

**GW - 227**

**PERMITS,  
RENEWALS,  
& MODS  
Application**

**Chavez, Carl J, EMNRD**

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, January 22, 2008 4:53 PM  
**To:** 'Klein, Elisabeth A'  
**Cc:** Price, Wayne, EMNRD  
**Subject:** FW: DCP Midstream, LP Status of Discharge Plans (Active, Inactive & Closed) & Other Miscellaneous Discharge Plans  
**Attachments:** GW-150 DP.tif

Elisabeth:

Re: DCP Midstream LP Letter of January 31, 2007 Renewal of Expired Discharge Plans as Requested by Carl Chavez & Other DP's currently being processed

Hi. Please find below the status of the DP's, etc. that were included in the above referenced letter.

1) Pure Gold "28" CS (GW-150): The permit expired on 11/22/2003 and is still active. Our records reflect a draft permit was issued to ConocoPhillips (COP) on January 23, 2004, but the final permit was never signed and returned to OCD with the \$1,700 flat fee. Please find attached a copy of the permit (COP), please sign and return the final permit with the \$1,700 to OCD. We apologize for the changes; however, considering the situation, it is the most expedient means of resolving the discharge plan for the facility.

2) Rambo C.S. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive. According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

3) Apex C.S. (GW-163): Currently in litigation.

4) Hobbs Gas Plant (GW-175) currently in litigation.

5) Eunice Gas Plant (GW-16): According to OCD records GW-009 and GW-016 were merged into GW-16. The permit expires 4/25/2009 and is active. No action needed at this time.

6) CP-1 C.S. (GW-139): The permit was closed.

7) Indian Hills Gas Plant (GW-42): OCD records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

**Discharge Plan Renewals processed tomorrow are:**

1) Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

2) Magnum C.S. (GW-127): OCD records indicate that the facility is active with an expiration date of 2/3/2008. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow.

3) Carrasco C.S. (GW-137): OCD records indicate that the facility is active with an expiration date of 4/28/2008.

1/23/2008

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow.

4) Pardue C.S. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

**DCP Midstream, LP Discharge Plans awaiting final signature of discharge plan with \$1,700 final fee:**

1) Northeast Carlsbad C.S. (GW-280)

**Miscellaneous Discharge Plans:**

1) Lee C.S. (GW-227): The permit expired on 12/28/2005 and is listed as inactive. Also, our records show LG&E Hadson Gillespie/Feagan C.S. for the facility name. According to an OCD e-mail msg. dated 12/21/2006, and DPC correspondence dated 12/28/2006, the facility was going to remain inactive and a closure plan was to be submitted to permanently close the facility. Upon receipt of the closure plan info. and verification that no contamination exists at the facility, and some photos to display what the site currently looks like, the OCD was going to consider closure of the facility. The OCD requests to know the status of operations at the facility?

Please provide me with an update on each of the above items and contact me if you have questions. Thank you.

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

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, January 17, 2008 2:27 PM  
**To:** 'Klein, Elisabeth A'  
**Subject:** Northeast Carlsbad Compressor Station (GW-280) Signed Discharge Plan w/ \$1,700.00 Renewal Fee

Ms. Klein:

Good afternoon. I am now working on DCP Midstream L.P. applications, etc.

NMOCD records show that we never received the final signed DP for GW-280 (NE Carlsbad C.S.) with the \$1,700.00 renewal fee. NMOCD mailed a letter with the attached final discharge plan for DCP Midstream L.P.'s signature and remittance w/ final payment; however, we did not receive it. Please locate the final discharge plan that was dated June 13, 2007, sign it, and remit it to me with the final \$1,700.00 renewal fee so we may update our records and finalize the permit at this facility.

I have been in receipt of DCP Midstream L.P. Discharge Plans (GWs-24, 44, 127, 137, 150, and 288). I am planning to process them by next Wednesday, January 23, 2008. I will let you know if I need anything based on my review.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.

1/23/2008

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

**Chavez, Carl J, EMNRD**

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, December 21, 2006 3:32 PM  
**To:** 'rmlang@duke-energy.com'  
**Subject:** Duke Energy Field Services (DEFS) Expired Discharge Plan Facilities

Ruth:

DEFS is presently in violation of its discharge plan expiration and renewal dates at the facilities discussed this morning. Regarding DEFS request for a 120 day extension on the renewal of its discharge plan permits, the OCD can allow you 60 days or by March 1, 2007 to submit your renewal applications with \$100 filing fees associated with each GW-### permit made payable to the Water Quality Management Fund.

Regarding the Lee Compressor Station (GW-227), there is correspondence from DEFS dated December 28, 2006 indicating that the facility will remain inactive and follow the closure plan to permanently close the facility. Upon receipt of the closure plan information and verification that no contamination exists at the facility and some photos to display what the site currently looks like, the OCD may approve closure of the facility.

Please contact me if you have questions. Thank you.

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

1/2/2007



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

November 27, 2000

Lori Wrotenbery  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 4805**

Mr. Ed Sloman  
LG&E Energy Marketing Inc.  
921 West Sanger  
Hobbs, New Mexico 88240

**RE: Discharge Plan Renewal GW-227  
LG&E Energy Marketing Inc.  
Gillespie/Feagan Compressor Station  
Lea County, New Mexico**

Dear Mr. Sloman:

The groundwater discharge plan renewal application GW-227 for the LG&E Energy Marketing Inc. Gillespie/Feagan Compressor Station located in the NE/4 NE/4 of Section 24, Township 17 South, Range 35 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 10 working days of receipt of this letter.**

The original discharge plan application was submitted on September 26, 1995 and approved on December 28, 1995 with an expiration date of December 28, 2000. The discharge plan renewal application dated October 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 LG&E Energy Marketing Inc. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve LG&E Energy Marketing Inc. 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., LG&E Energy Marketing Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire December 28, 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. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the LG&E Energy Marketing Inc., Gillespie/Feagan Compressor Station 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 \$50 plus a renewal flat fee. There is no flat fee for natural gas compressor stations with horsepower ratings less than 1000 horsepower. OCD has received the \$50.00 filing fee.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). 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-227 APPROVAL**  
**LG&E Energy Marketing Inc., Gillespie/Feagan Compressor Station**  
**DISCHARGE PLAN APPROVAL CONDITIONS**  
**November 27, 2000**

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD.
2. Commitments: LG&E Energy Marketing Inc. will abide by all commitments submitted in the discharge plan renewal application dated October 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 March 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 April 15, 2001.



9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than March 15, 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 April 15, 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: LG&E Natural Gathering and Processing Co. will submit a stormwater run-off plan for OCD approval by April 15, 2001.
16. 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.
17. 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.

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

Conditions accepted by: **LG&E Energy Marketing Inc.**

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Sign

\_\_\_\_\_  
Title



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 28, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-962-591**

Mr. Ed Sloman  
Hadson Gas Gathering and Processing  
921 W. Sanger  
Hobbs, New Mexico 88240

**Re: Discharge Plan (GW-227)**  
**Gillespie/Feagan Compressor Station**  
**Lea County, New Mexico**

Dear Mr. Sloman:

The groundwater discharge plan GW-227 for the Hadson Gas Gathering and Processing (Hadson) Gillespie/Feagan Compressor Station located in the NE/4 NE/4 Section 24, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated September 26, 1995.

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

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

Please note that section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. Hadson 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.

Mr. Ed Sloman  
December 28, 1995  
Pg 2

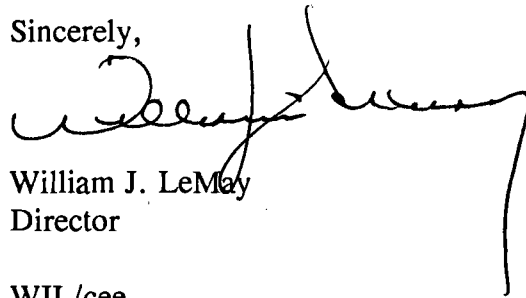
Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire December 28, 2000 and Hadson should submit an application for renewal in ample time before that date.

The discharge plan application for the Hadson Gillespie/Feagan Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars and a flat rate fee. There is no flat fee for a compressor facility with less than 1000 horsepower (site rated)s.

The OCD has received the fifty dollar filing fee.

On behalf of the staff of the Oil Conservation Division, I wish to thank Hadson and their staff for cooperating during this discharge plan review.

Sincerely,

A handwritten signature in black ink, appearing to read 'William J. LeMay', with a long, sweeping horizontal stroke extending to the right.

William J. LeMay  
Director

WJL/cee  
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-227 APPROVAL  
HADSON GAS GATHERING AND PROCESSING  
GILLESPIE/FEAGAN COMPRESSOR STATION  
DISCHARGE PLAN REQUIREMENTS  
(December 28, 1995)

1. Drum Storage: All drums will be stored on pad and curb type containment.
2. Tank Inspection: All tanks will be cleaned out and inspected prior to renewal of the discharge plan.
3. Sump Inspection: All sumps will be cleaned and inspected on an annual basis. All inspections will be documented and recorded for a period of five (5) years and the records made available to OCD inspectors upon request. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.
4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
5. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
6. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
7. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
8. Hadson Commitments: Hadson will abide by all commitments submitted in the discharge plan application.
9. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure..
10. Transfer of Discharge Plan: Prior to any transfer of ownership, control or possession of this facility, the OCD will be notified. A written request must be submitted and approved by the OCD prior to the transaction.
11. 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 to the OCD 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.

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9-26-00,  
or cash received on \_\_\_\_\_ in the amount of \$ 50<sup>00</sup>  
from LLANO, INC.

for FERGAN/GILLESPIE COMP. ST GW-227

Submitted by: (Family Name) WAYNE PRICE Date: 10/13/00

Submitted to ASD by: [Signature] Date: 10/13/00

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee ☒ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_  
(Optional)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

LLANO, INC.

BOX 1320  
HOBBS, NEW MEXICO 88240

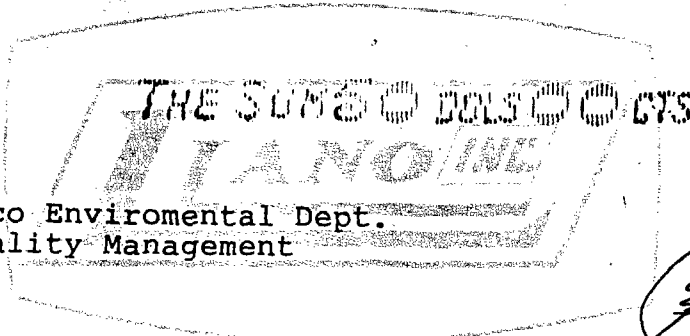
SUNWEST BANK OF HOBBS, N.A.  
HOBBS, NEW MEXICO 88240

95-32  
1122

CHECK DATE	CHECK NO.
09-26-00	03250

PAY TO THE ORDER OF

New Mexico Enviromental Dept.  
Water Quality Management



CHECK AMOUNT
\$ 50.00*****

LLANO, INC. - GENERAL ACCOUNT

[Signature]

VOID AFTER 90 DAYS

Mr. Ed Sloman  
11/27/00  
Page 3

**ATTACHMENT TO THE DISCHARGE PLAN GW-227 APPROVAL**  
**LG&E Energy Marketing Inc., Gillespie/Feagan Compressor Station**  
**DISCHARGE PLAN APPROVAL CONDITIONS**  
**November 27, 2000**

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD.
2. Commitments: LG&E Energy Marketing Inc. will abide by all commitments submitted in the discharge plan renewal application dated October 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 March 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 April 15, 2001.

Mr. Ed Sloman  
11/27/00  
Page 4

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than March 15, 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 April 15, 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 *during site visits*.
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: LG&E Natural Gathering and Processing Co. will submit a stormwater run-off plan for OCD approval by April 15, 2001.
16. 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.
17. 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.



Mr. Ed Sloman

11/27/00

Page 5

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

Conditions accepted by: ~~LG&E Energy Marketing Inc.~~ Conoco Inc

Joyce Miley  
Company Representative print name

Joyce Miley Date 12-21-00  
Company Representative Sign

Title Environmental Consultant

# LLANO, INC.

INVOICE NO.	INVOICE DATE	DESCRIPTION	GROSS AMO.	DISCOUNT	NET AMOUNT
		Application Fee for Discharge Plan Feagan/Gillespie Location Meter #644 <u>GW-227</u>			
CHECK NUMBER		TOTALS ➤			\$50.00

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/26/95  
or cash received on 10/6/95 in the amount of \$ 50.00  
from LLANO

for Hudson Gillette/Ferguson 9/3 GW 227  
(Facility Name) (DP No.)

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

Submitted to ASD by: Ferguson Date: 10/13/95

Received in ASD by: PA Date: 10/13/95

Filing Fee ☒ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_  
(optional)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

LLANO, INC.

BOX 1320  
HOBBS, NEW MEXICO 88240

SUNWEST BANK OF HOBBS, N.A.  
HOBBS, NEW MEXICO 88240

95  
11

THE SUM OF FIFTY DOLLARS

PAY TO THE ORDER OF

STATE OF NEW MEXICO  
WATER QUALITY MANAGEMENT FUND  
OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, NM 87501

CHECK DATE	CHECK NO.
9/26/95	030

CHECK AMOUNT
\$ 50.00

LLANO, INC. - GENERAL ACCOUNT

VOID AFTER 90 DAYS

# LLANO, INC.

INVOICE NO.	INVOICE DATE	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
	9/26/95	Discharge Plan Application Fee GW-227	\$50.00		\$50.00
CHECK NUMBER		TOTALS ➤	\$50.00		\$50.00

5/9

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

OIL CONSERVATION DIVISION  
RECEIVED  
FEB 8 52

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,  
OIL REFINERIES AND GAS COMPRESSOR STATIONS**

(Refer to OCD Guidelines for assistance in completing the application.)

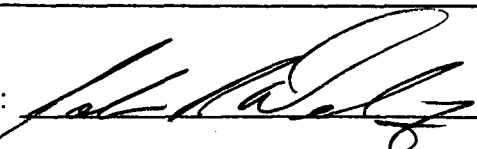
GW-227

- I. TYPE: Compressor Station
- II. OPERATOR: Hadson Gas Gathering & Processing  
ADDRESS: 921 W Sanger, Hobbs, NM 88240  
CONTACT PERSON: Ed Sloman PHONE: 505-393-2153
- III. LOCATION: NE/4 NE/4 Section 24 Township 17S Range 35E  
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. Attach a description of current liquid and solid waste disposal procedures.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a contingency plan for reporting and clean-up of spills or releases.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XIII. CERTIFICATION

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

Name: JOHN R. DELANEY

Title: GENERAL MANAGER

Signature: 

Date: 9-26-95

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

I.

The major purpose of this facility, The Gillespie/Feagan Compressor Station, is to compress natural gas.

This compressor station will be a "Low Pressure Gathering " compressor station. We will take gas from various wells which are being designated as low pressure, boost the pressure, and move the gas to another part of our system. To accomplish this goal we will be using a ~~360~~ H.P., and ~~280~~ H.P. two stage, gas compressor.

At this facility we will have a scrubber in front of the compressors. This will remove the free liquids from the stream of natural gas before it is compressed. All liquids which are recovered from this facility will be contained by a 210 Bbl. and a 100 Bbl. tank which will be emptied into trucks as often as necessary, and transported to either market, or to a licensed disposal, which ever is applicable. /

II.

The Owner/Operator of the facility will be:  
Hadson Gas Gathering and Processing (505) 393-2153  
921 W. Sanger  
Hobbs, New Mexico 88240

Mr. J. R. Delaney (505) 393-2153  
Manager; Operations  
921 W. Sanger  
Hobbs, New Mexico 88240

The Compressor units, will belong to the below listed company. They will provide the compressors, and full maintenance on the units.

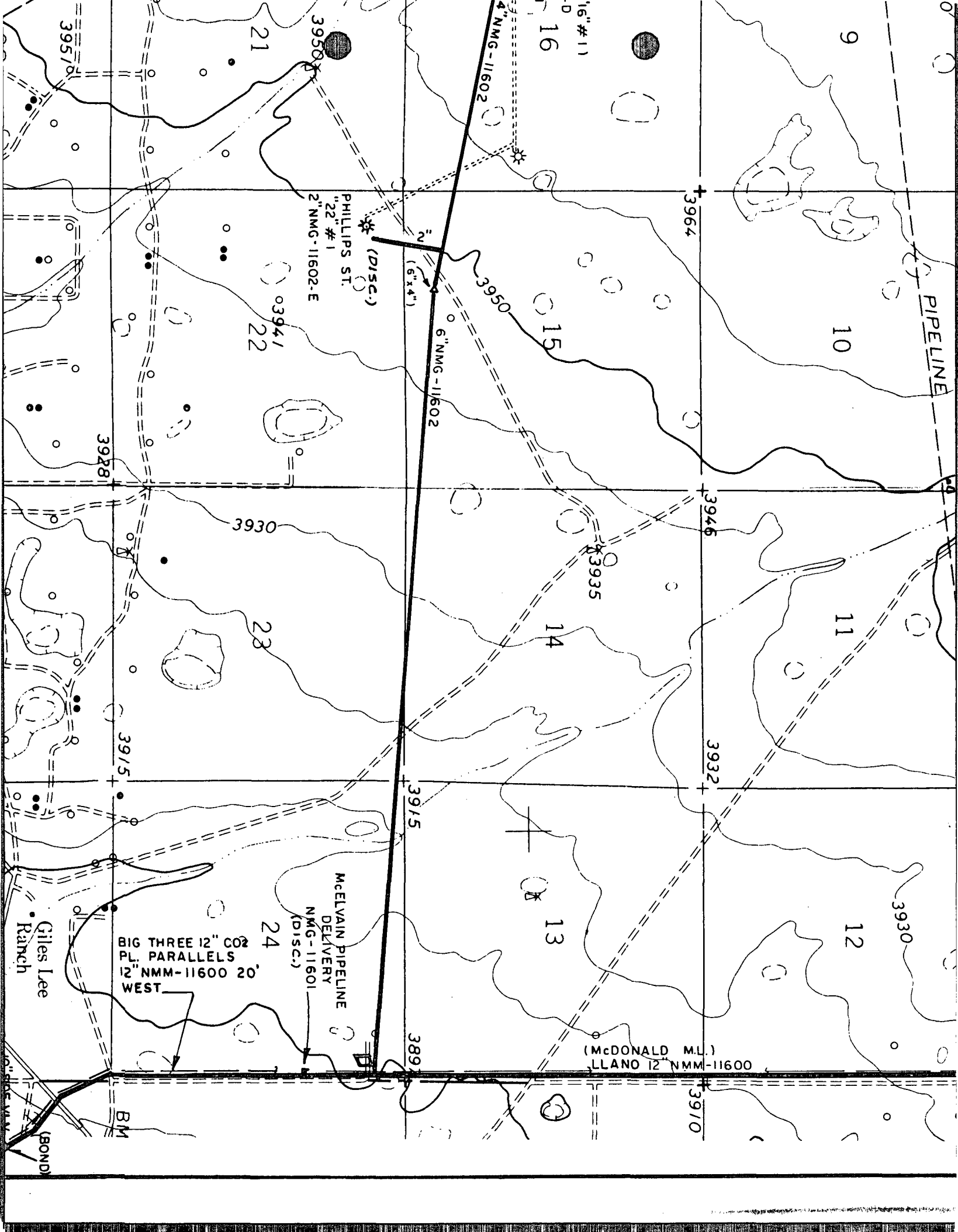
Tidewater Compression Service, Inc.  
4430 Brittmoore Road  
Houston, Texas 77240  
713-466-4103  
Carlsbad, N. Mex. Office  
Ray Trout (Service Rep. Maintaining Compressor)  
887-3249

III.

