEA COUNTY, NEW MEXICO

Dear Mr. Truscott:

The New Mexico Oil Conservation Division (OCD) has received the KN Energy, Inc. (KEI) "Stage 1 Abatement Update" dated May 27, 1997. The report was required as part of the approval from OCD dated February 25, 1997 "Delineation Work Plan." The purpose of the "Stage 1 Abatement Update" was to further delineate and characterize the lateral and vertical extent of the groundwater contamination at the facility in a manner consistent with 20 NMAC 6.2., Subpart IV, 4106.

Based on the information and documentation shown in the "Stage 1 Abatement Update" , **the report is hereby approved** subject to the following conditions:

1. KEI will sample all the monitor wells for the following constituents: BTEX, Naphthalene, and Chlorides on a Quarterly basis. (**Note**: KEI has the option after each quarter of sampling to modify the sampling suite - and may propose in writing to the Santa Fe OCD Division that the sample suite be modified.)

2. KEI shall submit to the OCD Santa Fe Division Office for approval (with a copy to the Hobbs OCD District) a "One Year Natural Attenuation Report" by June 1, 1998 the report will include the following information:

   A. Each quarter of analytical sampling per (1.) above for each of the monitor wells.

   B. A map showing iso-concentrations of each individual contaminate per quarter. (i.e four maps)

C. A map showing the groundwater flow direction and gradient per quarter. (i.e. four maps)

D. An update on the progress of the surface soil contamination removal and facility demolition.

8-4-97

D. A proposal for remediation of the contamination based upon the information
E. gathered in all previous reports.

Note: KEI and OCD will have to meet towards the end of June 1998 to establish timeliness for implementation of the remediation. The discussion will focus on submittal by KEI for approval by the OCD of a "Groundwater Remediation" plan for the facility. This will be considered a modification to GW-191 pursuant to 20 NMAC 6.2, Subpart III, 3109. E. Upon submittal of the plan OCD will issue public notice pursuant to 20 NMAC 6.2, Subpart III, 3108 and a 30 day period for public comment will be allowed. After the 30 day comment period (if no protest from the public) OCD will either approve or disapprove of the proposed modification for "Groundwater Remediation."

Note: OCD approval of this report does not relieve KEI from responsibility, should it at a later date be found that groundwater contamination is greater in lateral and vertical extent than shown in this report. Further OCD approval of this report does relieve KEI from responsibility to comply with other federal, state, and local, rules and regulations that may apply.

All OCD rules, regulations, and guidelines are available on the Internet at the following website address: **www.emnrd.state.nm.us/ocd/**

If you have any questions, please contact me by telephone at (505) 827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - OCD

c: OCD Hobbs District Office

P 326 936 621

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

Sent to	KN-Energy - Mr. Truscott
Street & Number	GW-191
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Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form 3800, April 1995

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

October 15, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-668

Mr. Hayden C. Truscott
Environmental Manager
KN-Energy, Inc.
P.O. Box 281304
Lakewood, CO 80228-8304

RE: Delineation Investigation(Groundwater)
Hobbs Gas Plant GW-191
Lea County, New Mexico

Dear Mr. Truscott:

The New Mexico Oil Conservation Division (OCD) has reviewed the "Delineation Work Plan" for the KN-Energy, Inc. Hobbs Gas Plant GW-191 as submitted by Eco-logical Environmental Services Inc (Dated October 9, 1996, ECO Project No. 279-512). **Upon review of the plan the OCD hereby approves of the groundwater "Delineation Work Plan" with the following conditions:**

1. As outlined in the letter dated September 26, 1996 from OCD, all groundwater samples will be analyzed for the full suite of WQCC 3103 constituents during the initial delineation and sampling at all groundwater monitor wells upon proper development and purging. When the samples have been analyzed KN-Energy may then propose the constituents of concern for groundwater monitoring as outlined in the September 26, 1996 letter from OCD.

2. In the "Sampling and Analysis Plan" Eco-logical on behalf of KN-Energy purposes that "Groundwater sampling will occur each quarter of the year for a period of one year after any remediation has appeared to be complete." The OCD cannot approve of this statement- please reference 20 NMAC 6.2.4112.A.- ties to 20 NMAC 6.2.4103.E. (Note: Completion and Termination of the remedial activities should be part of the "Discharge Plan Modification" submittal, which will address remedial action at the site and will be submitted as the report on December 30, 1996 and pursuant to 20 NMAC 6.2.3109.E. as a "Discharge Plan Modification.")

