

**GW - 266**

**PERMITS,  
RENEWALS,  
& MODS  
Application**



# New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**John H. Bemis**  
Cabinet Secretary

**Brett F. Woods, Ph.D.**  
Deputy Cabinet Secretary

**Jami Bailey**  
Division Director  
Oil Conservation Division



**FEBRUARY 21, 2012**

Ms. Tiana Andriamanarivo  
ConocoPhillips  
905 S. Fillmore, Suite 600  
Amarillo, TX 79101

Dear Ms. Andriamanarivo:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that one of your facilities with an expired or soon to be expired permit does not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for **GW - 266** (Eunice Crude Station) is hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permits is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will make an inspection of your facility to determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

**Jami Bailey**  
Director

JB/ll

**Chavez, Carl J, EMNRD**

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, January 16, 2008 8:39 AM  
**To:** 'kirby.m.shipp@conocophillips.com'  
**Cc:** Lowe, Leonard, EMNRD; Hansen, Edward J., EMNRD  
**Subject:** ConocoPhillips EuniceTruck Unloading & Gathering Facility

January 16, 2008

Mr. Kirby Shipp:

**Re: ConocoPhillips (COP) Eunice Truck Unloading & Gathering Facility Inspection**

The Oil Conservation Division (OCD) is following up with you on our January 11, 2008 facility inspection. Mr. Ed Hansen and I inspected the facility for Mr. Leonard Lowe, since we were in the area. Please find the OCD observations, comments, and/or requirements provided below based on our inspection.

Location: Take Hwy. 8 W. of Eunice about 0.5 Mi. W of Oil Center

**Primary Observations:**

- 1) The sweet crude dual Tank Battery is currently out-of-service. The tanks are within a bermed secondary containment area, but there is no liner beneath and within the secondary containment area. The tanks were gauged on site and contained about 2 feet of fluid + BSW.

COP wishes to store the tanks at the facility in their present location with the possibility of placing the tanks back in service at a later date. The OCD has no problem with storage if the fluids are evacuated as practicable to minimize any threat of leakage into an unlined containment area. The OCD requires that the tanks be lined (COP

1/16/2008

indicated that it uses 60-mil HDPE standard at its facility) before placing them back into service.



- 2) The sour tank is in service and similar to the above tanks, the secondary containment area is not lined. A 60-mil HDPE liner similar to No. 1 above is required to be installed within 90 days of this correspondence and the bermed area shall be constructed to contain at least 1.333... of the volume of the tank within the bermed area.

"All tanks shall be placed on impermeable pads and surrounded by lined berms or other impermeable secondary containment device having a capacity at least equal to one and one-third times the capacity of the largest tank, or, if the tanks are interconnected, of all interconnected tanks."

The OCD commends COP on the skid(s) observed under the pump and chemical storage container in the photo below with the sour tank in the background. This is a great waste minimization- good housekeeping action by COP and is in conformance with OCD pollution prevention initiatives. Thank you.







**Secondary Observation:**

- 1) Although not a requirement, COP may want to consider placing a sign with the company name and name or type (i.e., COP Truck Unload Facility or Pipeline Gathering Facility) of facility near the roadside. The OCD had some difficulty locating the facility based on the existing sign.



Thank you for the opportunity to inspect the facility. You may provide your follow-up photos of COP actions correcting the requirement(s) or recommendations listed above to Mr. Leonard Lowe (OCD Inspector) at e-mail address: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us) or to discuss the inspection, please call (505) 476-3492. Thank you.