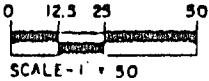
Location: NE/4, of NE/4, Section 24, Township 17 S,  
Range 35 E, NMPM, LEA County,  
New Mexico:

Attached please find a copy of the topographic map showing the location of the compressor station, a set of survey plats, along with a copy of the plan view of the multiple unit station.



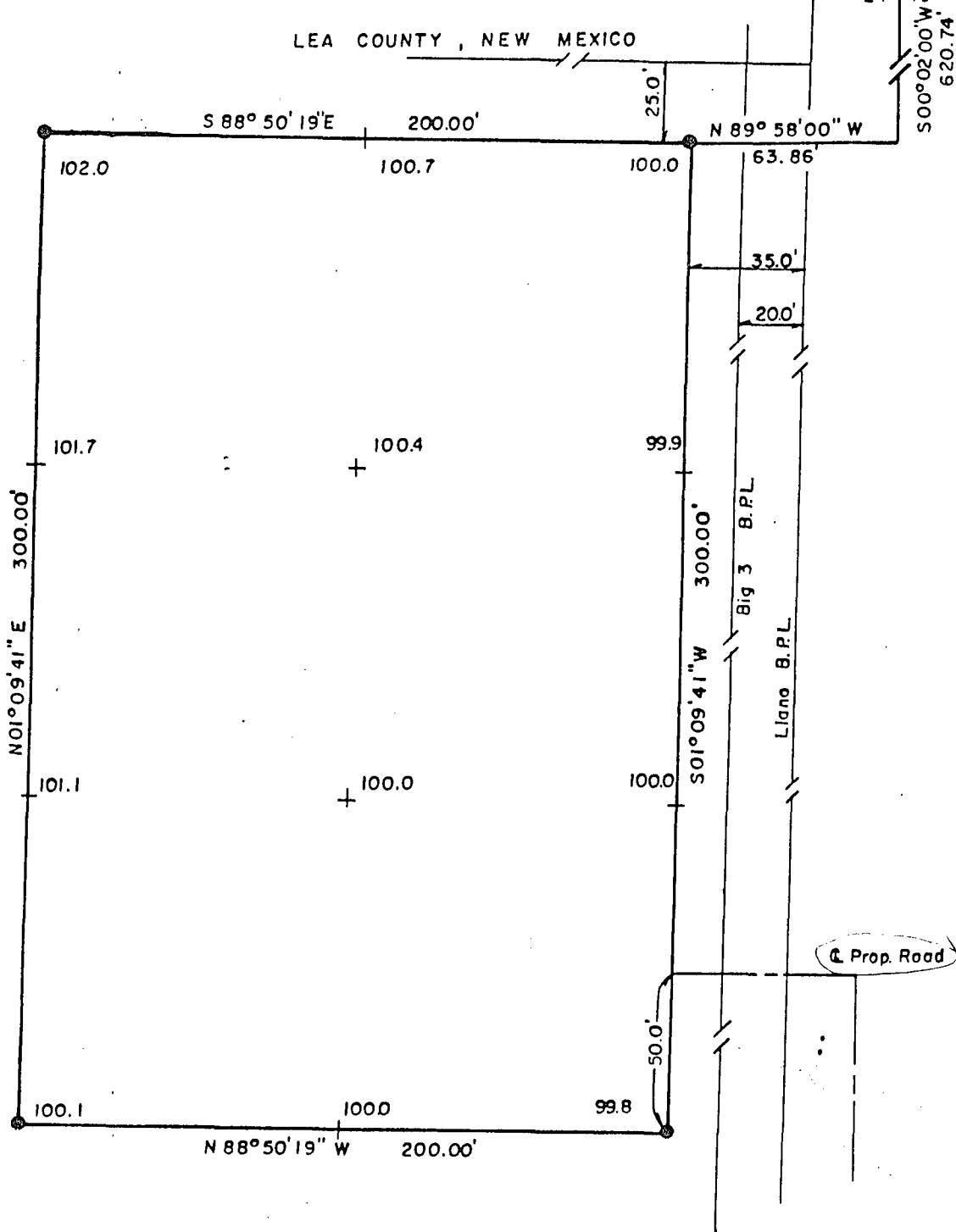


# PLAT OF SURVEY



SEC. 24, T17S, R 35E, N.M.P.M.,

LEA COUNTY, NEW MEXICO



## DESCRIPTION

A 1.377 acre tract of land situated in the Northeast Quarter of the Northeast Quarter (NE $\frac{1}{4}$ NE $\frac{1}{4}$ ) of Section 24, Township 17 South, Range 35 East, N.M.P.M., Lea County, New Mexico, being further described as follows:

Beginning at a point which lies S00° 02' W 620.74 feet and N89° 58' W 63.86 feet from the Northeast Corner of said Section 24; thence S01° 09' 41" W 300.0 feet; thence N88° 50' 19" W 200.0 feet; thence N01° 09' 41" E 300.0 feet; thence S88° 50' 19" E 200.0 feet to the point of beginning.

I HEREBY CERTIFY THAT I AM THE PROFESSIONAL LAND SURVEYOR WHO PREPARED THE ABOVE PLAT FROM FIELD NOTES OF ACTUAL SURVEYS MADE UNDER MY DIRECTION AND THAT THE SAME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

LLANO, INC.

Proposed compressor site in Section 24, Township 17 South, Range 35 East, N.M.P.M., Lea County, New Mexico.

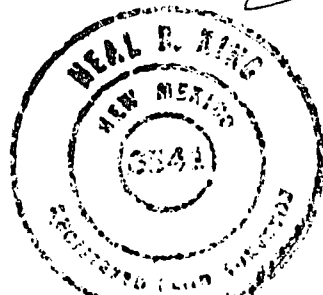
KING SURVEYING

4001 MAHAN DRIVE HOBBS, NEW MEXICO 88240

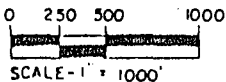
SUB. 1 = 50 DRAWN BY J.D. NORBY

DATE 8/8/94 TITLE

P.L.S. No. 6541 N.M.  
R.P.L.S. No. 2308 TX

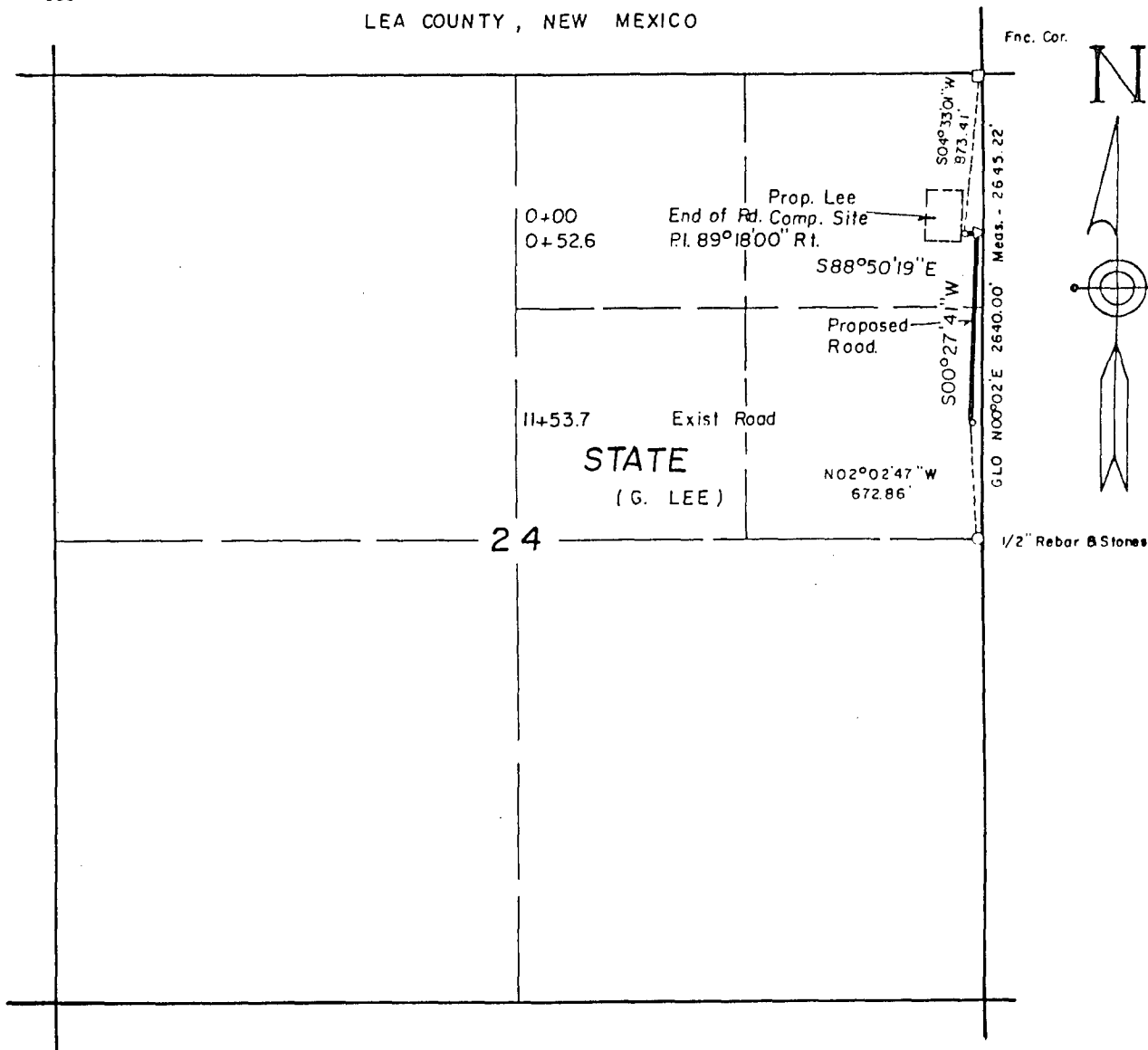


# PLAT OF SURVEY



SEC. 24, T17S, R 35E, N.M.P.M.,

LEA COUNTY, NEW MEXICO



## DESCRIPTION

A strip of land 30 feet in width and 1153.7 feet or 69.92 rods in length lying in Section 24, Township 17 South, Range 35 East, N.M.P.M., Lea County, New Mexico, being 15 feet left and 15 feet right of the following described survey of centerline across State of New Mexico land:

Beginning at Eng. Sta. 0+00, a point which lies S04° 33' 01"W 873.41 feet from the Northeast corner of said Section 24 ; thence S88° 50' 19"E 52.6 feet to Eng. Sta. 0+52.6, a P.I. of 89° 18' 00" right; thence S00° 27' 41"W 1101.1 feet to Eng. Sta. 11+53.7, the end of line, a point which lies N02° 02' 47"W 672.86 feet from the East Quarter corner of said Section 24, the aforementioned strip of land contains 0.795 acres of which 0.347 acres lie in the NE $\frac{1}{4}$ NE $\frac{1}{4}$  and 0.448 acres lie within the SE $\frac{1}{4}$ NE $\frac{1}{4}$  of said Section 24.

I HEREBY CERTIFY THAT I AM THE PROFESSIONAL LAND SURVEYOR WHO PREPARED THE ABOVE PLAT FROM FIELD NOTES OF ACTUAL SURVEYS MADE UNDER MY DIRECTION AND THAT THE SAME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

LLANO, INC.

Proposed roadway across State of New Mexico land in Section 24, Township 17 South, Range 35 East, N.M.P.M., Lea County, New Mexico

KING SURVEYING

4001 MAHAN DRIVE HOBBS, NEW MEXICO 88240

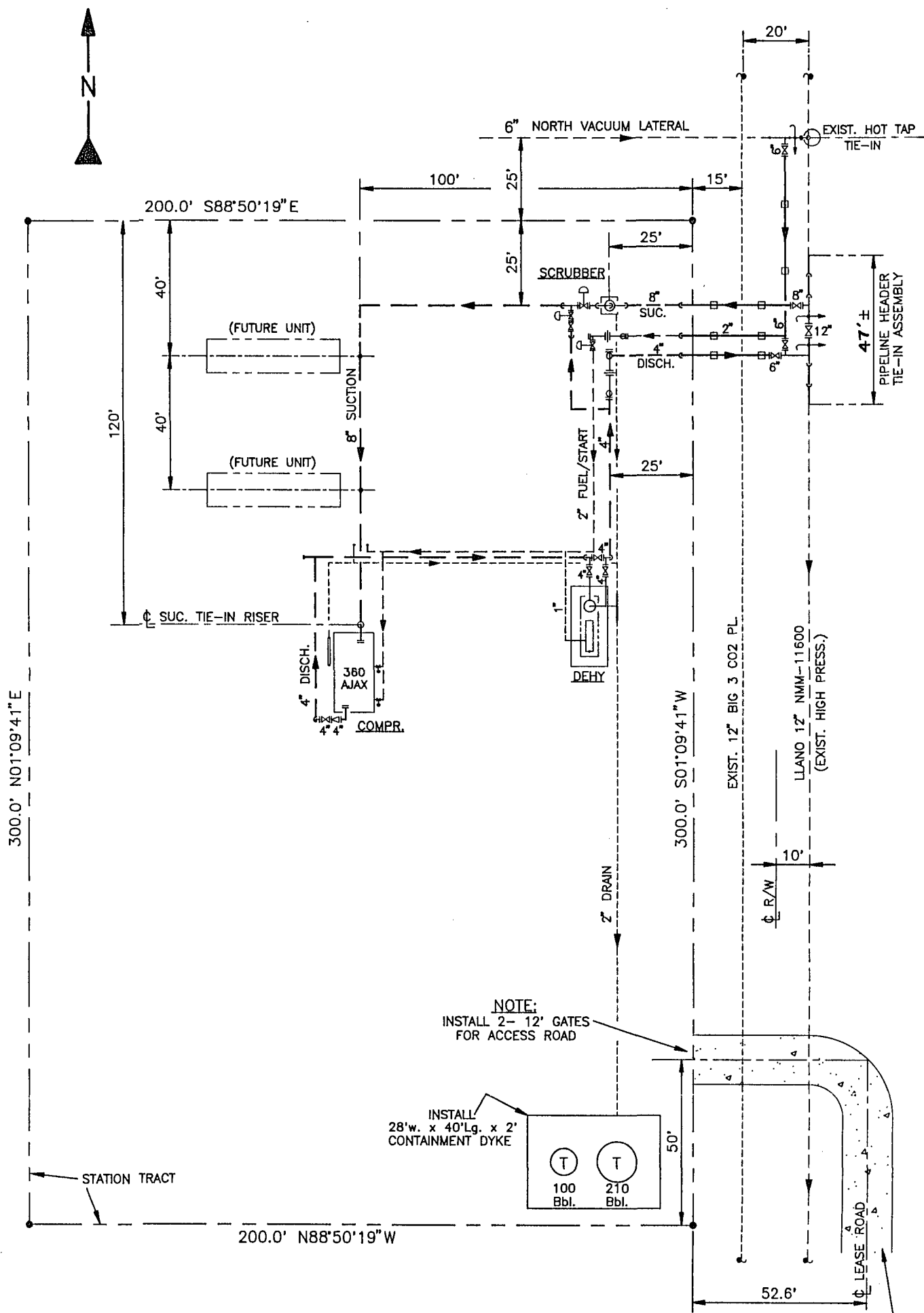
SCALE: 1" = 1000'

DRAWN BY: J. D. NORBY

DATE: 8/8/94

SHEET 1 OF 1





# STATION AREA PLAN

SCALE: 1" = 30'

(REFERENCE TO BLOW-UP PLAN At LEFT)

NOTE:  
BUILD LEASE ROAD  
FOR STATION ACCESS  
15' WIDE  
(LSE. RD. HAS 30' R/W)

IV.

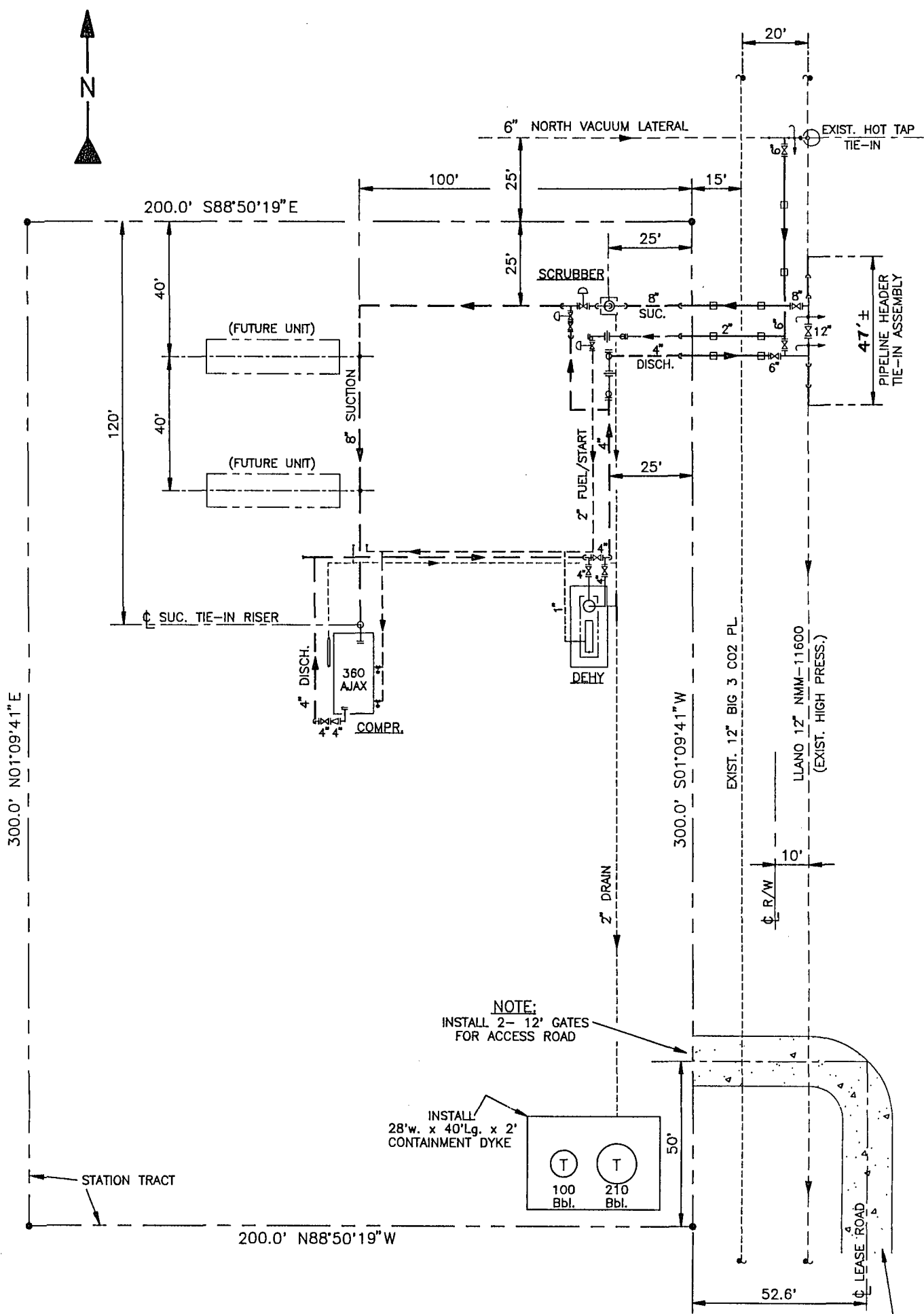
The land owner of the facility site is:

State of New Mexico  
Commissioner of Public Lands  
P. O. Box 1148  
Santa Fe, New Mexico 87504-1148

V. Facility Description

The proposed compressor station will consist of two skid - mounted, engine-driven gas compressors, an inlet separator, and a 210 Bbl, and a 100 Bbl. tank. (See attached diagram of the facility.)