3. The "Discharge Plan Modification", pursuant to 20 NMAC 6.2.3109.E., to be submitted with all the data as required in the September 26, 1996 letter from OCD will propose time lines for installation of remedial measures at the site which will include quarterly monitoring of the appropriate constituents of concern at the site. The Modification will be submitted in duplicate to the Santa Fe Division OCD for approval, with a copy to the Hobbs District office.

4. Mr. Wayne Price with the Hobbs office must be notified 72 hours prior to any field work beginning at the site. (Phone: (505)-393-6161) Mr. Price will also be delegated the authority onsite for selection of which field soil samples will be analyzed if more than four contaminated soil samples are collected per borehole.

5. All deadlines established in the September 26, 1996 letter from OCD, the October 9, 1996 letter from Eco-logical (Representing KN-Energy), and this letter of approval dated October 15, 1996 will apply.

Please be advised that the OCD approval to investigate the contamination of groundwater at the Hobbs Gas Plant GW-191 does not relieve **KN-Energy, Inc.** of liability should **KN-Energy, Inc.** fail to adequately determine the extent of contamination. Also, this OCD approval does not relieve **KN-Energy, Inc.** from responsibility to comply with other federal, state, and local rules/regulations that may apply to this project.

If KN-Energy, Inc. has any questions regarding this matter please feel free to give me a call at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist,
Environmental Bureau

Note: All OCD rules and regulations are available on the Internet at the following address:
www.emnrd.state.nm.us/ocd.htm

XC: Mr. Wayne Price - Environmental Engineer, Hobbs District
Ms. Carrie Eick - Eco-logical Environmental Services, via Fax (915-520-7737)

P 288 258 668

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail *(See reverse)*

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Street & Number	
Post Office, State, & ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
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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	

PS Form **3800**, April 1995

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/25/96,

or cash received on _____ in the amount of $ 1334.00

from KN Energy (American)

for Hobbs GP GW 191

(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R. Chandler Date: 5/9/96

Received in ASD by: M. Dayton Date: 5-20-96

Filing Fee ___ New Facility ___ Renewal ___

Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment X

142 of 5

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

KN ENERGY

NORWEST BANK
GRAND JUNCTION, CO

82-91
1021

NO. [redacted]

DATE 03/25/96

PAY THIS AMOUNT
$**********1334.00

PAY One Thousand Three Hundred Thirty-Four and NO/100 Dollars

TO THE ORDER OF
WATER QUALITY MANAGEMENT
PO BOX 2088
SANTA FE NM 87504 - 2088

K N ENERGY, INC. & AFFILIATES
ACCOUNTS PAYABLE

AUTHORIZED SIGNATURE

[redacted]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4-11-95,

or cash received on 4/20/95 in the amount of $ 50.00

from JANICE SMITH FOR AMERICAN OIL & GAS

for HOBBS GAS PLANT (Facility Name) GW 191 (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Roger Anderson Date: 4/20/95

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____ (specify)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

[redacted]

JANICE SMITH
TDL 05144535
4122 TUCSON PH. 352-8432
AMARILLO, TEXAS 79109

4-11 19 95 [redacted] 88-94/1113

PAY TO THE ORDER OF Water Quality Management Fund $ 50^00

Fifty and no/100 DOLLARS

WHIT-CO

BOATMEN'S
FIRST NATIONAL BANK OF AMARILLO
DOWNTOWN BANKING CENTER, AMARILLO, TEXAS

MEMO Hobbs Discharge Plan Filing Fee Janice Smith

[redacted]

File Copy
GW-141

DISCHARGE PLAN APPLICATION
AMERICAN PROCESSING, L. P.
HOBBS PLANT

I. Type of Operation -

Gathering, Processing and Treating Natural Gas. Natural gas is gathered from approximately 150 miles of gathering system to the Hobbs Plant. The gas is dehydrated and then passed through a cryogenic process where natural gas liquids are extracted. Residue gas is sold and distributed to several pipelines as well as the Southwestern Public Service Power Plant. The Natural gas liquids are treated to remove carbon dioxide and pumped into Chaparral Pipeline Company's pipeline for sale.

