GW - 262

GENERAL CORRESPONDENCE

YEAR(S): 2007-1996

NOTICE OF MOTION

STACE OF NEW MEXICO RURGY, MINERALS AND NATURAL RESOURCES SEVARTHENT OF DOVISERVATION TOWNSON

Notice is hereby given that pursuant to New Wexico Water Quality Control Commission Regulations (20.6.2.3106 Ni the following NMAC), discharge permit appli-cation(s) has been submitted to the Di-rector of the New Mexico Oil Conservation Division ("NMOCD"), 1220 Saint Francis Drive, Santa Fe, New Mexico 87505, Tel (505) 476-3440: Telephone

Southern Union Gas Services, LTD, Wayne Fariey, Vice President, Gas Operations, 301 Commerence Suite 700, Fort Worth, 76102, tele-817-302-9400, exas phone has submitted newal applies applications for the previously approved discharge plans for the following facilities: GW-259 3-3 Compressor Sta-tion SE/4 NE/4 Section 33-Tewnship 235-Range GW-260 C-2 Compressor Station NW/4 NE/4

Section 11-Yownship 235-Range 36E; GW-260 C-3 Compressor NE/4 SW/4 Station 3-Township Section 23S-Range GW-262 C-4 Compressor Station SW/4 SE/4 9-Township Section 23S-Range 235-Hange 365; GW-269 Boyd Com-pressor Station SE/4 SE/4 Section 11-Town-ship 20S-Range 385; GW-243 House Com-pressor Station NE/4 SE/4 Section 26-Township 22S-Range 37E; %MPM Lea County, New Mexico: These facilities are located between Eunice and ai, New Mexico with groundwater kely to be affected by a spill, leak or accidental discharge is at a depth ranging from ce 30 to 50 feet, with a otal dissolved solids concentration gener ally less than 1000 mg/i. The discharge pian addresses how cilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the sur-ace will be managed in order to profect resh water.

The NMOCD has deped that the apbn is administranvely complete and has prepared a draft permit. The draft permit. The NMOCD will accept comments and state-ments of interest regarding this applica-tion and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further inforsubmitting mation, comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The adminis-trative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Fri-day, or may also be viewed at the NMOCD http://www.emnrd.st ate.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of a publication of this not the day of the day publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth hearing snaw sectors the reasons why a should be held. A hearing will be held if the Director determines that there is significant public

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

interest.

Para obtener más información sobre esta solicitud en espan_ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department
(Depto. Del Energia,
Minerals y Recursos
Naturales de Nuevo
México), Oil Conser-Division vation (Depto. Conservacio'n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 25th day of January 2007.

> STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

Legal #80344 Pub. Feb. 1, 2007 NM EMNRD OIL CONSERV

ATTN: Wayne Phic 1220 S ST FRANCIS DR SANTA FE NM 87505 ALTERNATE ACCOUNT: 56689

AD NUMBER: 00201512 ACCOUNT: 00002212

LEGAL NO: 80344 P.C

P.O. #: 52100-00044

327 LINES 1 TIME(S)

183.12

AFFIDAVIT:

6.00

TAX:

14.42

TOTAL:

203.54

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

I. R. Lara, 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 #80344 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/01/2007 and 02/01/2007 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 1st day of February, 2007 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/____LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 1st day of February, 2007

•

Commission Expires:

11/23/07

ok To Lwin

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 1/33/0	7
or cash received on in the amount of \$ 100	
from Southern Union Bas Seoures	
for GW-262	
Submitted by: Lourence Concio Date: 1/26/07	_
Submitted to ASD by: Sawana Former Date: 1/20/07	
Received in ASD by: Date:	
Filing Fee New Facility Renewal	
Modification Other	
Organization Code 521.07 Applicable FY 2004	
To be deposited in the Water Quality Management Fund.	
Full Payment or Annual Increment	

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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Southern Union Gas Services, LTD, Wayne Farley, Vice President, Gas Operations, 301 Commerence Street, Suite 700, Fort Worth, Texas 76102, telephone 817-302-9400, has submitted renewal applications for the previously approved discharge plans for the following facilities: GW-259 C-1 Compressor Station SE/4 NE/4 Section 13-Township 23S-Range 36E; GW-260 C-2 Compressor Station NW/4 NE/4 Section 11-Township 23S-Range 36E; GW-261 C-3 Compressor Station NE/4 SW/4 Section 3-Township 23S-Range 36E; GW-262 C-4 Compressor Station SW/4 SE/4 Section 9-Township 23S-Range 36E; GW-269 Boyd Compressor Station SE/4 SE/4 Section 11-Township 20S-Range 38E; GW-243 House Compressor Station NE/4 SE/4 Section 26-Township 22S-Range 37E; NMPM Lea County, New Mexico: These facilities are located between Eunice and Jal, New Mexico with groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth ranging from of 30 to 50 feet, with a total dissolved solids concentration generally less than 1000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 25th day of January 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director



VonGonten, Glenn, EMNRD

From:

VonGonten, Glenn, EMNRD

Sent:

Thursday, December 28, 2006 1:10 PM

To:

'robert.gawlik@sug.com'

Subject:

Expired Discharge Plans for 5 Former Sid Richardson Compressor Stations

Attachments: Renewal WQCC Notice Regs.pdf; Discharge Plan App Form.pdf; Guidelines For Discharge

Plans.pdf; PN Flow Chart.20.6.2renewal.pdf

Robert,

Oil Conservation Division (OCD) records indicate that five of your discharge plans for five former Sid Richardson compressor stations have expired:

GW259 (SID RICHARDSON C-2 CS), GW260 (SID RICHARDSON C-2 CS), GW261 (SID RICHARDSON C-3 CS, (GW262 (SID RICHARDSON C-4 CS), and GW269 (SID RICHARDSON BOYD CS). New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that 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. You may be operating without a permit. Please submit a permit renewal application with a filing fee (20.6.2.3114 NMAC) of \$100.00 for each facility separately by January 12, 2007. Please make all checks payable to the Water Quality Management Fund and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. Application forms and guidance documents are attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Please contact me by phone at 505-476-3488 or email glenn.vongonten@state.nm.us if you have any questions regarding this matter.

Glenn von Gonten Senior Hydrologist



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

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

January 26, 2007

Wayne J. Farley Southern Union Gas Services, LTD 301 Commerce Street, Suite 700 Forth Worth, Texas 76102

Re: Discharge Plan Renewals Permit GW-259, 260, 261, 262, 269 and 243

Dear Mr. Farley:

The New Mexico Oil Conservation Division (NMOCD) has received Southern Union's request and initial and flat fees, dated January 04 2007, to renew the above Compressor Stations. The initial submittal provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3490 or wayne.price@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price

Environmental Bureau Chief

xc: OCD District I Office, Hobbs

SID RICHARDSON

ENERGY SERVICES CO.

201 MAIN STREET, SUITE 3000 FORT WORTH, TEXAS 76102-3131 817/390-8685 FAX 817/339-7394 EMAIL: rlgawlik@sidrich.com

<u>CERTIFIED MAIL – Return Receipt</u> 7000 0520 0024 3418 7232

New Mexico Oil Conservation Division Environmental Bureau Attn: Roger Anderson 1220 South St. Francis Drive Santa Fe, NM 87505

Re: Storm Water Run-Off Plan

C-4 Compressor Station GW-262

Dear Mr. Anderson:

This letter is in response to the Discharge Plan Renewal Approval GW-262. In the letter of approval the Oil Conservation Division (OCD) requested that Sid Richardson Energy Services Co. submit a storm water run-off plan for approval by OCD.

Oil and gas exploration and production facilities are exempt from the Clean Water Act (CWA) Storm Water Phase I regulations under most conditions. Specifically this facility is exempt from these regulations and as such has determined that it is not necessary to apply to the Environmental Protection Agency for a Multi-Sector General Permit nor is it necessary to develop a Storm Water Pollution Prevention Plan under the CWA.

At this facility storm water does not come into contact with any sources that may contaminate the storm water runoff except for the rain that falls onto the compressor engines. Storm water that falls on the compressor engines is collected either on the compressor skids or is contained within the curbed concrete compressor pads and does not run-off from the facility.

If you have any questions about this application please contact me at (817) 390-8685.

Sincerely,

Robert L. Gawlik

Com L. Oueld

cc: MRR/WJF/CPO/HH Randall Dunn ROBERT L. GAWLIK

Manager, Environmental Health & Safety

May 29, 2002 RLG-44-02



NEW TEXICO ENERGY, MENERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor
Jennifer A. Salisbury
Cabinet Secretary

October 29, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0913

Mr. Wayne J. Farley Sid Richardson Energy Services, Ltd. 201 North Main St. Fort Worth, Texas 76102

RE: Discharge Plan Renewal Approval GW-262

Sid Richardson Energy Services, Ltd.

C-4 Compressor Station Lea County, New Mexico

Dear Mr. Farley:

The ground water discharge plan renewal GW-262 for the Sid Richardson Energy Services, Ltd. C-4 Compressor Station located in the SW/4 SE/4 of Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.

The original discharge plan application was submitted on July 23, 1996 and approved September 18, 1996. The discharge plan renewal application, dated September 14, 2001, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 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 Sid Richardson Energy Services, Ltd. of liability should operations result in pollution of surface water, ground water, or the environment.

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

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Sid Richardson Energy Services, Ltd. 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. Wayne J. Farley GW-262 C-4 Compressor Station October 29, 2001 Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **September 18, 2006**, and Sid Richardson Energy Services, Ltd. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

Sid Richardson Energy Services, Ltd. will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the C-4 Compressor Station.

The discharge plan application for the Sid Richardson Energy Services, Ltd. C-4 Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for natural gas compressor stations with horsepower rating less than 1000 horsepower equal to \$400.00. The OCD has received the filing fee.

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

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge

U.S. Postal Service

CERTIFIED MAIL RECEIPT

Sincerely,
Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

OCD Hobbs Office

xc:

(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Postage \$

Certified Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees

Name (Please Print Clearly) (To be completed by mailer)
Street, Apt. No.; or PO Box No.

City, State, ZIP+4

PS Form 3800, July 1999
See Reverse for Instructions

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-262 SID RICHARDSON ENERGY SERVICES, LTD. C-4 COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (October 29, 2001)

- 1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating less than 1000 horsepower equal to \$400.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
- 2. <u>Sid Richardson Energy Services, Ltd. Commitments:</u> Sid Richardson Energy Services, Ltd. will abide by all commitments submitted in the discharge plan renewal application dated September 14, 2001 and these conditions for approval.
- 3. <u>Waste Disposal</u>: 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.
- 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. 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.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected by a Sid Richardson Energy Services, Ltd.'s representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
- 13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Plan:</u> The facility will have an approved storm water run-off plan.

- 16. <u>Closure:</u> The OCD will be notified when operations of the C-4 Compressor Station are discontinued for a period in excess of six months. Prior to closure of the C-4 Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Certification:</u> Sid Richardson Energy Services, Ltd., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Sid Richardson Energy Services, Ltd. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

	Accepted:
LTD.	SID RICHARDSON ENERGY SERVICES
	by

• NEW MEXICAN

Founded 1849

NM OIL CONSERVATION DIVISION

ATTN: ED MARTIN

AD NUMBER: 228591 LEGAL NO: 70097 ACCOUNT: 56689 P.O.#: 02199000249

358 LINES 1 time(s) at \$ 157.81

AFFIDAVITS: 5.25

TAX: 10.19 TOTAL: 173.25

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, mm weideman 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 a copy of which is hereto attached was published in said newspaper 1 day(s) between 09/26/2001 and 09/26/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 26 day of September, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

Subscribed and sworn to before me on this 26 day of September A.D., 2001

Commission Expires _

12/30/03



OFFICIAL SEAL
Janet L. Montoya
NOTARY PUBLIC - STATE OF NEW MEXICO

MY COMMISSION EXPIRES 12/30/03

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, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-259) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-1 Compressor Station located in the Station located in the SE/4 NE/4, Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 3 galions per day of waste water will be stored on the line closed ten. site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 132 feet with a total dissolved solids concentrations of a proximately 1100 mg/l. The discharge plan ad-dresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-260) - Sid Richardson Gasoline - Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-2 Compressor Station located in the NW/4 NE/4, Section 11, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on

alte in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being trasported to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental disolver solids concentrations of approximately 1100 mg/l. The discharge plan addresses how splif, leaks, and other accidental discharges to the surface will be managed.

(GW-261) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 78102-3131, has sub-mitted a discharge plan renewal application for their C-3 Compressor Station located in the NE/4 SW/4, Section 3, Township 23 South, Range 36 East, NMPM, Lea County, New Mexi-oo. Approximately 2 galions per day of weste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be appearated prior to waste water being transported to an OCD approved offelte disposal Facility. Groundwater most likely to be affected by an acoldental discharge is at a depth of 140 feet with a total dissolved solids concentrations of approximately 11.00 mg/l.
The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-262) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 761.02-3131, has submitted a discharge plan renewal application for their C-4 Compressor Station located in the SW/4 SE/4, Section 9, Township 22. South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 galions per day of waste water will be stored on site in closed top berned tanks. Fiulds will be processed and hydrocarbons will be

separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 171 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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 vation Division shall allow at least thirty (30) days after the date of publication of this notice 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 behald if the director deterheld if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fé, New Mexico, on this 20th day of September, 2001.

STATE OF NEW MEXICO OIL CONSERVATION DIVI-SION

SEAL

LORI WROTENBERY, Director Legal #70097 Pub. September 26, 2001



State of New Mexico, County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

supplement increase for a pe	1100.
of1	
	weeks.
Beginning with the issue da	ited
September 27	2001
and ending with the issue d	
September 27	2001
Kathi Palarda	
Publisher	
Sworn and subscribed to b	efore
me this 27th	day of
September	2001

di Monson

My Commission expires October 18, 2004 (Seal)

Notary Public.

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-259) – Sid Richardson Gasoline Co., Mr. Wayne J. Ferley, 201 Mein Street, Suita 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-1 Compressor Station located in the SE/4 NE/4, Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 3 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD epproved off-site disposal facility. Coroundwater most likely to be affected by an accidental discharge is at a depth of 132 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-260) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suita 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-2 Compressor Station located in the NW/4 NE/4, Section 11, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 70 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-261) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suita 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-3 Compressor Station located in the NE/4 SW/4, Section 3, Township 23 South, Range 36 East, NMPM, Les County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top-bermed tanks. Fluids will be processed and hydrocarbons, will be separated prior to waste water being transported to an QCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 140 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how splil, leaks, and other accidental discharges to the surface will be managed.

(GW-262) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-4 Compressor Station located in the SW/4 SE/4, Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to effected by an accidental discharge is at a depth of 171 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between \$: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 hotice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing, shall be held. A hearing will be their discount of this 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 hased on the information in the plan and information pre-

Ford, Jack

From:

Martin, Ed

Sent:

Thursday, September 20, 2001 10:41 AM

To:

Santa Fe New Mexican (E-mail); Hobbs News-Sun Attn: Brenda Tison (E-mail)

Cc:

Ford, Jack; Anaya, Mary

Subject:

Legal Notices

Please publish the attached legal notice, one time only, by Thursday, September 27, 2001.

Upon publication, please forward to this office:

1. Publisher's affidavit.

2. Invoice. Our purchase order numbers are:

Santa Fe New Mexican 02199000249

Hobbs News Sun

02199000223

If you have any questions, please e-mail me or phone (505) 476-3492.

Thank you.



Ford, Jack

From: Sent:

To:

Subject:

Ford, Jack Thursday, September 20, 2001 10:29 AM Martin, Ed Public Notice for GW-259, GW-260, GW-261, & GW-262



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, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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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 thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 20th day of September, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of chec	ek No.	_ dated <u>9-17-01</u>
or cash received on	in the amount	of \$ 400.00
from Environmental Services for Si	Licharlone	French Service
for C-1, C-2, C-3, +C-4C,5.	Giv- 25	9. 260, 361, 4 262
Submitted by:	Date:	9-20-01
Submitted to ASD by:	Date:	
Recsived in ASD by:	Date:	<u> </u>
Filing Fee New Facility	Renewal	
ModificationOther		
Organization Code <u>521.07</u> To be deposited in the Water Quality Full Payment or Annual 1		
ENVIRONMENTAL SERVICES, INC. 04-96 PH. 505-266-6611 4665 INDIAN SCHOOL RD. NE, SUITE 106 ALBUQUERQUE, NM 87110 Pay to the order of NMOCO Four Hundred and 00/100	Date. Dep 17, 2001 95	-32/1070 NM 2260
Bank of America.	,	1
ACH R/T 107000327	11. TZ~	
For SRC 015 C-16-2, C-3, C-4 filing Fre Jack	<u> </u>	NP
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nvironme Tal Services (

September 17, 2001

Oil Conservation Division Attn: Roger Anderson 1220 South St. Francis Dr. Santa Fe, NM 87505

Subject: Sid Richardson Discharge Plan Renewals for C-1, C-2, C-3 and C-4 Compressor Stations

Dear Roger,

Enclosed please find two copies of the Applications for Renewal of Discharge Plans for Sid Richardson's C-1, C-2, C-3, and C-4 Compressor Stations. One copy of each of the applications has also been sent to the District 1 office in Hobbs, NM.

The included signature pages are fax copies of the original signature pages. The original signature pages have been sent to me but due to the situation in New York and the subsequent grounding of airplanes; I have not received the signature pages yet. As soon as I receive the original signature pages I will immediately courier the originals to your office.

Attached to this letter you will also find a check for \$400 to cover the \$100 filing fee for each of the applications.

If you have any questions regarding this application please feel free to contact me at (505) 266-6611.

Sincerely

Cale E. Swanson

Environmental Scientist II

cc: OCD District 1 Office





nvironmen~√al Services On nc.

September 26, 2001

Oil Conservation Division Attn: Roger Anderson 1220 South St. Francis Dr. Santa Fe, NM 87505

Subject: Sid Richardson Discharge Plan Renewal Signature Pages for C-1, C-2,

C-3 and C-4 Compressor Stations

Dear Roger,

On September 17, 2001, discharge plan renewals were submitted for Sid Richardson's C-1, C-2, C-3 and C-4 compressor stations. Due to the grounding of airplanes recently we were unable to include the original signature pages with the applications. Instead we included fax copies and in our cover letter indicated that I would send you the original signatures pages when they arrived.

Attached to this letter you will find the original signature pages for the renewals. Thank you for your understanding in this matter.

If you have any questions regarding this application please feel free to contact me at (505) 266-6611.

Sincerely

Cale E. Swanson

Environmental Scientist II

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
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Revised January 24, 2001

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

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

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

	(vers in the OCD directines for assistance in combining the approach)
	□Ncw ☑ Renewal □ Modification
1.	Type: C-4 Compressor Station
2.	Operator: Sid Richardson Energy Services, Ltd.
	Address: 201 N. Main Street, Fort Worth, Texas 76102
	Contact Person: Wayne Farley Phone: (817) 390-8686
3.	Location: <u>SW /4 SE /4 Section 9 Township 22S Range 36E</u> Submit large scale topographic map showing exact location.
4.	Attach the name, telephone number and address of the landowner of the facility site.
5 .	Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6.	Attach a description of all materials stored or used at the facility.
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10.	Attach a routine inspection and maintenance plan to ensure permit compliance.
11.	Attach a contingency plan for reporting and clean-up of spills or releases.
12.	Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13.	Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. of 1	CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best my knowledge and belief.
Na	me: Wayne Farley . Title: Director of Gas Operations .
Sig	nature: Mayer Failey Date: 9-14-01

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C-4 Compressor Station Discharge Plan

Sid Richardson Energy Services, Ltd.—C-4 Compressor Station

This document constitutes a renewal application for Groundwater Discharge Plan #262 for the C-4 Compressor Station. The C-4 Compressor Station was constructed in 1992 by Excel Gas Company. Sid Richardson Energy Services, Ltd. purchased the facility in September 1995. This Discharge Plan application has been prepared in accordance with the New Mexico Oil Conservation Division's (OCD) *Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations* (revised 3-97) and New Mexico Water Quality Control Commission regulations at 20 New Mexico Administrative Code (NMAC) 6.2.

1 TYPE OF OPERATION

The C-4 Compressor Station is operated to meter, remove liquids, and compress natural gas pipelined through natural gas production lines. An inlet gas scrubber is utilized to remove liquids from the inlet gas to the station. The dried gas is sent to one of two natural gas compressors. Total site horsepower is 710 hp. Each compressor is equipped with a suction scrubber that dries the gas further prior to compression. Most of the discharge gas from the compressors is pipelined off-site for further processing. The discharge gas not transported off-site is utilized for engine fuel. The fuel gas is routed to a fuel sweetener that absorbs hydrogen sulfide (H₂S) from the gas. The fuel gas is then passed through a fuel scrubber for additional liquid removal before engine use.

2 OPERATOR/LEGALLY RESPONSIBLE PARTY

Operator Sid Richardson Energy Services, Ltd. Attn: Randall Dunn Box 1226, Jal, NM 88252 (505) 395-2116

Legally Responsible Party Sid Richardson Energy Services, Ltd. Attn: Wayne J. Farley 201 N. Main St., Fort Worth, TX 76102 (817) 390-8686

3 LOCATION OF DISCHARGE FACILITY

Lea County, NM Section 9, Township 22 South, Range 36 East

4 LANDOWNER

Sid Richardson Energy Services, Ltd. 201 N Main St., Fort Worth, TX 76102 (817) 390-8686

5 FACILITY DESCRIPTION

Facility and process flow diagrams are located in Appendix 1.

6 MATERIAL STORED AND USED

Table 1 identifies materials and storage containments for substances used and stored at C-4. Material Safety Data Sheets (MSDS) for these substances are in Appendix 5.

Table 1
Material Used and Stored

ID	Material	Composition	Type	Container	Quantity	Location
TK-1	Scrubber liquids	Water w/ hyrdocarbon liquids	Liquid	Tank	1270 gal	South of inlet scrubber
TK-2	Lube Oil	See MSDS	Liquid	Tank	300 gal	SE of compressor
	Coolant	See MSDS	Liquid	Drum	30 gal	Brought in when needed
	SulfaTreat	See MSDS	Solid	Sack	(3) 2000 lb	May be sorted on-site when needed

7 SOURCES AND QUANTITIES OF EFFLUENT AND WASTE SOLIDS

Figure 1 (Appendix 1) depicts the effluent and solid waste sources at C-4. Table 2 summarizes the effluent and solid wastes generated at the facility. The major sources of liquid and solid waste are described in the sections following Table 2.

Table 2
Effluent and Solid Waste Sources, Quantity and Disposition

Source	Waste/Quality	Quantity	Disposition
Scrubbers	Water w/ hydrocarbon liquids	200 gal/month	TK-1
Compressor pad wash down	Water with soap, lube oil, and coolant	200 gal/month	Removed as generated
Engine	Waste oil	36 gal/month	Removed as generated
	Oil filters	60 filters/year	Removed as generated
Fuel sweetener Waste SulfaTreat		2300 lb/month	Road/driveway
Corrosion inhibitor Rainwater with corrosion drip pan inhibitor		Varies	TK-1

Separators/Scrubbers and Slug Catchers

Four scrubbers are utilized at C-4: an inlet scrubber, a suction scrubber, and a fuel scrubber. Water with hydrocarbon liquids (drip) is discharged from the scrubbers to the drip tank (TK-1). The amount of liquids accumulated by the scrubbers varies and is dependent upon the moisture content of the inlet gas stream. The maximum amount of drip expected to be removed from the site is 2400 gallons per year.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers at C-4

Process and Storage Equipment Wash Down

The compressor skids are washed down once per month using a portable high pressure system. Approximately 100 gallons of water is used for each washing. Occasionally, five gallons of soap is added to the wash water for cleaning. Equipment wash water may contain soap, lube oil, and coolant. The compressor skids are placed on a concrete pad with a four-inch curb to contain any effluent.

Solvents/Degreasers

A non-chlorinated soap is used to clean the compressor engine. The soap is not stored onsite. Disposal of spent soap is addressed in Process and Storage Equipment Wash Down.