Natural gas will enter the compressor station from the north through a pipeline. The gas will be a commingled stream from various wells in the area. The gas will go through an inlet separator, before going into the compressors. After compression the gas will flow to the south through an existing pipeline.



# **STATION AREA PLAN**

SCALE: 1" = 30'  
(REFERENCE TO BLOW-UP PLAN At LEFT)

**NOTE:**  
BUILD LEASE ROAD  
FOR STATION ACCESS  
15' WIDE  
(LSE. RD. HAS 30' R/W)

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

- 1) ENGINE COOLING WATER - The engines driving the compressor contains approximately 220 gallons each of a 50% antifreeze, 50% water mixture for cooling purposes. This is a closed loop system and normally requires no make-up.
- 2) SEPARATORS - The inlet separator, and scrubber remove an estimated 0 to 10 BBL/day of water and an estimated 0 to 30 BBL/day of hydrocarbon liquids depending upon ambient conditions, and other factors involved in the gathering of natural gas.
- 3) WASTE LUBRICATION OILS - The compressor contains approximately 25 gallons of lubricating oil and the engine contains approximately 28 gallons of lubrication oil each. The lubrication oil is a standard 30 or 40 weight oil and replaced approximately every 5000 hours of run time, or as required by oil analysis. The owner of the compressors, Tidewater Compression, will be responsible for the waste lubrication oils and filters from the compressors.

The waste water and hydrocarbon liquids will be commingled within the facility. Individual rates, volumes and concentrations should not vary beyond the ranges identified above. All process units will be self-contained to prevent unintentional or inadvertent discharges and spills.

*Dehy/Steam cond tank ?*



## VII. TRANSFER & STORAGE OF PROCESS FLUIDS & EFFLUENTS

Waste water and hydrocarbon liquids are collected in the inlet separator, the compressor scrubber, and the blowcase. The waste water and hydrocarbon liquids are commingled and piped to a closed storage tank. ( See attached facility schematic).

The inlet separator, and compressor scrubber, are each pressurized. The closed storage tanks will be maintained and checked on a daily bases.

The closed storage tanks are standard API 210 Barrel and 100 Barrel tanks. The tanks will be constructed above ground level with an earthen dike enclosure to provide secondary containment equal to at least one-third greater than the capacity of the largest tank.

*wrong* { Waste lubrication oil and foundation drains are piped to above ground pipe blowcases. The blowcases will be pressured as required to send the waste lubrication oil to a separate waste oil storage tank .

VIII.

This is not a disposal site for EFFLUENT Liquid.

As previously stated, the purpose of this site is to compress natural gas. There will be some produced water, and condensate which will be recovered from the natural gas.

These liquids will be stored in a 210 Bbl., and a 100 Bbl. tank, and will be hauled from location. The produced water will be disposed of by a trucking company, either Rowland Trucking, or AA Oilfield Service. Both of these companies have approved disposal wells which they use, and charge us for the disposal of the produced water.

The condensate will be sold to a refinery. The refinery of choice will be elected by price, and they will pick up the condensate from the storage tank and transport it to their facility.

The used engine lubricants, and engine coolants will be picked up by our compressor vendor, Tidewater Compression.

The storage tanks will be monitored by our operators on a daily bases. Our operators will be reporting to their supervisor by mobile communications if the tanks should need any further attention. Our supervisors have the means to order a truck to haul liquid at the time our operator's report to him. With this type of check, and safety check, there should be no ground water contamination to contend with.

Simply stated, if the liquid is contained in the tank, then it cannot contaminate the ground, or ground water.

IX.

This facility will have an operator which will check the operations of the facility on daily bases. The operator will report the functioning of the compressor, and a log will be kept of the units. If the operator should locate any problem in any of the equipment, what-so-ever, he will report the problem to his supervisor. Each operator is equipped with mobile communications, which is monitored 24 hours a day.

In the event of a "reportable spill", the operator would notify his supervisor immediately of the occurrence. The supervisor would in turn notify his immediate supervisor, and our emergency report and operating plan would be implemented.

Fluids will be collected inside pressure vessels. These vessels will be ASME stamped, approved, pressure vessels. Therefore, no precipitation can be collected in them, or commingled with produced fluids.

The compressor unit will have an "environmental" skid, which will not allow precipitation which has contacted this unit to runoff onto the ground. The unit skid will be piped into a "blow casing" which will transfer all fluids to an above ground storage tank. As previously stated the contents of this tank will be hauled by truck as often as necessary to assure proper levels are maintained.

X.

Our contingency plan for cleaning up spills, and reporting same is not complicated. We have a supervisor on call who is available 24 hours a day. There are administrative support supervisors available when ever needed.

If a spill should occur, the supervisor on duty would start the field operations of the clean-up, by first stopping the source of the spill, and containing all fluids that he possibly can. The on duty supervisor would notify the support people of the situation. The OCD would be notified pursuant to rule 116, and a contractor would be dispatched at that time to start clean up. The land owner would be notified, and all measures would be taken to protect his live-stock, as well as any wild animals.

All clean up would be carried out in an approved manner, and all necessary waste would be dealt with accordingly.

## XI. SITE CHARACTERISTICS

A. There have been various water wells located within one mile of the location of this compressor station. Therefore laboratory analysis of water from the closest well has been submitted, and is attached to this application.

This is not a disposal site. So we would not adversely effect any water, ground, or other environmental state with the disposal of waste.

(ALSO SEE SECTION 5)



PHONE (915) 673-7901 \* 3111 BEECHWOOD \* ABILENE, TX 79603

PHONE (505) 383-2328 \* 101 E. MARLAND \* HOBBS, NM 88240

PHONE (505) 326-4869 \* 118 S. COMMERCIAL AVE. \* FARMINGTON, NM 87401

## CHEMICAL ANALYSIS OF WATER

Company : Hadson Gas Gathering  
City, St.: 921 W. Sanger, Hobbs, NM  
Proj. Name: No. 811  
Location : NE Quar./NE Quar. Sec. 24,  
T17S R35E

Date : 9/20/95  
Lab #: H2171  
Date Received: 9/7/95  
Date Analyzed: various

Sample 1 : Water Well Sec. 13 T17S R35E

Units: mg/L

<u>PARAMETER</u>	<u>RESULT 1</u>
pH	7.32
Hardness ( $\text{CaCO}_3$ )	195.2
TDS	421.5
Total Alkalinity	170
Conductivity ( $\mu\text{mhos}/\text{cm}$ )	398
Chloride ( $\text{Cl}^-$ )	131.16
Sulfate ( $\text{SO}_4$ )	50.90
Calcium (Ca)	73.7
Magnesium (Mg)	2.64
Carbonate	-0-
Bicarbonate	170

Methods: EPA 600-150.1, 130.2, 200.7, 375.4, 325.3, 160.1, 310.1, 120.1

Manuel Garbalena  
Manuel Garbalena

9/19/95  
Date



PHONE (915) 673-7001 \* 2111 BEECHWOOD \* ABILENE, TX 79603

PHONE (505) 393-2326 \* 101 E. MARLAND \* HOBBS, NM 88240

PHONE (505) 326-4569 \* 118 S. COMMERCIAL AVE. \* FARMINGTON, NM 87401

## METALS ANALYSIS REPORT

Company: Hadson Gas Gathering  
Address: 921 W. Sanger  
City, State: Hobbs, NM

Date: 9/20/95  
Lab #: H2171

Project Name: No. 811  
Location: NE Quar./NE Quar. Sec. 24, T17S R35E  
Sampled by: ES  
Sample Type: Water

Date: 9/7/95  
Sample Condition: Intact

Sample ID: Water Well Sec. 13 T17S R35E

Units: ppm

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>
Silver	<0.1	5
Arsenic	<0.1	5
Barium	<0.2	100
Cadmium	<0.1	1
Chromium	<0.1	1
Mercury	<0.001	5
Lead	<0.1	0.2
Selenium	<0.1	1

METHODS: -EPA 1311, 600/4-91/010, 200.7, 245.1

Manuel Garbalena  
Manuel Garbalena

9/19/95  
Date



**CARDINAL**  
LABORATORIES

PHONE (915) 673-7001 \* 2111 BEECHWOOD \* ABILENE, TX 79603

PHONE (505) 393-2328 \* 101 E. MARLAND \* HOBBS, NM 88240

PHONE (505) 326-4689 \* 118 S. COMMERCIAL AVE. \* FARMINGTON, NM 87401

TPH/BTEX ANALYSIS REPORT

Company: Hadson Gas Gathering  
Address: 921 W. Sanger  
City, State: Hobbs, NM

Date: 9/19/95  
Lab #: H2171

Project Name: No. 811

Location: NE Quar./NE Quar. Sec. 24, T17S R35E

Sampled by: ES

Date: 9/7/95

Time: 3:15

Analyzed by: MG

Date: 9/10/95

Sample Type: Water

Sample Condition: Intact

Units: ppm

\*\*\*\*\*

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES
1	Water Well Sec. 13 T17S R35E	<1.0	<0.001	<0.001	<0.001	<0.001

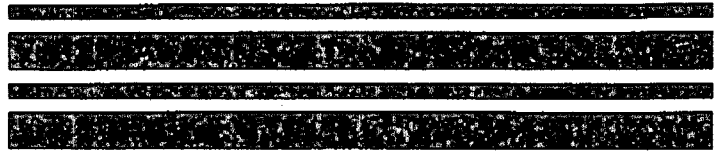
QC Recovery	414	97	90.3	102.5	298
QC Spike	430	100	100	100	300
Accuracy	96%	97%	90%	103%	99%
Air Blank	***	<0.001	<0.001	<0.001	<0.001

Methods - GAS CHROMATOGRAPHY; INFRARED SPECTROSCOPY  
- EPA SW-846; 8020, 418.1, 3510, 3540, OR 3550

M. Garbalena  
Mamuel Garbalena

9/19/95  
Date





Patch T

GW - 227

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

---

2007-1995

**Chavez, Carl J, EMNRD**

**From:** Weathers, Stephen W [SWWeathers@dcpmidstream.com]

**Sent:** Monday, January 15, 2007 9:36 AM

**To:** Chavez, Carl J, EMNRD

**Subject:** DCP Midstream Remediation Projects

Carl

I would like to set up a meeting with you to go over DCP Midstream Remediation Projects. What would your availability be for next week possibly on Thursday (January 25) or Mid Week the following week to meet and discuss the projects?

Daniel Dick and myself would attend as well as Mike Stewart the Environmental Consultant that does most of our groundwater remediation projects in NM.

Thanks

Stephen Weathers  
Sr. Environmental Specialist  
DCP Midstream  
303-605-1718 (Office)  
303-619-3042 (Cell)

Effective 1/1/07 my email address has changed to [swweathers@dcpmidstream.com](mailto:swweathers@dcpmidstream.com)

1/16/2007

**OCD DCP Midstream LP. Sites Discussion Meeting  
(Stephen Weathers, Daniel Dick, et. al) February 1, 2007**

**GPM Artesia GP (GW-23)**

On 5/26/2006, Stephen Weathers PG 303-605-1718 (swweathers@duke-energy.com) submitted a Flare Pit Soil Remediation & Closure Work plan by Conestoga-Rovers & Assoc. to Mike Bratcher. Upon your approval, DEFS will move forward w/ the closure activities. One hard copy of the work plan will also be mailed next week (OCD Santa Fe never received it).

Stephen Weathers, et al. will present the info. during the 1/31/2007 meeting in Santa Fe.

**Lee Compressor Station (GW-227) (Also known as the Gillespie/Feagan)  
A-24-T17 S 35 E**

Closure work plan dated 9/5/2006 mailed to Ben Stone to complete a site closure.

The work plan was develop. Based on DEFS decision to cancel the discharge plan GW-227 and close the site. The closure plan is submitted to the OCD for approval.

Closure Activities: DEFS will remove all remaining equip. from site. The site will be visually inspected to determine if hydrocarb. impacted soil is present at the site. If no HC impacted soils are encountered, the site will be leveled and reseeded with native grass. If HC impacted soils are encountered, the impact soil will be remediated following NMOCD Guidelines for Remed. of Leaks, Spills, & Releases, 8/1993 and using: Benz (10 ppm), BTEX (50 ppm), and TPH (100 ppm). A PID might be used to screen potential HC impacted soil. If headspace is  $\leq 100$  ppm, the PID reading will be used as a substitute to lab analysis for benz./BTEX. If the PID is not used for screening confirm. soil samples will be analyzed for BTEX using EPA 8021B.

HC impact soils that are found to be greater than cleanup criteria will be excavated and properly disposed at an NMOCD approved facility. Confirmation soil samples will then be collected within the base and sidewalls of the excavation to confirm that the HC impacted soils have been removed to below the NMOCD cleanup stds. for this site.

After confirmation soil samples confirm the impacted soils has been removed to below the NMOCD cleanup Stds., the excavation will be backfilled with clean fill mtl. and the area reseeded w/ native grass. A closure report will be completed summarizing all field activities and analytical results. The closure report will also request that no further action will be needed at this site. Upon approval of this work plan, field activities will be scheduled. A 48 hr. notice will be given to the NMOCD Hobbs DO informing them of the start up of the field activities.

## **LEE GP (GW-2)**

Dick Daniel (DIDick@dcpmidstream.com)

Received Q4 2006 GW Monitor Rpt. On 1/30/07 w/ recommendations for certain activities, i.e., free-product recovery in MWs 5 and 15 w/ restart analysis on MW-8 recommended.

Expired DP and OCD msg. to Ruth Lang on 12/21/06: the Lee Compressor Station (GW-227) correspondence dated 12/28/06 indicates that the facility will remain inactive and follow the closure plan to permanently close the facility. Upon receipt of the closure plan info. and verification that contamination exists at the facility with some photos to display what the site currently looks like, the OCD may close the DP?

## **DUKE LINAM RANCH GP (GW-15)**

Third Qtr. 2006 GW Monitoring Report dated January 30, 2007.

GW conditions remain stable. Next monitor event is scheduled for first qtr. 2007. Next annual report for site will be prepared following completion of first qtr. 2007 monitor activities.

On 11/1/2006 Dick Daniel (didick@duke-energy.com) submitted the Annual GW Rpt. 2005-2006. The summary rpt. for Q3 2005 and Q1 2006 GW sampling event. The data indicate that GW conditions remain stable. The next monitor event was performed in 9/2006. The next annual rpt. for the site will be prepared following the completion of the Q1 2007 monitor activities & review & validation of the analytical results. The water tables rose substantially more in MW-1 and 2 than in MW-3, 7 & 9. MW-1 & 2 are located in or adjacent to a natural drainage swale that has been blocked in the S part of site to produce an internally drained condition. The other 3 wells are outside of this area. Unusually high precip in 2004-2005 resulted in more GW mounding beneath the closed drain swale than the rest of the site. The water table in MWs 1 & 2 began to recede after the precip. patterns returned to normal. Water tables in the other 3 wells continue to rise suggesting a more dampened relationship between the precipitation and resulting chgs. in the water table elevations.

MW-7 was not included in the piezometer maps. The level in MW-7 was not included in these maps. Including this well results in a water-table configuration that suggests radial flow from the center of the property. MW-7 has never contained measurable BTEX. This suggests the relatively higher water table in the central part of site is localized so contours should not be carried to the NW. FPH thick measurements for 9/29/2005 (MW-4=0.68 in & MW-6=4.23 in.) and 3/22/2006 (MW-4=0.76 & MW-6=3.69 in.). Only MWs 10 & 10D exceeded BTEX Stds. Any dissolved phase BTEX that emanate from FPH at MW-4 & MW-6 attenuate to below the method reporting limits before migrating to the vicinity of MW-1 (cross gradient) or MW-8 (down gradient). BTEX measured at MW-10 and 10D attenuate to concentrations that are slightly above MW-9 or below the reporting limits (MW-12 & 13) at the interior down gradient wells. The above have remained constant since ~ 6/2001. This indicates that BTEX distribution and attenuating mechanism that controls it are equilibrated.

The affected areas are min. of 1,000 ft. from the nearest down gradient property boundary. Wells containing FPH are in an active gas processing area so the safety risks inherent to restarting FPH collection more than offsets the environmental benefits that would be associated with the activity. The data establishes that dissolved phase releases from the FPH that is present in this area are attenuated approx. 1,000 ft. from the nearest down-gradient property boundary. The next semi-annual GW monitor event is scheduled for the Q3 2006. Contact Michael Stewart PE 303-948-7733 if you have questions.

### **HOBBS BOOSTER CS (GW-44)**

Project Summary: Hobbs Booster Station, (Discharge Plan GW-044)  
(Units C and D, Section 4, Township 19 South, Range 38 East)

Summary date: October 10, 2006

#### **Project history:**

DEFS inherited Hobbs Booster Station (Former Gas Plant) when it acquired the assets of GPM. Site investigation activities began in July 1999. Plume delineation was completed in June 2003.

Two remediation systems are present at the site. An air sparge system was installed in January 2004 to control cross-gradient off site migration of dissolved phase hydrocarbons. It has operated on a near continual basis except for a couple of periods when it was under repair, and the groundwater data verifies that it is controlling off-site migration.

A free phase hydrocarbon (FPH) collection system became operational in January 2005 in the center of the site. It has operated on a regular schedule except for a couple of brief periods when it was down for repairs. The system has effectively remove FPH since it was started. The system is inspected and maintained on a regular basis. DEFS is currently evaluating the potential of adding vacuum to the system to increase the production rate and capture zone of each well.

#### **Current Project Status:**

The hydrocarbon plume has been delineated to below the method detection limits. There is no evidence of plume expansion. Operation of the air sparge system is necessary to control dissolved-phase hydrocarbon releases to the south. FPH collection will continue indefinitely.

Detection level Groundwater monitoring continues at the site on a quarterly basis. Operation of the air sparge and the FPH collection system will continue indefinitely.

On 12/17/06 Michael Stewart & Steve Weathers notified OCD that Trident Environmental will conduct quarterly monitor well gauging & GW sampling and the following: SWLs in MW, RW and temp. wells using an oil/water interface problem; Collect GW samples for BTEX w/ QA/QC; Purge water disposed at NMOCD approved facility. Project site location: 1625 W. Marland, Hobbs (C&D 4-19S-36E). Sampling will begin on 12/20/06.

On 10/30/06, Stephen Weathers 303-605-1718 (swweathers@duke-energy.com) submitted additional vacuum enhancement testing for the free phase hydrocarbon extraction system located at C&D 4-19S-38E. DEFS would like to complete this test early next week. Upon completion of the field activities DEFS will complete an assessment report summarizing the results of the test.

The AEC 10/30/06 summary of initial assessment activities & recom. for further evaluation of adding vacuum enhancement to the free phase hydrocarbon extraction system. Depth (BTOC) is about 50 feet. The above SWL indicate that recent heavy rains have not affected the water table in a fashion similar to 2004 precip. This fact is important because the WT historically declined at a rate of about 1 ft/yr. this trend should continue to expose more of the screened interval in these wells to make them available to vacuum effects.