II. Operator/Legally Responsible Party and Local Representative -

The facility is operated by American Processing, L. P., an affiliate of American Pipeline Company, 801 S. Pierce, Amarillo, Texas 79101; Contact: Janice Smith - Telephone (806-371-3118). The local representative is Clay Robertson, Plant Supervisor, Hobbs Plant, Star Route A, Box 335, Hobbs, New Mexico 88240 - Telephone (505-397-3634).

III. Location of Discharge facility -

24.08 acres in the SW of the SE 1/4 of Section 28, T-18-S, R-36-E, Lea County, New Mexico.

IV. Landowners -

The site is leased by American Processing, L. P. from Southwestern Public Service Company, P. O. Box 1261, Amarillo, Texas 79170.

V. Facility Description -

See attached plot plan which indicates the location of fences, pits, and tanks at the facility as well as the processing area.

VI. Sources, Quantities & Quality of Effluent & Waste Solids -

A. Sources, Quantities

1. Waste water from compressor engine washdown.

2. Waste water which comes from dehydration of the incoming gas stream - (Approximately 200 barrels per month)

3. Spent oil filters from the compressor engines - (Approxmately 15-30 pounds per month)

4. Used lube oil - (Approximately 100 gallons per month)

5. Waste or slop oil (condensate) - (Approximately 100 barrels per month)

6. Sewage

7. Safety Solvent

8. Spent Molecular Sieve

B. Quality Characteristics -

The wastewater from compressor engine washdown is the only non-exempt waste at this facility. An analysis of this wastewater is attached. This sample was a "grab" sample and the analysis was performed by a professional lab (Trace Analysis, Inc. of Lubbock, Texas). The analysis performed was a "RCRA TCLP" pursuant to instructions from Mr. Chris Eustice of the State of New Mexico Energy, Minerals and Natrual Resource Department, Oil Conservation Division.

Limits reported above are "maximum" levels.

C. Commingled Waste Streams -

Water is the only process fluid which comes from the seperators into a tank and settles out. The water is then hauled to a disposal well as discussed below.

VII. Transfer & Storage of Process Fluids & Effluents -

Waste water comes from floor drains which drain wash water from a compressor engine. This liquid drains to a sump and from the sump it is pumped to aboveground storage. Then it is hauled by Chaparral Service, Inc. to their disposal well.

Wash water from three compressor engines is presently drained onto the ground. We are in the process of constructing a drainage system to properly collect the water and haul to a disposal well. Absorbent socks will be used to capture any oil from this compressor washing process until the drainage system is completed. An analysis of this water is attached.

There is also waste water which comes from dehydration of the incoming gas stream. This gas/water goes through a molecular sieve process and water is extracted from the gas. The water then goes to an ASME approved separator. From there is goes to an aboveground tank. The water is pumped from the tank and trucked by Chaparral Service, Inc. to their disposal well.

There are approximately 200 barrels per month from this source. This well is permitted by the New Mexico OilConservation Division as the "Chapparral SWD Lea #1-B," Permit 292SWD, Sec. 17, T-23-S, R-37-E.

Another waste is spent oil filters from the compressor engines. These filters are placed in an approved Waste Control of New Mexico container and hauled off by them. Approximately 25-30 pounds per month of spent oil filters are generated.

Approximately 200 gallons per month of used lube oil is drained into a sump and then pumped to an aboveground tank. The used oil is transported by Industrial Oil of Lubbock, Texas and recycled.

Waste or slop oil (condensate) comes from separator dumps before processing and goes into a tank. Approximately 100 barrels are generated monthly. Petrosource purchases this product and hauls it away by truck.

There are two septic tanks at the plant and sewage is completely separate from other effluents.

Solvent is used in a parts-washer furnished by Safety-Kleen. Safety-Kleen furnishes the safety-solvent and they handle the recycling of this product.

Molecular Sieve used for dehydration is disposed of on site. Permission was granted by the State of New Mexico for this on-site disposal.

Storage Tanks -

All storage tanks are atmospheric tanks.

Methanol - 5733 gallon steel, aboveground unlined storage tank.