Spent Acids/Caustics

No acids or caustics are utilized at C-4

Used Engine Coolants

Ambitrol, comprised of 50 percent water and 50 percent ethylene glycol, is utilized as coolant in the compressor engine. Coolant is brought on-site in a 30-gallon drum when needed. Coolant is immediately added to the engine and is not stored at C-4. No waste coolant is generated.

Waste Lubrication and Motor Oils

Waste oil is generated by maintenance of the compressor engines. Each engine uses 18 gallons per month of oil. Oil is supplied to the compressor engine by an on-site lube oil tank (TK-2). Waste oil, approximately 18 gallons/month, is drained from each of the compressor engines into drums for removal from the facility.

Used Filters

The compressor engines operate with two and three oil filters. These filters are replaced once per month. After removal from the engines, the filters are placed in a 55-gallon drum with drain rack. Once the filters have drained, they are taken to a central dumpster located at Sid Richardson's West Eunice Tank Battery. Waste oil drained from the filters is disposed with the waste lube oil

Solids and Sludges

No solids or sludges are generated at C-4.

Painting Wastes

If any equipment at C-4 requires painting, painting supplies will be brought on-site at the time of painting. Wastes will be removed immediately upon completion of the painting,

Sewage

No sewage is generated at C-4.

Lab Wastes

C-4 is not equipped with a lab.

Other Liquids and Solid Wastes

The fuel sweetener removes H₂S from the fuel gas. Seven thousand pounds of SulfaTreat is used in the fuel sweetener to absorb the H₂S. The SulfaTreat utilized in the sweetener is replaced approximately every three months. The spent SulfaTreat is spread on the driveway and road along C-4.

Drips and leaks from the corrosion inhibitor tank (TK-3) are contained in a drip pan below the tank. The pan is emptied into TK-1 as needed

8 LIQUID AND SOLID WASTE COLLECTION/STORAGE/DISPOSAL

This section provides a general description of the collection, storage, and disposal systems used for effluents and solid wastes generated at C-4. Section 7 identifies the specific collection, storage, and disposal method utilized for each of the effluents generated at the site.

Collection

All effluent dumped to TK-1 is transported via aboveground pipelines.

Storage

None of the storage tanks at C-4 are equipped with berms. TK-1 is a partially buried fiberglass tank. TK-2 and TK-3 are located on saddle racks that provide full views of tank surfaces.

On-Site Disposal

Spent SulfaTreat removed from the fuel sweetener is spread on the driveway and road to C-4. This disposal method was approved by the NMOCD on September 9, 1995. Copies of correspondence from Sid Richardson and the NMOCD approval letter are in Appendix 4.

Off-site Disposal

All remaining effluent and waste is removed and disposed of elsewhere as identified on Table 3.

Table 3
Off-Site Disposal Contractors and Disposal Facilities

Material	Disposal Pathway	Contractor Details
Scrubber liquids	Transported by Chaparral Trucking to West Eunice	Chaparral Trucking
	Tank Battery. Oil Portion taken by Petrosource	PO Drawer 1769
	to its oil recycling facility.	Eunice, NM 8823
		(505) 394-2545
		PetroSource Partners Limited
		129 S. Grimes
		Hobbs, NM 88240
		(505) 397-7212
Washwater	Transported by Sid Richardson to Jal #3	
	Gas Plant (GW-010)	
Waste oil	Transported by Sid Richardson to Jal #3	
	Gas Plant (GW-010)	
Filters	Transported by Sid Richardson to West Eunice Tank	Quell Petroleum Services Incinerator
	Battery. Removed by Quell Petroleum Services	PO Box 1552
	to their incinerator.	Monohans, TX 79756
		(915) 943-8400

9 PROPOSED MODIFICATIONS

Sid Richardson does not propose any modifications at this time.

10 INSPECTION, MAINTENANCE, AND REPORTING

C-4 is unmanned but inspected at least once per day Monday through Friday. The station is equipped with an alarm system that notifies operators in Jal of an emergency or malfunction.

11 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

The process area of the plant is graveled to allow for early leak detection and quick response by facility personnel in the event of a leak of process fluids. Sid Richardson will handle all spills as required by the spill procedures in Appendix 3 and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and 20 NMAC 6.2.1203. Copies of these regulations are in Appendix 2.

12 SITE CHARACTERISTICS

The C-4 Compressor Station is located on dune sands of the Eunice Plain in the Capitan Basin. The structural setting is on the Permian shelf of the Central Basin Platform, east of the Capitan Reef Complex. The site bedrock is the poorly consolidated sand of the Tertiary Ogallala Formation [Dane and Bachman, Geologic Map of New Mexico, 1965].

There are no water bodies, water courses or groundwater discharge sites within one mile of the perimeter of the facility on the 1987 Oil Center, NM, USGS 7.5' quadrangle. The almost flat topography is in a large area of poorly defined surface drainage with a 1% grade. The area is slightly undulating with a very gentle slope to the southeast

Soil type at the site is Pyote and Maljamar. This soil is well-drained sand over a sandy loam developed to about 5 feet in depth [Soil Conservation Survey, Soil Survey, Lea County, New Mexico: USDA, 1974]. The soil is developed on eolian dune deposits underlain by a caliche layer. This type of soil has a moderately rapid permeability with a slow runoff.

As of January 1996, two wells are recorded with the New Mexico State Engineer within one-quarter mile of the perimeter of the facility. One, a stock well, is 400 ft south-southeast of the facility and draws water from the Ogallala Formation. The other well, a stock well, is near the facility, and the only information on file for this well states the water turned so bad that cattle would not drink it.

Three wells are within one-quarter mile of the facility as of January 1996 on the USGS National Water Information System, Version I, Ground Water Site Information. All three wells are northwest of the facility at a distance of 600, 1100, and 1350 feet. These three wells, used for

stock and unknown purposes, draw water from the Ogallala Formation. Other wells within one mile of the facility are used for oil-field industrial purposes as well as stock.

The depth of the water table ranges from 171 to 174 feet in the five wells located within one-quarter mile of the facility. The estimated depth to groundwater at C-4 Compressor Station is 171 feet in the Ogallala Formation.

The aquifers below the facility are the poorly consolidated sands of the Ogallala Formation, the deeper, Triassic Dockum Group of Hematite-cemented clay and sandstones, and the deeper Paleozoic dolomitic limestones [Nicholson and Clebsch, *Ground-Water Report 6: Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico, Bureau of Mines & Mineral Resources, 1961*].

Water in the Ogallala Formation is high in silica (49 to 73 ppm), moderately high in calcium and magnesium, low in sulfates and chlorides, very high in fluoride, and has total dissolved solids of less than 110 ppm [Nicholson and Clebsch].

The lower Dockum Group is low in silica (9 to 41 ppm), very high in fluoride, high in sodium, and has a wide range of concentrations of chlorides, sulfates, calcium, and magnesium. The total dissolved solids in the Dockum Group are higher than that of the Ogallala [Nicholson and Clebsch]. The deeper Paleozoic aquifers do not contain usable water and are brine-injected [Nicholson and Clebsch].

The flood potential at the facility is moderate, as the facility is at the downslope terminus of an intermittent stream and is also downslope of another drainage channel from the intermittent lake. A period of heavy precipitation could fill the intermittent stream and the other channel to the north and flood the facility before the water soaked into the ground. Sheetwash at the facility would run downslope to the southeast.

13 ADDITIONAL INFORMATION

Closure Plan

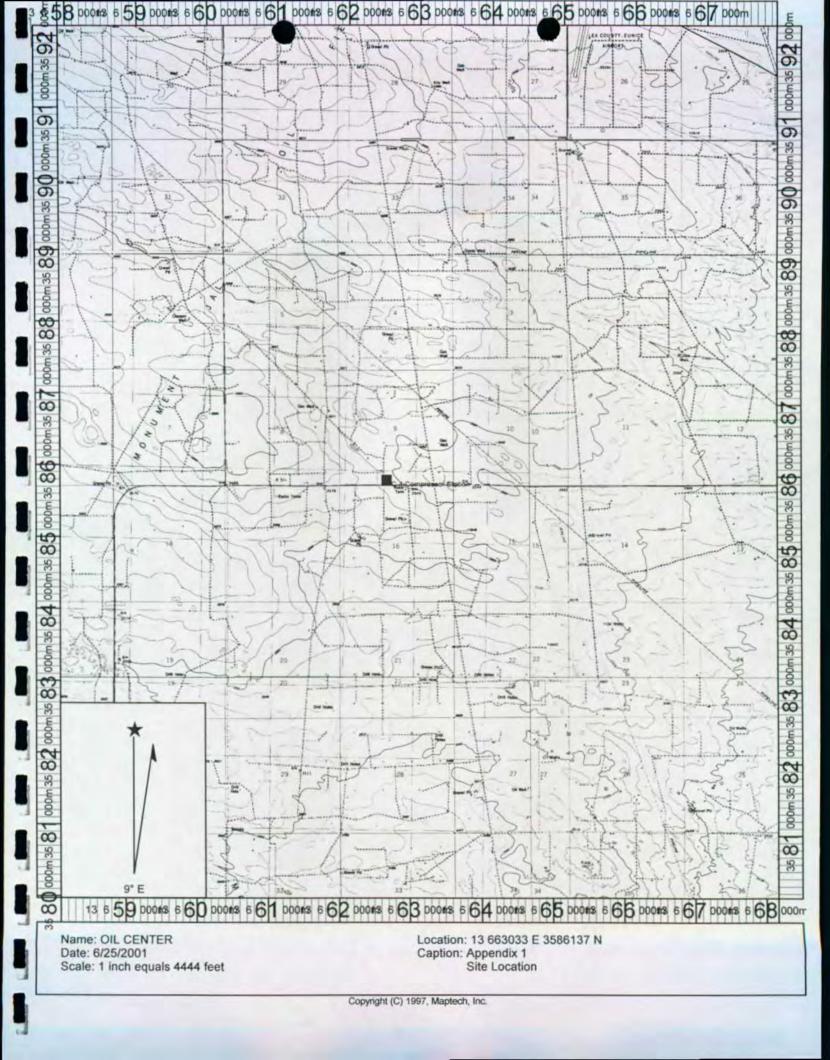
Should Sid Richardson choose to permanently close the C-4 Compressor Station, all reasonable and necessary measures will be taken to prevent the exceedances of 20 NMAC 6.2.3103 quality standards. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 113 and 20 NMAC 3.2.1203 will be made, and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

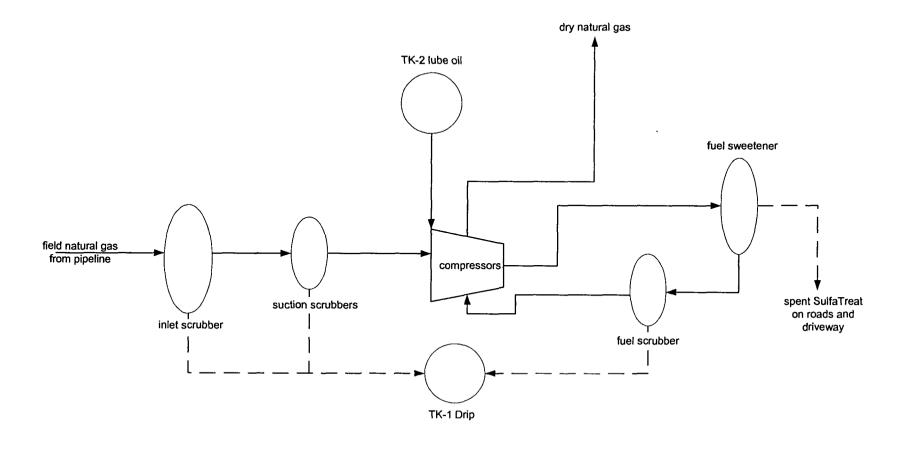
AFFIRMATION

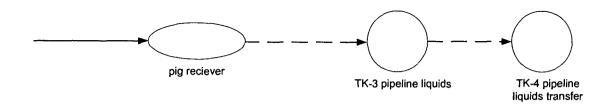
I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the C-4 compressor station and that such information is true/accurate, and complete to the best of my knowledge and belief.

Wayne J. Farley
Director of Gas Operations

Sid Richardson Energy Services, Ltd.







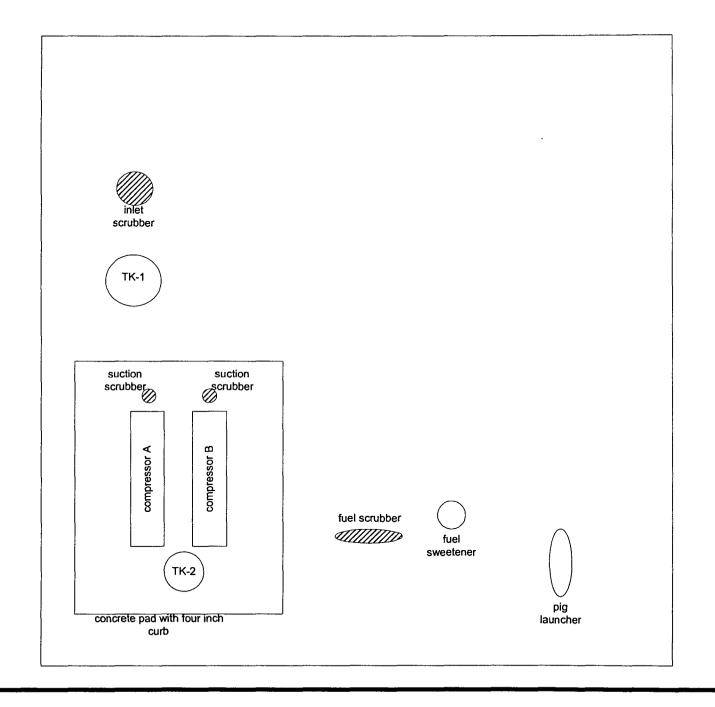


Figure 2

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

TITLE 19 CHAPTER 15 NATURAL RESOURCES & WILDLIFE OIL AND GAS

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

- (1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]
- (2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS:

Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

- (1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:
 - (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
 - (b) an unauthorized release of any volume which:
 - (i) results in a fire;
 - (ii) will reach a water course;
 - (iii) may with reasonable probability endanger public health; or
 - (iv) results in substantial damage to property or the environment;
 - (c) an unauthorized release of natural gases in excess of 500 mcf; or
 - (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141.

Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification.

[5-22-73...2-1-96; A, 3-15-97]

116.D CORRECTIVE ACTION:

The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A.19). [3-15-97]

GROUND AND SURFACE WATER PROTECTION -- 20NMAC 6.2

Statutory Authority: Standards and Regulations are adopted by the commission under the authority of the Water Quality Act, NMSA 1978, Sections 74-6-1 through 74-6-17. [2-18-77, 9-20-82, 12-1-95]

1203. NOTIFICATION OF DISCHARGE-REMOVAL.

- A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]
 - 1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief of the Ground Water Protection and Remediation Bureau of the department, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:
 - a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
 - b. the name and address of the facility;
 - c. the date, time, location, and duration of the discharge;
 - d. the source and cause of discharge;
 - e. a description of the discharge, including its chemical composition;
 - f. the estimated volume of the discharge; and
 - g. any actions taken to mitigate immediate damage from the discharge. [2-17-74, 2-20-81, 12-24-87, 12-1-95]
 - 2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-95]
 - 3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]

- 4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]
- 5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]
- 6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]
- 7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]
- 8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]

- If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106. A of this Part. [12-1-95] Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74] In conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74] In violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74] C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]
 - 1. "Discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water,[2-17-74]
 - 2. "Facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;[2-17-74]
 - 3. "Oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, and oil refuse and oil mixed with wastes; [2-17-74]
 - 4. "Operator" means the person or persons responsible for the overall operations of a facility; and[12-24-87]
 - 5. "Owner" means the person or persons who own a facility, or part of a facility. [12-24-87]

RICHARDSON GASOLINE CO. STANDARD OPERATING PROCEDURE

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids,
Produced Water or Natural Gas

SCOPE

This procedure provides the guidelines necessary to properly notify the State of New Mexico in the event of a Spill, Leak or Release of Hydrocarbon Liquids, Produced Water or Natural Gas.

<u>RESPONSIBILITY</u>

Each employee involved in field and plant operations and his/her supervisor are responsible for the requirements of this procedure.

DEFINITIONS

<u>Immediate notification</u> - Notification to the State District office by phone or in person as soon as possible but no later than 24 hours of initial discovery. Followed by a written notification within 15 days of initial discovery

<u>Subsequent notification</u> - Notification to the appropriate State District office by written report within 15 days of discovery. The State of New Mexico Form C-141 (attached) must be used for all written notifications.

<u>Major Release</u> - Requires verbal notification within 24 hours of discovery, followed by a written notification within 15 days of initial discovery.

Minor Release - Requires written notification only within 15 days of initial discovery.

<u>Spill, leak or release</u> - An incident where crude oil, produced water or natural gas is discharged and contaminates either a water, soil, or air.

<u>Hydrocarbon Liquid</u> - Crude oil associated with the exploration and production, including transportation, of oil or gas.

<u>Watercourse</u> - Any lake bed or gully, draw, stream bed, wash, arroyo, or natural or manmade channel through which water flows or has flowed.

<u>Reporting Requirements</u> - The notification of releases shall be made by the person operating or controlling either the release or the location of the release.



Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids,
Produced Water or Natural Gas

INITIAL RESPONSE TO A SPILL, LEAK OR RELEASE

STEP 1: Evaluate the potential hazard to the general public. Take

appropriate action.

STEP 2: Eliminate or restrict the source of the spill, leak or release

by whatever safe and reasonable means available.

STEP 3: Contain the spill, leak or release to minimize the area of

exposure. This may be accomplished by the use of dikes, berms or absorbent materials such as tubes, pads, hay, etc...

STEP 4: Remove as much standing liquid (free oil) as possible by

any reasonable method.

INTER-COMPANY REPORTING REQUIREMENTS

Any spill, leak or release of hydrocarbon liquid, produced water or natural gas that requires State notification or effects any watercourse will be reported to the Area Manager and/or the Area Safety Coordinator immediately.

NEW MEXICO REPORTING REQUIREMENTS

Immediate Notification (Major release)

Any amount of hydrocarbon liquid into a watercourse.

- >25 bbls. of hydrocarbon liquid on the ground.
- >25 bbls. of produced water into a watercourse.
- >25 bbls. of produced water on the ground.
- >500 mcf of natural gas

or an unauthorized release of any volume (oil, water or gas) that :

- 1) results in a fire;
- 2) will reach a watercourse;
- 3) may (w/ reasonable probability) endanger public health
- 4) results in substantial damage to property or the environment.

Subsequent Notification (Minor release)

- >5 bbls. but <25 bbls. of hydrocarbon liquid on the ground.
- >5 bbls. but <25 bbls. of produced water on the ground or in a watercourse.
- >50 mcf but <500 mcf of natural gas.



Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids,
Produced Water or Natural Gas

NEW MEXICO REMEDIATION REQUIREMENTS

Soil must be remediated if:

TPH >5000 ppm BTEX >50 ppm Benzene >10 ppm

In circumstances where the contaminated soil is:

<100 ft. above the water table <1000 ft. from a water well <1000 ft. from a surface water body

Remediation levels may be lower in these cases and the Area EH&S Coordinator should be consulted as to the extent of remediation required.

REMEDIATION PROCEDURES

STEP 1: Where the spill, leak or release is from a gathering pipeline the pipe should be excavated in a manner that allows for some blending with uncontaminated soil upon backfilling.

STEP 2: Sample the contaminated soil for the required components using a representative composite sample. Depending on the size contaminated area, a typical composite sample would be one with equal parts of soil from the four "corners" and one part from the center of the contaminated area.

STEP 3: Determine the type of remediation to be used i.e., natural remediation, soil blending, land farming, enhanced bio-remediation, thermal disorbtion etc. For significant spills, leaks or releases contact Area EH&S Coordinator for recommendations or assistance in making this determination.

STEP 4: Monitor the remediation process to see that it is progressing. This could entail further sampling, watering, aerating or tilling.



Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

PREVENTIVE MEASURES

Certain steps should be taken to prevent the occurrence of a spill, leak or release:

- (1) The integrity of equipment should be monitored and maintained.
- (2) Containment's, that would prevent any contact with the soil of liquids that cause contamination, should be used when possible.
- (3) Gathering systems should be kept free of liquids where possible at pigging facilities, drips and siphons.
- (4) Equipment near watercourses should be of particular concern.
- Past experience should be used in determining the need for other preventive measures.



Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids,
Produced Water or Natural Gas

Attachment A

Contaminated Soils Ranking Criteria

- A) Depth to Ground Water < 50 feet 20 50-99 feet 10 >100 feet 0
- B) Wellhead Protection Area
 <1000 feet from a water source, or
 <200 feet from a private domestic water source

YES 20 NO 0

C) Distance to Surface Water
<200 horizontal feet 20
200-1000 horizontal feet 10
>1000 horizontal feet 0

A = _____ B = ____ C = ____ Total =

Total Ranking is as follows:

	Level I >19	Level II 10-19	Level II 0-9
Benzene (PPM)	10	10	10
BTEX (PPB)	50	50	50
TPH (PPM)	100	1000	5000



Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

Attachment B

Leak, Spill or Release Report

Facility Person Filing Report
Facility Person Filing Report Report Date/ / Time of Filing: AM / PM
Responsible Party: Sid Richardson Gasoline Co. Facility address:
City: State: NM TX Zip Code:
Telephone: Fax:
Discharge Date:/_/ Time: _: AM / PM
Duration of Discharge: Hr. Min. Quantity Discharged: Gal. / Lbs.
Source and/or Cause of Discharge:
Type of Discharge: Gas Crude Oil Condensate Saltwater Other If other, explain by noting the chemical composition and physical characteristics on the reverse side of this page or attach the MSDS.
Location: 1/4 1/4 Section Township Range Survey Block
Distance from the nearest town, community or landmark:
Site characteristics are as follows:
Precipitation during the release prior to remediation:
Wind Conditions and Direction:
Temperature:
Soil Type: Double of Paratisms
Depth of Penetration:
Area of Delineation:
Nearest Residence:
Nearest *Fresh Water:
*Any water well or watercourse, i.e., river, lake, stream, playa, arroyo, draw, wash, gully, natural or man-made channel.
Attach a copy of the chronological record of all federal, state and local agencies notified in reference to this report. Always indicate the name of the person who receives the call and the time the call was made for each agency.



Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids,
Produced Water or Natural Gas

ATTACHMENT C

DEFINITIONS

Unsaturated/Contaminated Soil

Soils, which are <u>not</u> highly contaminated/saturated, but contain Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) and Total Petroleum Hydrocarbons (TPH) or other potential fresh water contaminants.

Saturated/Highly Contaminated

Those soils that contain a free liquid phase or exhibit gross staining.

Watercourse

Any lakebed or gully, draw, streambed, wash, arroyos, or natural or man-made channel through which water flows or has flowed.

Immediate Notification

Shall be as soon as possible after discovery and shall be in person or by telephone to the district office of the Division in which the incident occurred. If incident occurs after normal business hours, notify the District Supervisor, the Oil & Gas Inspector, or the Deputy Oil & Gas Inspector. Follow up with a completed written report within ten (10) days of the incident.

Subsequent Notification

A complete written report of the incident within ten (10) days of the discovery of the incident.

Written Report

Complete written reports will be submitted in DUPLICATE to the district office of the OCD in the district in which the incident occurred within ten (10) days after discovery of the incident.

Content of Notification

Refer to Attachment B.

SID RICHARDSON GASOLINE CO.

WEST TEXAS AREA OFFICE

5030 E. UNIVERSITY SUITE C-104 ODESSA, TEXAS 79762 TELEPHONE: (915) 367-2867 FAX: (915) 367-2862

September 22, 1995

Mr. Roger Anderson State of New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505

Mr Anderson:

Recently Sid Richardson Gasoline Co. purchased the Xcel Gas Company (Clayton Williams Companies) gas gathering system in southeastern Lea County. This system includes five (5) compressor sites located between Jal and Eunice New Mexico.