FPH thickness ranges from about 0.43 in. to 10.63 in. in TW-C, OW-25W & 50W, OW-100W, OW-25S, OW-50S, OW-25 E & OW-25 N. There is a gravel interval at about 34 to 64 feet BGL.

On 10/23/2006, Stephen Weathers 4-303-605-1718 (swweathers@duke-energy.com) submitted an electronic copy of the 2005-2006 Annual GW Monitor Rpt. along w/ a cover letter.

The report is missing & OCD should request another copy.

#### **DUKE APEX CS (GW-163)**

old conoco

Trisha Elizondo (ARCADIS) (Trisha.elizondo@arcadis-us.com)

On 1/17/07, notification that ARCADIS will be conducting mo. Product recovery and PCA Junction on 1/22-23/07. Routine product recovery is on-going at site through hand-bailing. MWs at 2 locations will be surveyed to help w/ GW flow & potentiometric surface.

#### **DUKE HOBBS GP (GW-175)**

old conoco

Stephen Weathers (SWWeathers@dcpmidstream.com)

Project Summary: Hobbs Gas Plant  
Unit G, Section 36 Township 18 South, Range 36 East

Summary date: October 10, 2006

#### **Project history:**

DEFS acquired the Hobbs Gas Plant in March of 2004. Ground water monitoring wells (6 wells) were installed at the site during the due diligence phase of the acquisition. Benzene was identified above the WQCC standards in one of the groundwater monitoring wells.

Current Project Status:

Groundwater monitoring continues at the site on a quarterly basis.

On 1/29/07, 4Q 2006 GW monitor rpt. submitted. Two MWs exhibit elevated benzene levels. SE and E-central portions of site adjacent to process equip. Qtly sampling continues. Results of Q1 2007 sampling will be reported in A1 2007 GW monitor report. Potentiometric surface maps for site in future reports can be expected.

**Remediation Sites**

**C-line Release Site (1RP-401-0)**

Project Summary: C-line Release site (1RP-401-0)  
(Unit O, Section 31, Township 19 South, Range 37 East)

Summary date: October 10, 2006

Project history: Pipeline Release

Duke Energy Field Services C-Line Pipeline Release occurred in May of 2002. The release occurred on New Mexico State Land. Environmental Plus, Inc. was contracted to complete the soil remediation. Approximately 3,868 cubic yards of impacted soil was excavated. 2,707 cubic yards of impacted soils was properly disposed and the remaining impacted soil was blended/shredded until below cleanup standards and placed back into the excavation. During the soil remediation, groundwater was determined to be impacted with hydrocarbons. The groundwater characterization activities began in fourth quarter 2002. A total of 9 groundwater monitor wells were installed. Active free phase hydrocarbon (FPH) removal initiated in November 2003. A soil vapor extraction system was installed in October 2004. The system was expanded to include a second well in June 2005. No FPH has been measured since March 2006 even after the SVE system was turned off (but remains at the site) in June 2006.

Current Project Status:

All FPH has been removed as discussed above. The hydrocarbon plume has been delineated. There is no evidence of plume expansion, and, in fact, the plume may actually be contracting.

Groundwater monitoring continues at the site on a quarterly basis. Site monitoring could be decreased to semi-annual.

Received Q3 2006 GW monitor rpt. from Stephen Weathers on 12/18/06.



## **Eldridge Ranch (AP-33)**

Stephen Weathers (SWWeathers@dcpmidstream.com)

Project Summary: Eldridge Ranch, (Abatement Plan AP-33)  
(Unit P, Section 21, Township 19 South, Range 37 East)

Summary date: October 10, 2006

Project history: Pipeline Release

DEFS initiated investigative activities in June 2002 following notification by NMOCD. Site characterization activities were largely completed by the fourth quarter of 2003. The boundaries of detectable hydrocarbons have been delineated.

DEFS submitted the Stage 1 Abatement Site Investigation Report (ASIR) on February 11, 2004 to the New Mexico Oil Conservation Division (OCD). In the ASIR, DEFS committed to continuing two activities (groundwater monitoring and free phase hydrocarbon (FPH) removal) independent of the ASIR review timeframe. The OCD has not commented on the ASIR. Groundwater monitoring and FPH removal activities continue on a regular basis.

### **Current Project Status:**

FPH recovery has been attempted at the site with limited results. The FPH at the site is generally limited in thickness to less than one foot. In addition, the FPH appears to be relatively immobile based upon the inability of the automatic collection systems to collect the liquids.

The hydrocarbon plume has been delineated to below the method detection limits. There is no evidence of plume expansion; however, concentrations the interior of the plume appears to exhibit nominal increases and decrease in response to seasonal precipitation.

Groundwater monitoring continues at the site on a quarterly basis. Site monitoring could be decreased to semi-annual without jeopardizing environmental impacts. FPH removal continues as site conditions warrant.

On 1/26/07, received Q4 2006 GW monitor rpt. for AP-33 near Monument NM. Some conclusions: FPH mobility appears to be limited based on historic bail down/recovery tests and failure to reappear; FPH thick is less than 0.8 ft. in six wells and less than 0.1 ft in 2 of 6 wells. FPH is relatively immobile at thick less than 1 ft. FH continues to decline in MW-EE from max. thick. of 0.83 ft. in 9/2005. FPH thick in other wells (excepting MW-CC) also exhibit decreasing trends. Benzene horiz. distrib. remain unchanged over duration of project. The benz level in the former house well continues to remain below NM WQCC GW std. Summer 2006 rains did not create a spike in levels at MWs like the heavy 2004-2005 rains. No evidence of plume expansion exists ; thus, natural attenuation stabilizes and removes hydrocarbs as they migrate away from area.

AEC recommends that Q1 2007 monitoring be completed and data reviewed to evaluate changes in GW flow patterns in S-central part of study area.

On 12/22/06, received Q3 2006 GW monitor report conclusions: FPH remains in 4 wells in W-central part of study area. FPH thick decrease in 3 of 4 wells. FPH present to N in MW-EE at 0.35 ft. FPH continues to decline from max thick of 0.83 ft. in 9/2005. FPH was not measured anywhere else within study area. FPH mobility appears to be limited based on historic bail down/recovery tests and its failure to reappear in previously affected wells to S. Benz distrib. unchg. over duration of project. Temporal benz distrib. - see charts.

On 10/24/06, Stephen Weathers 303-605-1718 (swweathers@duke-energy.com) submitted GW monitor rpt. for Q2 2006. The former NMG-148C Study Area was combined with the Eldridge Ranch Study Area beginning w/ the Q1 2006. The areas were combined after estab. that hydrocarb plume orig. from NMG-148C had migrated into the Eldridge Ranch Study Area before it attenuated. The combined sites will be treated as a single entity in all subsequent sample events. Activities are governed under AP-33. DEFS submitted the Stage 1 Abatement Site Investigation Rpt. (ASIR) on 2/11/2004 to the OCD. In that rpt., DEFS is committed to continuing 2 activities independ. of the ASIR review timeframe. The activities include GW monitor. & free phase hydrocarb. (FPH) removal when practicable.

GW Monitor activities were completed on 6/19 and 20, 2006 abiding by the OCD approved SAP. SWLs, FPH tick measurements, and GW sampling were completed (see report). The conclusions were: The interpretations are grouped accord. to GW flow, product thick and GW chemistry. 6/2006: data from newly installed MW-28-31 continues to indicate that GW flow beneath the northern part of the Huston property is southward rather than toward the SE.

The WT continues to decline at a uniform rate across the site from a high in 12/2004. The vertical gradient measured between MWs 1s & 1d has not varied substantially over the duration of the project.

Conclusions are: FPH is present in 5 MWs in the w-central part of the study area. The FPH mobility appears to be limited based upon historic bail down/recovery tests & its failure to reappear in previously affected wells to the S. FPH was also present to the N in MW-EE at 0.35 ft. FPH has now declined from a max. thick of 0.83 ft. in 9/2005. FPH was not measured anywhere else within the study area. The Benz distribution has remained essentially unchg. over the duration of the project. MWs 28, 30 & 31 installed in 3/2006 did not contain detectable concentrations of BTEX constituents when they were sampled a second time. MW-29 has detected BTEX. The northernmost NMG-148C plume and moves south. The pattern indicates that the areal extent of the dissolved phase plume assoc. w/ NMG release is not expanding.

The concern. in MW-e & MW-1 located in the S part of this area continue to decline. Samples from the other 4 wells (MW-M, O, Q & M) produced concentrations that were at or slightly higher than the 3/2006 values. This indicates that the S part of the dissolved phase plume in this area appears to be contracting to the N while the remainder of the plume in this area remains constant. None of the data indicates that the plume is expanding.

Benz time concent. for the wells located immed. adjacent to MW-1 or on the Eldridge property (irrigation wells, house well) are shown in Fig. 9. The concentrations in MW-1 and the irrig. well leveled out after an apprec. 1-yr decline. The concent. in the house well has remained consistent over the past 3 sample events. The pattern does not indicate that the dissolved phase plume is expanding in this area. Wells MW-A, 4 & 5 located N of the Huston-Eldridge boundary, remained relatively consistent.

All of the above relationships indicate that natural attenuation is stabilizing & removing hydrocarbs as they migrate away from the src. areas. There is no evidence of plume expansion.

#### Recommendations:

AEC recommends that a Q3 monitoring be completed and evaluated. The monitor freq. should then be decreased from qtrly. to semi-annual if the data results do not vary appreciably. The potential for FPH removal will be evaluated based upon info. gathered during the Q3 monitor event. Recommendations on FPH will be provided as necessary separate from the monitor report. Michael Stewart PE (303-948-7733).

### **J-4-2 Release Site**

Project Summary: J-4-2 Release Site  
Unit C, Section 27 Township 19 South, Range 35 East

Summary date: October 10, 2006

Project history: Pipeline Leak

The release at this site was discovered in August 2005. EPI completed a limited soil cleanup and preliminary groundwater investigations between August 2005 and the first quarter of 2006.

A work plan proposing additional site characterization activities was submitted to the NMOCD. The site activities were completed in September 2006 and a report is currently being generated.

#### Current Project Status:

Preliminary evaluation of the data indicates that the groundwater plume has been defined beyond the limit of detectable concentrations. Additional activities will be proposed as necessary in the pending investigative report.

On 12/28/06, Stephen Weathers e-mailed a AEC Consultants site investigation rpt. (12/26/07). Water table elevations rose by 0.45 to 1 ft. FPH thickness in MW-2 declined from 0.57 to 0.15 between 2/06 and 9/06. Probably due to high precip. summer 2006. I~ 0.006 toward SE. Head at MW-2 slightly higher than at other wells. K~ 90 ft/day based on pump test. n! 0.15. Estimated GW velocity !3.6 ft/day or 1,310 ft/yr. All develop. and purge water was disposed of at the Linam Ranch facility by EPI. All cuttings generated during the drilling process will be stockpiled

and sampled and then disposed of in an appropriate fashion. Unaffected cuttings will be spread thin.

Final field activity completed was to measure physical properties of saturated mtl. Slug tests were completed on all wells that don't contain FPH to estim. saturated K.

Following recommendations from AEC (Michael Stewart 303-948-7733):

A passive bailer should be installed in MW-2 to attempt to remove mobile FPH. GW monitoring should be completed 3 more times on a qly. basis to compile a data base based upon 4 seasons of measurements; Qtly rept. should be generated based upon the results of the 4th qtr. 2006 and Q1 2007 monitor events; A comprehensive report will be compiled follow. completion of Q2 2007 monitor episode. This report. include recom. of both long-term monitor and , if necessary, implementation of active remediation; Additional charact. activities & active remediation activities will not be completed during this time interval unless data indicates hydrocarb. plume is expanding; the next GW monitor event is scheduled fro the Q4 2006.

On 12/20/06, John Furgerson (jmfergerson@grandecom.net) sent msg. that Trident Environ. a subcontractor of Duke's will be conducting monitor well gauging & GW sampling at 1300 MST Thursday, Dec. 21, 2006. They will measure SWLs in all MWs using an oil/water interface probe; purge non-product MW/RWs. Collect GW samples for BTEX; ship samples using COC protocol; and purge water will be disposed at a NMOCD approved facility.

#### **X-line Site (1RP-400)**

Project Summary: X line Release Site (1RP-400)  
Unit B, Section 7 Township 15 South, Range 34 East

Summary date: October 10, 2006

Project history: Pipeline Release

The release at this site was discovered in January 2002. EPI completed soil cleanup and preliminary groundwater investigations the first quarter of 2002. A preliminary groundwater investigation was completed in May 2002.

The following remediation components were installed at the site:

- A free phase hydrocarbon (FPH) removal system was installed in MW-8 in July 2003. The system continued to function until the mobile FPH was removed.
- An air sparge (AS) system became operational in June 2003. The system was operated until hydrocarbon concentrations in the wells (except for the FPH collection well) were all measured below the method detection limits.

· A soil vapor extraction (SVE) system was also installed in June 2003. The SVE system operated regularly until August 2006. No FPH was present in the extraction well in September 2006.

Quarterly monitoring is completed at the site. The last monitoring episode was conducted in September 2006.

Current Project Status:

A report detailing the September 2006 activities at this site will be prepared when the analytical data is received and verified.

DEFS will evaluate the feasibility of initiating air sparge in the FPH recovery well to complete source recovery provided no additional FPH is measured in the well.

Received 4th qtr 2006 GW monitor report for pipeline release on January 30, 2007.

Received Q3 2006 GW monitor report from Stephen Weathers 303-605-1718)) for pipeline release on 12/18/06. X-Line pipeline release on the Etcheverry Ranch at 33 deg 02 min 11 sec, 103 deg 32 min 48 sec. MWs 1 through 8 sampled. SWLs reassured. Unfiltered samples were collected for BTEX. MW-8 is not included in hydrograph because casing elev. has not been established (see report for conclusions, etc.).

On 9/8/2006, Stephen Weathers (swweathers@duke-energy.com) sent Ben Stone the Q2 2006 GW monitor report located on the Etcheverry Ranch near Lovington, NM.

The report is missing and OCD needs another copy.

### **RR Ext, (AP-55)**

Project Summary: RR Ext, (Abatement Plan AP-55)  
Unit C, Section 19 Township 20 South, Range 37 East

Summary date: October 10, 2006

Project history:

DEFS initiated cleanup activities after a December 13, 2005 release. The spill was remediated, and a temporary well was drilled to groundwater during the first quarter of 2006. A sample from the well contained dissolved-phase hydrocarbons.

The NMOCD assigned the site an abatement plan number based upon the groundwater sample. A Stage 1 Abatement Plan Proposal was submitted to the NMOCD on or about May 26, 2006.

Current Project Status:

DEFS is waiting for approval for the Stage 1 Abatement Plan Proposal. DEFS will initiate the required activities following receipt of that approval

### **PCA Junction**

Trisha Elizondo (ARCADIS) (Trisha.elizondo@arcadis-us.com)

On 1/17/07, notification that ARCADIS will be conducting mo. Product recovery and PCA Junction on 1/22-23/07. Routine product recovery is on going at site through hand bailing. MWs at 2 locations will be surveyed to help w/ GW flow & potentiometric surface.

### **Monument Booster Station (Gas Compression Facility)**

Q3 2006 GW Monitor activities completed on 9/20/06 & submitted 1/30/07. Next monitor event Q1 2007. Next annual rpt. Prepared following completion of Q1 2007.

No measurable free-product was detected in any MWs. However, in the submittal is shows MWs 1 and 5 have free product at 1.6 and 0.55 inches? No BTEX detected in down-gradient boundary wells MW-3 and 4. No BTEX in up gradient MWs 1D and 2. MW-6 showed anomalously high levels of BEX. Will keep in mind next sample event for continuing trend.

On 11/1/2006, Daniel Dick 303-605-1893 (didick@duke-energy.com) submitted Annual GW Monitor Rpt. 2005-2006. A copy of the summary report for Q3 2005 and Q1 2006 GW sampling effort. Data indicates that the GW conditions remain stable. The next monitor episode was performed 9/2006. The next annual report for the site will be prepared following the completion of the Q1 2007 monitor activities & review & validation of the analytical results. FPH thick measurements on 3/16/06 for period since passive FPH collectors were removed at MW-1 (0.37 in.) and MW-5 (0.39). FPH thick may be declining in MW-1 and is stable at MW-5. None of the BTEX constituents were detected in downgrade boundary wells MW-3 and MW-4. BTEX was also not detected in upgrade wells MW-1D & 2. Hydrocarbs were detected in MW-7, but benz was only constituent above WQCC Stds. No sample has exceeded the WQCC Stds for TEX. Only MW-7 samples have exceeded for benz. Since 2/2000. Benz detection sporadic in all wells except MW-7 since 2/2000. BTX concentrations in MW-7 continue to fluctuate.

Further src. control activities should be postponed given the decreasing product thick in MW-1. The Next semi-annual gw monitor event is scheduled for Q3 2006. Reporting will continue on an annual basis unless unusual conditions warrant notification after the Q3 sampling event.