Diethanolamine - 1000 gallon steel, aboveground unlined tank.

Diethanolamine - 1000 gallon steel aboveground unlined tank.

Triethylene Glycol - 300 gallon steel aboveground unlined tank.

Nuto-100 Lube Oil - 1000 gallon steel aboveground unlined tank.

Nuto-100 Lube Oil - 300 gallon steel aboveground unlined tank.

Pegasus 80 Lube Oil - 1000 gallon steel aboveground unlined

tank.

Pegasus 80 Lube Oil - 300 gallon steel aboveground unlined tank.

Condensate - 500 barrel steel aboveground coal-tar enamel coated tank.

Slop water/oil/condensate - 500 barrel steel aboveground coal-tar enamel coated tank.

Slop water/oil/condensate - 500 barrel steel aboveground coal-tar enamel coated tank.

Waste Oil - 100 barrel steel aboveground coal-tar enamel coated tank.

Wastewater Evaporation tank - 300 gallon open-topped fiberglass unlined storage tank.

All tanks are located on gravel or concrete pads. None of the tanks are presently diked. All are in good condition.

Any tanks requiring diking will be diked to contain a volume one-third more than the total volume of the tank and any tanks interconnected will be diked to contain a volume one-third more than the total volume of the interconnected tanks.

Drum Storage -

There are six 55-gallon barrels for office trash.

Sumps -

There two existing below grade tanks classified as sumps - These are only used periodically for waste water and are pumped out immediately. They are not used for storage.

Underground Pipeline -

This plant was constructed in 1977 and all underground process pipelines are of steel construction. The minimum grade of pipe used was grade "B" seamless pipe. The average wall thickness is .250 inches. There are no underground wastewater pipelines at this site.

VIII. Effluent Disposal

On-site disposal -

There is no on-site effluent disposal with the exception of the molecular sieve plant yard spreading as mentioned above.

A closed system is in place to collect and store waste liquids.

The septic system volume averages approximately 50 gallons per day. There is no commingling of septic system waste with any other waste streams.

There is a flare pit which is 20 feet by 30 feet. It is a caliche bermed pit used for catching flared liquids. There are no contents in this pit.

Off-site disposal -

Waste water is hauled by Chaparral Service, Inc. to their disposal well as discussed above. This well is permitted by the New Mexico Oil Conservation Division as the "Chapparral SWD Lea #1-B," Permit 292SWD, Sec. 17, T-23-S, R-37-E.

Waste Contol of New Mexico provides a container for used oil filter disposal and they haul the filters off-site for proper disposal. Approximately 25-30 pounds per month of spent oil filters are generated.

Approximately 200 gallons per month of used lube oil is drained into a sump and then pumped to an aboveground tank. The used oil is transported by Industrial Oil of Lubbock, Texas and recycled.

Waste or slop oil (condensate) comes from separator dumps before processing and goes into a tank. Approximately 100 barrels are generated monthly. Petrosource purchases this product and hauls it away by truck.

Solvent is used in a parts-washer furnished by Safety-Kleen. Safety-Kleen furnishes the safety-solvent and they handle the recycling of this product.

IX. Inspection, Maintenance and Reporting

A. Visual inspections of all storage tanks occur on a daily basis.

The tanks will be inspected annually for deterioration and whenever evidence of leakage arises. If inspection reveals a leak, the tank will be replaced or repaired. Records of the annual inspection will be maintained on site.

B. The plant site is level with natural draininge. There are no waterways or surface water features near the facility.

X. Spill/Leak Prevention & Reporting

If any spill or leak from storage tanks occurs, the dikes will prevent any discharge to groundwater or movement to surface waters. Impacted soils will be fully remediated to State and Federal requirements if a spill or leak occurs.

Site Characteristics

A. Hydrologic Features -

1. Squire's Pond, located in T18S, R36E, NW/4 Section 28, Lea County, New Mexico. It is used for agricultural purposes.

   Water wells are located in the centers of Sections 28 and 29, T18S, R36E. Well water is used by adjacent Southwestern Public Service Company facility for potable and industrial cooling and boiler makeup.

2. Depth to water: 47 feet
   TDS: approximately 350 mg/l
   Water quality analysis: See attachment
   Source of information: Southwestern Public Service Co.