Each compressor is natural gas driven and each utilizes a fuel scrubber to make the field gas usable for the operation of these engines. Each scrubber contains approximately 4-7 cu. yds. of a product called Sulfa Treat (MSDS attached). Sulfa Treat contains no hazardous materials as listed by the ACGIH, is non-toxic and stable. Also there are no special procedures for spills or disposal. This material is a solid waste.

Sid Richardson Gasoline Co. request permission to dispose of our Sulfa Treat material on site and on top of the ground. For your convenience, I have also included a copy of your approval letter to Xcel Gas Company (2-5-93).

If there are any further questions or if more information is needed, do not hesitate to call myself or Harold Hicks, Field Mgr. for Sid Richardson Gasoline Co. Lea County gas gathering system at (505)395-2116. Your help and prompt attention to this matter is greatly appreciated.

Robert Lee Gawlik

KAGIN Bee Mu

WTA Safety Mgr.

Enclosures

rely.

cc: Curtis Clark Harold Hicks Herb Harless

MATERIAL SAFETY DATA SHEET

I. PROD	DUCT IDENTIFICATION ——————
TRADE NAME (as labeled) SulfaTreat	MANUFACTURER'S NAME & ADDRESS The SulfaTreat Company 900 Roosevelt Pkwy, Suite 610 Chesterfield, Missouri 63017
Phone number for additional information	n: 1-800-726-7687 (314-532-2189)
Date prepared or revised:	6/21/94
II. HAZ	ARDOUS INGREDIENTS
Chemical Names CAS Numbers	Percent Exposure Limits in Air (units) ACGIH TLV OSHA PEL Other (specify)
None	
NA	
	HYSICAL PROPERTIES
Vapor density (air=1)	NA Melting point or range, °F NA
Specific gravity	2.4 Boiling point or range, °F NA
Solubility in water	0 Evaporation rate (butyl acetate=1) NA
Vapor pressure, mmHg at 20°C	0
Appearance and odor Black	k, Granular, Odorless
How to detect this substance (warning	properties of substance as a gas, vapor, dust, or mist) NA -
	. !!
Flash Point, °F (give method) NA	RE AND EXPLOSION ————————————————————————————————————
Flammable limits in air, volume %: NA	lower (LEL) upper (UEL)
	A water spray NA carbon dioxide NA other: NA dry chemical
Special firefighting procedures: Not	ne Unusual fire and explosion hazards: None

V. HEALTH HAZARD INFO	RMATION ————			
SYMPTOMS OF OVEREXPOSURE (for each potential route	of exposure)			
Inhaled: Over exposure to dust may irritate nasal pass	sage.			
Contact with skin or eyes: Contact with skin has no affect; could cause eye irritation similar to dust.				
Absorbed through skin: None.	Swallowed: None			
HEALTH EFFECTS OR RISKS FROM EXPOSURE: Expla				
if more space is needed. Acute: No acute effects to health are known. LD50 greater than 3990 mg/kg (highest practical test level). Not toxic.				
Chronic: No chronic effects to health are known.				
FIRST AID: EMERGENCY PROCEDURES	None. Swallowed: None.			
SUSPECTED CANCER AGENT? X NO - This produ	uct's ingredients are not found in the lists below.			
Federal OSHANTP	IARC			
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: None known. VI. REACTIVITY DATA				
Stability:X_Stable Conditions to avoid: NA Incompatibility Hazardous decomposition products (including combustion pro Hazardous polymerization:May occur	Unstable (materials to avoid): NA ducts): NoneX_Will not occur			
VII. SPILL, LEAK, AND DISPOSA	AL PROCEDURES			
Spill response procedures (include employee protection measures): No special pro	cedures required.			
Preparing wastes for disposal (container types, neutralization, etc.): No special procedures required.				
NOTE: Dispose of all wastes in accordance with federal, state and local regulations.				
VIII. SPECIAL HANDLING INFORMATION				
Ventilation and engineering controls: No special require Respiratory protection (type): NIOSH/MSHA approved Eye protection (type): None required. Gloves (special requirements of contaminated according and storage requirements: No special requirements of contaminated according measures during maintenance of contaminated according to the contaminated according to th	I dust mask (TC-21C-132) city material): None required. ts. nents. quirements.			

EVALUATION OF THE ENVIRONMENTAL CHARACTERISTICS OF Sulfatreat® AND ITS REACTION PRODUCTS USING EPA GUIDELINES FOR THE "IDENTIFICATION AND LISTING OF HAZARDOUS WASTE" MARCH, 1992

SUMMARY

SulfaTreat® is used in a patented process which consists of the use of a proprietary iron compound to fremove hydrogen sulfide from natural gas. As a result of the process, a solid residue is produced.

Laboratory evaluations were performed on SulfaTreat® and its air dried reaction products according to U.S. Environmental Protection Agency (EPA) test protocol cited in 40 CFR Subpart C (Section 261.20 through 261.24) of Section 3001 of the Resource Conservation and Recovery Act in the Federal Register, Volume 45, Number 98, on May 19, 1980, revised July 1,1989 and the Toxicity Characteristics Leaching Procedure (TCLP) effective September 2, 1990. Reacted SulfaTreat® was also analyzed according to extractable California title 22 methods using the calwet extraction procedure.

Evaluations included testing of the ignitability, corrosivity, reactivity, and the determination of the ipresence of heavy metals and pesticides as iprescribed in the regulations.

Also the oral and dermal toxicity and the aquatic 96 hour LC50 was determined and the agricultural characteristics were studied. All results showed SulfaTreat® and its reaction products to be safe for personnel and non-hazardous to the environment and effective for plant growth.

The work summarized herein was performed for Gas Sweetener Associates dba The SulfaTreat Company by the following companies and individuals:

EPA:

Gulf South Research Institute (GSRI)
Shilstone Testing Laboratories
Tim Sloan, Scientific Consultant
Dr. R. P. Wendt, Professor of Chemistry,
Loyola University
Thermo Analytical Inc.
SPL, Inc.

ORAL AND DERMAL TOXICITY:

Scientific Associates, Inc.

CORN GROWTH EXPERIMENTS:

Terry L. Smith, Ph.D., California Polytechnic State University, Soil Science Deparent.

II. EXPERIMENTAL RESULTS

A. Characteristics of ignitability

The residue is not a liquid. Flash point of wet sludge - Does not flash below 100°C. Flash point of dry sludge - 137°C.

1. Friction Testing

Friction testing was conducted by grinding the sample under standard temperature and pressure in a mortar and pestle and monitoring the temperature. There was neither Ignition nor any variation in the temperature or cause of fire during the course of the evaluation.

2. Flame Testing

Flame testing was conducted by 1) directly heating the sample with a Fischer burner flame and 2) indirectly heating the sample in a porcelain crucible. In both cases, the sample did not ignite but merely glowed with red color due to high temperature.

3. Exposure to Moisture Testing

Exposure to moisture testing was conducted by placing small amounts of the sample in water. The sample remained unchanged.

4. Oxidizer

By the definition stated in 49 CFR 173.141, the sample is not an oxidizer.

B. Characteristics of Corrosivity

1. pH Determination

The pH determination was made on a slurried sample in accordance with EPA 600/4.79-020. The initial pH reading was approximately 9.

2. Corrosion Rate Determination

The corrosion rate of the sample on 1020 steel was determined using a potentiodynamic polarization technique (ASTM G-5 specification). The studies were conducted using a Princeton Applied Research computerized Model 350 corrosion measurement system.

The results of the potentiodynamic polarization experiment with SAE 1020 steel showed that the general corrosion rate a 455C (130°F) of 5.8 mils (.15 mm) per year is substantially below the maximum 0.250 inches (6.25 mm) per year specified in the regulation.

C. Characteristics of Reactivity

1. Stability Testing

An aqueous suspension of the reacted SulfaTreat® monitored with a potentiometer from pH 1 to pH 12.5. The pH alterations were accomplished using dilute HCL and dilute NaOH. The material was stable and totally unreactive when exposed to these pH extremes without any evolution of gases, including H₂S and SO₂.

2. Classification as an Explosive Neither the material nor anything similar to this material is listed as a Forbidden, Class A, or Class B explosive in 49 CFR 173.51, 49 CFR 173.53, or 49 CFR 173.88.

D. Characteristics of EP Toxicity

Laboratory evaluations of the EP toxicity required a leaching step prior to analysis. The leaching step was carried out in accordance with the test methods described within the Federal Register, Volume 45, Number 98 on May 19, 1980 (Appendix III). 100 grams of the ground solid sample were placed in a mechanically stirred extractor with 1600 g of deionized water. The pH was maintained at 5 for a period of 24 hours by the addition of 0.5 N acetic acid at 30 minute intervals as needed. This solution was then filtered using a 0.45 millipore filter. The filtrate was analyzed for the presence of contaminants using the following EPA methods:

Contaminant	EPA Method
Mercury	245.1
Arsenic	206.1
Barium	208.1
Cadmium	213.1
Chromium	218.1
Lead	239.2
Selenium '	270.3
Silver	272.1
Mercury	245.1
TCLP	1311

The concentration of contaminants in the extract is far below the maximum allowable limits in all cases.

E. Oral and Dermal Toxicity

1. Unreacted SulfaTreat® (Oral Toxicity)
The acute oral LD50 of SulfaTreat® when administered as a 67% w/w aqueous suspension to male and female SASCO rats weighing 219 to 345 grams, was found to be greater than 39.91 g/kg of body weight.

As the term is defined in the Federal Hazardous Substances Act (FHSA), the product was found not to be a Toxic Substance.

- 2. Reacted SulfaTreat® (Oral Toxicity)
 Undiluted, reacted SulfaTreat® (semisolid phase) was administered orally to ten SASCO-SD rats (five male and five females), weighing 198 to 265 grams at a dosage level of 5.00 grams per kilogram of body weight. All of the animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substance Act (FHSA), the semisolid phase of the test material was found not to be a Toxic Substance.
- 3. Reacted SulfaTreat® (Dermal Toxicity) Undiluted, reacted SulfaTreat® (liquid phase) was applied for twenty-four hours to the abraded skin of five male and five female New Zealand White Rabbits, weighing 2.72 to 3.09 kilograms, at a dosage level of 2.00 grams per kilogram of body weight. All ten animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substances Act (FHSA), the liquid phase of the test material was found not to be a Toxic Substance.
- 4. Reacted SulfaTreat® (Aquatic Toxicity)
 Passed the aquatic 96 hour LC50 which was determined to be more than 500 milligrams per liter when measured in soft water with fathead minnows.

F. Other

The material is not listed (as a hazardous waste) in Subpart 261.30-261.33 of "Identification and Listing of Hazardous Wastes, "EPA-8700-12(FR), May 29, 1980.





ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR February 5, 1993

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

ANITA LOCKWOOD CABINET SECRETARY

Mr. Rick Boring 684-3849 Xcel Gas Company 6 Desta Drive Suite 5800 Midland, Texas 79705

Re: Sulfa Treat Waste

Dear Mr. Boring

Based on the Sulfa Treat Material Safety Data Sheet and supplemental information provided, the solid waste generated from the use of Sulfa Treat does not exhibit hazardous waste characteristics and may be disposed of on site pursuant to OCD solid waste disposal requirements or offsite at an OCD approved disposal facility.

If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely:

Roger C. Anderson

Environmental Bureau Chief

xc: Jerry Sexton- OCD Hobbs

OIL CONSERVATION DIVISION

September 25, 1995

CERTIFIED MAIL RETURN RECEIPT NO. Z-765-963-060

Mr. Robert Gawlik Sid Richardson Gasoline Co. 5030 East University, Suite C-104 Odessa, TX 79762

Re: Disposal Request - Sulfa Treat Waste

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) has received your request letter dated September 22, 1995, for approval to remove and dispose of spent Sulfa Treat from 5 compressor stations located in Lea county, with approximately 7 cubic yards per station. Based on the information provided, your disposal request is approved. The spent Sulfa Treat may be disposed of in a the same manner as the February 5, 1993 approval from Mr. Roger Anderson with the NMOCD. (see attached letter)

Please be advised that this approval does not relieve you of liability should your operation result in pollution of surface or groundwater or the environment.

If there are any questions on this matter, please contact me at (505) 827-7156.

Sincerely,

Patricio W. Sanchez, Petroleum Engineer

XC: Mr. Wayne Price and Mr. Jerry Sexton

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SEP 2 7 1995

WTA Odessa



Material Safety Data Sheet

Chevron HDAX LFG Gas Engine Oil

MSDS: 7046 Revision #: 2 Revision Date: 06/06/00

Click Product Test Data to search database.

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON HDAX Low Ash Gas Engine Oil and HDAX LFG

PRODUCT NUMBER(S): CPS232325 CPS232327 CPS232328 SYNONYM: CHEVRON HDAX Low Ash Gas Engine Oil SAE 15W-40 CHEVRON HDAX Low Ash Gas Engine Oil SAE 30 CHEVRON HDAX Low Ash Gas Engine Oil SAE 40 CHEVRON HDAX LFG Gas Engine Oil SAE 40

COMPANY IDENTIFICATION

EMERGENCY TELEPHONE NUMBERS

Lubricants and Specialty Products (510)231-0623 (International) 6001 Bollinger Canvon Rd. T3325/R10 San Ramon, CA 94583 www.chevron-lubricants.com

HEALTH (24 hr): (800)231-0623 or TRANSPORTATION (24 hr): CHEMTREC (800)424-9300 or (703)527~3887 Emergency Information Centers are located in U.S.A. Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request: (800)414-6737 email:lubemsds@chevron.com Environmental, Safety, & Health Info: (925) 842-5535 Product Information: (800) 582-3835

2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON HDAX Low Ash Gas Engine Oil and HDAX LFG

CONTAINING

COMPONENTS TUUOMA LIMIT/QTY AGENCY/TYPE

LUBRICATING BASE OIL SEVERELY REFINED PETROLEUM DISTILLATE

> 80.00% 5 mg/m3 (mist) ACGIH TWA 10 mg/m3 (mist) ACGIH STEL 5 mg/m3 (mist) OSHA PEL

The BASE OIL may be a mixture of any of the following: CAS 64741884, CAS 64741895, CAS 64741964, CAS 64741975, CAS 64742014, CAS 64742525, CAS 64742536, CAS 64742547, CAS 64742627, CAS 64742650, or CAS 72623837.

ADDITIVES INCLUDING THE FOLLOWING < 20.00%

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ZINC ALKARYL DITHIOPHOSPHATE Chemical Name: ZINC ALKARYL DITHIOPHOSPHATE

CASS4261675 < 0.50% NONE

NA

COMPOSITION COMMENT:

All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

IMMEDIATE HEALTH EFFECTS

EYE:

Not expected to cause prolonged or significant eye irritation.

SKIN

Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.

INGESTION:

Not expected to be harmful if swallowed.

INHALATION:

Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit.

4. FIRST AID MEASURES

EYE:

No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.

No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse. INGESTION:

No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person. INHALATION:

If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:

Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.

FLAMMABLE PROPERTIES:

FLASH POINT: (COC) 399F (204C) min.

AUTOIGNITION: NDA

FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA

EXTINGUISHING MEDIA:

CO2, Dry Chemical, Foam, Water Fog

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.

FIRE FIGHTING INSTRUCTIONS:

This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.

COMBUSTION PRODUCTS:

Normal combustion forms carbon dioxide and water vapor and may produce oxides of Ca, P, N, S, Mo, Zn. Incomplete combustion can produce carbon monoxide.

6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887 International Collect Calls Accepted ACCIDENTAL RELEASE MEASURES:

Stop the source of the leak or release. Clean up releases as soon as possible, observing precautions in Exposure Controls/Personal Protection. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

7. HANDLING AND STORAGE

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:

Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS

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Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT

EYE/FACE PROTECTION:

No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice. SKIN PROTECTION:

No special protective clothing is normally required. Where splashing is possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H> RESPIRATORY PROTECTION:

No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:

Dark amber liquid.

VAPOR PRESSURE:

NA

VAPOR DENSITY

NA

(AIR=1): BOILING POINT:

NDA

FREEZING POINT: MELTING POINT:

NDA

SOLUBILITY:

Soluble in hydrocarbon solvents; insoluble in water. 0.87 - 0.88@ 15.6/15.6C

SPECIFIC GRAVITY: EVAPORATION RATE:

VISCOSITY:

11.0 - 14.4 cSt @ 100C (min.)

PERCENT VOLATILE

(VOL):

NA

10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:

H2S may be released at high temperatures.

CHEMICAL STABILITY:

Stable.

CONDITIONS TO AVOID:

No data available.

INCOMPATIBILITY WITH OTHER MATERIALS:

May react with strong oxidizing agents, such as chlorates, nitrates,

peroxides, etc.

HAZARDOUS POLYMERIZATION:

Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:

The eye irritation hazard is based on an evaluation of the data for the components.

SKIN EFFECTS:

The skin irritation hazard is based on an evaluation of the data for the components.

ACUTE ORAL EFFECTS:

The acute oral toxicity is based on an evaluation of the data for the components.

ACUTE INHALATION EFFECTS:

The acute respiratory toxicity is based on an evaluation of the data for the components.

ADDITIONAL TOXICOLOGY INFORMATION:

This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

This product contains zinc alkaryl dithiophosphate which is similar in toxicity to zinc alkyl dithiophosphate (ZDDP). Several (ZDDPs) have been reported to have weak mutagenic activity in cultured mammalian cells but only at concentrations that were toxic to the test cells. We do not believe that there is any mutagenic risk to workers exposed to ZDDPs.

During use in engines, contamination of oil with low levels of cancer-causing combustion products occurs. Used motor oils have been shown to cause skin cancer in mice following repeated application and continuous exposure. Brief or intermittent skin contact with used motor oil is not expected to have serious effects in humans if the oil is thoroughly removed by washing with soap and water. See Chevron Material Safety Data Sheet No. 1793 for additional information on used motor oil.

12. ECOLOGICAL INFORMATION

ECOTOXICITY:

The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.

ENVIRONMENTAL FATE:

This material is not expected to be readily biodegradable.

13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations.

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Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE DOT HAZARD CLASS: NONE

DOT IDENTIFICATION NUMBER: NONE

DOT PACKING GROUP: N/A

ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT.

ADR/RID Hazard class - Not applicable.

15. REGULATORY INFORMATION

SARA 311 CATEGORIES:

- Immediate (Acute) Health Effects:
 Delayed (Chronic) Health Effects: NO
- 3. Fire Hazard:
- 4. Sudden Release of Pressure Hazard: NO
- 5. Reactivity Hazard:

REGULATORY LISTS SEARCHED:

01=SARA 313 02=MASS RTK	11=NJ RTK	22=TSCA Sect 5(a)(2)
	12=CERCLA 302.4 13=MN RTK	23=TSCA Sect 6 24=TSCA Sect 12(b)
	14=ACGIH TWA	25=TSCA Sect 8(a)
05=CA Prop 65-Repro Tox	15=ACGIH STEL	26=TSCA Sect 8(d)
06=IARC Group 1	16=ACGIH Calc TLV	27=TSCA Sect 4(a)
07=IARC Group 2A	17=OSHA PEL	28=Canadian WHMIS
08=IARC Group 2B	18=DOT Marine Pollutant	29=OSHA CEILING
09=SARA 302/304	19=Chevron TWA	30=Chevron STEL
10=PA RTK	20=EPA Carcinogen	

The following components of this material are found on the regulatory lists indicated.

ZINC ALKARYL DITHIOPHOSPHATE is found on lists: 01,11,

SEVERELY REFINED PETROLEUM DISTILLATE

is found on lists: 14,15,17,

EU RISK AND SAFETY LABEL PHRASES:

R53: May cause long-term adverse effects in the aquatic environment.

NEW JERSEY RTK CLASSIFICATION:

Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows: PETROLEUM OIL

New Jersey Right-To-Know trade secret registry number 01154100-5031P New Jersey Right-To-Know trade secret registry number 01154100-5063P WHMIS CLASSIFICATION:

This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0; HMIS RATINGS: Health 1; Flammability 1; Reactivity 0; (0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or

http://library.cbest.chevron.com/lub.../b60916f1705543bb88256628005d52ea?OpenDocumen 2/21/2001

published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:

This revision updates Sections 1, 2, 5, 9, 12, and 15.

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value

TWA - Time Weighted Average

STEL - Short-term Exposure Limit TPQ - Threshold Planning Quantity

- Reportable Quantity

PEL - Permissible Exposure Limit

- Ceiling Limit

CAS - Chemical Abstract Service Number

A1-5 - Appendix A Categories

() - Change Has Been ProposedNA - Not Applicable

NDA - No Data Available

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

*********** THIS IS THE LAST PAGE OF THIS MSDS ***********



Material Safety Data Sheet

Chevron HDAX NG Screw Compressor Oil

MSDS: 6852 Revision #: 2 Revision Date: 10/17/00

Click Product Test Data to search database.

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON HDAX NG Screw Compressor Oil

PRODUCT NUMBER(S): CPS255204 CPS255205

SYNONYM: CHEVRON HDAX NG Screw Compressor Oil ISO 150 CHEVRON HDAX NG Screw Compressor Oil ISO 68

COMPANY IDENTIFICATION

EMERGENCY TELEPHONE NUMBERS

Chevron Products Company Lubricants and Specialty Products 6001 Bollinger Canyon Rd., T3325/B10 San Ramon, CA 94583 www.chevron-lubricants.com

HEALTH (24 hr): (800)231-0623 or (510)231-0623 (International) TRANSPORTATION (24 hr): CHEMTREC (800) 424-9300 or (703) 527-3887 Emergency Information Centers are located in U.S.A. Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request: (800)414-6737 email:lubemsds@chevron.com Environmental, Safety, & Health Info: (925) 842-5535 Product Information: (800) 582-3835

2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON HDAX NG Screw Compressor Oil

CONTAINING

COMPONENTS AMOUNT LIMIT/QTY

AGENCY/TYPE

HYDROTREATED DIST., HVY PARA

Chemical Name: DISTILLATES, HYDROTREATED HEAVY PARAFFINIC

CAS64742547 > 80.00%

5 mg/m3 (mist) ACGIH TWA

10 mg/m3 (mist) ACGIH STEL

5 mg/m3 (mist)

OSHA PEL

ADDITIVES

< 20.00%

COMPOSITION COMMENT:

All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

IMMEDIATE HEALTH EFFECTS

EYE:

Not expected to cause prolonged or significant eye irritation.

SKIN:

Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.

INGESTION:

Not expected to be harmful if swallowed.

INHALATION:

Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit.

.4. FIRST AID MEASURES

EYE:

No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.

SKIN:

No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse. INGESTION:

No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person. INHALATION:

If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:

Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.

FLAMMABLE PROPERTIES:

FLASH POINT: (COC) 419F (215C) Min.

AUTOIGNITION: NDA

FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA EXTINGUISHING MEDIA:

CO2, Dry Chemical, Foam, Water Fog

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.

FIRE FIGHTING INSTRUCTIONS:

This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space

without proper protective equipment, including self-contained breathing apparatus.

COMBUSTION PRODUCTS:

Normal combustion forms carbon dioxide and water vapor and may produce oxides of nitrogen and phosphorus. Incomplete combustion can produce carbon monoxide.

6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887 International Collect Calls Accepted

ACCIDENTAL RELEASE MEASURES:

Stop the source of the leak or release. Clean up releases as soon as possible. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

7. HANDLING AND STORAGE

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:

Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS

Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT

EYE/FACE PROTECTION:

No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice. SKIN PROTECTION:

No special protective clothing is normally required. Where splashing is

possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H> RESPIRATORY PROTECTION:

No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:

Liquid.

pH:

NA

VAPOR PRESSURE:

NA

VAPOR DENSITY

NA

(AIR=1): BOILING POINT:

NDA

FREEZING POINT:

NDA

MELTING POINT:

NA

SOLUBILITY:

Soluble in hydrocarbon solvents; insoluble in water.