Attachment: DCP Midstream LP Related Facilities

Application No.	Application Type	Order No. (ex. GW-#)	Applicant	Facility	Environmental Permit Status	Rcvd	Order	Exp	Legal	County	Reviewer	District	Issuing Off	Notes	Cleanup Status
pENV000GW0154	Discharge Plan Permit	143	DCP MIDSTREAM L.P.	DUKE CAL-MON CS	A	03/29/1993	05/14/1993	05/14/2008	J-35-23 S-31 E	Eddy	Chavez	Artesia	Santa Fe		
pENV000GW0242	Discharge Plan Permit	227	DCP MIDSTREAM L.P.	LG&E HADSON GILLESPIE/F EAGAN CS	I		12/28/1995	12/28/2005	A-24-17 S-35 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0331	Discharge Plan Permit	316	DCP MIDSTREAM L.P.	DUKE PAIGE CS	A	08/17/1999	01/06/2000	01/06/2005	O-4-21 S-32 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0326	Discharge Plan Permit	311	DCP MIDSTREAM L.P.	RACTOR COTTON DRAW	A	01/15/1999	01/06/2000	01/06/2005	C-18-25 S-32 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0187	Discharge Plan Permit	176	DCP MIDSTREAM L.P.	DUKE BOOTLEG CS	A	10/27/1994	01/20/1995	01/20/2005	J-18-22 S-33 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0163	Discharge Plan Permit	152	DCP MIDSTREAM L.P.	DUKE WHITE CITY C.S.	C		12/13/1993		-10-24 S-26 E	Eddy	Chavez	Artesia	Santa Fe	Site is shut down-Ulano to submit closure	
pENV000GW0228	Discharge Plan Permit	213	DCP MIDSTREAM L.P.	DUKE STRATA CS	A	07/18/1995	08/30/1995	08/30/2000	A-22-23 S-34 E	Lea	Chavez	Hobbs	Santa Fe	closure requested need picture and TPH analysis	
pENV000GW0156	Discharge Plan Permit	145	DCP MIDSTREAM L.P.	DUKE ZIA GAS PLANT & ZIA BOOSTER STATION	A		07/06/1993	07/06/2008	A-19-19 S-32 E	Lea	Chavez	Hobbs	Santa Fe	3 below grade tanks registered	
pENV000GW0303	Discharge Plan Permit	288	DCP MIDSTREAM L.P.	DUKE PARDUE CS	A	10/06/1997	11/24/1997	11/24/2007	J-10-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	need \$400 fee + sign-off	
pENV000GW0178	Discharge Plan Permit	167	DCP MIDSTREAM L.P.	DUKE P & P Malaga CS	A	05/19/1994	07/25/1994	07/25/2004	G-3-24 S-28 E	Eddy	Chavez	Artesia	Santa Fe	need sign-offs	
pENV000GW0173	Discharge Plan Permit	162	DCP MIDSTREAM L.P.	DUKE ANTELOPE RIDGE GP	A	01/21/1994	04/04/1994	03/23/2004	O-15-23 S-34 E	Lea	Chavez	Hobbs	Santa Fe	rec DP App + \$100 issued PN and Draft DP 1/23/04	
pENV000GW0171	Discharge Plan Permit	160	DCP MIDSTREAM L.P.	DUKE BRIGHTM FED CS	C	11/29/1993	01/14/1994		C-21-19 S-33 E	Lea	Chavez	Hobbs	Santa Fe	DP terminated 1/22/04	
pENV000GW0161	Discharge Plan Permit	150	DCP MIDSTREAM L.P.	DUKE PURE GOLD "28" CS	A		11/22/1993	11/22/2003	D-28-23 S-31 E	Lea	Chavez	Hobbs	Santa Fe	Rec DP application + \$100 issued PN 1/23/04 & Draft DP	
pENV000GW0311	Discharge Plan Permit	296	DCP MIDSTREAM L.P.	DUKE CEDAR CANYON CS	A	03/23/1998	07/15/1998	07/15/2008	P-9-24 S-29 E	Eddy	Chavez	Artesia	Santa Fe		
pENV000GW0252	Discharge Plan Permit	237	DCP MIDSTREAM L.P.	DUKE PECOS DIAMOND GP	A	02/05/1996	03/29/1996	03/29/2011	G-3-18 S-27 E	Eddy	Chavez	Artesia	Santa Fe		1 below grade tank registered

pENV000GW00254	Discharge Plan Permit	239	DCP MIDSTREAM L.P.	Duke QUINN CS	A	03/08/1996	08/09/1996	08/09/2011	L-16-31 N-8 W	San Juan	Chavez	Aztec	Santa Fe	DP w/ filing fee process, renewed, issued with letter mailed out 10/23/2006. Received \$1700 fee 10/26/06. Signed DP received 1-11-07 Ok.	
pENV000GW00088	Discharge Plan Permit	77	DCP MIDSTREAM L.P.	Duke MIDDLE MESA CS	A	04/10/1991	11/14/1991	11/14/2006	M-10-31 N-7 W	San Juan	Chavez	Aztec	Santa Fe		
pENV000GW00002	Discharge Plan Permit	2	DCP MIDSTREAM L.P.	LEE GP	A	11/13/1995	03/16/1991	03/16/2011	N-30-17 S-35 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW00009	Discharge Plan Permit	9	DCP MIDSTREAM L.P.	EUNICE CS	C	10/06/1988	10/11/1983		-5-21 S-36 E	Lea	Chavez	Hobbs	Santa Fe	GW-009 vacated and merged into GW-16 OCT 8, 1993	
pENV000GW00016	Discharge Plan Permit	15	DCP MIDSTREAM L.P.	DUKE LINAM RANCH GP	A	05/17/1989	04/25/1984	04/25/2009	-6-19 S-37 E	Lea	Chavez	Hobbs	Santa Fe	1 below grade concrete tank registered	
pENV000GW00017	Discharge Plan Permit	16	DCP MIDSTREAM L.P.	DUKE EUNICE GP	A	04/13/1989	04/25/1984	04/25/2009	H-5-21 S-36 E	Lea	Chavez	Hobbs	Santa Fe	10 below grade tanks + 1 sulphur pit registered	
pENV000GW00024	Discharge Plan Permit	23	DCP MIDSTREAM L.P.	GPM ARTESIA GP	A	01/17/1995	07/01/1985	07/01/2010	-7-18 S-28 E	Eddy	Chavez	Artesia	Santa Fe	call&E-mail 1/07/2000 120 day notice. Late flat fee notice sent 1/11/02. Flat fee received 1/29/02.	1 classifier, 5 sumps. 1 sulphur pit, 2 below grade tanks registered (Flare Pit Soil Remediation & Closure Workplan)
pENV000GW00025	Discharge Plan Permit	24	DCP MIDSTREAM L.P.	DUKE AVALON GP	I	06/15/1990	09/18/1985	09/18/2005	J-9-21 S-27 E	Eddy	Chavez	Artesia	Santa Fe	Notice of late flat fee sent 1/11/2002.	
pENV000GW00044	Discharge Plan Permit	42	DCP MIDSTREAM L.P.	GPM INDIAN HILLS GP	I		07/20/1987		L-13-21 S-25 E	Eddy	Chavez	Artesia	Santa Fe	Letter from Duke, dated 12/10/01, notifying site is inactive.	
pENV000GW00149	Discharge Plan Permit	138	DCP MIDSTREAM L.P.	DUKE TRACHTA CS	C		04/30/1993		-14-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Facility is inactive	



pENV000GW00079	Discharge Plan Permit	69	DCP MIDSTREAM L.P.	DUKE CARLSBAD GP	A	12/28/2006	04/29/1992	04/29/2012	G-10-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Public Notice prepared 1/15/02. Request for additional information sent 1/2/02. Received \$100 filing fee & renewal on 12/28/06.	4 sumps registered
pENV000GW00189	Discharge Plan Permit	178	DCP MIDSTREAM L.P.	DUKE WON TON CS	C		03/21/1995	03/21/2005	I-10-17 S-37 E	Lea	Chavez	Hobbs	Santa Fe	1 below grade tank registered	
pENV000GW00138	Discharge Plan Permit	127	DCP MIDSTREAM L.P.	DUKE MAGNUM C.S. (BURTON FLATS GP)	A	08/10/1992	02/03/1993	02/03/2008	G-9-20 S-29 E	Eddy	Chavez	Artesia	Santa Fe	1 below grade tank registered as sump	
pENV000GW00139	Discharge Plan Permit	128	DCP MIDSTREAM L.P.	DUKE PAIGE CS	A	08/11/1992	11/19/1992	11/20/2007	O-4-21 S-32 E	Lea	Chavez	Hobbs	Santa Fe	6 mo. Renewal notice sent 7/10/02. renewal application received	
pENV000GW00148	Discharge Plan Permit	137	DCP MIDSTREAM L.P.	DUKE CARRASCO CS	A		04/28/1993	04/28/2008	F-14-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	1 skid sump registered	
pENV000GW00150	Discharge Plan Permit	139	DCP MIDSTREAM L.P.	DUKE CP-1 CS	C		04/28/1993		I-15-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Site inactive, requested closure workplan 1/10/03, WP approved, Closure Approved 10/15/2003	
pENV000GW00153	Discharge Plan Permit	142	DCP MIDSTREAM L.P.	DUKE SAND DUNES CS	A	03/26/1993	05/17/1993	05/17/2008	P-23-23 S-31 E	Eddy	Chavez	Artesia	Santa Fe	1 below grade tank registered	
pENV000GW00155	Discharge Plan Permit	144	DCP MIDSTREAM L.P.	DUKE NORTH (WESTALL) CS	A	05/05/1993	08/19/1993	08/19/2008	E-35-22 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Renewal application dated 4/3/03 - renewal on hold pending legal determination	1 below grade tank registered
pENV000GW00179	Discharge Plan Permit	168	DCP MIDSTREAM L.P.	DUKE SOUTH FEAGAN CS	C	07/06/1994	12/28/1994	12/27/2004	N-31-19 S-25 E	Eddy	Chavez	Artesia	Santa Fe	Late filing fee and flat fee notice sent 1/11/02. Flat fee received 1/29/02.	
pENV000GW00188	Discharge Plan Permit	177	DCP MIDSTREAM L.P.	DUKE MALJAMAR CS	C		03/21/1995	03/21/2005	I-20-17 S-33 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW00046	Discharge Plan Permit	44	DCP MIDSTREAM L.P.	HOBBS BOOSTER CS	A		12/23/1987	12/23/2007	-4-19 S-38 E	Lea	Chavez	Hobbs	Santa Fe	renewal notice sent 7/10/02	

pENV000GWO 0270	Discharge Plan Permit	255	DCP MIDSTREAM L.P.	Duke BUENA VISTA CS	A	07/15/1996	09/05/1996	09/05/2011	B-13-30 N-9 W	San Juan	Chavez	Aztec	Santa Fe	DP renewed, issued with letter mailed out 10/23/2006. Received \$1700 on 10/26/2006. Signed DP received on 1/11/2007. Ok.	
pENV000GWO 0273	Discharge Plan Permit	258	DCP MIDSTREAM L.P.	Duke CEDAR HILL CS	A	07/30/1996	09/30/1996	09/30/2011	-29-32 N-10 W	San Juan	Chavez	Aztec	Santa Fe	DP renewed, issued with letter mailed out 10/23/2006. Permit fee of \$1700 received on 10/26/2006. Signed DP received on 1/11/07. Ok.	
pENV000GWO 0292	Discharge Plan Permit	277	DCP MIDSTREAM L.P.	CSI - BIG EDDY LATERAL#1 CS	A		02/17/1997	02/17/2007	A-19-21 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Taken over by Duke Energy. Received DP renewal letter dated 10/19/2006 w/ \$100 filing fee. Mailed out final permit 9/16/06. Awaiting \$1700 Compressor Station fee.	1 below grade tank registered
pENV000GWO 0174	Discharge Plan Permit	163	DCP MIDSTREAM L.P.	DUKE APEX CS	A		04/29/1999	04/29/2004	C-36-18 S-36 E	Lea	Chavez	Hobbs	Santa Fe	request GW info and DP renewal by 12/01/04	
pENV000GWO 0186	Discharge Plan Permit	175	DCP MIDSTREAM L.P.	DUKE HOBBS GP	A		01/09/1995	01/09/2005	G-36-18 S-36 E	Lea	Chavez	Hobbs	Santa Fe	Request DP renewal and GW info BY 12/01/04	
	1RP-401-0		DCP MIDSTREAM L.P.	C-line Release Site (1RP-401-0)					O-31-19 S-37 E	Lea	?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	AP-33		DCP MIDSTREAM L.P.	Eldridge Ranch					P-21-19 S-37 E	Lea	?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
			DCP MIDSTREAM L.P.	J-4-2 Pipeline Release Site					C-27-19 S-35 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	1RP-400		DCP MIDSTREAM L.P.	X-line Pipeline Site (1RP-400)					B-7-15 S-34 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	

	AP-55		DCP MIDSTREAM L.P.	RR Ext. (AP- 55)					C-19-20 S-37 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	2R-043		DCP MIDSTREAM L.P.	PCA Junction					11-20 S-30 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	1R-156		DCP MIDSTREAM L.P.	Monument Booster Station					B-33-19 S-37 E (32.6238 -103.2550)		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	

Chavez, Carl J, EMNRD

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

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

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

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

1/5/2007

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

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, December 21, 2006 3:32 PM  
**To:** 'rmlang@duke-energy.com'  
**Subject:** Duke Energy Field Services (DEFS) Expired Discharge Plan Facilities

Ruth:

DEFS is presently in violation of its discharge plan expiration and renewal dates at the facilities discussed this morning. Regarding DEFS request for a 120 day extension on the renewal of its discharge plan permits, the OCD can allow you 60 days or by March 1, 2007 to submit your renewal applications with \$100 filing fees associated with each GW-### permit made payable to the Water Quality Management Fund.

Regarding the Lee Compressor Station (GW-227), there is correspondence from DEFS dated December 28, 2006 indicating that the facility will remain inactive and follow the closure plan to permanently close the facility. Upon receipt of the closure plan information and verification that no contamination exists at the facility and some photos to display what the site currently looks like, the OCD may approve closure of the facility.

Please contact me if you have questions. Thank you.

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

12/21/2006

December 28, 2005

**UPS Next Day Air** (Tracking No. 1Z F46 915 22 1004 570 6)

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

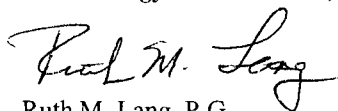
Subject: Notification of Operations Discontinued for a Period in Excess of Six Months  
Lee Compressor Station (aka Gillespie/Feagan)  
Discharge Plan GW-227 (expires 12/28/2005)  
Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) acquired the Lee Compressor Station along with other facilities from ConocoPhillips in 2004. DEFS has never operated the Lee Compressor Station. DEFS has now determined that this facility will remain inactive and will follow all requirements and utilize an applicable closure plan to permanently close this facility.

If you have any questions concerning the inactive Lee Compressor Station, please contact me at (303) 605-1713. Please send all correspondence regarding this notification to my attention at 370 17<sup>th</sup> Street, Suite 2500, Denver, CO 80202.

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



Ruth M. Lang, P.G.  
Manager of Water & Waste Permitting and Programs

Enclosures

cc: NMOCD District 1 Office (UPS Next Day Air Tracking No. 1Z F46 915 22 1004 571 5)  
1625 N. French Drive  
Hobbs, New Mexico 88240

**Price, Wayne****From:** Price, Wayne**Sent:** Tuesday, February 05, 2002 12:08 PM**To:** 'Bishop, Mark A.'**Subject:** RE: Non-exempt waste disposal for Conoco CG&P

OCD hereby approves of your request and will place a copy of this approval in each Discharge Plan.

-----Original Message-----

**From:** Bishop, Mark A. [mailto:Mark.A.Bishop@conoco.com]**Sent:** Tuesday, February 05, 2002 11:24 AM**To:** WPrice@state.nm.us**Subject:** Non-exempt waste disposal for Conoco CG&P facilities

Mr. Price,

A reevaluation of preferred non-exempt waste handling facilities has been completed for southeast New Mexico and a team of Conoco personnel has chosen Sundance waste handling facility at Eunice, NM to be our primary non-exempt waste handling facility. Controlled recovery Inc. will be the secondary facility. We would like to amend the following OCD Groundwater discharge permits to include the Sundance facility for disposal of non-exempt fluids. Thank you for your consideration of our request

Maljamar Gas Plant	GW-020
Maljamar Area Blanket OCD permit	
Antelope Ridge Gas Plant	GW-162
Hobbs Gas Plant	GW-175
Apex compressor Station	GW-163
Bootleg Compressor Station	GW-176
Bright Yates Compressor Station	GW-160
Cedar Canyon Compressor Station	GW-296
Cal-Mon Compressor Station	GW-143
NE Carlsbad Compressor Station	GW-280
Cotton Draw Compressor Station	GW-311
Hat Mesa Compressor Station	GW-316
Lee Compressor Station	GW-227
Pardue Compressor Station	GW-288
Pure Gold Compressor Station	GW-150
Malaga Compressor Station	GW-167

Mark Bishop  
 Environmental Specialist  
 Conoco Inc. CG&P  
 SE New Mexico Operating Unit  
 505-391-1956

2/6/2002



**Price, Wayne**

**From:** Price, Wayne  
**Sent:** Thursday, August 30, 2001 4:18 PM  
**To:** 'mark.a.bishop@usa.conoco.com'  
**Cc:** Williams, Chris  
**Subject:** Conoco inspection frequency for GW-143,150,162,163,167,175,227, and 316

Dear Mr. Bishop:

The OCD is in receipt of Conoco's letters dated 04/06/2001 requesting a change in inspection frequency for the above captioned facilities.  
Your request is hereby approved.

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

**Tracking:**

**Recipient**

'mark.a.bishop@usa.conoco.com'  
Williams, Chris

**Delivery**

Delivered: 8/30/01 4:18 PM



**Mark Bishop**  
Environmental Specialist  
SH&E Services  
Conoco Gas & Power

**Conoco Inc.**  
921 W. Sanger  
Hobbs, NM 88240  
Phone 505-391-1956  
Cell (281) 380-0018  
E-mail [mark.a.bishop@conoco.com](mailto:mark.a.bishop@conoco.com)

August 16, 2002

**Return Receipt Requested**  
**Certified Mail No.**  
**7099 3220 0001 4997 2868**

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

RECEIVED  
AUG 26 2002  
Environmental Bureau  
Oil Conservation Division

**RE: GW-227 Discharge Plan**  
**Feagan/Gillespie (Lee) Compressor Station**  
**Testing of, Underground process/ Wastewater Lines and Below Grade Tanks**  
**and Sumps**

Dear Mr. Price:

In accordance with our OCD discharge plan the following actions were performed. Mr. Larry Johnson of the Oil conservation Division in Hobbs was notified on July 12, 2002 integrity tests to be performed at our Lee Compressor Station. On July 16 the required integrity tests were performed with no underground leaks or lack of integrity observed. A copy of the test notes and circle charts are included for your inspection.

If you have any questions or require more information please contact me at, 505-391-1956.

Sincerely,

  
Mark Bishop

CC: Joyce Miley  
Jeff Driver  
File: 1059 L2

Enclosed: Circle charts  
Testing Procedure & results

**Lee Compressor Station GW-227**  
**Raptor Natural Gathering & Processing LLC.**  
**Operated by Conoco Gas & Power**  
**OCD Open Drain Test Record**

July 12; notified local Hobbs OCD office of intent to perform required testing

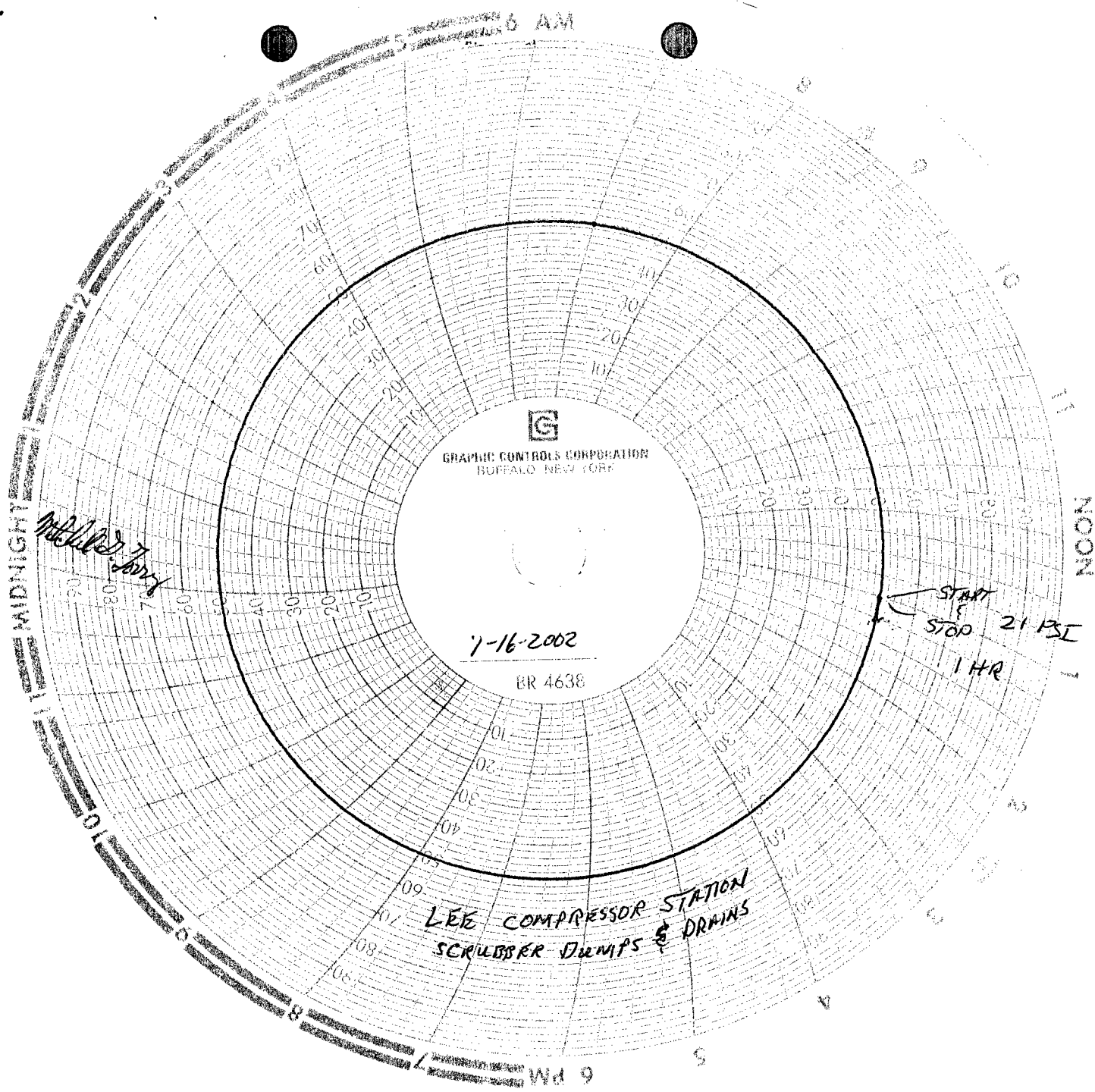
July 16; OCD representative did not arrive, continued with test; isolated drain lines and installed pressure chart recorder on the following open drain lines;

- Scrubber dump drain line

Pressurized drain line for 1 hour and observed no pressure drop off on chart indicating good line integrity.