3. Groundwater flow: Southeast direction with a slope of 10-15 feet per mile.
   Source: Hart, Donald L. Jr., and McAda, Douglas, P. (1985) Geohydrology of the High Plains Aquifer in Southeastern New Mexico: U. S. Geological Survey Hydrologic Investigations Atlas HA-679, 1 sheet.

B. Geologic Description

Mary Simmons of the U.S. Geological Survey Water Resources Division in Albuquerque New Mexico provided the following information.

1. The soil consists of a top layer of caliche with an underlying mixture of sand, gravel and clay. It is from the Triassic Dockum group.

2. The aquifer is the Ogallala.

3. The aquifer is composed of alluvium with a small amount of sandstone.

CONSTITUENTS	PPM AS	WATER WELL SECTION 29
T HARDNESS	CACO3	176.00
CALCIUM	CA	144.00
MAGNESIUM	MG	32.00
SODIUM	NA	31.00
POTASSIUM	K	2.40
AMMONIA	NH4	0.050
BICARBONATE	HCO3	209.84
CARBONATE	CO3	0.00
HYDROXIDE	OH	0.00
SULFATE	SO4	35.6
CHLORIDE	CL	24.4
NITRATE	NO3	12.0
NITRITE	NO2	0.00
PHOSPHATE	PO4	0.00
SILICA	SIO2	39.200
COD	MG/L	0
BOD	MG/L	-0.1
PH		7.60
TDS BY EVAP	MG/L	327
OIL & GREASE	MG/L	-0.1
FLUORIDE	F	-0.1
TEMPERATURE	DEG F	66
BORON	B	0.10

A -0.10 INDICATES THAT NO ANALYSIS WAS PERFORMED ON A CERTAIN CONSTIUENT

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
AMERICAN PROCESSING L.P.
Attention: Janice Smith
P. O. Box 90
Amarillo, TX 79105-0090

February 6, 1995
Receiving Date: 01/26/95
Sample Type: Water
Project No: NA
Project Location: Hobbs Plant, Hobbs, NM

Analysis Date: 02/03/95
Sampling Date: 01/26/95
Sample Condition: Intact & Cool
Sample Received by: CC
Project Name: Hobbs Discharge Plan

TA#	Field Code	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)	CORROSIVITY	pH (s.u.)	FLASHPOINT (^{o}F)
T31478	Drain Composite	Non-reactive	<10.0	<2.5	Non-corrosive	9.74	>150
QC	Quality Control	---	---	---	---	7.00	---
% Precision		100	100	100	100	100	100
Extraction Accuracy		---	---	---	---	---	---
Instrument Accuracy		---	---	---	---	100	---

METHODS: EPA SW 846-2.1.3, 2.1.2, 2.1.1.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

2-6-95
DATE

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February 6, 1995
Receiving Date: 01/26/95
Sample Type: Water
Project No: NA
Project Location: Hobbs Plant, Hobbs, NM

Extraction Date: 01/31/95
Analysis Date: 02/02/95
Sampling Date: 01/26/95
Sample Condition: Intact & Cool
Sample Received by: CC
Project Name: Hobbs Discharge Plan

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	5.0	100.0	0.20
T31478	Drain Composite	<0.1	<0.2	<0.1	<0.1	<0.1	0.04	<1.0	<0.01
QC	Quality Control	10.4	2.1	10.5	2.1	10.4	10.2	200	0.118
Detection Limit		0.1	0.2	0.1	0.1	0.1	0.01	1.0	0.01
%	Precision	97	100	98	100	98	99	100	99
%	Extraction Accuracy	97	100	88	93	93	88	115	104
%	Instrument Accuracy	104	105	105	105	104	102	100	98

METHODS: EPA SW 846-1311, 6010, 7471.
TCLP METALS QC: Blank Spiked with 10.0 mg/L As, Cr, Pb, Ag; 2.0 mg/L Se, Cd; 200.0 mg/L Ba; 0.12 mg/L Hg.