SPECIFIC GRAVITY: 0.87 - 0.88 @ 15.6/15.6/C

EVAPORATION RATE: NA

VISCOSITY:

61.2 - 135 cSt @ 40C (Min.)

PERCENT VOLATILE

(VOL):

NA

10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:

No data available.

CHEMICAL STABILITY:

Stable.

CONDITIONS TO AVOID:

No data available.

INCOMPATIBILITY WITH OTHER MATERIALS:

May react with strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.

HAZARDOUS POLYMERIZATION:

Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:

The eye irritation hazard is based on data for a similar material. SKIN EFFECTS:

The skin irritation hazard is based on data for a similar material. ACUTE ORAL EFFECTS:

The acute oral toxicity is based on data for a similar material. ACUTE INHALATION EFFECTS:

The acute respiratory toxicity is based on data for a similar material. ADDITIONAL TOXICOLOGY INFORMATION:

This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under

the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

12. ECOLOGICAL INFORMATION

ECOTOXICITY:

The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.

ENVIRONMENTAL FATE:

This material is not expected to be readily biodegradable.

13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations, Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE DOT HAZARD CLASS: NONE

DOT IDENTIFICATION NUMBER: NONE

DOT PACKING GROUP: N/A

ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT. ADR/RID Hazard class - Not applicable.

15. REGULATORY INFORMATION

SARA 311 CATEGORIES: Immediate (Acute) Health Effects: 2. Delayed (Chronic) Health Effects: NO

3. Fire Hazard:

4. Sudden Release of Pressure Hazard: NO NO

5. Reactivity Hazard:

REGULATORY LISTS SEARCHED:

01=SARA 313 11=NJ RTK 22=TSCA Sect 5(a)(2) 02=MASS RTK 12=CERCLA 302.4 23=TSCA Sect 6 03=NTP Carcinogen 13=MN RTK 24=TSCA Sect 12(b) 04=CA Prop 65-Carcin 14=ACGIH TWA 25=TSCA Sect 8(a) 05=CA Prop 65-Repro Tox 15=ACGIH STEL 26=TSCA Sect 8(d) 06=IARC Group 1 16=ACGIH Calc TLV 27=TSCA Sect 4(a)

07=IARC Group 2A 08=IARC Group 2B 09=SARA 302/304 10=PA RTK

17=OSHA PEL 18=DOT Marine Pollutant 29=OSHA CEILING 19=Chevron TWA 20=EPA Carcinogen

28=Canadian WHMIS 30=Chevron STEL

The following components of this material are found on the regulatory lists indicated.

DISTILLATES, HYDROTREATED HEAVY PARAFFINIC is found on lists: 14,15,17,

EU RISK AND SAFETY LABEL PHRASES:

R53: May cause long-term adverse effects in the aquatic environment.

NEW JERSEY RTK CLASSIFICATION:

Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows: PETROLEUM OIL

WHMIS CLASSIFICATION:

This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0; HMIS RATINGS: Health 1; Flammability 1; Reactivity 0; (0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:

This revision updates Sections 1, 5, 8, 9, 12, and 15.

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value TWA - Time Weighted Average

STEL - Short-term Exposure Limit TPQ - Threshold Planning Quantity

RQ - Reportable Quantity PEL - Permissible Exposure Limit

CAS - Chemical Abstract Service Number 1988 - Chemical Abstrac

- Ceiling Limit

CAS - Chemical Abstract Service Number

A1-5 - Appendix A Categories

() - Change Has Been Proposed

NDA - No Data Available

NA - Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (2400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination

of the suitability of the material for his particular purpose. **********

THIS IS THE LAST PAGE OF THIS MSDS

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON HDAX NG Screw Compressor Oil

PRODUCT NUMBER(S): CPS255204 CPS255205 CPS259135
SYNONYM: CHEVRON HDAX NG Screw Compressor Oil ISO 100
CHEVRON HDAX NG Screw Compressor Oil ISO 150
CHEVRON HDAX NG Screw Compressor Oil ISO 68

COMPANY IDENTIFICATION

EMERGENCY TELEPHONE NUMBERS

Chevron Products Company Lubricants and Specialty Products 6001 Bollinger Canyon Rd., T3325/B10 San Ramon, CA 94583 www.chevron-lubricants.com HEALTH (24 hr): (800)231-0623 or (510)231-0623 (International) TRANSPORTATION (24 hr): CHEMTREC (800)424-9300 or (703)527-3887 Emergency Information Centers are located in U.S.A. Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request: (800) 414-6737 email: lubemsds@chevron.com Environmental, Safety, & Health Info: (925) 842-5535 Product Information: (800) 582-3835

2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON HDAX NG Screw Compressor Oil

CONTAINING

COMPONENTS AMOUNT LIMIT/QTY AGENCY/TYPE

HYDROTREATED DIST., HVY PARA

Chemical Name: DISTILLATES, HYDROTREATED HEAVY PARAFFINIC

CAS64742547 > 80.00% 5 mg/m3 (mist)

> 80.00% 5 mg/m3 (mist) ACGIH TWA 10 mg/m3 (mist) ACGIH STEL 5 mg/m3 (mist) OSHA PEL

ADDITIVES

< 20.00%

COMPOSITION COMMENT:

All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

IMMEDIATE HEALTH EFFECTS

EYE:

Not expected to cause prolonged or significant eye irritation. SKIN:

Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.

INGESTION:

Not expected to be harmful if swallowed.

INHALATION:

Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit.

4. FIRST AID MEASURES

EYE:

No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.

SKIN:

No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse. INGESTION:

No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person. INHALATION:

If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:

Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.

FLAMMABLE PROPERTIES:

FLASH POINT: (COC) 419F (215C) Min.

AUTOIGNITION: NDA

FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA

EXTINGUISHING MEDIA:

CO2, Dry Chemical, Foam, Water Fog

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.

FIRE FIGHTING INSTRUCTIONS:

This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.

COMBUSTION PRODUCTS:

Normal combustion forms carbon dioxide and water vapor and may produce oxides of nitrogen and phosphorus. Incomplete combustion can produce carbon monoxide.

6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887 International Collect Calls Accepted

ACCIDENTAL RELEASE MEASURES:

Stop the source of the leak or release. Clean up releases as soon as possible. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

7. HANDLING AND STORAGE

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:

Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS

Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT

EYE/FACE PROTECTION:

No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice. SKIN PROTECTION:

No special protective clothing is normally required. Where splashing is possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H> RESPIRATORY PROTECTION:

No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:

Liquid.

pH: NA

VAPOR PRESSURE: NA

VAPOR DENSITY

(AIR=1): NA
BOILING POINT: NDA
FREEZING POINT: NDA
MELTING POINT: NA

MELTING POINT: NA

SOLUBILITY: Soluble in hydrocarbon solvents; insoluble in water.

SPECIFIC GRAVITY: 0.87 - 0.88 @ 15.6/15.6/C

EVAPORATION RATE: NA

VISCOSITY: 61.2 - 135 cSt @ 40C (Min.)

PERCENT VOLATILE

(VOL):

NA

10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:

No data available.

CHEMICAL STABILITY:

Stable.

CONDITIONS TO AVOID:

No data available.

INCOMPATIBILITY WITH OTHER MATERIALS:

May react with strong oxidizing agents, such as chlorates, nitrates,

peroxides, etc.

HAZARDOUS POLYMERIZATION:

Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:

The eye irritation hazard is based on data for a similar material. SKIN EFFECTS:

The skin irritation hazard is based on data for a similar material. ACUTE ORAL EFFECTS:

The acute oral toxicity is based on data for a similar material.

ACUTE INHALATION EFFECTS:

The acute respiratory toxicity is based on data for a similar material. ADDITIONAL TOXICOLOGY INFORMATION:

This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

12. ECOLOGICAL INFORMATION

ECOTOXICITY:

The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.

ENVIRONMENTAL FATE:

This material is not expected to be readily biodegradable.

13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE DOT HAZARD CLASS: NONE

DOT IDENTIFICATION NUMBER: NONE

DOT PACKING GROUP: N/A

ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT.

ADR/RID Hazard class - Not applicable.

15. REGULATORY INFORMATION

SARA 311 CATEGOR	RTES:
------------------	-------

- Immediate (Acute) Health Effects: NO
- 2. Delayed (Chronic) Health Effects: NO
- 3. Fire Hazard: NO
- 4. Sudden Release of Pressure Hazard: NO
- 5. Reactivity Hazard: NC

REGULATORY LISTS SEARCHED:

The following components of this material are found on the regulatory lists indicated.

DISTILLATES, HYDROTREATED HEAVY PARAFFINIC is found on lists: 14,15,17,

EU RISK AND SAFETY LABEL PHRASES:

R53: May cause long-term adverse effects in the aquatic environment.

NEW JERSEY RTK CLASSIFICATION:

Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows:

PETROLEUM OIL WHMIS CLASSIFICATION:

This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0; HMIS RATINGS: Health 1; Flammability 1; Reactivity 0; (0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:

Changes have been made in Section 1 (Chemical Product and Company

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value TWA - Time Weighted Average

1 460 17 01 17

STEL - Short-term Exposure Limit

RQ - Reportable Quantity

C - Ceiling Limit

TPQ - Threshold Planning Quantity

PEL - Permissible Exposure Limit

CAS - Chemical Abstract Service Number

() - Change Has Been Proposed

Al-5 - Appendix A Categories NDA - No Data Available

NA - Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804 **********

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

*********** THIS IS THE LAST PAGE OF THIS MSDS

Material Safety Data Sheet

Section 1. Ch	emical Product and Company Identification		
Common Name	Coastalguard 50%	Code	37172
		MSDS#	Not available.
Supplier .	COASTAL CHEMICAL CO.,L.L.C. 3520 Veterans Memorial Drive	Validation Date	1/9/97
	ABBEVILLE, LA 70510 318-893-3862	Print Date	7/13/99
Synonym	Not available.	in case of Tra	ansportation Emergency Call
Trade name	Not available.	Emergency Cl	HEMTREC 800-424-9300
Material Uses	Industrial applications: Coolant and antifreeze.	Jo	her Information Call e Hudman 3-477-6675
Manufacturer	Coastal Chemical Co., Inc. 3520 Veterans Memorial Drive Abbeville, La.		

Section 2. Composition and I	nformation or	n Ingredien	ts	
Name	CAS#	% by Weight	TLV/PEL	LC,u/LD,a
Ethylene Glycol	107-21-1	50	(mg/m³)	ORAL (LD50): Acute: 4700 mg/kg [Rat]. DERMAL (LD50): Acute: 9530 mg/kg [Rabbit.].

Section 3. Hazards Id	dentification '
Emergency Overview	CAUTIONI
	HARMFUL IF INHALED. HARMFUL IF SWALLOWED. MAY CAUSE EYE IRRITATION. Repeated or prolonged exposure to the substance can produce kidney damage.
Routes of Entry	Ingestion.
Potential Acute Health Effects	Very dangerous in case of ingestion. Very slightly to slightly dangerous in case of skin contact (irritant, sensitizer, permeator), of eye contact (irritant), of inhalation. This product may irritate eyes and skin upon contact.
Potential Chronic Health Effects	CARCINOGENIC EFFECTS: Not available. MUTAGENIC EFFECTS: Not available. TERATOGENIC EFFECTS: Not available. The substance is toxic to kidneys, the nervous system, the reproductive system, liver. Repeated or prolonged exposure to the substance can produce target organs damage.

Section 4. First Aid	Measures
Eye Contact	IMMEDIATELY flush eyes with running water for at least 15 minutes, keeping eyelids open. COLD water may be used.
Skin Contact	If the chemical got onto the clothed portion of the body, remove the contaminated clothes as quickly as possible, protecting your own hands and body. Place the victim under a deluge shower. If the chemical touches the victim's exposed skin, such as the hands: Gently and thoroughly wash the contaminated skin with running water and non-abrasive soap. Be particularly careful to clean folds, crevices, creases and groin. COLD water may be used. Cover the irritated skin with an emollient. If irritation persists, seek medical attention. Wash contaminated clothing before reusing.
Hazardous Skin Contact	No additional information.
Inhalation	Allow the victim to rest in a well ventilated area. Seek immediate medical attention.
Hazardous Inhalation	No additional information.
Ingestion	DO NOT induce vomiting. Have conscious person drink several glasses of water or milk. Seek immediate medical attention.

Coastalguard 50%	Page Number: 2
azardous Ingestion	DO NOT in vomiting. Examine the lips and mouth to ascertain whether the tissues are damaged, a possible indication that the toxic material was ingested; the absence of such signs, however, is not conclusive. Loosen tight clothing such as a collar, tie, belt or waistband. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek medical attention.
Section 5. Fire and Ex	oplosion Data
lammability of the Product	Combustible.
Auto-Ignition Temperature	The lowest known value is 398°C (748.4°F) (Ethylene Gly∞l).
Clash Points	The lowest known value is CLOSED CUP: 116°C (240.8°F) OPEN CUP: 232°C (240.8°F) (Cleveland) (Ethylene Glycol)
lammable Limits	The greatest known range is LOWER: 3.2% UPPER: 15.3% (Ethylene Glycol)
Products of Combustion	These products are carbon oxides (CO, CO2).
Fire Hazards in Presence of Various Substances	Very slightly to slightly flammable in presence of open flames and sparks, of heat.
Explosion Hazards in Presence of Various Substances	Risks of explosion of the product in presence of mechanical impact: Not available. Risks of explosion of the product in presence of static discharge; Not available. No specific information is available in our database regarding the product's risks of explosion in the presence of various materials.
Fire Fighting Media and Instructions	SMALL FIRE: Use DRY chemicals, CO2, water spray or foam. LARGE FIRE: Use water spray, fog or foam. DO NOT use water jet.
Special Remarks on Fire Hazards	When heated to decomposition, it emits acrid smoke and irritating fumes. (Ethylene Gly∞l)
Special Remarks on Explosion Hazards	No additional remark.
Section 6. Accidental	Release Measures
Small Spill	Dilute with water and mop up, or absorb with an inert DRY material and place in an appropriate waste dispose container. Finish deaning by spreading water on the contaminated surface and dispose of according to local an regional authority requirements.
Large Spill	Combustible material. Keep away from heat. Keep away from sources of ignition. Stop leak if without risk. Finish deaning by spreadin water on the contaminated surface and allow to evacuate through the sanitary system.
Section 7. Handling	and Storage
Handling	Not available.
Storage	Keep container dry. Keep in a cool place. Ground all equipment containing material. Keep container tight closed. Keep in a cool, well-ventilated place. Combustible materials should be stored away from extreme he and away from strong oxidizing agents.
Section 8. Exposure	Controls/Personal Protection
Engineering Controls	Provide exhaust ventilation or other engeneering controls to keep the airborne concentrations of vapors belotheir respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the wor station location.
Personal Protection	Safety glasses. Lab coat. Gloves (impervious). Wear appropriate respirator when ventilation is inadequate.

Personal Protection in Case of a Splash goggles. Full suit. Boots. Gloves. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits

CEIL: 39.4 (ppm) CEIL: 100 (mg/m³)

CAS#

107-21-1

Chemical Name or Product Name

1.2-Ethanediol

No additional remark.

Special Remarks on other Toxic Exposure can cause nausea, headache and vomiting. (Ethylene Glycol)

Special Remarks on

Effects on Humans

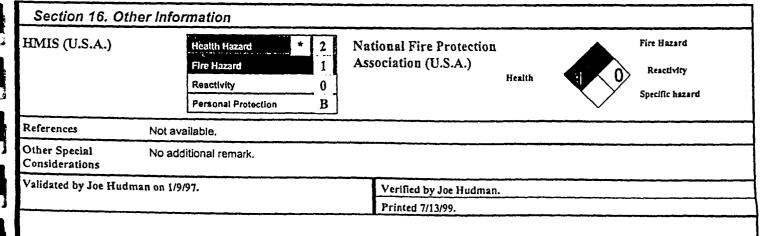
Chronic Effects on Humans

Section 13. Disposal Considerations

Waste Disposal

Section 14. Transpor	rt Information
Propper Shipping Name	Drums - Not Regulated Bulk (> 1000 gals.) - Regulated Other Regulated Substances, liquid, n.o.s. (Ethylene Glycol)
DOT Classification	DOT CLASS 9: Miscellaneous hazardous material.
DOT Identification Number	NA3082
Packing Group	III
Hazardous Substances Reportable Quantity (kg)	4535.9
Special Provisions for Transport	No additional remark.

Section 15. Regul	atory Information	
Federal and State Regulations	The following produc	ct(s) is (are) listed on SARA 313: , Ethylene Glycol ct(s) is (are) listed by the State of Massachusetts: Ethylene Glycol ct(s) is (are) listed on TSCA: Ethylene Glycol
Other Classifications	WHMIS (Canada)	WHMIS CLASS D-2A: Material causing other toxic effects (VERY TOXIC).
	DSCL (EEC)	Not controlled under DSCL (Europe).



Coastalguard 50%

Page Number: 5

Transportation Emergency Call CHEMTREC 800-424-9300
Other Information Cali
Joe Hudman

713-477-6675

Notice to Reader

e the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatoever for the accuracy or completeness of the information cantained weeks. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

February 9, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL RETURN RECEIPT NO. 5051 0128

Mr. Robert L. Gawlik Sid Richardson Gasoline Co. 201 Main Street, Suite 3000 Fort Worth, Texas 76102

RE: Discharge Plan Renewal Notice for the Sid Richardson Gasoline Co. Facilities

Dear Mr. Gawlik:

Sid Richardson Gasoline Co. has the following discharge plans which expire during the current calendar year.

GW-243 expires 5/30/2001 – House Compressor Station
GW-259 expires 9/18/2001 – C-1 Compressor Station
GW-260 expires 9/18/2001 – C-2 Compressor Station
GW-261 expires 9/18/2001 – C-3 Compressor Station
GW-262 expires 9/18/2001 – C-4 Compressor Station
GW-270 expires 12/18/2001 – West Eunice Compressor Station
GW-269 expires 12/18/2001 – Boyd 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 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00. After January 15, 2001 renewal discharge plans require a flat fee equal to the flat fee schedule for gas processing facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114.

Mr. Robert L. Gawlik February 9, 2001 Page 2

A copy of the revised fee schedule is included for your assistance. The \$100.00 filing fee is to be submitted with each 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 complete copy of the regulations is also available on NMED's website at www.nmenv.state.nm.us).

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

Sincerely,

Roger C. Anderson

Oil Conservation Division

cc: OCD Hobbs District Office

MEMORANDUM OF MEETING OR CONVERSATION

X Telephone	Personal	Time 8	3:20	A M	Date 12	/16/96	
•	Originating Party				<u>Othe</u>	r Parties	
Pat Sanche	- OCD			Russ	Boyd -	Sid Ric	chardson
				915-	367-28	67	
Subject Wash	water Cha	vacteri	20 L'	<u> </u>	D.P. A	provals	for
6W-269, (ew-270	(6W-	-243,	259,2	60, 261,	262,2	69, 270)
Discussion Mr.	Bayd said	they	hac	l rec	ieved	the 1e	Her
dated Decer	mber 12, 191	1b (V	<u> 1A</u>	FAX)	Fram	UCD	(Reyer
Anderson)	and were	in	the	proc	1855 V	f Sam	pling/
characterizing	the "wash.	vater"	pe-	- the	e och	letter	5 direction
Alsa, Mr.	Boyd sai	d th	nat	upar	obta	ining to	he sample
analysis of	the nate	/ 5	1 d R	Lichard	156m	wah 12	Submit
the analysis	and a	mma	ا ل	SW- 8	243, 25	9, 261	261, conc
the analysis GW-262.	I lot	Mr.	Boyd	know	- that	· the	12/12/96
letter from	UCD woul	d be	par	f cf	the	approv	al for
6w-269,				,			
Conclusions or Agr	eements					· · · · · · · · · · · · · · · · · · ·	
Mr. Boy	id will	Submi:	t 1	the in	formati	in out	-lined
above 45	scan as po	ossible	•	OCD	mill	proba	bly
issue the		don	9000	avals	for	6h-26	4 5
O == 4	(/ *.	196.					
Distribution FILE SW-243, GW-2	59,6W-260, 61	v-261,	Sigr	ned $\mathcal{J}_{\mathcal{G}}$	Asig b	110	
6n-262, 6n-2	69, GW-270,	,	1				7
WAYNE PRICE	= - NCD Habbs.						

December 12, 1996

CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-721

Mr. Herb Harless, CSP
Manager, Environmental Health & Safety
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102

RE: Non-Exempt Compressor Wash Water Sid Richardson Compressor Stations Lea County, New Mexico

Dear Mr. Harless:

The Oil Conservation Division (OCD) has received and reviewed the following submittals from Sid Richardson Gasoline Company: the letter dated December 4, 1996, the letter dated December 10, 1996 (via Fax), and the letter dated December 11, 1996 (via Fax) requesting that the OCD allow Sid Richardson Gasoline Inc. to dispose of the "wash water" offsite at an OCD permitted surface disposal facility. The effluent is generated at the following Sid Richardson Gasoline Company discharge plan facilities:

- 1. GW-243 "House Compressor Sation"
- 2. GW-259 "C-1 Compressor Station"
- 3. GW-260 "C-2 Compressor Station"
- 4. GW-261 "C-3 Compressor Station"
- 5. GW-262 "C-4 Compressor Station"
- 6. GW-269 "Boyd Compressor Station"
- 7. GW-270 "West Eunice Compressor Station"

Sid Richardson Gasoline Company has certified in writing that based on process knowledge and MSD sheets for new lube oil and the detergent, and used lube oil analysis that the wash water generated from these sites would be the same in terms of regulatory status. Sid Richardson Gasoline Company has certified that the waste water does not contain any hazardous constituents or characteristics per 40 CFR Part 261.

The OCD accepts this certification by Sid Richardson Gasoline Company for the seven (7) above listed compressor stations provided that one sample be taken of the "used wash water." The sample will be analyzed for Reactivity, Corrosivity, Ignitability, and TCLP - metals, semi-volatile, and volatile as defined in 40 CFR Part 261, prior to offsite disposal of the first load at an OCD Rule 711 permitted waste management facility.

Mr. Herb Harless Sid Richardson Gasoline Co. Wash Water - Lea County December 12, 1996 Page 2

Note (1): Since this waste is non-exempt the OCD Rule 711 facility will be required to file a form OCD C-138 prior to acceptance of this waste wash water.

Note (2): The OCD Rule 711 facility may upon its own discretion choose to accept or not accept the waste water based on their operating procedures for accepting non-exempt/non-hazardous oil field waste(s).

Note (3.) This approval is only valid for the seven (7) above listed facilities, and is only good for the term of the discharge plan and must be renewed along with the discharge plan upon expiration. Also, should any change in the process occur this approval is invalidated.

OCD approval does not relieve Sid Richardson Gasoline Company liability associated with the generation, collection, transportation, and disposal of this waste. OCD approval does not relieve Sid Richardson Gasoline Inc. of responsibility for compliance with any other federal, state, or other local laws and/or regulations that may apply.

If Sid Richardson Gasoline Inc. has any questions regarding this matter please feel free to call me at (505)-827-7152 or Pat Sanchez at (505)-827-7156.

Sincerely.

Roger C. Anderson

Bureau Chief

Environmental Bureau - OCD

RCA/pws

xc:

Mr. Wayne Price - OCD Hobbs Office.

Mr. Ross Boyd, Area Engineer Sid Richardson Gasoline Co.

Cert. Mail No. P-288-258-722

SID RICHARDSON GASOLINE CO.

201 MAIN STREET, SUITE 3000 FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK ENVIRONMENTAL HEALTH & SAFETY ASSOCIATE

September 27, 1996 RLG-58-96 817/390-8600

14

CERTIFIED MAIL - Z 378 134 273

Mr. William J. LeMay, Director New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505 BECEIVED

SEP 3 0 1996

Environa entel 35 cau Oil Conservation Division

Re: D

Discharge Plans GW-259

GW-260, GW-261 and GW-262

Dear Mr. LeMay:

Attached are signed copies of the conditions of approval for the referenced compressor sites as requested.