Conoco employees witnessing the test;

Mitchell Torrez  
Steve Bettis



GRAPHIC CONTROLS CORPORATION  
BUFFALO NEW YORK

7-16-2002

BR 4638

LEE COMPRESSOR STATION  
SCRUBBER DUMPS & DRAINS

START  
STOP 21 PSI  
1 HR

Midnight 7:00

NOON

MIDNIGHT



**Mark Bishop**  
Environmental Specialist  
SH&E Services  
Natural Gas & Gas Product

**Conoco Inc.**  
921 W. Sanger  
Hobbs, NM 88240  
Phone 505-393-2153  
Cell (281) 380-0018  
E-mail [mark.a.bishop@usa.conoco.com](mailto:mark.a.bishop@usa.conoco.com)

October 9, 2001

**Return Receipt Requested**  
**Certified Mail No.**  
**7099 3220 0001 4997 0932** **RECEIVED**

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**OCT 17 2001**  
**Environmental Bureau**  
**Oil Conservation Division**

**RE: GW-227 Discharge Plan**  
**Feagan/ Gillespie (Lee) Compressor Station**  
**Testing of, Underground process/ Wastewater Lines and Below Grade**  
**Tanks and Sumps**

Dear Mr. Price:

In accordance with our OCD discharge plan the following actions were performed. Mr. Paul Sheeley of the Oil conservation Division in Hobbs was notified on May 25, 2001 of scheduled integrity tests to be performed at our Lee Compressor Station. On May 30 the required integrity tests were performed with no underground leaks or lack of integrity observed. A copy of the test notes and circle charts are included for your inspection.

If you have any questions or require more information please contact me at, 505-393-2153.

Sincerely,

Mark Bishop

CC: Joyce Miley  
Jeff Driver  
File: 215-5-23-9

Enclosed: Circle charts  
Testing Procedure & results

LEE COMPRESSOR Station

Process Line 5 year integrity test & Annual Integrity Test

ARRIVED 8:00 AM

5-30-01

Station SCRUBBER Blocked motor valve AND MANUAL valve

#3 Unit Blocked SCRUBBER dumps

Blocked Blow CASE inlet & vent

#2 Unit

Blocked SCRUBBER dumps

Blocked Blow CASE inlet & vent

#1 Unit

Blocked SCRUBBER dumps

Blocked Blowcase inlet & vent

CONDENSATE TANK

Blocked Inlet

DEHY Blocked SCRUBBER dump & ~~BTEX~~ BTEX dumps

Installed CHART connections at DEHY dump outlet

STARTED CHART at 8:50 AM

REMOVED CHART at 9:50 AM

PERSONS ON LOCATION

Steve Batts Conoco

Michael J. Gory Conoco

PRINTED IN U.S.A.

NIGHT  
10 8 6 4 2  
START

NIGHT  
10 8 6 4 2

LEAK COMPRESSOR STATION  
5 year integrity test and  
annual inspection  
START 8:50 AM  
END 9:50 AM

**TEJAS**

Instruments, Inc.

METER NUMBER  
8:50 AM  
TIME PUT ON  
5-30-01  
DATE PUT ON

TUBE & ORIF. SIZE  
8-50 AM  
TIME TAKEN OFF  
5-30-01/M  
DATE TAKEN OFF

MW-M 1000-H-8D  
8D-P1000-W100

SIGNATURE

*Steve Pettis*  
*Michael Roberts*

SEVEN  
10 NOON 2

FIFTH  
10 NOON 2

SIXTH  
10 NOON 2

NIGHT



**Mark Bishop** OIL CONSERVATION DIV.  
Environmental Specialist  
SH&E Services  
Natural Gas & Gas Products  
APR 16 PM 3:20

**Conoco Inc.**  
P.O. Box 90  
Maljamar NM 88264  
Phone 505-676-3519  
Cell (281) 380-0018  
E-mail [mark.a.bishop@usa.conoco.com](mailto:mark.a.bishop@usa.conoco.com)

04/06/2001

**Return Receipt Requested  
Certified Mail No.  
7099 3220 0001 4997 4091**

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

**Re: Discharge Plan GW – 227, Lee Compressor Station  
Storm Water Runoff Plan**

Dear Mr. Price:

Please find the attached Precipitation/Storm water Runoff Control Plan as required in the above referenced OCD Groundwater Discharge Permit.

Conoco, Inc. also requests that the inspection frequency required in Discharge Plan Approval Condition 11 (Housekeeping) be changed to monthly. This will allow us to maintain consistency with other facility Discharge Plans.

If you have any questions or require more information please contact me at 505-676-3519.

Sincerely,

Mark Bishop

CC:

Joyce Miley  
File: Env xxxxx



**Conoco, Inc.**  
**Lee Compressor Station,**  
**Discharge Plan GW – 227, Approval Condition 15**  
**Storm Water Runoff Control Plan**

The Lee Compressor Station will minimize precipitation/storm water runoff at the facility through exposure minimization practices. These practices lessen the potential for storm water to come in contact with process and waste streams. Precipitation that comes in contact with process equipment is contained in bermed or containment areas and allowed to evaporate. The facility process and waste stream containment structures are maintained to minimize erosion and prevent surface accumulations. Storage tanks are inspected periodically to monitor fluid levels.

A storm water plan at this facility is not a requirement of the EPA (40 CFR 122.26(b)(14)). This regulation specifies that oil and gas operations that discharge contaminated storm water at any time between November 16, 1987 and October 1, 1992, and that are currently not authorized by an NPDES permit, must apply for a permit. Operators of oil and gas exploration, production, processing, or treatment operations or transmission facilities, that are not required to submit a permit application as of October 1, 1992 in accordance with 40 CFR 122.26(c)(1)(iii), but that after October 1, 1992 have a discharge of a reportable quantity of oil or a hazardous substance (in a storm water discharge) for which notification is required pursuant to either 40 CFR 110.6, 117.21, or 302.6, must apply for a permit.

Since Conoco, Inc. has not had a discharge at this facility of a reportable quantity of oil or a hazardous substance (in a storm water discharge) for which notification is required pursuant to either 40 CFR 110.6, 117.21, or 302.6, a storm water discharge permit is not required for the Lee Compressor Station.

**Price, Wayne**

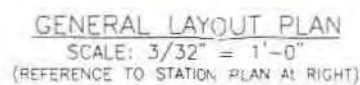
---

**From:** Price, Wayne  
**Sent:** Wednesday, February 07, 2001 11:02 AM  
**To:** 'joyce.m.miley@usa.conoco.com'  
**Cc:** 'claysmithassociates@home.com'  
**Subject:** GW-227 Gillespie/Fagen Comp. St. Approval Condition Item. 11

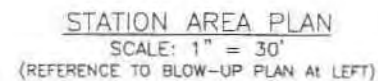
Dear Ms. Miley:

The NMOCD is in receipt of your letter dated December 21, 2000 requesting a change in wording on Item 11.  
Housekeeping of the DP approval Conditions:

The NMOCD will allow the wording to be changed from daily inspections to monthly. This E-Mail will be attached to the GW-227 plan.



## REFERENCE DRAWINGS



2	ADDED PIG LAUNCHER (PROJ. #1319)	RLS	12-14-00
1	ADDED 2nd UNIT AS PER AS-BUILT	RLS	9-8-98
REV. NO.	REVISION	REV. BY	REV. DATE

PIPELINE ENGINEERING DEPARTMENT

HOBBS, NEW MEXICO

## CONOCO NATURAL GAS & GAS PRODUCTS

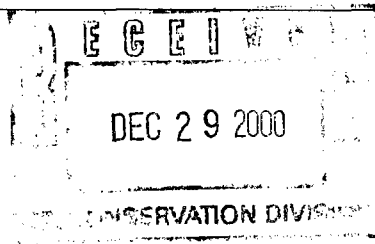
~~"LEE"~~ COMPRESSOR STATION INSTALLATION  
STATION LAYOUT PLAN DETAILS  
NE/4 NE/4 SEC. 24, T17S, R35E, N.M.P.M.  
LEA COUNTY, NEW MEXICO

FILE: STA/B11STA

DATE	DWN. BY	APPR. BY	PROJ. NO.	SCALE	DRAWING NO.	REV.
9-5-95	RLS	W.C.	811	NOTED	1065B-03	2



Joyce M. Miley  
Environmental Consultant  
Natural Gas & Gas Products



Conoco Inc  
Humber 3036  
P.O. Box 2197  
Houston, TX 77252-2197  
(281) 293-4498  
Fax: (281) 293-1214

December 21, 2000

Certified Mail: 7099 3220 0003 1150 1841  
Return Receipt Requested

Mr. Wayne Price  
NMEMNRD, Oil Conservation Division  
P.O. Box 6429  
Santa Fe, NM 87505-6429

**RE: Discharge Plan GW-227 Approval Conditions  
Gillespie/Feagan Compressor Station**

Dear Mr. Price:

We are in receipt of your Discharge Plan Approval Conditions for the Gillespie/Feagan Compressor Station dated November 27, 2000. The conditions were sent to LG&E Energy Marketing. On December 12, 2000 the Oil Conservation Division was notified that Conoco is now the operator of these facilities, therefore, we are signing the Discharge Plan Approval Conditions.

Conoco requests that the following item be taken into consideration.

**Item 11. Housekeeping** - This item makes the statement that "All systems designed for spill collection/prevention, and leak detection will be inspected daily...". Conoco requests approval to inspect during routine site visits. Since this is a remote compressor station location and Conoco intends to do electronic monitoring of the operations we may not perform "daily" visits. We will be making routine inspections of the equipment as well as performance based call outs so will be performing frequent inspections (but not necessarily daily).

If you should have any questions, please feel free to contact me at 281-293-4498.

Sincerely,

Joyce Miley

cc: Marshall Honeyman - Maljamar  
Mark Bishop - Maljamar  
File: ENV 216-9-4

*E-MAIL*

*JOYCE.M. MILEY@  
USA.CONOCO.COM*

**Price, Wayne**

---

**From:** Price, Wayne  
**Sent:** Wednesday, February 07, 2001 11:02 AM  
**To:** 'joyce.m.miley@usa.conoco.com'  
**Cc:** 'claysmithassociates@home.com'  
**Subject:** GW-227 Gillespie/Fagen Comp. St. Approval Condition Item. 11

Dear Ms. Miley:

The NMOCD is in receipt of your letter dated December 21, 2000 requesting a change in wording on Item 11.  
Housekeeping of the DP approval Conditions:

The NMOCD will allow the wording to be changed from daily inspections to monthly. This E-Mail will be attached to the GW-227 plan.





Joyce M. Miley  
Environmental Consultant  
Engineering and Compliance  
Natural Gas & Gas Products Department

Conoco Inc.  
600 N. Dairy Ashford Rd.  
P.O. Box 2197, HU3036  
Houston, TX 77252  
Telephone: (281) 293-4498  
Facsimile: (281) 293-1214

DEC 18 2000

November 30, 2000

**Certified Mail No. 7099 3220 0003 1150 1803**  
**Return Receipt Requested**

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

Re: Change of Ownership  
Conoco Inc., Natural Gas & Gas Products Department

Dear Mr. Anderson:

Effective December 1, 2000, Conoco Inc., Natural Gas & Gas Products Department (NG&GP) assumed ownership of LG&E Natural Gathering & Processing LLC,; and LG&E Natural Pipeline LLC (LG&E). These LG&E entities, in turn, own certain natural gas facilities in SE New Mexico. These facilities and their OCD Groundwater Discharge numbers are listed in the table below.

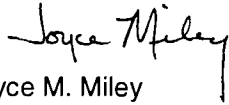
Facility Name	OCD Groundwater Discharge Permit
Antelope Ridge Gas Plant	GW-162
Hobbs Gas Plant	GW-175
Apex Compressor Station	GW-163
Bootleg (aka. NBR) Compressor Station	GW-176
Bright/Yates Compressor Station	GW-160
Cedar Canyon Compressor Station	GW-296
Cal-Mon Compressor Station	GW-143
NE Carlsbad Compressor Station	GW-280
Cotton Draw Compressor Station	GW-311
Hat Mesa Compressor Station	GW-316
Lee (aka. Lea and/or Fagan/Gillespie) Compressor Station	GW-227
Pardue Farms Compressor Station	GW-288
Pure Gold 28 Compressor Station	GW-150
Parker & Parsley (aka. Malaga) Compressor Station	GW-167

Several of these locations have conditions in their permits that require the new owner to supply a written commitment to comply with the terms and conditions of the previously approved discharge plans. LG&E has informed Conoco that all above locations are in compliance with the discharge plans. Conoco has copies of all of the approval letters and LG&E signed conditions of approval for these locations. We agree to continue to operate the locations in conformance with the groundwater permits, the approval conditions and the OCD regulations.

In addition, pursuant to certain requirements of the transaction in which Conoco acquired the entities, the names of certain entities have been changed to the following: Raptor Natural Gathering & Processing LLC and Raptor Natural Pipeline LLC (in each case replacing LG&E with Raptor).

Conoco Inc. requests that all future correspondence concerning these facilities be forwarded to me at the address above. If you have any questions or require additional information, please do not hesitate to contact Mr. Mark Bishop at (505) 623-5659 or myself at (281) 293-4498.

Sincerely,



Joyce M. Miley

cc.:

Ms. Patricia Merrill  
LG&E Energy Corp.  
220 West Main Street  
PO Box 32030  
Louisville, KY 40232-2030

**Certified Mail No. 7099 3220 0003 1150 1797**  
**Return Receipt Requested**

# Affidavit of Publication

STATE OF NEW MEXICO )

) ss.

COUNTY OF LEA )

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertising Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

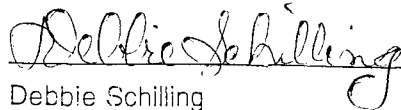
## Legal Notice

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, for one (1) day, beginning with the issue of October 31, 2000 and ending with the issue of October 31, 2000.

And that the cost of publishing said notice is the sum of \$ 56.32 which sum has been (Paid) as Court Costs.



Subscribed and sworn to before me this 14th day of November 2000



Debbie Schilling

Notary Public, Lea County, New Mexico

My Commission Expires June 22, 2002

## 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-227) - Hadson Gas Gathering and Processing, J.R. Delaney, General Manager, 921 W. Sanger, Hobbs, New Mexico, 88240, has submitted a discharge plan application for their Gillespie/Feagan Compressor Station located in the NE/4 NE/4 Section 24, Township 17 South, range 35 East, NMPM, Lea County, New Mexico. Approximately 10 barrels per day of produced water with a total dissolved solids concentration of approximately 18,000 mg/l will be collected and 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 in the event of an accidental discharge is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 421 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 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 the information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of

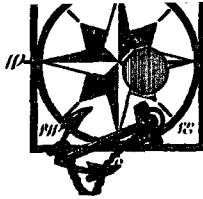
October, 2000.

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION  
LORI WROTENBERY,  
Director

SEAL

Published in the Lovington Daily Leader October 31, 2000.





# Compliance Services

Phone (505) 391-7797  
1220 N. Grimes, Hobbs, NM 88240

LG & E Natural  
Gathering and Processing Co.  
921 W. Sanger  
Hobbs, NM 88240

Fax (505) 391-7954  
Cell (505) 370-5924

June 01, 2000

RECEIVED  
NOV 13 2000  
Environmental Bureau  
Oil Conservation Division

## Fagan Gillispie Lea Compressor Station Stormwater Discharge Plan & SPCC Plan Determination

The following is the determination for the need of a *Stormwater Discharge Plan*, and the need for a *Spill Prevention Control and Countermeasure* (SPCC) plan for the Fagan Gillispie Lea Compressor Station. It is prepared in accordance with federal, state, and local laws and regulations.

### Storm Water Discharges Associate with Industrial Activity 40 C.F.R. 122.26(b)(14)

The term "Storm Water Discharges Associated with Industrial Activity" defined in federal regulations 40 CFR 122.26(b)(14)(i)-(xi), determined which industrial facilities are potentially subject to Phase I of the storm water program. Facilities subject to the program must apply for a permit. The definition uses either SIC (Standard Industrial Classification) codes or narrative descriptions to characterize the activities. Note that categories iii, viii, and xi have special conditions, or exceptions which may make a facility NOT subject to the program, and therefore not required to apply, even though the facility's activity matches one of the SIC codes category (i) Facilities subject to storm water effluent limitations guideline, new source performance standards, or toxic pollutant effluent standards under 40 CFR subchapter N (except facilities with toxic pollutant effluent standards which are exempted under category (xi)). These types of facilities include the following:

#### 40 CFR Subchapter N

##### SIC Code

- 10 metal mining (metallic mineral/ores)
- 12 coal mining
- 13 oil and gas extraction
- 14 non-metallic minerals except fuels

Oil and gas operations that discharge contaminated storm water at any time between November 16, 1987 and October 1, 1992, and that are currently not authorized by an NPDES permit, must apply for a permit. Operators of oil and gas exploration, production, processing, or treatment operations or transmission facilities, that are not required to submit a permit application as of October 1, 1992 in accordance with 40 CFR 122.26(c)(1)(iii), but that after October 1, 1992 have a discharge of a reportable quantity of oil or a hazardous substance (in a storm water discharge)



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**1220 N. Grimes, Hobbs, NM 88240**

**Fax (505) 391-7954**  
**Cell (505) 370-5924**

for which notification is required pursuant to either 40 CFR 110.6, 117.21, or 302.6, must apply for a permit.