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

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 12/11/07

or cash received on                      in the amount of \$ 1200<sup>00</sup>

from Conoco Phillips

for GW-266

Submitted by: Lawrence Rogers Date: 12/27/07

Submitted to ASD by: Lawrence Rogers Date: 12/27/07

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



**ConocoPhillips  
Pipe Line Company**

RECEIVED

2007 DEC 21 PM 12:54

**Thomas Lacki, CHMM**

Environmental Coordinator  
Western Operations – Transportation  
Texas Panhandle and West Texas Districts  
**ConocoPhillips Pipe Line Company**  
4001 E. 42<sup>nd</sup> Street, Suite 105  
Odessa, TX 79762  
Phone 432.368.1315  
thomas.lacki@conocophillips.com

December 14, 2007

Certified Mail: 7006 0810 0004 9498 4765  
Return Receipt Requested

State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**RE: Discharge Plan w/ Fee - GW-266  
Eunice Station  
ConocoPhillips Pipe Line Company**

Dear Sir or Madam:

Please find the enclosed signed Discharge Permit for the above referenced ConocoPhillips Pipe Line Company facility. Also enclosed is check number 1924 in the amount of \$1200 for the associated permitting fee.

Please contact me at (432) 368-1315 or thomas.lacki@conocophillips.com if you have any questions or if you require any additional information

Best regards,

Thomas Lacki, CHMM  
Environmental Coordinator

Enc.(2)

RC w/enc. Kirby Shipp; ConocoPhillips Pipe Line Company

**ATTACHMENT TO THE DISCHARGE PERMIT  
CONOCO PHILLIPS PIPELINE COMPANY EUNICE STATION (GW-266)  
DISCHARGE PERMIT APPROVAL CONDITIONS  
NOVEMBER 28, 2007**

**Please remit a check for \$1200.00 made payable to Water Quality Management Fund:**

**Water Quality Management Fund  
C/o: Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505**

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$1200.00 renewal permit fee for a crude pump station.
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on February 10, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its July 20<sup>th</sup>, 2007 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.



**5. Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

**6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

**B. Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

**7. Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

**8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

**9. Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

**10. Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

**11. Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**12. Underground Process/Wastewater Lines:**

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**13. Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that 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 (NMED).

**14. Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

**17. Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22. Closure Plan and Financial Assurance:** Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

**23. Certification: Conoco Phillips Pipeline Company, (Owner/Operator),** by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Mr. Thomas Lacki  
GW-266  
November 28, 2007  
Page 7 of 7

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

CONOCO PHILLIPS PIPE LINE COMPANY  
Company Name-print name above

KIRBY SHIPP  
Company Representative- print name

KY SHIPP  
Company Representative- signature

Title GAINES SUPERVISOR

Date: 12-13-07



ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 7/13/07

or cash received on                      in the amount of \$ 100<sup>00</sup>

from ConocoPhillips

for GW-266

Submitted by: Lawrence Romero Date: 8/10/07

Submitted to ASD by: Brian Romero Date: 8/10/07

Received in ASD by:                      Date:                     

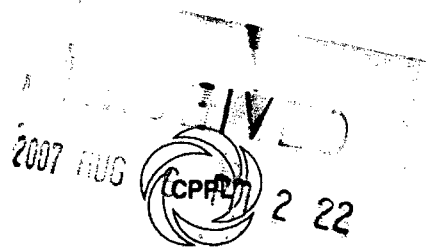
Filing Fee ☒ New Facility ☐ Renewal ☐

Modification ☐ Other ☐

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ☐ or Annual Increment ☐



**ConocoPhillips  
Pipe Line Company**

**Thomas Lacki, CHMM**  
Environmental Coordinator  
Western Operations – Transportation  
Texas Panhandle and West Texas Districts  
**ConocoPhillips Pipe Line Company**  
4001 E. 42<sup>nd</sup> Street, Suite 105  
Odessa, TX 79762  
Phone 432.368.1315  
thomas.lacki@conocophillips.com

July 20, 2007

Certified Mail: 7006 0810 0004 9498 4413  
Return Receipt Requested

Mr. Wayne Price  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**RE: Discharge Plan Renewal – GW-266  
Eunice Station  
ConocoPhillips Pipe Line Company**

Dear Mr. Price:

Please find the enclosed packet containing the Discharge Plan Application Renewal for the above referenced ConocoPhillips Pipe Line Company facility. Included in the packet is the renewal application with drawings, a copy of the full application, and check #1862 for \$100.