If there are any further questions or if more information should be required, please do not hesitate to call.

Sincerely.

Robert L. Gawlik

Environmental Health & Safety Associate

RLG:gad Attachments

cc:

C. P. O'Farrell/H. Harless - w/o atts.

W. J. Farley - w/atts.

K. C. Clark - w/atts.

H. E. Hicks - w/atts.

W. Price (OCD - Hobbs, NM) - w/atts.

Affidavit of Publication

STATE OF NEW ME	XICO)	
) ss.	
COUNTY OF LEA)	
Joyce Clemens	being	first	duly	

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.

ing 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
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entire issue of THE LOVINGTON DAILY LEADER and
not in any supplement thereof, Sheexaaaxxxxxxxxxxxxxxxx
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LEGAL NOTICE NOTICE OF PUBLICATION STATUTE NEW MEXICO ENER 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 has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-259)-Sid Richardson Gasoline Company, Mr. Wayne Farley, 210 N. Main Street, Fort Worth, Texas 76102, has submitted a Discharge Plan Application for the C-1 Compressor Station located in the SE/4 NE/4 of Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New MExico. Approximately 3 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 132 feet with a total dissolved solids concentration of approximately 1,100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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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 applications may be viewed at the above address between 8:00

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

P 288 258 628

September 18, 1996

CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-628

Mr. Robert L. Gawlik
Environmental Health & Safety Associate
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102

RE: Approval of Discharge Plan GW-262

C-4 Compressor Station Lea County, New Mexico

Dear Mr. Gawlik:

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided

	Do not use for International Mail (See reverse				
Sid Rich Gawlik					
	Street & Number	APR.			
	Post Office, State, & ZIP Code				
	Postage	\$			
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The discharge plan GW-262 for the Sid Richardson Gasoline Co. C-4 Compressor Station located in SW/4 SE/4, Section 9, Township 22 South, Range 36 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 July 23, 1996, and this approval letter with conditions of approval from OCD dated September 18, 1996. 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 five working days of receipt of this letter.

The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve **Sid Richardson Gasoline Co.** of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

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

Mr. Robert Gawlik Sid Richardson Gasoline Co. GW-262 Page 2 September 18, 1996

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 Sid Richardson Gasoline Co. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. This approval will expire September 18, 2001, and an application for renewal should be submitted in ample time before that date. 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 approval.

The discharge plan for the Sid Richardson Gasoline Co. C-4 Compressor Station GW-262 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars (\$50). As stated in WQCC 3114 compressor stations below 1,000 horsepower do not require a flat fee.

The \$50 filing fee has been received by the OCD.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J./LeMay

Director/

WJL/pws Attachment

xc: Mr. Wayne Price

Mr. Robert Gawlik Sid Richardson Gasoline Co. GW-262 Page 3 September 18, 1996

ATTACHMENT TO DISCHARGE PLAN GW-262 Sid Richarson Gasoline Co. C-4 Compressor Station DISCHARGE PLAN REQUIREMENTS

(September 18, 1996)

- 1. <u>Sid Richardson Gasoline Co. Commitments:</u> Sid Richardson Gasoline Co. will abide by all commitments submitted in the Application dated July 23, 1996, and this Discharge Plan Approval from OCD dated September 18, 1996.
- 2. **Drum Storage**: All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. 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 should also be stored on an impermeable pad and curb type containment.
- 3. <u>Process Areas</u>: 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.
- 4. <u>Above Ground Tanks</u>: 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.
- 5. <u>Above Ground Saddle Tanks</u>: 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.
- 6. <u>Tank Labeling</u>: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
- 7. <u>Below Grade Tanks/Sumps</u>: 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 that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

Mr. Robert Gawlik Sid Richardson Gasoline Co. GW-262 Page 4 September 18, 1996

- 8. <u>Underground Process/Wastewater Lines</u>: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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.
- 9. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

- 10. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Hobbs OCD District Office at (505)-393-6161.
- 11. **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.
- 12. <u>Closure:</u> 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.

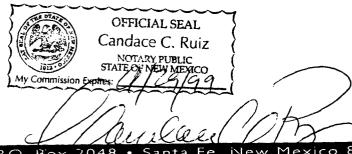
13.	New Mexico Oil Conservation Division Inspections:	Additional requirements may be
placed	on the facility based upon results from New Mexico Oil Co	onservation Division inspections.

14.	Conditions accepted by:				
	- •	Company Representative	Date		
		Title			

The Santa Fe New Mexican

Since 1849. We Read You.

AD NUMBER: 533127 ACCOUNT:56689 NEW MEXICO OIL CONSERVATION ATTN: SALLY MARTINEZ LEGAL NO: 60162 P.O. #:96199002997 2040 S. PACHECO ST. SANTA FE, NM 87505 310 LINES once at \$ 124.00 5.25 Affidavits: 8.08 Tax: ୍ **- 8** (୧୧୫ -AFFIDAVIT OF PUBLICATION STATE OF NEW MEXICO COUNTY OF SANTA FE I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #60162 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the AUGUST 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit. /s/ LEGAL ADVERTISEMENT REPRESENTATIVE Subscribed and sworn to before me on this 5th day of AUGUST A.D., 1996



NOTICE OF PUBLICATION

STATE OF NEW MEXICO

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 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 30th day of July 1996.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION WILLIAM J. LEMAY, Director Lagal #60162 Pub. August 5, 1994



July 26, 1996

Roger Anderson Environmental Bureau Chief Oil Conservation Division 2040 South Pacheco Street Santa F., INM 87505

Subject: Groundwater Discharge Plan Applications, C-1 Compressor Station, C-2 Compressor Station, C-3 Compressor Station, C-4 Compressor Station, Lea County, New Mexico

Gw-259 260 261 262

Dear Mr. Anderson

On behalf of my client, Sid Richardson Gasoline Company, I am enclosing two copies of the subject discharge plan applications and a check for the application fees. If you have any questions, please don't hesitate to contact me or Ross Boyd at Sid Richardson Gasoline Company at (915) 367-2867.

4665 INDIAN SCHOOL NE

Sincerely

SUITE 106

Robin K. DeLapp

Environmental Scientist

Robert K. De Sapp

ALBUQUERQUE

NEW MEXICO

cc: Wayne Price OCD, Hobbs

an environmentally friendly company

87110

PHO 505 266 6611

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of chec	k No dated _
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Submitted to ASD by:	
	Date: 731-9
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Organization Code <u>521.07</u>	Applicable FY 97
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ENVIRONMENTAL SERVICES, INC. 4665 INDIAN SCHOOL RD. NE, STE. 106 PH. 266-6611 ALBUQUERQUE, NM 87110 DAT	TE 7/24/96 95-32/1070 0109676338
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Application for Groundwater Discharge Plan

C-4 Compressor

Gw-262

prepared for

Sid Richardson Gasoline Company July 1996



4665 Indian School ne Suive 106 Albuquerque New Mexico

87110

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of July, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

SEAL

District I - (505) 393-6161 P. O. Box 1980 Hobbs, NM 88241-1980 District II - (505) 748-1283 811 S. First Artesia, NM 88210 District III - (505) 334-6178 1000 Rio Brazos Road Aztec, NM 87410 District IV - (505) 827-7131

New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

Revised 12/1/95

Submit Original Plus 1 Copies to Santa Fe 1 Copy to appropriate District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS (Refer to the OCD Guidelines for assistance in completing the application)

	X New Renewal Modification				
1.	Type: Compressor Station				
2.	Operator: Sid Richardson Gasoline Company				
	Address: 201 N. Main Street, Fort Worth, Texas 76102				
	Contact Person: Wayne Farley Phone: (817) 390-8686				
3.	Location: SW 14 SE 14 Section 9 Township 22S Range 36E Submit large scale topographic map showing exact location.				
4.	Attach the name, telephone number and address of the landowner of the facility site.				
5.	Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.				
6.	Attach a description of all materials stored or used at the facility.				
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.				
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures.				
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems.				
10.	Attach a routine inspection and maintenance plan to ensure permit compliance.				
11.	Attach a contingency plan for reporting and clean-up of spills or releases.				
12.	Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.				
13.	Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.				
14.	CERTIFICATION				
	I herby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.				
	NAME: Wayne Farley Title: Manager of Gas Operations				
	Signature: League Farkey Date: 7-23-96				

C-4 Compressor Station—Groundwater Discharge Plan Table of Contents

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Sid Ri	chardson Spill Procedures	Appendix 3
Sulfa'l	Freat Correspondence	Appendix 4
		* *

C-4 Compressor Station Discharge Plan

This document constitutes a first time application for a Groundwater Discharge Plan for the C-4 Compressor Station. The C-4 Compressor Station was constructed in 1992 by Excel Gas company. Sid Richardson Gasoline Company purchased the facility in September 1995. This Discharge Plan application has been prepared in accordance with the New Mexico Oil Conservation Division's (OCD) "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95) and New Mexico Water Quality Control Commission regulations at 20 New Mexico Administrative Code (NMAC) 6.2.

1 Type of Operation

The C-4 Compressor Station is operated to meter, remove liquids, and compress natural gas pipelined through natural gas production lines. An inlet gas scrubber is utilized to remove liquids from the inlet gas to the station. The dried gas is passed through a suction scrubber on the compressor skid for further liquid removal. The gas then enters a 270-horsepower, natural-gas-fired, compressor engine. Most of the discharge gas from the compressor is pipelined off-site for further processing. A corrosion inhibitor is injected into the station discharge line to prevent corrosion of the pipeline. The discharge gas not transported off-site is utilized for engine fuel. The fuel gas is routed to a fuel sweetener which absorbs hydrogen sulfide (H₂S) from the gas. The fuel gas is then passed through a fuel scrubber for additional liquid removal before engine use.

2 Operator/Legally Responsible Party

Operator

Sid Richardson Gasoline Co. Attn: Harold Hicks Box 1226, Jal, NM 88252 505-395-2116

Legally Responsible Party

Sid Richardson Gasoline Co. Attn: Wayne J. Farley 201 N Main St, Forth Worth, TX 76102 817-390-8686

3 Location of Discharge/Facility

Lea County, NM Section 9, Township 22 South, Range 36 East

4 Landowner

Sid Richardson Gasoline Co. 201 N Main St, Forth Worth, TX 76102 817-390-8686

5 Facility Description

Facility and process flow diagrams are located in appendix 1.

6 Materials Stored or Used

Table 1 identifies materials and storage containments for substances used and stored at C-4. Material Safety Data Sheets (MSDS) for these substances are in appendix 5.

table 1
Materials Used and Stored

<i>ID</i> TK-1	Material Scrubber liquids	Composition Water with hydrocarbon liquids	<i>Type</i> Liquid	Container Tank	Quantity 1270 gal	Location South of inlet scrubber
TK-2	Lube oil	See MSDS	Liquid	Tank	300 gal	SE of compressor
TK-3	Corrosion inhibitor	See MSDS	Liquid	Tank	200 gal	SE of fuel sweetener
	Coolant	See MSDS	Liquid	Drum	30 gal	Brought in when needed
	SulfaTreat	See MSDS	Solid	Sack	(3) 2000 lb	May be stored on-site when needed

7 Sources and Quantities of Effluent and Waste Solids

Figure 1 depicts the effluent and solid waste sources at C-4. Table 2 summarizes the effluent and solid wastes generated at the facility. The major sources of liquid and solid waste are described in the sections following table 2.

table 2 Effluent and Solid Waste Sources, Quantity, Quality and Disposition

Source Scrubbers	Waste/Quality Water with hydrocarbon liquids	Quantity 200 gal/mo	Disposition TK-1
Compressor pad wash down	Water with soap, lube oil, and and coolant	100 gal/mo	Removed as generated
Engine	Waste oil Oil filters	18 gal/mo 24/yr	Removed as generated Removed as generated
Fuel sweetener	Waste SulfaTreat	2300 lb/mo	Road/driveway
Corrosion inhibitor drip pan	Rainwater with corrosion inhibitor	Varies	TK-1

Separators/Scrubbers and Slug Catchers

Three scrubbers are utilized at C-4: an inlet scrubber, suction scrubber, and fuel scrubber. Water with hydrocarbon liquids (drip) is discharged from the scrubbers to the drip tank (TK-1). The amount of liquids accumulated by the scrubbers varies and is dependent upon the moisture content of the inlet gas stream. The maximum amount of drip expected to be removed from the site is 2400 gallons per year.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers at C-4.

Process and Storage Equipment Wash Down

The compressor skid is washed down once per month using a portable high pressure system. Approximately 100 gallons of water is used for each washing. Occasionally, 2.5 gallons of soap is added to the wash water for cleaning. Equipment wash water may contain soap, lube oil, and coolant. Angle iron containment on skid used to channel wash water to truck holding tank.

Solvents/Degreasers

A non-chlorinated soap is used to clean the compressor engine. The soap is not stored on-site. Disposal of spent soap is addressed in Process and Storage Equipment Wash Down.

Spent Acids/Caustics

No acids or caustics are utilized at C-4.

Used Engine Coolants

Ambitrol, comprised of 50 percent water and 50 percent ethylene glycol, is utilized as coolant in the compressor engine. Coolant is brought on-site in a 30-gallon drum when needed. Coolant is immediately added to the engine and is not stored at C-4. No waste coolant is generated.

Waste Lubrication and Motor Oils

Waste lube oil is generated by maintenance of the compressor engine. The engine uses 18 gallons per month of lube oil. Lube oil is supplied to the compressor engine by an on-site lube oil tank (TK-2). Waste oil, approximately 18 gallons per month, is drained from the compressor engine into drums for removal from the facility.

Used Filters

The compressor engine operates with four oil filters. These filters are replaced every other month. After removal from the engines, the filters are placed in a 55-gallon drum with drain rack. Once the filters have drained, they are taken to a central dumpster located at Sid Richardson's West Eunice Tank Battery. Waste oil drained from the filters is disposed with the waste lube oil.

Solids and Sludges

No solids or sludges are generated at C-4.

Painting Wastes

If any equipment at C-4 requires painting, painting supplies will be brought on-site at the time of painting. Wastes will be removed immediately upon completion of the painting.

Sewage

No sewage is generated at C-4.

Lab Wastes

C-4 is not equipped with a lab.

Other Liquid and Solid Wastes

The fuel sweetener removes H₂S from the fuel gas. Seven thousand pounds of SulfaTreat is used in the fuel sweetener to absorb the H₂S. The SulfaTreat utilized in the sweetener is replaced approximately every three months. The spent SulfaTreat is spread on the driveway and road along C-4.

Drips and leaks from the corrosion inhibitor tank (TK-3) are contained in a drip pan below the tank. The pan is emptied into TK-1 as needed.

8 Liquid and Solid Waste Collection/Storage/Disposal

This section provides a general description of the collection, storage, and disposal systems used for effluents and solid wastes generated at the facility. Section 7 identifies the specific collection, storage, and disposal method utilized for each of the effluents generated at the site.

Collection

All effluent dumped to TK-1 is transported via aboveground pipelines.

Storage

None of the storage tanks at C-4 are equipped with berms. TK-1 is a partially buried fiberglass tank. TK-2 and TK-3 are located on saddle racks which provide full views of tank surfaces.

On-Site Disposal

Spent SulfaTreat removed from the fuel sweetener is spread on the driveway and road to C-4. This disposal method was approved by the NMOCD on September 9, 1995. Copies of correspondence from Sid Richardson and the NMOCD approval letter are in appendix 4.

Off-site Disposal

All remaining effluent and waste is removed and disposed of elsewhere as identified on table 3.

table 3 Off Site Disposal Contractors and Disposal Facilities

Scrubber liquids	
·	Transported by Chaparral Trucking* to West Eunice Tank Battery. Oil portion taken by Petrosource** to its oil recycling facility
Wash water	
	Transported by Sid Richardson to Jal#3 Gas Plant (GW-010, exp. 11/21/98)
Waste oil	
	Transported by Sid Richardson to Jal#3 Gas Plant (GW-010, exp. 11/21/98)
Filters	
	Transported by Sid Richardson to West Eunice Tank Battery. Removed by Quell Petroleum Services ***to their incinerator.

- Chaparral Trucking, PO Drawer 1769, Eunice NM 88231, 505-394-2545
- ** PetroSource Partners Limited, 129 S. Grimes, Hobbs, NM 88240, 505-397-7212
- *** Quell Petroleum Services Incinerator, PO Box 1552, Monahans, TX 79756, 915-943-8400

9 Proposed Modifications

TK-1 will be replaced with a below-grade tank system constructed according to the OCD Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks (revised 10/91) within one year of plan effectiveness. Sid Richardson will berm TK-2 and TK-3 and construct pad and curb type containment for drums within one year of plan effectiveness.

10 Inspection, Maintenance, and Reporting

C-4 is unmanned but inspected at least once per day Monday through Friday. The station is equipped with an alarm system which notifies operators in Jal of an emergency or malfunction.

11 Spill/Leak Prevention and Reporting (Contingency Plans)

The process area of the plant is graveled to allow for early leak detection and quick response by facility personnel in the event of a leak of process fluids. Sid Richardson will handle all spills as required by the spill procedures in appendix 3 and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and 20 NMAC 6.2.1203. Copies of these regulations are in appendix 2.

12 Site Characteristics

The C-4 Compressor Station is located on dune sands of the Eunice Plain in the Capitan



Basin. The structural setting is on the Permian shelf of the Central Basin Platform, east of the Capitan Reef Complex. The site bedrock is the poorly consolidated sand of the Tertiary Ogallala Formation.

There are no water bodies, water courses, or groundwater discharge sites within one mile of the perimeter of the facility on the Oil Center, New Mexico, 1987 U.S.G.S. 7.5 'quadrangle. The almost flat topography is in a large area of poorly defined surface drainage with a 1% grade. The area is slightly undulating with a very gentle slope to the southeast.

Pyote and Maljamar is the soil type at the site. This soil (Soil Conservation Survey, 1974, Soil Survey, Lea County, New Mexico: U.S.D.A.) is well-drained sand over a sandy loam developed to about 5 feet in depth. The soil is developed on eolian dune deposits underlain by a caliche layer. This type of soil has a moderately rapid permeability with a slow runoff.

As of January 1996, two wells are recorded with the New Mexico State Engineer Office within one-quarter mile of the perimeter of the facility. One, a stock well, is 400 ft south-southeast of the facility and draws water from the Ogallala Formation. The other well, a stock well, is in the vicinity of the facility, and the only information on file for this well states that the water turned so bad that cattle would not drink it.

Three wells are within one-quarter mile of the facility as of January 1996 on the U.S.G.S., National Water Information System, Version I, Ground Water Site Information. All three wells are northwest of the facility, 600 ft, 1100 ft, and 1350 ft respectively. These three wells, used for stock and unknown purposes, draw water from the Ogallala Formation. Other wells within one mile of the facility are used for oil-field industrial purposes as well as stock.

The depth of the water table ranges from 171 to 174 feet in the five wells located within one-quarter mile of the facility. The estimated depth to groundwater at C-4 Compressor Station is 171 feet in the Ogallala Formation.

The aquifers (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6) below the facility are the poorly consolidated sands of the Ogallala Formation, the deeper, Triassic Dockum Group of hematite-cemented clay and sandstones, and the deeper Paleozoic dolomitic limestones.

Water in the Ogallala Formation is high in silica (49 to 73 ppm), moderately high in calcium and magnesium, low in sulfates and chlorides, very high in fluoride, and has

total dissolved solids of less than 1100 ppm (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6).

The lower Dockum Group is low in silica (9-41 ppm), very high in fluoride, high in sodium, and has a wide range of concentrations of chlorides, sulfates, calcium, and magnesium. The total dissolved solids in the Dockum Group is higher than that of the Ogallala (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6). The deeper Paleozoic aquifers do not contain usable water and are brine-injected (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6).

The flood potential at the facility is low, as the area is on a tilted plain with no stream floodplains developed and high soil permeability. from the facility would drain to the east and slowly infiltrate the sandy ground.

13 Additional Information

Closure Plan

All reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC6.2.3103 quality standards should Sid Richardson choose to permanently close the C-4 Compressor Station. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will be made, and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

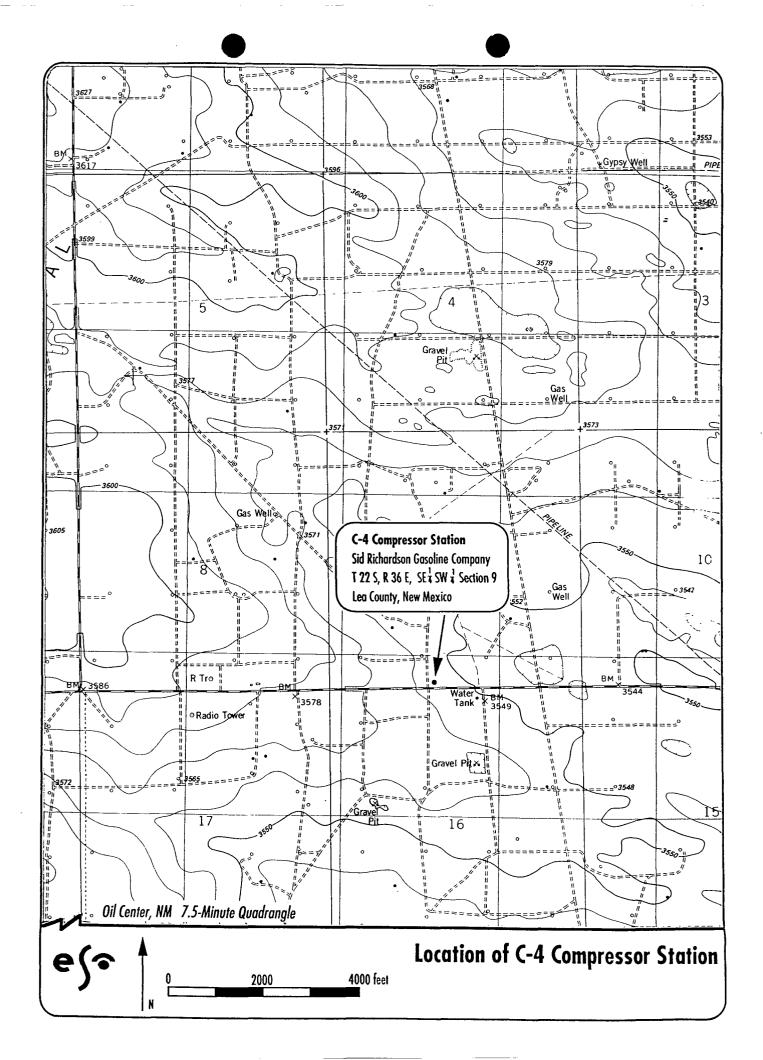
Affirmation

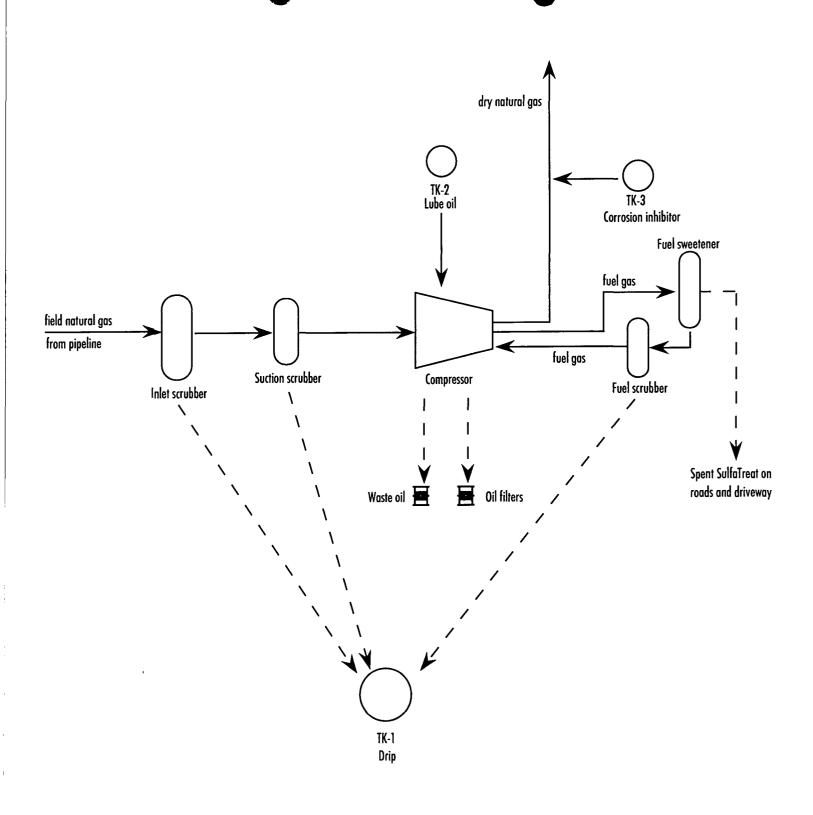
I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the C-4 Compressor Station and that such information is true, accurate, and complete to the best of my knowledge and belief.