### **Storm Water Discharge Plan Determination**

Since LG & E Natural has not had a discharge at this facility of a reportable quantity of oil or a hazardous substance (in a storm water discharge) for which notification is required pursuant to either 40 CFR 110.6, 117.21, or 302.6, a storm water discharge plan is not required for the Fagan Gillispie Lea Compressor Station.

### **SPCC Regulations**

An SPCC plan must be prepared by all facilities subject to regulation. This plan is to help prevent any discharge of oil into navigable waters or adjoining shorelines. The main thrust of the SPCC regulations is prevention as opposed to after-the-fact reactive measures commonly described in Spill Contingency Plans.

#### **Facilities regulated by the SPCC regulations**

There are three criteria a facility must meet to be regulated by the SPCC regulations. These criteria are

1. the facility must be non-transportation related,
2. the facility must have an aboveground storage capacity greater than 660 gallons in a single container or an aggregate storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons, and
3. there must be a reasonable expectation of a discharge to navigable waters or adjoining shorelines.

#### **Non-transportation related facilities**

These facilities (including all equipment and appurtenances) may include, but are not limited to:

- Fixed onshore and offshore oil well drilling facilities;
- Mobile onshore and offshore oil well drilling platforms, barges, trucks or other mobile facilities;
- Fixed onshore and offshore oil production structures, platforms, derricks and rigs;
- Mobile onshore and offshore oil production facilities;
- Oil refining or storage facilities;
- Industrial, commercial, agricultural, or public facilities that use, store, drill for, produce, gather, process, refine or consume oil or oil products;
- Waste treatment facilities;
- Loading areas/racks, transfer hoses, loading arms and other equipment that are appurtenant to a non-transportation related facility;



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- Highway vehicles and railroad cars used to transport oil exclusively within the confines of a non-transportation related facility; and
- Pipeline systems used to transport oil exclusively within the confines of a non-transportation related facility.

### **Oil storage capacity defined**

Oil storage includes all containers storing oil at a facility. The **capacity** of the containers (maximum volume) must be considered and **not** the actual amount of product stored in the container (operational volume). Oil storage containers include, but are not limited to,

- tanks,
- containers,
- pails,
- drums,
- quart containers,
- transformers,
- oil-filled equipment, and
- mobile or portable totes.

A facility may be subject to SPCC regulations if they have at least one of the following oil storage capacities:

- If a facility has one aboveground oil storage container greater than 660 gallons; **or**
- If a facility has a total aboveground oil storage capacity greater than 1,320 gallons; **or**
- If a facility has a total underground oil storage capacity of greater than 42,000 gallons.

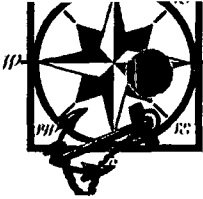
Under the SPCC regulations, oil is defined as

"oil of any kind or in any form including, but not limited to, petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil and oily mixtures."

This also includes non-petroleum oils, animal and vegetable oils.

### **Discharge of oil into or upon navigable waters or adjoining shorelines**

This determination is based upon a consideration of the geographical and locational aspects of the facility. The location of the facility must be considered in relation to streams, ponds and ditches (perennial or intermittent), storm or sanitary sewers, wetlands, mudflats, sandflats or farm tile drains. The distance to navigable waters, volume of material stored, worst case weather conditions, drainage patterns, land contours, soil conditions, etc., must also be taken into account. Further, according to the regulations, this determination shall **not** include consideration of man-made features such as dikes, equipment or other structures that may serve to restrain, hinder, contain or **prevent** an oil discharge.



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## Determination of Need for SPCC

Under the above definitions (from the regulations) the possibility for the discharge of oil into or upon navigable waters or adjoining shorelines, the Fagan Gillispie Lea Compressor Station will require a SPCC plan. Considering the location of the facility in relation to streams, ponds and ditches (perennial or intermittent), storm or sanitary sewers, wetlands, mudflats, sandflats or farm tile drains, the distance to navigable waters, volume of material stored, worst case weather conditions, drainage patters, land contours, and soil conditions, a discharge of oil into or upon navigable waters or adjoining shorelines is possible.

Persons making this determination are:

Dyke Browning  
Registered Environmental Manager #7771  
Certified Environmental Inspector #12441

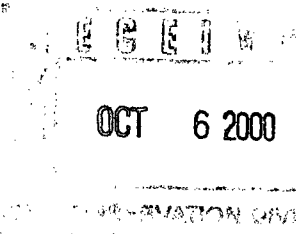
Lee Hinman  
Registered Professional Engineer  
Texas #75230

September 26, 2000

**LG&E POWER INC.**

**LG&E Natural Gathering & Processing LLC**  
921 W. Sanger  
Hobbs, New Mexico 88240  
(505) 393-2153  
(505) 393-0381 FAX

Mr. Roger C. Anderson  
New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, New Mexico 87505



Dear Mr. Anderson,

Enclosed Please find our application for renewal of Discharge Plan GW-227, for the Gillespie/Feagan (Lee) Compressor Station. I have included with this package a check for \$50.00 for the Application Fee. The changes in the compressor station are noted along with the application.

Thanks you for your attention in the matter of mutual concern.

Sincerely,

Ed Sloman  
Supervisor  
Operations Ssupport

A SUBSIDIARY OF  
**LG&E ENERGY.**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

## DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New

☒ Renewal

☐ Modification

1. Type: Compressor Station (under 1000 HP)

2. Operator: LG&E NATURAL GATHERING AND PROCESSING LLC

Address: 921 W. Sanger, Hobbs NM 88240

Contact Person: Ed Sloman Phone: 505-393-2153

3. Location: NE /4 NE /4 Section 24 Township 17 S Range 35 E  
Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.

no change

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

6. no change  
Attach a description of all materials stored or used at the facility.

7. see attached change  
Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

no change

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

no change

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

10. no change  
Attach a routine inspection and maintenance plan to ensure permit compliance.

11. no change  
Attach a contingency plan for reporting and clean-up of spills or releases.

12. no change  
Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

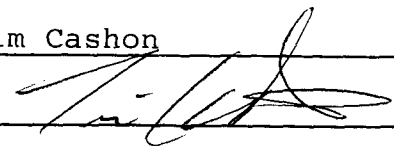
13. no change  
Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

### 14. CERTIFICATION

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

Name: Tim Cashion

Title: Director of Facilities

Signature: 

Date: 10/4/00

I. The only change in this area is the addition of one 300 horse power compressor. Now instead of two compressors there are three. There is one 360 horse power compressor, and two 300 horse power compressors. This gives the station a total compression horsepower of 960-horse power.

II.

The owner Operator of the facility is:  
LG&E Natural Gathering and Processing LLC  
921 West Sanger  
Hobbs, NM 88240

505-393-2153

Mr. Tim Cashon  
Director of Facilities  
921 West Sanger  
Hobbs, NM 88240

(214) 640-6848

The compressor units belong to the following vendors:

360 HP unit

300 HP unit

Belong to Universal Compression:[formerly Tidewater Compression Services]

Universal will still be performing full maintenance on their units.

300 HP unit

Belong to Hanover Compression. Hanover will be performing full maintenance on this unit.



## VI.

### Change in #3

3. WASTE LUBRICATION OILS - The compressors each contain approximately 25 gallons of lubricating oil and the engine contains approximately 28 gallons of lubricating oil. The lubrication oil is a standard 30 or 40 weight engine oil and replaced approximately every 5000 hours of run time, or as required by oil analysis. The owner of the compressors, Universal, and Hanover (respectfully) will be responsible for the waste lubricating oil and filters from the compressors.

September 26, 2000

**LG&E POWER INC.**

**LG&E Natural Gathering & Processing LLC**

921 W. Sanger

Hobbs, New Mexico 88240

(505) 393-2153

(505) 393-0381 FAX

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Oil Conservation Division  
Environmental Bureau  
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Revised March 17, 1999

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(Refer to the OCD Guidelines for assistance in completing the application)

☐ New

☒ Renewal

☐ Modification

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Address: 921 W. Sanger, Hobbs NM 88240

Contact Person: Ed Sloman Phone: 505-393-2153

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THE SANTA FE  
**NEW MEXICAN**

Founded 1849

NOV - 1 2000

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

AD NUMBER: 178572      ACCOUNT: 56689  
LEGAL NO: 68306      P.O.#: 00199000278  
182 LINES      1 time(s) at \$ 80.23  
AFFIDAVITS: 5.25  
TAX: 5.34  
TOTAL: 90.82

**NOTICE OF PUBLICATION**

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND  
NATURAL RESOURCES  
DEPARTMENT  
OIL CONSERVATION  
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, this 24 th day of October 2000.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION  
LORI WROTENBERY,  
Director

Legal #68306  
Pub. October 31, 2000

**AFFIDAVIT OF PUBLICATION**

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, Betty Rupe 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 #68306 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/31/2000 and 10/31/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 31 day of October, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

Betty Rupe  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
31 day of October A.D., 2000

Notary

Laura Z. Harding

Commission Expires

11/23/03

*Approved  
Wrote*

**NOTICE OF PUBLICATION**

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

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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 24 th day of October, 2000.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
for LORI WROTENBERY, Director

S E A L





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury  
CABINET SECRETARY

Oil Conservation Div.  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

**Memorandum of Meeting or Conversation**

Telephone \_\_\_\_\_  
Personal \_\_\_\_\_  
E-Mail   X   \_\_\_\_\_  
Time: 1:30 pm  
Date: May 17, 2000

**Originating Party:** Wayne Price-OCD

**Other Parties:** Ed Sloman- LG&E ed.sloman@lgeenergy.com

**Subject:** Discharge Plan Renewal Notice for the following Facilities:

**GW- 227 GILLESPIE/FEAGAN COMP. ST expires 12/28/2000**

**WQCC 3106.F.** If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

**Discussion:** Please submit Discharge Plan renewal application with \$50.00 filing fee for the above listed facilities.

**Conclusions or Agreements:**

**Signed:** \_\_\_\_\_

**CC:** Ed Sloman- ed.sloman@lgeenergy.com



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

**Price, Wayne**

---

**From:** System Administrator[SMTP:postmaster@lgeenergy.com]  
**Sent:** Wednesday, May 17, 2000 1:41 PM  
**To:** Price, Wayne  
**Subject:** Delivered: Discharge Plan Renewal Notice GW-227

Discharge Plan  
Renewal Not...

<<Discharge Plan Renewal Notice GW-227>> Your message

**To:** 'ed.sloman@lgeenergy.com'  
**Subject:** Discharge Plan Renewal Notice GW-227  
**Sent:** Wed, 17 May 2000 15:36:53 -0400

was delivered to the following recipient(s):

Sloman, Ed on Wed, 17 May 2000 15:40:29 -0400  
MSEXCH:MSEExchangeMTA:HOBBS:HONMMONTFS1



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury  
CABINET SECRETARY

Oil Conservation Div.  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

March 15, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5050 9467**

Mr. Ed Sloman  
Hadson Gas Gathering and Processing  
921 West Sanger  
Hobbs, New Mexico 88240

**RE: Discharge Plan Renewal Notice for Hadson Gas Gathering and Processing Facility**

Dear Mr. Sloman:

Hadson Gas Gathering and Processing has the following discharge plan which expires during the current calendar year.

**GW-227 expires 12/28/2000 – Gillespie/Feagan Compressor Station**

**WQCC 3106.F.** If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 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, which varies in amount dependent upon horsepower rating. 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 Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (A copy of the discharge plan application form is enclosed to aid you in preparing the renewal application. A complete copy of the regulations is available on OCD's website at [www.emnrd.state.nm.us/oecd/](http://www.emnrd.state.nm.us/oecd/)).

Mr. Ed Sloman  
March 15, 2000  
Page 2

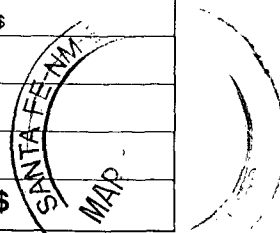
If the above sited facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Hadson Gas Gathering and Processing has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Oil Conservation Division

cc: OCD Hobbs District Office

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To:	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (To be completed by mailer) <i>E. Sloman</i>	
Street, Apt. No.; or PO Box No. <i>Hadson</i>	
City, State, ZIP+4 <i>Hobbs NM 870-227</i>	
PS Form 3800, July 1999 See Reverse for Instructions	

7099 3220 0000 5050 9467

## OIL CONSERVATION DIVISION

2040 S. Pacheco  
Santa Fe, New Mexico 87505

November 28, 1995

**CERTIFIED MAIL****RETURN RECEIPT NO. Z-765-962-595**

Mr. Ed Sloman  
Hadson Gas Gathering and Processing  
921 W. Sanger  
Hobbs, New Mexico 88240

Re: Discharge Plan (GW-227)  
Gillespie/Feagan Compressor Station  
Lea County, New Mexico

Dear Mr. Sloman:

The Oil Conservation Division (OCD) has received and is in the process of reviewing Hadson Gas Gathering and Processing's (Hadson) groundwater discharge plan application dated October 14, 1995 for the above referenced facility. The following comments and requests for additional information are based upon the OCD's review of the application and an inspection of the facility October 17, 1995.

1. Provide the OCD with a method of inspecting the 200 bbl storage tank every five (5) years to ensure the integrity of the tank.
2. The load line at the storage tank did not have drip containment. Provide the OCD with a means of collecting the drip and/or treating the soils that may become contaminated as a result of drip from the load line.
3. Section VII (last paragraph) states that waste lubrication oil will be stored in a separate tank. The OCD only noted one tank at the facility. Is the waste lubrication oil commingled with the produced water. Clarify this statement and how Hadson proposes to dispose of this waste..

NOTE. Only exempt oilfield wastes may be injected in a Class II injection well, however, "non-exempt" wastes that have proven to be non-hazardous by characteristics maybe disposed of at an OCD approved surface disposal facility.

Mr. Ed Sloman  
November 29, 1995  
Page 2

Submission of the above requested information will allow the review process to continue. If you have any questions please call me at (505) 827-7153.

Sincerely,

Chris Eustice  
Geologist

cc: Wayne Price, NMOCD- Hobbs Office



December 18, 1995

Mr. Chris Eustice  
Geologist  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

DEC 21 1995

Re: Discharge Plan (GW-227)  
Gillespie/Feagan Compressor Station  
Lea County, New Mexico

Dear Mr. Eustice:

In response to your letter dated November 28, 1995 there were three concerns listed. This will address each of these concerns in the same order as listed in your letter.

1. A Method of inspecting the 200 bbl storage tank every five years to ensure the integrity of the tank.
  - Once every five (5) years, upon renewal of this Discharge Plan, Hadson will pressure test the tank and all of the under ground lines going to the tank to assure their integrity. These test will be charted and a copy of the chart will be made available to the O C D upon request.
2. The load line at the storage tank did not have drip containment.
  - Hadson has installed drip containment at this load line in question. The containment used at this location is a "Trapper Junior." With this type of containment there should be no soil contamination in the area of the load line.
3. Is the waste lubrication oil commingled with the produced water? Clarify the statement of how Hadson purposes to dispose of these waste.
  - As stated in section VI. Paragraph 3), the compressor vendor, Tidewater Compression, is responsible for the waste lubrication oil. Tidewater furnishes their container to drain and remove the used lubrication oil, and replaced the used oil with new oil. They are further responsible for the used oil filters from the compressor. With the used engine oils being removed from the location by the compressor vendor there will be no commingling of the used compressor lubricants into the produced water. These arrangements were also discussed with Mr. Price from your Department in the Hobbs office.

If you have any further questions please do not hesitate to contact me at your earliest opportunity.

Sincerely

Ed Sloman  
Supervisor  
Operations Support  
Hadson Gas Gathering and Processing

### NMOCD Inter-Correspondence

To: Chris Eustice-Environmental Bureau  
From: Wayne Price-Environmental Engineer District I

Date: November 17, 1995

Reference: Hadson Gas (Llano)-Gillespie/Feagan Compressor St.  
Discharge Plan Review.

Subject: Request for Comments.

Comments:

Dear Chris,

Per your request I have the following comments:

Since your going to attach the standard conditions for approval and the fact that this facility is quite small I am going to limit my comments to the following important items:

1. Add generic conditions such as; Payment of DP fee's, Drum storage, Sump Inspections, Berms and Tanks\*, Tank and Drum Labeling, Pressure testing (should include blowcase since it is partially buried), Spills, OCD Inspections and additional requirements, Modifications, Waste Disposal (if not listed in plan then must be addressed on each event).

\* Note: It is my opinion that all tanks, especially tanks that are holding gas condensate liquids should have an impermeable pad under them. I base this fact on that just about every major gas plant facility has ground water contamination and our experience that AST's bermed without a pad under them can and has caused such contamination. Also, our guidelines that indicate they must have a gravel pad is not consistent with our goals of protecting ground water.



2. Since they built this compressor station without obtaining a discharge plan first, circumvented our ability to recommend or require them to provide an impermeable pad under the tanks.

**Therefore, I recommend that we make a statement to the effect that these tanks should be inspected for leaks once every five years. Also recommend that the load/unload lines have drip containment.**

3. I also recommend that they be put on notice that any other Compressor Stations built without an approved WQCC discharge Plan would put them in a violation condition.
4. Their Item VII. last paragraph indicates that the waste lubrication oil is sent to a separate tank. This is not correct the way the system is set up now.

Have them correct this statement or set another tank for these type of non-exempt fluids.

5. Their Item VIII. second paragraph indicates that the plants produced water is going to be disposed of into a UIC Class II type well. As stated above the non-exempt used lube oils is co-mingled with the produced water stream.

**Therefore, I recommend that they be required to verify and demonstrate in writing to the NMOC that this waste stream is classified as an EPA Exempt status.**

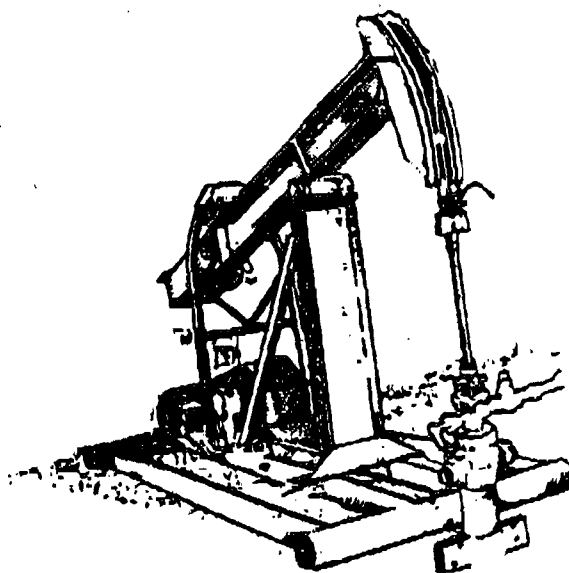
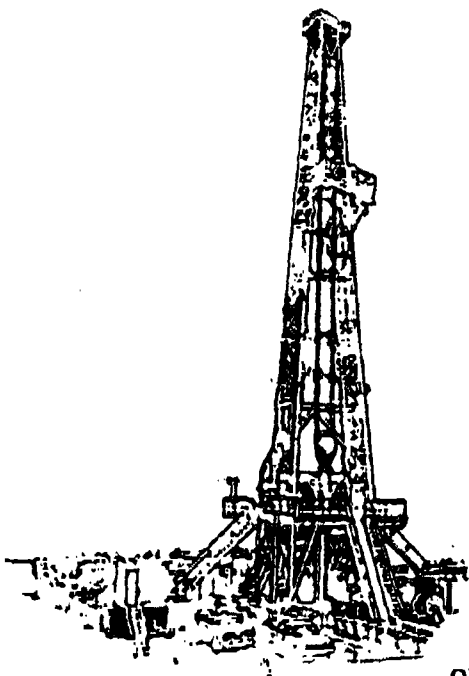
We could recommend that they be able to do this through regulatory citation of the rules and regulations, memorandums, knowledge of process or sampling of the different waste streams or sampling of the mixtures to demonstrate that these waste are non-hazardous per RCRA.