BS

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

2-6-95
Date

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ANALYTICAL RESULTS FOR
AMERICAN PROCESSING, L.P.
Attention: Janice Smith
P. O. Box 90
Amarillo, TX 79105-0090

February 6, 1995
Receiving Date: 01/26/95
Sample Type: Water
Project No: NA
Project Location: Hobbs Plant, Hobbs, NM

Extraction Date: 01/31/95
Analysis Date: 01/31/95
Sampling Date: 01/26/95
Sample Condition: Intact
Sample Received by: CC
Project Name: Hobbs Discharge Plan

TCLP Semi-Volatiles (mg/L)	EPA Limit	Detection Limit	T31478 Drain Composite	%P	%EA	QC	%IA
Pyridine	5.0	0.01	ND	99	68	4.25	85
1,4-Dichlorobenzene	7.5	0.01	ND	99	87	4.81	96
o-Cresol	200.0	0.01	ND	98	80	4.65	93
m,p-Cresol	200.0	0.01	ND	99	79	9.00	90
Total Cresol	200.0	0.01	ND	98	79	13.65	91
Hexachloroethane	3.0	0.01	ND	99	87	4.60	92
Nitrobenzene	2.0	0.01	ND	99	75	4.23	85
Hexachlorobutadiene	0.5	0.01	ND	99	96	4.97	99
2,4,6-Trichlorophenol	2.0	0.01	ND	98	51	2.90	59
2,4,5-Trichlorophenol	400.0	0.01	ND	93	48	3.34	67
2,4-Dinitrotoluene	0.13	0.01	ND	96	64	3.97	79
2,4-D	10.0	0.1	ND	98	53	4.02	80
Hexachlorobenzene	0.13	0.01	ND	99	121	5.65	113
2,4,5-TP	1.0	0.1	ND	99	86	5.14	103
Pentachlorophenol	100.0	0.01	ND	95	77	4.36	87
Lindane	0.4	0.01	ND	99	113	5.83	117
Total Heptachlor	0.008	0.01	ND	101	115	10.14	101
Endrin	0.02	0.01	ND	102	133	6.16	123
Methoxychlor	10.0	0.01	ND	101	100	6.17	123
Chlordane	0.03	0.002	ND	103	100	0.0019	100
Toxaphene	0.5	0.05	ND	103	97	0.0182	93

Surrogates	% RECOVERY
2-Fluorophenol	106
Phenol-d5	93
Nitrobenzene-d5	88
2-Fluorobiphenyl	103
2,4,6-Tribromophenol	126
Terphenyl-d14	126

Methods: EPA SW 846-1311, 8270, 8080.
ND - Not Detected

BL

2-6-95

Director, Dr. Blair Leftwich — DATE
Director, Dr. Bruce McDonell

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ANALYTICAL RESULTS FOR
AMERICAN PROCESSING, L.P.
Attention: Janice Smith
P. O. Box 90
Amarillo, TX 79105-0090

February 6, 1995
Receiving Date: 01/26/95
Sample Type: Water
Project No: NA
Project Location: Hobbs Plant, Hobbs, NM

Extraction Date: 01/30/95
Analysis Date: 01/30/95
Sampling Date: 01/26/95
Sample Condition: I & C
Sample Received by: CC
Project Name: Hobbs Discharge Plan

TCLP VOLATILES (mg/L)	EPA LIMIT	Detection Limit	T31478 Drain Comp.	QC	%P	%EA	%IA
Vinyl chloride	0.20	0.05	ND	0.054	---	98	108
1,1-Dichloroethene	0.70	0.05	ND	0.052	99	96	104
Methyl Ethyl Ketone	200.0	0.5	ND	0.05	101	96	100
Chloroform	6.00	0.5	ND	0.055	99	95	110
1,2-Dichloroethane	0.50	0.05	ND	0.059	98	104	118
Benzene	0.50	0.05	ND	0.054	100	98	108
Carbon Tetrachloride	0.50	0.05	ND	0.051	100	93	102
Trichloroethene	0.50	0.05	ND	0.051	99	95	102
Tetrachloroethene	0.70	0.05	ND	0.051	99	95	102
Chlorobenzene	100.00	0.05	ND	0.052	99	95	104
1,4-Dichlorobenzene	7.50	0.05	ND	0.053	100	80	106

SURROGATES	**% Recovery**
Dibromofluoromethane	102
Toluene-d8	104
4-Bromofluorobenzene	86

ND = Not Detected

METHODS: EPA SW 846-1311, 8240.

2-6-95

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Director, Dr. Bruce McDonell