Wayne J. Farle

Date

Manager of Gas Operations Sid Richardson Gasoline Co.



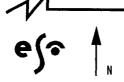


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C-4 Compressor Station Effluent and Solid Waste Production Diagram

property b	oundary —
inlet scrubber	
TK-1 Drip tank (partially buried)	
suction scrubber	driveway
fuel scrubber fuel sweetener	
g loes zeronnes toes zweesleuer	
	\wedge
TK-2 Lube oil tank TK-3 Corrosion inhibitor tank	pig launcher
74	

road



C-4 Compressor Station
Site Diagram

(as of 3-1-91)

RULE 113. - SHOOTING AND CHEMICAL TREATMENT OF WELLS

If injury results to the producing formation, injection interval, casing or casing seat from shooting, fracturing, or treating a well and which injury may create underground waste or contamination of fresh water, the operator shall give written notice to the Division within five (5) working days and proceed with diligence to use the appropriate method and means for rectifying such damage. If shooting, fracturing, or chemical treating results in irreparable injury to the well the Division may require the operator to properly plug and abandon the well.

RULE 114. - SAFETY REGULATIONS

(as of 3-1-91)

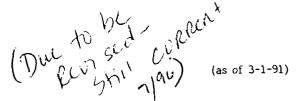
- A. All oil wells shall be cleaned into a pit or tank, not less than 40 feet from the derrick floor and 150 feet from any fire hazard. All flowing oil wells must be produced through an oil and gas separator of ample capacity and in good working order. No boiler or portable electric lighting generator shall be placed or remain nearer than 150 feet to any producing well or oil tank. Any rubbish or debris that might constitute a fire hazard shall be removed to a distance of at least 150 feet from the vicinity of wells and tanks. All waste shall be burned or disposed of in such manner as to avoid creating a fire hazard.
- B. When coming out of the hole with drill pipe, drilling fluid shall be circulated until equalized and subsequently drilling fluid level shall be maintained at a height sufficient to control subsurface pressures. During course of drilling blowout preventers shall be tested at least once each 24-hour period.

RULE 115. - WELL AND LEASE EQUIPMENT

(as of 3-1-91)

- A. Christmas tree fittings or wellhead connections shall be installed and maintained in first class condition so that all necessary pressure tests may easily be made on flowing wells. On oil wells the Christmas tree fittings shall have a test pressure rating at least equivalent to the calculated or known pressure in the reservoir from which production is expected. On gas wells the Christmas tree fittings shall have a test pressure equivalent to at least 150 percent of the calculated or known pressure in the reservoir from which production is expected.
- B. Valves shall be installed and maintained in good working order to permit pressures to be obtained on both casing and tubing. Each flowing well shall be equipped to control properly the flowing of each well, and in case of an oil well, shall be produced into an oil and gas separator of a type generally used in the industry.

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS



- A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.
- B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with

oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

- C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:
- (1) <u>Well Blowouts</u>. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)
- (2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.
- (3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.
- (4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.
- (5) <u>Tank Fires</u>. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.
- spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.
- (7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of

the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

- (8) <u>SUBSEQUENT NOTIFICATION</u>. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.
- (9) <u>CONTENT OF NOTIFICATION</u>. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.
- (10) <u>WATERCOURSE</u>, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

RULE 117. - WELL LOG, COMPLETION AND WORKOVER REPORTS

(as of 3-1-91)

Within 20 days after the completion of a well drilled for oil or gas, or the recompletion of a well into a different common source of supply, a completion report shall be filed with the Division on Form C-105. For the purpose of this rule, any hole drilled or cored below fresh water or which penetrates oil- or gas-bearing formations or which is drilled by an "owner" as defined herein shall be presumed to be a well drilled for oil or gas.

RULE 118. - HYDROGEN SULFIDE GAS - PUBLIC SAFETY

(as of 3-1-91)

- A. The intent of this rule is to provide for the protection of the public's safety in areas where hydrogen sulfide (H₂S) gas in concentrations greater than 100 parts per million (PPM) may be encountered.
- B. Producing operations should be conducted with due consideration and guidance from American Petroleum Institute (API) publication "Conducting Oil and Gas Production Operations Involving Hydrogen Sulfide" (RP-55). The operator of a lease producing, or a gas processing plant handling H₂S or any other related facility where H₂S gas is present in concentrations of 100 PPM or more shall take reasonable measures to forewarn and safeguard persons having occasion to be on or near the property. In addition to training operator's employees in H₂S safety such measures may include, but are not necessarily limited to, posting of warning signs, fencing of surface installations, installation of safety devices and wind direction indicators, and maintaining tanks, thief hatches and gaskets, valves and piping in condition so as to prevent avoidable loss of vapors. Where release of hydrogen sulfide is unavoidable, the operator shall burn or vent the gas stream in such a manner as to avoid endangering human life.
- C. Wells drilled in known H₂S gas producing areas, or where there is substantial probability of encountering H₂S gas in concentrations of 100 PPM or more, should be planned and drilled with due regard to and guidance from API RP-49 "Recommended Practices for Safe Drilling of Wells Containing Hydrogen Sulfide", latest edition. Wells completed and serviced by well servicing units where there is substantial probability of encountering H₂S gas in concentrations of 100 PPM or more should be worked on with due regard to the latest industry accepted practices. These practices may include, but are not necessarily limited to, the proper training of personnel in H₂S safety and the use of H₂S safety equipment as listed for safe operations by the American Petroleum Institute draft report for "Land, Oil and Gas Well Servicing and Workover Operations Involving Hydrogen Sulfide."*

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- B. Plans, specifications and reports required by this Section, if related to facilities for the production, refinement and pipeline transmission of oil and gas, or products thereof, shall be filed instead with the Oil Conservation Division. [1-4-68, 12-1-95]
- C. Plans and specifications required to be filed under this Section must be filed prior to the commencement of construction. [9-3-72]

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

- A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]
- 1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief of the Ground Water Protection and Remediation Bureau of the department, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:
- a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
 - b. the name and address of the facility;
- c. the date, time, location, and duration of the discharge;
 - d. the source and cause of discharge;
- e. a description of the discharge, including its chemical composition;
 - f. the estimated volume of the discharge; and
- g. any actions taken to mitigate immediate damage from the discharge. [2-17-74, 2-20-81, 12-24-87, 12-1-95]
 - 2. When in doubt as to which agency to notify, the

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person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-1-95]

- 3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]
- 4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]
- 5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]
- delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]
- 7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified

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time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

- 8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]
- 9. If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106.A of this Part. [12-1-95]
- B. Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74]
- 1. in conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74]
- 2. in violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74]
- C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]
- 1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water; [2-17-74]
- 2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling

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stock, or activity of any kind, whether stationary or mobile; [2-17-74]

- 3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes; [2-17-74]
- 4. "operator" means the person or persons responsible for the overall operations of a facility; and [12-24-87]
- 5. "owner" means the person or persons who own a facility, or part of a facility. [12-24-87]
- D. Notification of discharge received pursuant to this Part or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement. [2-17-74]
- E. Any person who has any information relating to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, is urged to notify the Chief of the Ground Water Protection and Remediation Bureau of the department. Upon such notification, the secretary may require an owner/operator or responsible person to perform corrective actions pursuant to Sections 1203.A.5 or 1203.A.9 of this Part. [12-1-95]

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

- A. Any person seeking a variance pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall: [7-19-68, 11-27-70, 9-3-72]
- 1. state the petitioner's name and address; [7-19-68, 11-27-70]
 - 2. state the date of the petition; [7-19-68]
- 3. describe the facility or activity for which the variance is sought; [7-19-68, 11-27-70]
- 4. state the address or description of the property upon which the facility is located; [11-27-70]

20 NMAC 6.2

SID RICHARDSON GASOLINE CO.

INTER-COMPANY CORRESPONDENCE

		DATE: July , 1994
ТО:	Curtis Clark	FROM: Robert Gawlik
SUBJECT:	New Mexico Leak, Spill	, and Release Requirements
It is imp	perative that the response	to any leak, spill, or release of any gas, crud

It is imperative that the response to any leak, spill, or release of any gas, crude oil, or condensate be immediate. The recognition, notification, containment, recovery of standing liquid and remediation is of the utmost importance. Quick response will mitigate any immediate threats to fresh waters, public health and the environment.

I. Initial Response Actions

When notified of a leak, spill, or reasonable probability to injure or be detrimental to public health, fresh waters, or the environment or unreasonably interfer with the public welfare we must take the following immediate actions:

Note: Take immediate action **unless** that action will create a safety hazard which could result in personnel or public injury.

1) Source Elimination and Site Security

Block off supply of material to the leak, spill, or release. Limit access to only necessary and essential personnel and equipment.

2) Containment

As soon as it is safe for personnel and equipment to enter the area, we must contain the leak, spill, or release to minimize the possible contamination of resources and to limit the area impacted. Construct berms or dikes, or use absorbent pads or hay.

3) Site Stabilization

Remove all standing material or product from within containment.

Note: The disposition of all wastes or products removed from the site must be with the approval of the OCD.

/ /.

II. Notification of Leak, Spill, or Release

Leaks, spills, or release of any wastes or products from oil field operations are required to be reported pursuant to the following:

- 1) Oil Conservation Division (OCD)
 Rule 116 (Attachment D)
- 2) New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Attachment E)
- 3) Bureau of Land Management (BLM) (Attachment F)

Note: Be prepared to give information required on the reporting form provided (Attachment B).

File NOTIFICATIONS & REPORTS to:

New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division Environmental Section P. O. Box 2088 Santa Fe, New Mexico 87504-2088 (505) 827 5800 (8 am - 5 pm) MST

District I - Hobbs (Lea County) Jerry Sexton 1000 W. Broadway Hobbs, New Mexico 88240 (505) 393 6161

District II - Artesia (Eddy County) 811 South First Street P. O. Box "DD" Artesia, New Mexico 88210 (505) 748 1283

U. S. Department of Interior
Bureau of Land Management
New Mexico State Office
P. O. Box 27115
Santa Fe, New Mexico 87502-7115
(505) 438 7400

** Note: Spill report to the BLM is necessary only when spills occur on BLM owned surface and/or minerals.

Insure that complete records, (i.e. notifications, cleanup, or remediation work) are documented and maintained at the nearest company office.

III. Reportable Quantities (RQ) Overview of Rule 116 (Attachment A)

A)

Material	Quantity (bbl)	Watercourse ¹	Notification
Crude Oil or Condensate	25551	No No No Yes	Immediate ² Subsequent ³ None Immediate
Saltwater	> 100 > 25 > 25	No Yes No	Immediate Immediate Subsequent

¹Watercourse is defined as any lake bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

B) Summary - Reporting requirements

- a) Any spill into water would be reported.
- b) Any spill of five (5) barrels or less <u>would not</u> be reported, but <u>would</u> have to be remediated.

²Immediate Notification shall be as soon as possible, but no later than twenty four (24) hours after discovery. Notification may be made in person or by telephone to the appropriate District office.

³Subsequent Notification shall be a complete written report of the incident in duplicate to the appropriate authorities within 10 days of the incident.

c) Any spill of more than five (5) barrels but less than twenty five (25) barrels would be reported in writing within ten (10) days of the incident and remediated.

d) Any spill of twenty five (25) barrels or more would be reported as soon as possible in person or by telephone and then followed up by a complete written report within ten (10) days of the incident.

IV. Guidelines for Clean-up of Leak, Spill, or Release

- 1) Determine remediation level for unsaturated contaminated soil by using the Attachment A chart.
- 2) All soil having more than .5% total petroleum hydrocarbon (TPH) will be brought to the surface for disposal or remediation.
- 3) A final clean up of .5% TPH would have to be achieved as soon as feasible.
- 4) Highly contaminated saturated soils and unsaturated contaminated soils exceeding the standards described in Attachment A should be either:
 - a) Excavate from the ground all soil that is above the ranking score level (I, II, III) as indicated in Attachment A or an alternate approved remediation level, or;
 - b) Excavated to the maximum depth and horizonal extent practicable. Upon reaching this limit, a sample should be taken from the walls and the bottom of the excavation to determine the remaining levels of soil contaminants, or;
 - c) Treated in place until a representative sample is below the contaminant specific remediation level as indicated on Attachment A or an alternate approved remediation level, or;
 - d) Managed according to an approved alternate method.
- 5) <u>All</u> soil management options must be approved by OCD.
 - a) Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

- b) Soil treatment or remediation:
 - Land farming One time application on location, spread to 6" lift within a bermed area.
 - ii) Insitu treatment by vapor venting, bioremediation or other approved treatment.
 - iii) Alternate methods approved by OCD are but not limited to:
 - active soil aeration composting
 - solidification bioremediation
 - thermal treatment

Attachment A

Contaminated Soils Ranking Criteria

(circle one)

A) Depth of Ground Water

- < 50 feet 20 50 - 99 feet 10
- > 100 feet (

B) Wellhead Protection Area

- < 1000 feet from a water source, or;
- < 200 feet from a private domestic water source

Yes 20 No 0

C) <u>Distance to Surface Water Body</u>

- < 200 horizontal feet 20 200 - 1000 horizontal feet 10 > 1000 horizontal feet 0
 - A _____ +B ____ = Total ____ +C

Total Ranking Score

	Level I	Level II	Level III
	>19	10 - 19	0 - 9
Benzene (ppm)	10	10	10
BTEX(ppb)	50	5 0	50
BTEX (ppb) TPH (ppm)	100	1000	5000

Attachment B

SID RICHARDSON GASOLINE CO.

Leak, Spill, or Release Report

Facility		Person	Filing Report	
Report Date			AM	
Responsible Party:	Sid Richa	rdson Gasoline Co).	
	City	 State _	7in	
	Telephon	ə <u> </u>		
Discharge DateSource and/or Cause o	Time f Discharge	Duration	n Qu	antity
Source and/or Cause of Type of Discharge:	Gas	Crude Oil	Condensate	Softwoler
Note: If 'other' give che or attach MSDS.	emical compos	sition and physical	characteristics on b	ack of page
Quarter-QuarterS	ectionT	ownshipRang	geSurvey	Block
Distance from nearest	own and/or la	ndmark		
Site Characteristics are	as follows:			
Precipitation Wind Conditions Temperature Soil Type Depth of Penetra Nearest Resider *Nearest Fresh	ation			
*Any water well or wat natural or man-made cl		. any river, lake, s	tream, playa, arroy	o, draw, wash, gully

List all federal, state, and local agencies notified on chronological record form and attach to a copy

of this report.

Note: List notification time and who received the call.

Attachment C

Definitions

Unsaturated/Contaminated Soil

Soils which are <u>not</u> highly contaminated/saturated, but contain Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) and Total Petroleum Hydrocarbons (TPH) or other potential fresh water contaminants.

Saturated/Highly Contaminated

Those soils which contain a free liquid phase or exhibit gross staining.

Watercourse

Any lake bed or gully, draw, stream bed, wash, arroyos, or natural or man-made channel through which water flows or has flowed.

Immediate Notification

Shall be as soon as possible after discovery and shall be in person or by telephone to the district office of the Division in which the incident occurred. If incident occurs after normal business hours, notify the District Supervisor, the Oil & Gas Inspector, or the Deputy Oil & Gas Inspector. Follow up with a completed written report within (ten) 10 days of the incident.

Subsequent Notification

A complete written report of the incident within ten (10) days of the discovery of the incident.

Written Report

Complete written reports will be submitted in DUPLICATE to the district office of the OCD in the district in which the incident occurred within 10 days after discovery of the incident.

Content of Notification

Refer to Attachment B

ATTACHMENT D

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS

(as of 3-1-91)

- A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.
- B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.
- C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:
- (1) <u>Well Blowouts</u>. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)
- (2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.
- (3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.
- (4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.
- (5) <u>Tank Fires</u>. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

- spills from any drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.
 - (7) <u>IMMEDIATE NOTIFICATION</u>. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.
 - (8) <u>SUBSEQUENT NOTIFICATION</u>. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.
 - (9) <u>CONTENT OF NOTIFICATION</u>. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.
 - (10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

NEW MEXICO

WATER QUALITY CONTROL COMMISSION REGULATIONS AS AMENDED THROUGH NOVEMBER 25, 1988

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required;

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the

facility;

c. the date, time, location, and

duration of the discharge;

d. the source and cause of

discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of

discharge; and

g. any action's taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief,

WQCC 82-1 Amendment No. 7 Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

- 3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.
- 4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein.
- 5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.
- 6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agency, in an effort to determine the division's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days.
- 7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall

approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

- 8. In the event that the modified corrective action report also is unsatisfactory to the division, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the division director. The division director shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the director concerning the shortcomings of the modified corrective action report, the division may take whatever enforcement or legal action it deems necessary or appropriate.
- B. Exempt from the requirements of this section are continuous or periodic discharges which are made:
- 1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or
- 2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies.

C. As used in this section:

- 1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water;
- 2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;
- 3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes.
- 4. "operator" means the person or persons responsible for the overall operation of a facility; and
- 5. "owner" means the person or persons who own a facility, or part of a facility.

WQCC 82-1 Amendment No. 7 D. Notification of discharge received pursuant to this regulation or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.

SID RICHARDSON GASOLINE CO.

WEST TEXAS AREA OFFICE

5030 E. UNIVERSITY SUITE C-104 ODESSA, TEXAS 79762 TELEPHONE: (915) 367-2867 FAX: (915) 367-2862

September 22, 1995

Mr. Roger Anderson State of New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505

Mr. Anderson:

Recently Sid Richardson Gasoline Co. purchased the Xcel Gas Company (Clayton Williams Companies) gas gathering system in southeastern Lea County. This system includes five (5) compressor sites located between Jal and Eunice New Mexico.

Each compressor is natural gas driven and each utilizes a fuel scrubber to make the field gas usable for the operation of these engines. Each scrubber contains approximately 4-7 cu. yds. of a product called Sulfa Treat (MSDS attached). Sulfa Treat contains no hazardous materials as listed by the ACGIH, is non-toxic and stable. Also there are no special procedures for spills or disposal. This material is a solid waste.

Sid Richardson Gasoline Co. request permission to dispose of our Sulfa Treat material on site and on top of the ground. For your convenience, I have also included a copy of your approval letter to Xcel Gas Company (2-5-93).

If there are any further questions or if more information is needed, do not hesitate to call myself or Harold Hicks, Field Mgr. for Sid Richardson Gasoline Co. Lea County gas gathering system at (505)395-2116. Your help and prompt attention to this matter is greatly appreciated.

Robert Lee Gawlik WTA Safety Mgr.

COBAIN Bee ON

Enclosures

cc: Curtis Clark Harold Hicks Herb Harless

MATERIAL SAFETY DATA SHEET

	I. PRODUCT	IDENTIFICATION	
TRADE NAME (as labeled) SulfaTreat		MANUFACTURER'S NAME & ADDRE The SulfaTreat Company 900 Roosevelt Pkwy, Suite 610 Chesterfield, Missouri 63017	ESS
Phone number for a	dditional information:	1-800-726-7687 (314-532-2189)	
Date prepared or rev	vised:	6/21/94	
	II. HAZARD	OUS INGREDIENTS	
Chemical Names	CAS Numbers Perce	nt Exposure Limits in Air (units) ACGIH TLV OSHA PEL Other (specify)
	None		
	NA		
Governmental H	,	CAL PROPERTIES —————	
· Vapor density (air=1	I) NA	Melting point or range, °F NA	4
Specific gravity	2.4	Boiling point or range, °F NA	4
Solubility in water	0	Evaporation rate (butyl acetate=1) N/	4
Vapor pressure, mn	nHg at 20°C 0		
Appearance and oc	dor Black, Grai	nular, Odorless	
How to detect this s	substance (warning propert	ies of substance as a gas, vapor, dust, or mist)	A -
***************************************	IV. FIRE AN	ID EXPLOSION ————	
Flash Point, °F (give		Auto ignition temperature, °F NA	
Flammable limits in	air, volume %: NA	lower (LEL) upper (UEL)	
Fire extinguishing r	materials: <u>NA</u> water <u>NA</u> foam	spray NA_carbon dioxide NA_dry chemical •	NA_other:
Special firefighting	procedures: None	Unusual fire and explosion hazards: Non	ie

V.	HEALTH HAZ	ARD INFOR	- NOITAN		
SYMPTOMS OF OVERE	EXPOSURE (for each	ch potential route of	exposure)		
Inhaled: Over exposur	e to dust may irrit	ate nasal passag	ge.		
Contact with skin or eyes:	Contact with ski similar to dust.	n has no affect; o	could cause	e eye irritatio	on
Absorbed through skin:	None.	Sv	wallowed: N	lone	
HEALTH EFFECTS OR		if	more space i	s needed.	age
Acute: No acute effect (highest practi	cal test level). No		aler man s	aao mg/kg	
Chronic: No chronic et	ffects to health ar				
FIRST AID: EMERGEN Eye Contact: Flush with Inhaled: Remove to free	n water.	S		Swallowed:	
SUSPECTED CANCER	AGENT? X	NO - This product	s ingredients	are not found	in the lists below.
Fede	ral OSHA	NTP	IA	ARC	
MEDICAL CONDITIONS	VI. REAC	TIVITY DATA			
Stability: Conditions to avoid: Nazardous decomposition Hazardous polymerization	IA n products (including	Stable Incompatibility (m combustion produc ay occur	aterials to avo	nstable vid): NA Will not occur	
VII. SPIL	.L, LEAK, AN	D DISPOSAL	PROCE	DURES	
Spill response procedure (include employee protec	S				
Preparing wastes for disp (container types, neutrali:		pecial procedure	s required.		
NOTE: Dispose of all	wastes in accordance	e with federal, state a	and local regu	lations.	
VII	I. SPECIAL H	ANDLING IN	FORMAT	ION ——	
Ventilation and engineering Respiratory protection (ty Eye protection (type): Other clothing and equipowork practices, hygienic	/pe): NIOSH/MS None required.	HA approved du Gloves (specify r	st mask (Te	C-21C-132) one required	d.

EVALUATION OF THE ENVIRONMENTAL CHARACTERISTICS OF Sulfatreat® AND ITS REACTION PRODUCTS USING EPA GUIDELINES FOR THE "IDENTIFICATION AND LISTING OF HAZARDOUS WASTE" MARCH, 1992

I. SUMMARY

SulfaTreat[®] is used in a patented process which consists of the use of a proprietary iron compound to remove hydrogen sulfide from natural gas. As a result of the process, a solid residue is produced.

Laboratory evaluations were performed on SulfaTreat® and its air dried reaction products according to U.S. Environmental Protection Agency (EPA) test protocol cited in 40 CFR Subpart C (Section 261.20 through 261.24) of Section 3001 of the Resource Conservation and Recovery Act in the Federal Register, Volume 45, Number 98, on May 19, 1980, revised July 1,1989 and the Toxicity Characteristics Leaching Procedure (TCLP) effective September 2, 1990. Reacted SulfaTreat® was also analyzed according to extractable California title 22 methods using the calwet extraction procedure.