Item VIII. last paragraph which reads "Simply stated, if the liquid is contained in the tank, then it cannot contaminate the ground, or ground water". This statement is very ambiguous unless these tanks have an impermeable pad under them. Otherwise what happens if these tanks develop a leak?

**Recommend: Inspect tanks on routine basis and document.**

6. Item XI. At a minimum they should determine the depth to ground water and identify the underground water aquifer under the site.

cc: Jerry Sexton-District I Supervisor  
file: lwp-ce.11a

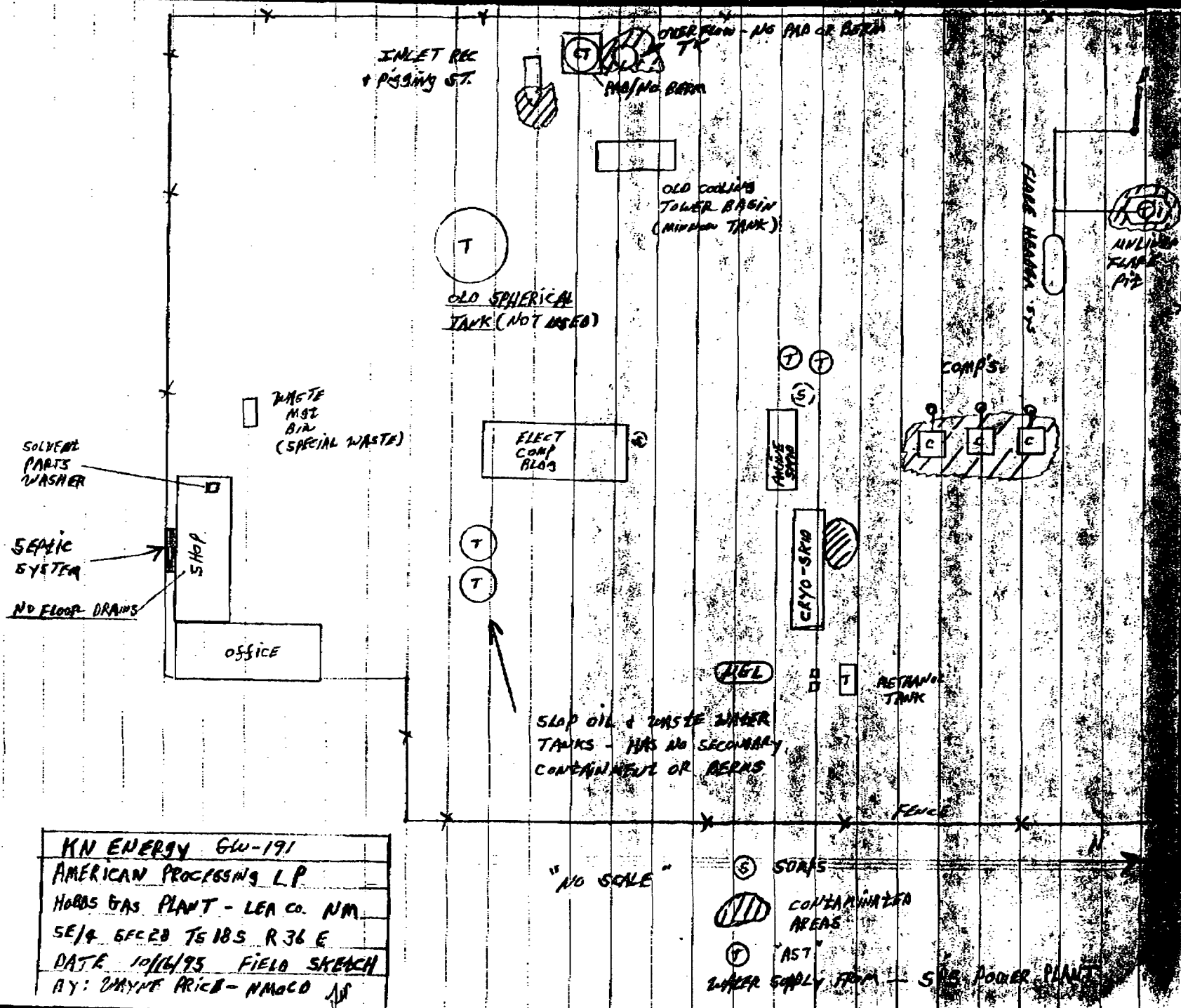


STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
PHONE: (505) 393-6161  
FAX: (505) 393-0720

SHOULD YOU HAVE TROUBLE RECEIVING THIS TRANSMISSION, PLEASE CALL  
(505) 393-6161.

TO: Chris Eustice  
COMPANY: OCD - Hobbs -  
FROM: Wayne Price  
DATE: 11-20-95  
PAGES  
INCLUDING  
COVER PAGE: 2

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



FROM: Wayne Price

TO: Chris Eustice

UNOCED

OIL CONSERVATION DIVISION  
RECEIVED

'95 NOV 27 AM 8 52

DATE: 11-17-95  
TIME: 15:58

CC: Jerry Sexton  
Wayne Price

SUBJECT: Hadson DP Gillespie Comp. ST.

PRIORITY: 4

ATTACHMENTS: LWP-CE.LLA


-----  
Dear Chris,

Per your comments I am sending you comments for the above mentioned facility. Please note, my comments are not intended to be set in stone, but they are given to assist you and your environmental group in your descision making process and the fact that most of these facilities are quite complex and all of the different issues we must address.

Hope it helps!

=====

NMOCD Inter-Correspondence

To: Chris Eustice-Environmental Bureau  
From: Wayne Price-Environmental Engineer District I   
Date: November 17, 1995  
Reference: Hadson Gas (Llano)-Gillespie/Feagan Compressor St.  
Discharge Plan Review.  
Subject: Request for Comments.

Comments:

Dear Chris,

Per your request I have the following comments:

Since your going to attach the standard conditions for approval and the fact that this facility is quite small I am going to limit my comments to the following important items:

1. Add generic conditions such as; Payment of DP fee's, Drum storage, Sump Inspections, Berms and Tanks\*, Tank and Drum Labeling, Pressure testing (should include blowcase since it is partially buried), Spills, OCD Inspections and additional requirements, Modifications, Waste Disposal (if not listed in plan then must be addressed on each event).

\* Note: It is my opinion that all tanks, especially tanks that are holding gas condensate liquids should have an impermeable pad under them. I base this fact on that just about every major gas plant facility has ground water contamination and our experience that AST's bermed without a pad under them can and has caused such contamination. Also, our guidelines that indicate they must have a gravel pad is not consistent with our goals of protecting ground water.

2. Since they built this compressor station without obtaining a discharge plan first, circumvented our ability to recommend or require them to provide an impermeable pad under the tanks.

Therefore, I recommend that we make a statement to the effect that these tanks should be inspected for leaks once every five years. Also recommend that the load/unload lines have drip containment.

3. I also recommend that they be put on notice that any other Compressor Stations built without an approved WQCC discharge Plan would put them in a violation condition.
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Have them correct this statement or set another tank for these type of non-exempt fluids.

5. Their Item VIII. second paragraph indicates that the plants produced water is going to be disposed of into a UIC Class II type well. As stated above the non-exempt used lube oils is co-mingled with the produced water stream.

Therefore, I recommend that they be required to verify and demonstrate in writing to the NMOCD that this waste stream is classified as an EPA Exempt status.

We could recommend that they be able to do this thur regulatory citation of the rules and regulations, memorandums, knowledge of process or sampling of the different waste streams or sampling of the mixtures to demonstrate that these waste are non-hazardous per RCRA.

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**Recommend:        Inspect tanks on routine basis and document.**

6. Item XI. At a minimum they should determine the depth to ground water and identify the underground water aquifer under the site.

cc: Jerry Sexton-District I Supervisor

## **Chris Eustice**

---

**From:** Wayne Price  
**To:** Chris Eustice  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** Hadson DP Gillespie Comp. ST.  
**Date:** Friday, November 17, 1995 3:58PM  
**Priority:** High

< <File Attachment: LWP-CE.LLA> >  
Dear Chris,

Per your comments I am sending you comments for the above mentioned facility. Please note, my comments are not intended to be set in stone, but they are given to assist you and your environmental group in your descision making process and the fact that most of these facilities are quite complex and all of the different issues we must address.

Hope it helps!

ca - Continued

under small centrif  
on North Side

② ② ② ①

it tanks

sk

Sign

land farm

hage

10-17-95

HADSON

FEAGAN GILLESPIE CS

ED SLOMAN

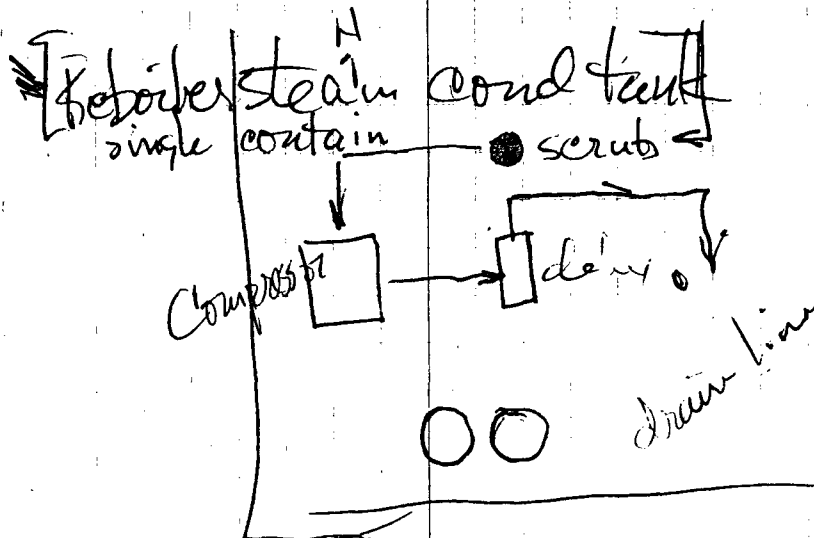
130 pm

Inlet (12") SCRIBBER on pad

Fuel Tanks are on saddle w/  
pad & curb containment

TEG dehydrator sits on pad; curb

SLOP TANKS - to be used  
according to guidelines



KTS Treat Plant

Call Laura don't reclassify

INSPECTION  
Farm Chris Justice Note Book.



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 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-227) - Hudson Gas Gathering and Processing, J.R. Doloney, General Manager, 921 W. Sangre, Hobbs, New Mexico, 88240, has submitted a discharge plan application for their Gillespie Padgas Compressor Station located in the NE 1/4 BE 4 Section 24, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Approximately 10 barrels per day of produced water with a total dissolved solids concentration of approximately 18,000 mg/l will be collected and stored in an above ground closed top steel tank prior to transport to an OGD approved effluent disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is to a depth of approximately 50 feet with a total dissolved solids concentration of approximately 421 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the aquifer 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 shown above. The discharge plan application may be inspected at the above address between 8:00 a.m. and 4:00 p.m. Monday thru Friday. Prior to filing any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall make 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 reasons why a hearing should 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 respond to dispositive 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. GIVE IN FRONT OF THE STATE OF NEW MEXICO OIL CONSERVATION COMMISSION at Santa Fe, New Mexico, on this 14th day of October, 1995.

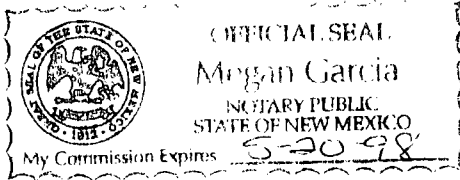
STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LEMAY, Director  
Journal: October 14, 1995

STATE OF NEW MEXICO  
County of Bernalillo SS

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 14th day of October, 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 16th day of Oct, 1995



PRICE \$36.82  
Statement to come at end of month.

*Megan Garcia*

CLA-22-A (R-1/93) ACCOUNT NUMBER C80932

# Affidavit of Publication

STATE OF NEW MEXICO )  
 ) ss.  
COUNTY OF LEA )

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled  
Notice Of Publication

XXXXXXXXXXXXX in the  
and numbered XXXXX  
Court of Lea  
County, New Mexico, was published in a regular and  
entire issue of THE LOVINGTON DAILY LEADER and  
not in any supplement thereof, XXXXXXXXXXXXXXXX  
XXXXXXXXXXXXXXXXXXXX one (1) day  
same day of the week, for  
XXXXXXXXXXXXXXXXXXXX consecutive weeks, beginning with the issue of  
October 13, 1995  
and ending with the issue of  
October 13, 1995

And that the cost of publishing said notice is the  
sum of \$ 44.80

which sum has been (Paid) (XXXXXX) as Court Costs

Joyce Clemens  
Subscribed and sworn to before me this 19th

day of October, 1995

Jean Senior  
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

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

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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 the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of October, 1995.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LEMAY, Director

SEAL  
Published in the Lovington Daily Leader October 13, 1995

## OIL CONSERVATION DIVISION

2040 S. Pacheco  
Santa Fe, New Mexico 87505

October 23, 1995

CERTIFIED MAILRETURN RECEIPT NO. Z-765-962-575

Mr. Ed Sloman  
Hadson Gas Gathering and Processing Co.  
921 W. Sanger  
Hobbs, New Mexico 88241

Re: Gillespie/Feagan Compressor Station  
Lea County, New Mexico

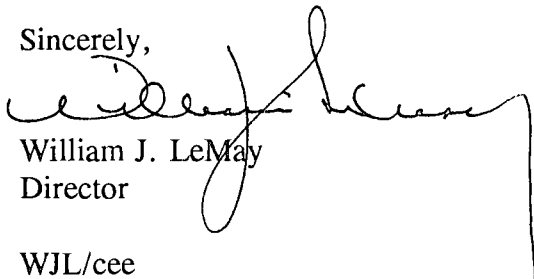
Dear Mr. Sloman:

The Oil Conservation Division (OCD) has received Hadson Gas Gathering and Processing Company's (Hadson) request dated October 10, 1995 for a 120 day authorization to discharge without an approved discharge plan at the above referenced facility. The OCD has received your discharge plan application dated October 2, 1995, and is in the process of reviewing the application.

Pursuant to Section 3-106.B. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, Hadson is hereby authorized to discharge at the Gillespie/Feagan Compressor Station, located in the NE/4 NE/4 Section 24, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico, without an approved discharge plan until February 20, 1995. This authorization is granted to allow the OCD time to review the discharge plan application.

If you have any questions, please feel free to contact Chris Eustice at (505) 827-5824.

Sincerely,



William J. LeMay  
Director

WJL/cee

xc: OCD - Hobbs Office, Wayne Price  
OCD - Hobbs Office, Jerry Sexton

OIL CONSERVATION DIVISION  
NEW MEXICO

25 00 11 AM 8 52

Sept. 29, 1995

Mr. William J. Lemay  
Director, Oil Conservation Division  
State of New Mexico  
Energy, Minerals and Natural Resources Department  
Post Office Box 2088  
Santa Fe, New Mexico 87504

C-227

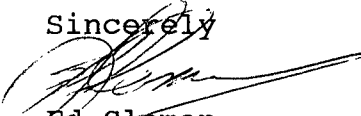
Dear Mr. Lemay;

Hadson Gas Gathering and Processing Company (here after referred to as Hadson) has submitted an application for Discharge Plan, for our Gillespie/Feagan Compressor Station. The New Mexico Oil Conservation Division received this application for Discharge Plan on Sept. 28, 1995.

Due to the economic impact of this facility concerning the producer, and Hadson, Hadson is requesting a one hundred twenty (120) day variance to operate this facility while awaiting the final approval stages of the submitted Discharge Plan.

If you have any questions concerning this matter of mutual concern please call me at your convenience.

Sincerely

  
Ed Sloman

Supervisor Operations Support  
Hadson Gas Gathering and Processing

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 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-227) - Hadson Gas Gathering and Processing, J.R. Delaney, General Manager, 921 W. Sanger, Hobbs, New Mexico, 88240, has submitted a discharge plan application for their Gillespie/Feagan Compressor Station located in the NE/4 NE/4 Section 24, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Approximately 10 barrels per day of produced water with a total dissolved solids concentration of approximately 18,000 mg/l will be collected and stored in an above ground closed top steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 421 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 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 Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of October, 1995.

NO EFFECT FINDING

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date October 17, 1995

SEAL

Consultation # GWOCD951

Approved by

U.S. FISH and WILDLIFE SERVICE  
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE  
ALBUQUERQUE, NEW MEXICO

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

NOTICE OF PUBLICATION

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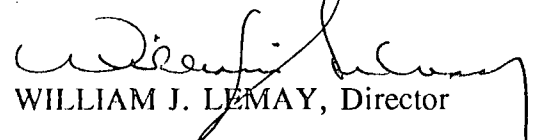
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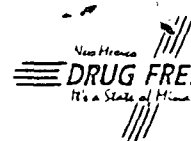
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of October, 1995.

SEAL

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director



October 10, 1995

**LOVINGTON DAILY LEADER**  
P. O. Box 1717  
Lovington, New Mexico 88260

**RE: NOTICE OF PUBLICATION**

**ATTN: ADVERTISING MANAGER**

*Dear Sir/Madam:*

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

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

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

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

*Please publish the notice no later than* October 17, 1995.

*Sincerely,*

Z 765 963 625

*Sally E. Martinez*  
**Sally E. Martinez**  
Administrative Secretary

**Attachment**

**VILLAGRA BUILDING - 400 Gadsden**  
Forestry and Resources Conservation Division  
P.O. Box 1948 87504-1948  
827-5830  
Park and Recreation Division  
P.O. Box 1147 87504-1147  
827-7465



**Receipt for  
Certified Mail**  
No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to	
Street and No	
P.O., State and ZIP Code	
Postage	LOVINGTON, NM 88260
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

**2850 South Poehoes**  
Office of the Secretary  
827-5950  
Administrative Services  
827-5925  
Energy Conservation & Management  
827-5900  
Mining and Minerals  
827-5970  
Oil Conservation  
827-7121



October 10, 1995

ALBUQUERQUE JOURNAL  
P. O. Drawer J-T  
Albuquerque, New Mexico 87103

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*Sally E. Martinez*  
Sally E. Martinez  
Administrative Secretary

Attachment

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Forestry and Resources Conservation Division  
P.O. Box 1948 87504-1948  
827-5830  
Park and Recreation Division  
P.O. Box 1147 87504-1147  
827-7465

Receipt for  
Certified Mail

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

Sent to <i>Journal</i>	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

2840 South Pecos

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



## NOTICE OF PUBLICATION

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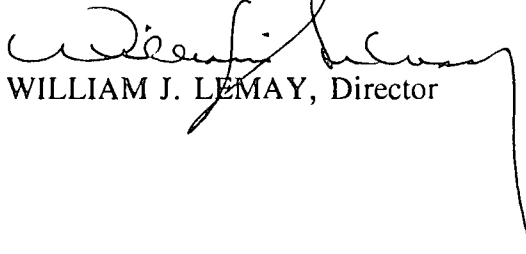
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SEAL

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
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