Evaluations included testing of the ignitability, corrosivity, reactivity, and the determination of the presence of heavy metals and pesticides as prescribed in the regulations.

Also the oral and dermal toxicity and the aquatic 96 hour LC50 was determined and the agricultural characteristics were studied. All results showed SulfaTreat® and its reaction products to be safe for personnel and non-hazardous to the environment and effective for plant growth.

The work summarized herein was performed for Gas Sweetener Associates dba The SulfaTreat Company by the following companies and individuals:

EPA:

Gulf South Research Institute (GSRI)
Shilstone Testing Laboratories
Tim Sloan, Scientific Consultant
Dr. R. P. Wendt, Professor of Chemistry,
Loyola University
Thermo Analytical Inc.
SPL, Inc.

ORAL AND DERMAL TOXICITY:

Scientific Associates, Inc.

CORN GROWTH EXPERIMENTS:

Terry L. Smith, Ph.D., California Polytechnic State University, Soil Science Deparent.

II. EXPERIMENTAL RESULTS

A. Characteristics of Ignitability

The residue is not a liquid. Flash point of wet sludge - Does not flash below 100°C. Flash point of dry sludge - 137°C.

1. Friction Testing

Friction testing was conducted by grinding the sample under standard temperature and pressure in a mortar and pestle and monitoring the temperature. There was neither ignition nor any variation in the temperature or cause of fire during the course of the evaluation.

2. Flame Testing

Flame testing was conducted by 1) directly heating the sample with a Fischer burner flame and 2) indirectly heating the sample in a porcelain crucible. In both cases, the sample did not ignite but merely glowed with red color due to high temperature.

3. Exposure to Moisture Testing

Exposure to moisture testing was conducted by placing small amounts of the sample in water. The sample remained unchanged.

4. Oxidizer

By the definition stated in 49 CFR 173.141, the sample is not an oxidizer.

B. Characteristics of Corrosivity

1. pH Determination

The pH determination was made on a slurried sample in accordance with EPA 600/4.79-020. The initial pH reading was approximately 9.

2. Corrosion Rate Determination

The corrosion rate of the sample on 1020 steel was determined using a potentiodynamic polarization technique (ASTM G-5 specification). The studies were conducted using a Princeton Applied Research computerized Model 350 corrosion measurement system.

The results of the potentiodynamic polarization experiment with SAE 1020 steel showed that the general corrosion rate a 455C (130°F) of 5.8 mils (.15 mm) per year is substantially below the maximum 0.250 inches (6.25 mm) per year specified in the regulation.

C. Characteristics of Reactivity

1. Stability Testing

An aqueous suspension of the reacted SulfaTreat® monitored with a potentiometer from pH 1 to pH 12.5. The pH alterations were accomplished using dilute HCL and dilute NaOH. The material was stable and totally unreactive when exposed to these pH extremes without any evolution of gases, including H₂S and SO₂.

2. Classification as an Explosive

Neither the material nor anything similar to this material is listed as a Forbidden, Class A, or Class B explosive in 49 CFR 173.51, 49 CFR 173.53, or 49 CFR 173.88.

D. Characteristics of EP Toxicity

Laboratory evaluations of the EP toxicity required a leaching step prior to analysis. The leaching step was carried out in accordance with the test methods described within the Federal Register, Volume 45, Number 98 on May 19, 1980 (Appendix III). 100 grams of the ground solid sample were placed in a mechanically stirred extractor with 1600 g of deionized water. The pH was maintained at 5 for a period of 24 hours by the addition of 0.5 N acetic acid at 30 minute intervals as needed. This solution was then filtered using a 0.45 millipore filter. The filtrate was analyzed for the presence of contaminants using the following EPA methods:

Contaminant	EPA Method
Mercury	245.1
Arsenic	206.1
Barium	208.1
Cadmium	213.1
Chromium	218.1
Lead	239.2
Selenium '	270.3
Silver	272.1
Mercury	245.1
TCLP	1311

The concentration of contaminants in the extract is far below the maximum allowable limits in all cases.

E. Oral and Dermal Toxicity

1. Unreacted SulfaTreat® (Oral Toxicity)
The acute oral LD50 of SulfaTreat® when administered as a 67% w/w aqueous suspension to male and female SASCO rats weighing 219 to 345 grams, was found to be greater than 39.91 g/kg of body weight.

As the term is defined in the Federal Hazardous Substances Act (FHSA), the product was found not to be a Toxic Substance.

- 2. Reacted SulfaTreat® (Oral Toxicity)
 Undiluted, reacted SulfaTreat® (semisolid phase) was administered orally to ten SASCO-SD rats (five male and five females), weighing 198 to 265 grams at a dosage level of 5.00 grams per kilogram of body weight. All of the animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substance Act (FHSA), the semisolid phase of the test material was found not to be a Toxic Substance.
- 3. Reacted SulfaTreat® (Dermal Toxicity)
 Undiluted, reacted SulfaTreat® (liquid phase) was applied for twenty-four hours to the abraded skin of five male and five female New Zealand White Rabbits, weighing 2.72 to 3.09 kilograms, at a dosage level of 2.00 grams per kilogram of body weight. All ten animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substances Act (FHSA), the liquid phase of the test material was found not to be a Toxic Substance.
- 4. Reacted SulfaTreat® (Aquatic Toxicity)
 Passed the aquatic 96 hour LC50 which was determined to be more than 500 milligrams per liter when measured in soft water with fathead minnows.

F. Other

The material is not listed (as a hazardous waste) in Subpart 261.30-261.33 of "Identification and Listing of Hazardous Wastes, "EPA-8700-12(FR), May 29, 1980.

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

February 5, 1993

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

Mr. Rick Boring 684-384. Xcel Gas Company 6 Desta Drive Suite 5800 Midland, Texas 79705

Re: Sulfa Treat Waste

Dear Mr. Boring

Based on the Sulfa Treat Material Safety Data Sheet and supplemental information provided, the solid waste generated from the use of Sulfa Treat does not exhibit hazardous waste characteristics and may be disposed of on site pursuant to OCD solid waste disposal requirements or offsite at an OCD approved disposal facility.

If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely:

Roger C. Anderson

Environmental Bureau Chief

xc: Jerry Sexton- OCD Hobbs

OIL CONSERVATION DIVISION

September 25, 1995

CERTIFIED MAIL RETURN RECEIPT NO. Z-765-963-060

Mr. Robert Gawlik Sid Richardson Gasoline Co. 5030 East University, Suite C-104 Odessa, TX 79762

Disposal Request - Sulfa Treat Waste Re:

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) has received your request letter dated September 22, 1995, for approval to remove and dispose of spent Sulfa Treat from 5 compressor stations located in Lea county, with approximately 7 cubic yards per station. Based on the information provided, your disposal request is approved. The spent Sulfa Treat may be disposed of in a the same manner as the February 5, 1993 approval from Mr. Roger Anderson with the NMOCD. (see attached letter)

Please be advised that this approval does not relieve you of liability should your operation result in pollution of surface or groundwater or the environment.

If there are any questions on this matter, please contact me at (505) 827-7156.

Sincerely

Patricio W. Sanchez.

Petroleum Engineer

XC: Mr. Wayne Price and Mr. Jerry Sexton

Mane of lecte Compo

Sold and a marketon WTA Odessa



Dow Chemical U.S.A.*





Dow U.S.A.

The Dow Chemical Company Midland, Michigan 48674

Material Safety Data Sheet

Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 07666

Page: 1

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Date Printed: 06/11/92

MSDS:000584

INGREDIENTS: (% w/w, unless otherwise noted)

Ethylene Glycol	CAS# 000107-21-1		47~55%
Diethylene Glycol	CAS# 000111-46-6		< 3%
Water	CAS# 007732-18-5	•	<50₹
Dipotassium phosphate	CAS# 007758-11-4		~5 %

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

PHYSICAL DATA:

BOILING POINT: 229F, 109C VAP. PRESS: Approx. 2.5 mmHg @ 20C VAP. DENSITY: Not applicable SOL. IN WATER: Completely miscible SP. GRAVITY: 1.084 @ 60/60F, 160 APPEARANCE: Red liquid. ODOR: Information not available.

FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: None METHOD USED: PMCC

FLAMMABLE LIMITS LfL: Not applicable. Not applicable.

EXTINGUISHING MEDIA: Water fog, carbon dioxide, dry chemical.

FIRE & EXPLOSION HAZAROS: After 50% of the initial volume has evaporated, the residual solution will burn at temperatures above 290f when exposed to an ignition source.

FIRE-FIGHTING EQUIPMENT: Wear positive-pressure, self-contained breathing apparatus.

REACTIVITY DATA:

....

(Continued on page 2 , over) (R) Indicates a Trademark of The Dow Chemical Company

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02/19/96 08:39

TX/RX NO.2503

P.002

Product Code: 07666 Page: 2

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Date Printed: 06/11/92 MSDS:000584

4. REACTIVITY DATA: (CONTINUED)

STABILITY: (CONDITIONS TO AVOID) Not considered to be a problem under normal storage conditions.

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Oxidizing material

HAZARDOUS DECOMPOSITION PRODUCTS: After water has volatilized, burning will produce carbon monoxide, carbon dioxide, and water.

HAZARDOUS POLYMERIZATION: Will not occur.

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS: Small spills: Cover with absorbent material, soak up and sweep into drums for disposal. Large spills: Dike around spill and pump into suitable containers for disposal or reprocessing.

DISPOSAL METHOD: Burn in approved incinerator in accordance with local, state, and federal regulations.

HEALTH HAZARD DATA:

1771

EYE: Essentially nonirritating to eyes. Vapors or mists may irritate eyes.

SKIN CONTACT: Prolonged or repeated exposure not likely to cause significant skin irritation. May cause more severe response if skin is abraded (scratched or cut).

SKIN ABSORPTION: A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts. The dermal LD50 has not been determined. Repeated skin exposure to large quantities may result in absorption of harmful amounts.

INGESTION: Excessive exposure may cause central nervous system effects, cardiopulmonary effects (metabolic acidosis), and kidney failure. Amounts ingested incidental to industrial handling are not likely to cause injury; however, ingestion of larger amounts could cause serious injury, even death. The oral LO50 for rats is 8200 mg/kg. Single oral dose toxicity is expected to be moderate to humans even though tests with animals show a lower degree of toxicity.

(Continued on page 3)
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Product Code: 07666 Page: 3

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Date Printed: 06/11/92 MSD5:000584

6. HEALTH HAZARD DATA: (CONTINUED)

INHALATION: At room temperature, exposures to vapors are minimal due to low vapor pressure. If heated or sprayed as an aerosol, concentrations may be attained that are sufficient to cause irritation and other effects.

SYSTEMIC & OTHER EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include formation of bladder stones after repeated oral doses of diethytene glycol. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Based on data from long-term animal studies, diethylene glycol is not believed to pose a carcinogenic risk to man. Ethylene glycol did not cause cancer in long-term animal studies. Based on animal studies, ingestion of very large amounts of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals to prevent ingestion) or skin contact, the primary routes of occupational exposure, had minimal or essentially no effect on the fetus. Birth defects are unlikely from exposure to diethylene glycol. Exposures having no adverse effects on the mother should have no effect on the fetus. Diethylene glycol has not interfered with reproduction in animal studies. studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of ethylene glycol in large amounts caused a small decrease in the number of litters/pair, live pups/litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests have been negative.

7. FIRST AID:

EYES: Irrigate immediately with water for at least 5 minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything to an unconscious person.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Consult standard literature. Supportive care. Treatment based on judgment of the physician in response to

(Continued on page 4 , over)
(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit of The Dow Chemical Company

Product Code: 07666 Page: 4

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Date Printed: 06/11/92 MSDS:000584

7. FIRST AID: (CONTINUED)

reactions of the patient. In the treatment of intoxication by ethylene glycol, the use of ethanol, hemodialysis and intravenous fluids to control acidosis should be considered. N. Eng. J. Med. 304:21 1981. If burn is present, treat as any thermal burn, after decontamination.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): Ethylene glycol: ACGIH TLV and OSHA PEL are 50 ppm Ceiling. Diethylene glycol: AIHA WEEL is 50 ppm. total; 10 mg/m3, serosol only.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator.

SKIN PROTECTION: Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Avoid skin and eye contact. Avoid ingestion. Avoid breathing vapors or mists.

Trace quantities of ethylene oxide (EO) may be present in this product. While these trace quantities could accumulate in headspace areas of storage and transport vessels, they are not expected to create a condition which will result in EO concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zones of the workplace for appropriate applications. OSHA has established a permissible exposure limit of 1.0 ppm 8 hr TWA for EO. (Code of Federal Regulations Part 1910.1047 of Title 29)

MSDS STATUS: Revised section 8.

1634

For information regarding state/provincial and federal regulations see The Regulatory Information Section.

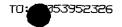
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TX/RX NO.2503

P.005



Product Code: 07666 Page: R-1

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Bate Printed: 06/11/92 MSDS:000584

REGULATORY INFORMATION: (Not meant to be all-inclusive--selected regulations represented.)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See MSO Sheet for health and safety information.

U.S. REGULATIONS

SARA 313 INFORMATION: This product contains the following substances subject to the reporting requirements of Section 313 of Title (II of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

CHEMICAL NAME CAS NUMBER CONCENTRATION

ETHYLENE GLYCOL 000107-21-1 47 -55 %

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard A delayed health hazard

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The Information Herein is Given in Good Faith, But No Warranty,
Express Or Implied, is Made. Consult The Dow Chemical Company
For Further Information.

^{*} An Operating Unit of The Dow Chemical Company

OMEGA 1172

HMIS HEALTH

() HMIS FLAMMABILITY

Ü HMIS REACTIVITY

HMIS PERSONAL PROTECTION

SECTION I IDENTIFICATION

COMPANY NAME....... OMEGA TREATING CHEMICALS

2500 WEST FRANCIS

MIDLAND, TEXAS 79701

PHONE NUMBER...... 915-683-3312

EMERGENCY PHONE NUMBER... 1(915) 683-3312

EFFECTIVE DATE..... APRIL, 1989

TRADE NAME OMEGA 1172 - Corrosion Unhibitar

CHEMICAL FAMILY.... Emulsion Breaker

CAS NUMBER...... Blend

CHEMICAL FORMULA..... Confidential

SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS

% TLV (Units) FROD, CAS M

ALKYL ARYL METEROCYCLIC CONF. NO DATA

NO DATE

AMINE SALT

SECTION III - PHYSICAL DATA

BOILING Point(F)...... ND

FREEZING POINT (F)...... ND

VAPOR PRESSURE (mm Hg)... ND

VAPOR DENSITY (Air=1).... ND

VOLATILITY/VOL(%)...... N/D

SOLUBILITY IN H20..... Dispersible

APPEARANCE/ODOR..... AMBER LIQUID

SPECIFIC GRAVITY (H20=1). 0.89 TO 0.93

PH.... 6.0 TO 8.0

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT...... NONE

LOWER FLAME LIMIT ND HIGHER FLAME LIMIT ND

EXTINGUISH MEDIA..... WATER FOG OR SPRAY. FOAM, DRY POWDER, CARBON DIOXITE

(002).

UNUSUAL FIRE HAZARD..... Containers may explode from internal pressure if

confined to fire. Cool with water. Keep unnecessary

people away.

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE ... NO DATA

01/31/1996

OMEGA 1172

ROUTES OF ENTRY

INHALATION?

SKIN?

INGESTION?

Irritant

Irritant

Irritant

MEALTH HAZARDS Acute, Inhalation of vapors may be anesthetic.

Ingestion of liquid will cause gastrointestinal distress, irritation, and possibly nausea. Liquid or

vapors may be irritating to skin and eyes.

CARCINOGENICITY

NTP?

IARC MONOGRAPHS?

OSHA REGULATED

No

No

No

OSHA Table Z1

OVER EXPOSURE EFFECTS.... Skin irritation develops slowly after contact. Eye

irritation develops immediately upon contact. Signs of Inhalation Overexposure: Irritation of Respiratory

Tract, Nervous System Depression, Headaches,

Dizziness, Confusion.

FIRST AID PROCEDURES.... IN CASE OF EYE CONTACT, FLUSH IMMEDIATELY WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION; FOR SKIN, WASH THOROUGHLY WITH SOAP AND WATER. IF INHALED, REMOVE TO FRESH AIR. IF NOT BREATHING, GIVE ARTIFICIAL RESPIRATION, PREFERABLY MOUTH-TO MOUTH. IF BREATHING IS DIFFICULT, GIVE OXYGEN. GET MEDICAL ATTENTION. IF SWALLOWED, DO NOT INDUCE VOMITING, GET IMMEDIATE MEDICAL ATTENTION. --NOTE TO PHYSICIAN--THIS MATERIAL CONTAINS A COMPONENT WHICH REQUIRES AN ALCOHOL SOLVENT TO REMOVE FROM THE SKIN AND EYES.

SECTION VI - REACTIVITY DATA

CHEMICAL STABILITY..... Stable

CONDITIONS TO AVOID..... None

INCOMPATIBLE MATERIALS... Oxidizers or Oxidizing Materials.

DECOMPOSITION PRODUCTS... FROM FIRE: SMOKE, CARBON DIOXIDE, CARBON MONOXIDE,

OXIDES OF SULFUR AND OXIDES OF NITROGEN

HAZARDOUS POLYMERIZATION, Will not occur

POLYMERIZATION AVOID None

SECTION VII - SPILL OR LEAK PROCEDURE

FOR SPILL In case of spillage, absorb with inert material and dispose of in accordance with applicable regulations.

WASTE DISPOSAL METHOD.... HAZARDOUS WASTE. EPA APPROVED HAZARDOUS WASTE DISPOSAL SITE. FOLLOW APPLICABLE LOCAL, STATE AND FEDERAL

REGULATIONS.

SECTION VIII - SPECIAL PROTECTION

RESPIRATORY PROTECTION... NOT NORMALLY NEEDED

VENTILATION......... Desired in closed places

MECHANICAL EXHAUST.... Desired

OMEGA 1172

LOCAL EXHAUST..... Desired in closed places

PROTECTIVE GLOVES..... Chemical Type suitable for hydrocarbon solvents.

EYE PROTECTION..... Chemical Goggles

OTHER PROTECTIVE

ROUIPMENT...... HMIS Personal Protection: B: Safety glasses and

Gloves.

CECTION IV _ CRECIAL HANDLING AND DOT

SECTION IX - SPECIAL HANDLING AND DOT

HANDLING AND STORAGE.... Store in a cool place away from ignition sources.

Store away from oxidizers or materials bearing a

yellow "DOT" label.

FRECAUTIONARY MEASURES... Keep away from heat, sparks and flame. Use with

adequate ventilation. Do not breathe vapors Avoid

prolonged or repeated contact with skin.

HAZARD CLASS..... NOT REGULATED

DOT SHIFFING NAME..... NOT REGULATED, GUIDE 31

REFORTABLE QUANTITY (RQ). NONE

UN NUMBER......... UN 1993

NA #.... None

PACKAGING SIZE..... Bulk and Drums

FOOT NOTES.... N/A=NOT APPLICABLE - N/D=NO DATA AVAILABLE

<=LESS THAN - >=GREATER THAN
APP = APPROXIMATE - EST. =ESTIMATED

PREPARED BY...... OMEGA TREATING CHEMICALS, INC. (915) 683-3312

REVISED DATE..... DECEMBER, 1994

THIS PRODUCT'S HEALTH AND SAFETY INFORMATION IS PROVIDED TO ASSIST OUR CUSTOMERS IN ASSESSING COMPLIANECE WITH HEALTH, SAFETY AND ENVIRONMENTAL REGULATIONS. THE INFORMATION CONTAINED HEREIN IS BASED ON DATA AVAILABLE TO US, AND IS BELIEVED TO BE ACCURATE, ALTHOUGH NO GUARANTEE OR WARRANTY IS PROVIDED OR IMPLIED BY THE COMPANY IS THIS RESPECT. SINCE THE USE OF THIS PRODUCT IS WITHIN THE EXCLUSIVE CONTROL OF THE USER, IT IS THE USER'S RESPONSIBILITY TO DETERMINE THE CONDITIONS OF SAFE USE. SUCH CONDITIONS MUST COMPLY WITH ALL GOVERNMENTAL REGULATIONS.

ALL MATERIALS IN THIS PRODUCT ARE PRODUCED IN COMPLIANCE WITH PUBLIC LAW 94-469. (ALSO KNOWN AS THE "TOXIC SUBSTANCES CONTROL ACT" OF 1976.)

OMEGA 1172

TRADE NAME........ OMEGA 1172

SIGNAL WORD..... CAUTION!

STATEMENT OF HAZARD.... CAUSES IRRITATION

CAUSES EYE IRRITATION

DOT LABEL REQUIRED..... NONE

01/31/1996

--- 4 ----

OMEGA 1172



ENVIRONMENTAL DATA SHEET

SECTION I — IDENTIFICATION

COMPANY NAME...... OMEGA TREATING CHEMICALS

2500 WEST FRANCIS

MIDLAND, TEXAS 79701

PHONE NUMBER...... 915-683-3312

EMERGENCY PHONE NUMBER... 1(915) 683-3312

EFFECTIVE DATE.... APRIL, 1989

TRADE NAME........ OMEGA 1172

CHEMICAL FAMILY..... Emulsion Breaker

SPECIAL NOTICE: In accordance with 40 CFR 372.45, this product contains the following materials which have been classified as TOXIC under SARA Title III, Section 313. This page is a part of the Material Safety Data Sheet describing the above named product and shall not be detached. Any reproduction or distribution of this Material Safety Data Sheet after January 1, 1989 must include this page.

SECTION XI — SARA TITLE III, SECTION 313

TOXIC CHEMICALS

Z

PROD. CAS #

MONE

SECTION X - ENVIRONMENTAL DATA

EPA HAZARD....... NONE

CERCLA RQ VALUE...... NONE

SARA TEG. NONE

RCRA HAZARDOUS WASTE.... NONE

CLEAN AIR....... CAA SECTION 111

CLEAN WATER....... CWA SECTION 311



CCEX VCC

605774-00 Page 1 of 4

MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 12/30/92

I. PRODUCT IDENTIFICATION ***************

MOBIL PEGASUS 80

SUPPLIER:

24-HOUR EMERGENCY (CALL COLLECT):

MOBIL CIL CORP. (609) 737-4411

CHEMICAL NAMES AND SYNONYMS:

CHEMIREC:

PET. HYDROCARBONS AND ADDITIVES

(800) 424-9300

USE OR DESCRIPTION:

PRODUCT AND MSDS INFORMATION:

NATURAL GAS ENGINE OIL

(800) 662-4525

********* II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES **********

APPEARANCE: Amber Liquid

ODOR: Mild

PH: NA

VISCOSITY AT 40 C, CS: 126.2 VISCOSITY AT 100 C, CS: > 12.5

PLASE POINT F(C): > 475(246) (ASTM D-92)

POUR POINT F(C): 5(-15)

MELTING POINT F(C): NA BOILING POINT F(C): 730(388)

YOG: < 5.00(Wt. %); 0.371 lbs/gal

RELATIVE DENSITY, 15/4 C: 0.89

SOLUBILITY IN WATER: Negligible

VAPOR PRESSURE ---- Hg 200: < .1

MAPMet Applicable ME=Not Established D=Decomposes FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

None

SEE SECTIONS ALL AND MILL FOR REGULATORY AND FURTHER COMPOSITIONAL DATA.

******************* IV. HEALTH HAZARD DATA ************** --- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---TRRESHOLD LIMIT VALUE: 5.00 mg/m3 Suggested for Gil Mist EFFECTS OF OVEREXPOSURE: Slight eye irritation. Slight skin. irritation.

********* Y. EMERGENCY AND FIRST AID PROCEDURES *********** --- FOR PRIMARY ROUTES OF ENTRY -

EYE CONTACT: Plush thoroughly with water. If irritation persists, call a physician.

SKIN CONTACT: Wash contact areas with soap and water.
INHALATION: Remove from further exposure. If respiratory irritation. dizziness, nausee, or unconsciousmess occurs, seek immediate medical assistance and call a physician. If breathing has stopped, use mouth to mouth resuscitation.

IMCESTION: Not expected to be a problem. However, if greater than 1/2 liter(pint) ingested, immediately give 1 to 2 glasses of Water and call a physician, hospital emergency room or poison control center for essistance. Do not induce vomiting or give anything by mouth to an unconscious person.



MOBIL PEGASUS 80

605774-00 Page 2 of 4

FLASH PUINT F(C): > 475(246) (ASTM D-92)
FLAMMABLE LIMITS. LEL: .67 UEL: 7.07
EXTINGUISHING MEDIA: Carbon dioxide, form, dry chemical and water fog.
SPECIAL FIRE FIGHTING PROCEDURES: Water or form may cause frothing.
Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fires in enclosed areas, firefighters must use self-contained breathing apparatus.

Prevent runoff from fire control or dilution from entering streams, savers, or drinking water supply.
UNUSUAL PIRE AND EXPLOSION HAZARDS: None.

NPPA HAZARD ID: Health: 0, Flasmability: 1, Reactivity: 0

STABILITY (Thermal, Light, etc.): Stable
COMDITIONS TO AVOID: Extreme heat.

INCOMPATIBILITY (Materials to Avoid): Strong oxidizers.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide.

HAZARDOUS POLYMERIZATION: Will not occur.

ENVIRONMENTAL IMPACT: Report spills as required to appropriate authorities. U. S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard toll free number (800) 424-8802. In case of accident or road spill notify CHEMIREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: Adsorb on fire retardant treated sawdust, distanceous earth, etc. Shovel up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.

WASTE HARAGENERT: Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by supervised incineration. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at any government approved waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

SKIN PROTECTION: No special equipment required. However, good personal bygiene practices should always be followed.

RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate ventilation.

VENTILATION: Use in well ventilated area.



MOBIL PEGASUS 80

605774-00 Page 3 of 4

*************************** XI. TOXICOLOGICAL DATA *************** ---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): Slightly toxic --- Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Slightly toxic --- Besed on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Not established

EYE IRRITATION (RABBITS): May cause slight irritation. testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): May cause slight irritation on prolonged or repeated contact. -- Based on testing of similar products and/or the components.

-SUBCERONIC TOXICOLOGY (SUMMARY) ---Severely solvent refined and severely hydrotreated mineral base oils

have been tosted at Mobil Environmental and Hualth Sciences Laboratory by dermal application to rate 5 days/week for 90 days at doses significantly higher than those expected during normal inductrial exposure. Extensive evaluations including microscopic examination of internal organs and clinical chamistry of body Eluids, showed no adverse effects. -CERONIC TOXICULOGY (SIMMARY)-

The base vils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of similar oils showed no evidence of carcinogenic effects.

******************** XII. REGULATORY INFORMATION *************** GOVERNMENTAL INVENTORY STATUS: All components registered in accordence with TSCA and EINECS. Transport Information:

DOT:

Shipping Name: Not applicable Hazard Class: Not applicable

US OSHA HAZARD COMMUNICATION STANDARD: Product assessed in accordance with OSHA 29 CFR 1910.1200 and determined not to be hazardous.

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EFA as a bazardous waste (40 CPR, Part 261D), nor is it formulated to contain materials which are listed hegardous wastes. It does not exhibit the hegardous characteristics of ignitability, corresivity, or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

U.S. Superfund Amendments and Reauthorization Act (SARA) Title III; This product contains no "EXTREMELY HAZARDONS SUBSTANCES".

SARA (311/312 - FORMERLY 302) REPORTABLE HAZARD CATEGORIES: None

This product contains no chemicals reportable under SARA (313) toxic release program.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

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Mobil

MOBIL PEGASUS 80

605774-00 Page 4 of 4

CHEMICAL NAME

ZINC (ELEMENTAL ANALYSIS) (.04%)

PHOSPHORODITHOIC ACID, 0.0-DI Cl14-ALKYL ESTERS, ZINC SALTS (2:1)
(ZDDF) (.32%)

--- REGULATORY LISTS SEARCHED ---

1 - ACCIH ALL 6 - 1ARC 1 11 - TSCA 4 17 - CA P65 27 = HI 293 7 = IARC 2A 2 = ACGIH AI 12 = TSCA 5e2 18 = CA RTK 23 - MN RTK 3 - ACGIH A2 8 = IARC 2B 13 = TSCA 5= 19 = FL RTK 24 - NJ RTK. 4 - NTP CARC 9 - OSHA CARC 14 - TSCA 6 25 - PA RTK 20 - IL RTK 5 - NTP SUS 10 - OSHA Z 15 - TSCA 12b 21 = LA RTK 26 = RI RIK 16 - WEMIS

CARC - CARCINOGEN; SUS - SUSPECTED CARCINOGEN

NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCRS.

INGREDIENT DESCRIPTION PERCENT CAS NUMBER

CONTAINS THE FOLLOWING BASE OIL: > 90.00

DISTILLATES (FETROLEUM), HYDROTREATED

HEAVY PARAPFINIC

ALLII. INGREDIENTS

PERCENT CAS NUMBER

| <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-> | <-

AMINES, POLYETHYLEMEPOLY-, REACTION < 5.72 68439-80-5
PRODUCTS WITH SUCCINIC AMBTERIDE
POLYEUTERYL DERIVS.
ZINC DITHIOPHOSPHATE 0.33 MJT 800967-5469P

FOR MOBIL USE ONLY: NMC: 1* 1* NE 1* 1*, MPPEC: A, PPEC: , US92-547
APPROVE CCODE:2 11/09/92 REQ: US - MARKETING

INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT MITHOUT GUARANTEE.. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR FARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL MARRANTIES OF EVERY KIND AND HATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. MOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

PREPARED BY: MOBIL OIL CORPORATION
ENVIRONMENTAL HEALTH AND SAPETY DEPARTMENT, PRINCETON, NJ
FOR FURTHER INFORMATION, CONTACT:
HOBYL OIL CORPORATION PRODUCT NORMULATION AND CHAITTY CO

HUBIL OIL CORPORATION, PRODUCT PORMULATION AND QUALITY CONTROL 3225 GALLOWS ROAD, PAINPAN, VA 22037 (800) 227-0707 X3265



Mobil

FEB-19 96 16:33 FROM: EDDING W

602953~00 Page 1 of 4

MOBIL DIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED:09/19/91

MOBIL SHC 630 SUPPLIER:

CHER

24-HOUR EMERGENCY (CALL COLLECT):

MOBIL OIL CORP.

(609) 737-4411

CHEMICAL NAMES AND SYNONYMS:

CHEMTREC:

SYN. HYDROCARBONS AND ADDITIVES

(800) 424-9300

USE OR DESCRIPTION: GEAR LUBRICANT

PRODUCT AND MSDS INFORMATION:

(800) 662-4525

********** II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES ************

APPEARANCE: Lt. Amber Liquid

ODOR; Mild

VISCOSITY AT 100 F, SUS: 1078.0 VISCOSITY AT 210 F, SUS: 128.0

209.0 AT 40 C. CS: AT 100 C, CS: 26.0

FLASH POINT F(C): > 480(249) (ASTM D-92)

MELTING POINT F(C): NA

POUR POINT F(C): -50(-46)

BOILING POINT F(C): > 600(316)

RELATIVE DENSITY, 15/4 C: 0.87

SOLUBILITY IN WATER: Negligible

VAPOR PRESSURE-mm Hg 20C: < .1

NA=Not Applicable NE=Not Established D-Decomposes FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

***************** (II. POTENTIALLY HAZARDOUS INGREDIENTS ***********

None

SEE SECTIONS XII AND XIII FOR REGULATORY AND FURTHER COMPOSITIONAL DATA.

SOURCES: A=ACGIH-TLV, A=Suggested-TLV, M-Mobil, O=OSHA, S=Supplier NOTE: Limits shown for guidance only. Follow applicable regulations.

ARREST TARGET TO A STREET TO A STREET TO A STREET ARREST TO A STREET ARREST ARR --- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---THRESHOLD LIMIT VALUE: 5.00 mg/m3 Suggested for Oil Mist EFFECTS OF OVEREXPOSURE: Not expected to be a problem.

*************** V. EMERGENCY AND FIRST AID PROCEDURES *********** --- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: Flush thoroughly with water. If irritation persists, call a physician.

SKIN CONTACT: Wash contact areas with somp and water.

INHALATION: Remove from further exposure. If respiratory irritation, dizziness, nauses, or unconstitueness occurs, seek immediate medical assistance and call a physician. If breathing has stopped, use mouth to mouth resuscitation.

INGESTION: Not expected to be a problem when ingested. If uncomfortable seek medical assistance.



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MOBIL SHC 630

6v2953~00 Page Z of 4

SEANE SEASON DE LA COMPANIE DEL COMPANIE DEL COMPANIE DE LA COMPAN FLASH POINT F(C): > 480(249) (ASTM 0-92) FLAMMABLE LIMITS. LEL: .6% UEL: 7.0% EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog. SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fices in enclosed areas. Firefighters must use self-contained breathing apparatus. Provest runoff from fire control or dilution from entering streams, sewers, or drinking water supply. UNUSUAL FIRE AND EXPLOSION HAZARDS: None.

NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

NUBBRROCCERERCTRACECTOR VII. REACTIVITY DATA NERESCOCCOCCOCCOCCERS STABILITY (Thermal, Light, etc.): Stable CONDITIONS TO AVOID: Extreme heat. INCOMPATIBILITY (Materials to Avoid): Strong oxidizers HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide. HAZARDOUS POLYMERIZATION: Will not occur.

hiskosunussen viii. Spill or Leak procedure "anauskakakananusunus ENVIRONMENTAL IMPACT: Report spills as required to appropriate authorities. U. S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard toll free number (800) 424-8802. In case of accident or road spill notify CHENTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: Adoorb on fire retardant treated sawdust, distanseeous earth, etc. Shovel up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.

WASTE MANAGEMENT: Product is suitable for burning in an enclosed. controlled burner for fuel value or disposal by supervised incineration. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at any government approved waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

ARREST AND ARREST IX. SPECIAL PROTECTION INFORMATION RESERVED ARREST ARRESTS ARREST EYE PROTECTION: Normal industrial eye protection practices should be employed.

SKIN PROTECTION: No special equipment required. However, good personal hygiene practices should always be followed.

RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate Ventilation.

VENTILATION: Use in well ventilated area.

Australians and the second see X. SPECIAL PRECAUTIONS and the see which and the see and the second see and the second see and the second second see and the second No special precautions required.

DATE: 08/11/95

REVISED: 08/11/95

None

SUPERSEDES: 07/31/95

I. PRODUCT IDENTIFICATION

Trade Name:

SUM-CLEAN

Chief Constituent:

TEA Dodecylbenzene Sulfonate

Hazardous Ingredients/OSHA:

2 - Butoxyethanol, (OSHA PEL - 25 ppm) (ACGIH TL - 25 ppm)

Carcinogenic Ingredients/OSHA/NTP/IARC:

Ingredients Regulated by SARA Title 3, Section 313: 2-Butoxyethanol

II. WARNING STATEMENTS

None

III. PHYSICAL AND CHEMICAL DATA

Appearance and Odor: Red on green

Specific Gravity: **Boiling Point:**

Vapor Pressure:

1.05

212°F

Evaporation Rate: Solubility in Water: 1.5

24 mm Hg.

100%

IV. FIRE PROTECTION

Flash Point:

None

Extinguishing Media:

N/A

Special Firefighting Procedure:

None

V. REACTIVITY DATA

Thermal Stability:

Stable

Materials to Avoid:

Acids

Hazardous Polymerization:

Will not occur

Hazardous Decomposition Products:

None

VI. HEALTH HAZARD DATA

Exposure Limits:

Skin - TLV 50 ppm

Effects of Overexposure:

Dry skin, stings eyes. Harmful if swallowed.

VII. PHYSIOLOGICAL EFFECTS SUMMARY

ACUTE:

Eyes:

Irritant to eyes.

Skin:

Will dry skin in concentrated forms.

Respiratory System:

Not Determined (Avoid breathing mist)

CHRONIC: Exposure of rats by inhalation to 2-BE caused hemolysis, hemoglobinuria (blood in the urine) and a slight increase in liver weight. Other species, including man, were less sensitive or more resistant to hemolysis. The hemolytic effect in rats was transitory and/or reversible and not considered to be relevant to human health. Inhalation exposure of pregnant rabbits caused some lethality to the dam and fetus at 200 PPM, but there were no effects at 100 PPM and below. Inhalation exposure to pregnant rats caused irritancy to the dams and related fetotoxicity at 200 and 100 PPM. but there were no effects at 50 PPM and below. 2-BE did not cause birth defects in either study.

REVISED: 08/11/95

SUMMIT SUM-CLEAN

SUPERSEDES: 07/31/95

VIII. PRECAUTIONS FOR SAFE HANDLING

For general personal hygiene, wash hands thoroughly after handling material. Avoid contact with skin and eyes.

Keep from freezing. If frozen, thaw and agitate before use.

IX. PROTECTION AND CONTROL MEASURES

Protective Equipment:

Rubber gloves, splash goggles and eye wash.

Respiratory Protection:

None

Ventilation:

N/A

X. EMERGENCY AND FIRST AID PROCEDURES

Eye Contact:

Flush with water. If irritation persists, get medical attention.

Skin Contact:

Wash with soap and water.

Inhalation:

Remove to fresh air and if burning persists, call physician.

Ingestion:

Take one or two glasses of water and induce vomiting. Call a physician.

XI. SPILL AND DISPOSAL PROCEDURES

Environmental Impact: Report spills as required to appropriate authorities. U. S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard Toll Free Number (800) 424-8802. In case of accident or road spill, notify Chemtrec (800) 424-9300.

<u>Procedures if Material is Released or Spilled:</u> Rinse with copious quantities of water to dilute. Sodium carbonate or calcium carbonate may be used to soak up liquid.

Waste Management: Material is considered non-hazardous and biodegradable as received. Spent material may be disposed of according to Federal, State and Local regulations in sewer system with water flush.

Toxic Substance Inventory Control Act: All components are included on the TSCA Inventory and are in compliance with the TSCA.

FOR ADDITIONAL INFORMATION CONTACT:

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INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

	I. PRODUC	T IDENTIFICATION	
TRADE NAME (as labeled) SulfaTreat		MANUFACTURER'S NAME & A The SulfaTreat Company 900 Roosevelt Pkwy, Suite 610 Chesterfield, Missouri 63017	DDRESS
Phone number for additional information:		1-800-726-7687 (314-532-2189)	
Date prepared or revised:		6/21/94	
	II. HAZARD	OUS INGREDIENTS	
Chemical Names	CAS Numbers Perce		(specify)
	None		
	NA		
Governmental Hy		ICAL PROPERTIES	
Vapor density (air=1)	NA	Melting point or range, °F	NA
Specific gravity	2.4	Boiling point or range, °F	NA
Solubility in water	0	Evaporation rate (butyl acetate=1)	NA
Vapor pressure, mml	dg at 20°C 0		
Appearance and odd	or Black, Gra	ınular, Odorless	
How to detect this su	bstance (warning proper	ties of substance as a gas, vapor, dust, or mist)	NA ·
Flash Point, °F (give		ND EXPLOSION ————————————————————————————————————	
Flammable limits in a	ir, volume %: NA	lower (LEL) upper	(UEL)
Fire extinguishing m	aterials: <u>NA</u> water <u>NA</u> foam	- · ·	<u>NA</u> other:
Special firefighting p	rocedures: None	Unusual fire and explosion hazards:	: None

V. HEALTH HAZARD INFORMATION				
SYMPTOMS OF OVEREXPOSURE (for each potential route of exposure)				
Inhaled: Over exposure to dust may irritate nasal passage.				
Contact with skin or eyes: Contact with skin has no affect; could cause eye similar to dust.	irritation			
Absorbed through skin: None. Swallowed: None				
HEALTH EFFECTS OR RISKS FROM EXPOSURE: Explain in lay terms. Attack if more space is nee Acute: No acute effects to health are known. LD50 greater than 3990 recommendation (highest practical test level). Not toxic.	ded.			
Chronic: No chronic effects to health are known.				
FIRST AID: EMERGENCY PROCEDURES Eye Contact: Flush with water. Skin Contact: None. Swa Inhaled: Remove to fresh air.	llowed: None.			
SUSPECTED CANCER AGENT? _X_NO - This product's ingredients are no				
Federal OSHANTPIARC				
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: None known. VI. REACTIVITY DATA				
Stability: X Stable Unstable Unstable Conditions to avoid: NA Incompatibility (materials to avoid): Hazardous decomposition products (including combustion products): None Hazardous polymerization: May occur X Will no	NA			
VII. SPILL, LEAK, AND DISPOSAL PROCEDUR	RES			
Spill response procedures (include employee protection measures): No special procedures required.				
Preparing wastes for disposal (container types, neutralization, etc.): No special procedures required.				
NOTE: Dispose of all wastes in accordance with federal, state and local regulation	S.			
VIII. SPECIAL HANDLING INFORMATION				
Ventilation and engineering controls: No special requirements. Respiratory protection (type): NIOSH/MSHA approved dust mask (TC-21) Eye protection (type): None required. Gloves (specify material): None of the clothing and equipment: No special requirements. Work practices, hygienic practices: No special requirements. Other handling and storage requirements: No special requirements. Protective measures during maintenance of contaminated equipment: NA	C-132) required.			

EVALUATION OF THE ENVIRONMENTAL CHARACTERISTICS OF Sulfatreat® AND ITS REACTION PRODUCTS USING EPA GUIDELINES FOR THE "IDENTIFICATION AND LISTING OF HAZARDOUS WASTE" MARCH, 1992

I. SUMMARY

SulfaTreat® is used in a patented process which consists of the use of a proprietary iron compound to remove hydrogen sulfide from natural gas. As a result of the process, a solid residue is produced.

Laboratory evaluations were performed on SulfaTreat® and its air dried reaction products according to U.S. Environmental Protection Agency (EPA) test protocol cited in 40 CFR Subpart C (Section 261.20 through 261.24) of Section 3001 of the Resource Conservation and Recovery Act in the Federal Register, Volume 45, Number 98, on May 19, 1980, revised July 1,1989 and the Toxicity Characteristics Leaching Procedure (TCLP) effective September 2, 1990. Reacted SulfaTreat® was also analyzed according to extractable California title 22 methods using the calwet extraction procedure.

Evaluations included testing of the ignitability, corrosivity, reactivity, and the determination of the presence of heavy metals and pesticides as prescribed in the regulations.

Also the oral and dermal toxicity and the aquatic 96 hour LC50 was determined and the agricultural characteristics were studied. All results showed SulfaTreat® and its reaction products to be safe for personnel and non-hazardous to the environment and effective for plant growth.

The work summarized herein was performed for Gas Sweetener Associates dba The SulfaTreat Company by the following companies and individuals:

EPA:

Gulf South Research Institute (GSRI)
Shilstone Testing Laboratories
Tim Sloan, Scientific Consultant
Dr. R. P. Wendt, Professor of Chemistry,
Loyola University
Thermo Analytical Inc.
SPL, Inc.

ORAL AND DERMAL TOXICITY:

Scientific Associates, Inc.

CORN GROWTH EXPERIMENTS:

Terry L Smith, Ph.D., California Polytechnic State University, Soil Science Deparent.

II. EXPERIMENTAL RESULTS

A. Characteristics of Ignitability

The residue is not a liquid. Flash point of wet sludge - Does not flash below 100°C. Flash point of dry sludge - 137°C.

1. Friction Testing

Friction testing was conducted by grinding the sample under standard temperature and pressure in a mortar and pestle and monitoring the temperature. There was neither ignition nor any variation in the temperature or cause of fire during the course of the evaluation.

2. Flame Testing

Flame testing was conducted by 1) directly heating the sample with a Fischer burner flame and 2) indirectly heating the sample in a porcelain crucible. In both cases, the sample did not ignite but merely glowed with red color due to high temperature.

3. Exposure to Moisture Testing

Exposure to moisture testing was conducted by placing small amounts of the sample in water. The sample remained unchanged.

4. Oxidizer

By the definition stated in 49 CFR 173.141, the sample is not an oxidizer.

B. Characteristics of Corrosivity

1. pH Determination

The pH determination was made on a slurried sample in accordance with EPA 600/4.79-020. The initial pH reading was approximately 9.

2. Corrosion Rate Determination

The corrosion rate of the sample on 1020 steel was determined using a potentiodynamic polarization technique (ASTM G-5 specification). The studies were conducted using a Princeton Applied Research computerized Model 350 corrosion measurement system.

The results of the potentiodynamic polarization experiment with SAE 1020 steel showed that the general corrosion rate a 455C (130°F) of 5.8 mils (.15 mm) per year is substantially below the maximum 0.250 inches (6.25 mm) per year specified in the regulation.

C. Characteristics of Reactivity

1. Stability Testing

An aqueous suspension of the reacted SulfaTreat® monitored with a potentiometer from pH 1 to pH 12.5. The pH alterations were accomplished using dilute HCL and dilute NaOH. The material was stable and totally unreactive when exposed to these pH extremes without any evolution of gases, including H₂S and SO₂.

2. Classification as an Explosive Neither the material nor anything similar to this material is listed as a Forbidden, Class A, or Class B explosive in 49 CFR 173.51, 49 CFR 173.53, or 49 CFR 173.88.

D. Characteristics of EP Toxicity

Laboratory evaluations of the EP toxicity required a leaching step prior to analysis. The leaching step was carried out in accordance with the test methods described within the Federal Register, Volume 45, Number 98 on May 19, 1980 (Appendix III). 100 grams of the ground solid sample were placed in a mechanically stirred extractor with 1600 g of deionized water. The pH was maintained at 5 for a period of 24 hours by the addition of 0.5 N acetic acid at 30 minute intervals as needed. This solution was then filtered using a 0.45 millipore filter. The filtrate was analyzed for the presence of contaminants using the following EPA methods:

Contaminant	EPA Method
Mercury	245.1
Arsenic	206.1
Barium	208.1
Cadmium	213.1
Chromium	218.1
Lead	239.2
Selenium :	270.3
Silver	272.1
Mercury	245.1
TCLP	1311

The concentration of contaminants in the extract is far below the maximum allowable limits in all cases.

E. Oral and Dermal Toxicity

1. Unreacted SulfaTreat® (Oral Toxicity)
The acute oral LD50 of SulfaTreat® when administered as a 67% w/w aqueous suspension to male and female SASCO rats weighing 219 to 345 grams, was found to be greater than 39.91 g/kg of body weight.

As the term is defined in the Federal Hazardous Substances Act (FHSA), the product was found not to be a Toxic Substance.

- 2. Reacted SulfaTreat® (Oral Toxicity)
 Undiluted, reacted SulfaTreat® (semisolid phase) was administered orally to ten SASCO-SD rats (five male and five females), weighing 198 to 265 grams at a dosage level of 5.00 grams per kilogram of body weight. All of the animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substance Act (FHSA), the semisolid phase of the test material was found not to be a Toxic Substance.
- 3. Reacted SulfaTreat® (Dermal Toxicity) Undiluted, reacted SulfaTreat® (liquid phase) was applied for twenty-four hours to the abraded skin of five male and five female New Zealand White Rabbits, weighing 2.72 to 3.09 kilograms, at a dosage level of 2.00 grams per kilogram of body weight. All ten animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substances Act (FHSA), the liquid phase of the test material was found not to be a Toxic Substance.
- 4. Reacted SulfaTreat® (Aquatic Toxicity)
 Passed the aquatic 96 hour LC50 which was
 determined to be more than 500 milligrams per liter
 when measured in soft water with fathead minnows.

F. Other

The material is not listed (as a hazardous waste) in Subpart 261.30-261.33 of "Identification and Listing of Hazardous Wastes, "EPA-8700-12(FR), May 29, 1980.