Please note that the 300 and 500 barrel sweet crude aboveground storage tanks (ASTs) included in the previous application have been taken out of service and replaced by a 456-bbl AST, which has also since been taken out of service. Additionally, the associated LACT unit has also been taken out of service. Also, the estimated amount of waste to be disposed of has been decreased from 30-bbls of tank bottoms annually to 5-bbls of tank bottoms per cleanout (approximately every 10 years) and 2-bbls of paraffin annually.

We anticipate using the Hobbs Sun News for our Public Notice.

I appreciate your understanding and assistance with this matter and ask that you please contact me at (432) 368-1315 or thomas.lacki@conocophillips.com with any questions or if you require any additional information

Best regards,

Thomas Lacki, CHMM  
Environmental Coordinator

Enc.

Cc w/enc. State of New Mexico OCD; District 1  
RC w/enc. Kirby Shipp; ConocoPhillips Pipe Line Company

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Revised June 10, 2003

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 FACILITIES  
AND CRUDE OIL PUMP STATIONS**

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

☐ New ☒ Renewal ☐ Modification GW# 266

1. Type: See attached

2. Operator: ConocoPhillips Pipe Line Company

Address: 4001 East 42<sup>nd</sup> St., Odessa, Texas

Contact Person: Kirby Shipp Phone: 505.391.8262

3. Location:                      /4                      /4 Section 3 Township 21 Range 36E  
Submit large scale topographic map showing exact location. (Attachment 1)

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

Name: KIRBY SHIPP Title: GAS OIL OPERATION SUPERVISOR

Signature: [Signature] Date: 08-02-07

E-mail Address: Kirby.M.Shipp@ConocoPhillips.com

**Discharge Plan Application Renewal - 2007**  
**ConocoPhillips Pipe Line Company (formerly Phillips Pipe Line)**  
**Eunice Truck Station**

**Item 1: Type of Operation**

The facility is a crude oil truck unloading station, SIC Code 4612. On site assets at the time of the previous application renewal included 500-bbl and 300 bbl aboveground storage tanks ASTs for sweet crude oil, one 1,000-bbl AST for sour crude oil, and two lease automated custody transfer (LACT) units. Currently, the only active assets onsite are the 1,000-bbl sour crude AST and the associated LACT unit. The 500-bbl AST, a 456-bbl AST which recently replaced the 300-bbl AST, and the sweet crude LACT unit are now out of service. Onsite activities involve delivery of crude oil from area producing wells via truck and transferring the oil through a hose into the AST, where it enters the pipeline and passes through the LACT unit on its way to the refinery.

**Item 2: Operator Information**

Operator: ConocoPhillips Pipe Line Company (formerly Phillips Pipe Line)  
Address: 4001 East 42<sup>nd</sup> Street, STE 105, Odessa, Texas 79762  
Contact: Kirby Shipp  
Phone: 505.391.8262

**Item 3: Location**

No change from the previous application; Section 3; Township 21; Range 36E. See Attachment 1 for drawing.

**Item 4: Landowner Information**

No change from the previous application; the site is leased from State of New Mexico, NM Lease #1389.

**Item 5: Facility Description**

No change from the previous application; see Attachment 2 for drawing.

**Item 6: Onsite Materials**

No change from the previous application; petroleum crude oil.

**Item 7: Sources of effluent and waste solids, including waste water volumes**

No waste, wastewater, or effluent is produced on a daily basis. Small amounts of wastewater can be produced during periodic maintenance activities. Basic sediment and water (BS&W) which can include sands, scales, water, etc., that settle at the bottom of a tank is produced during tank cleanouts. These cleanouts occur approximately every 10 years and produce, on average, 5-bbls per cleanout. The excess crude oil (drips, etc.) from the transfer lines is caught in screened drip pans located under the line storage area. Finally, maintenance (scraper trap) activities produce approximately 2-bbls of paraffin per year.

**Item 8: Current liquid and solid waste collection/treatment/disposal procedures**

Waste water and waste liquids produced during maintenance activities are generally managed through the use of drip pans or other collection methods and are re-injected into the pipeline system. BS&W is trucked offsite by an approved contractor for reclamation as part of the tank cleaning process. Excess crude oil from drip pans is pumped out as needed, but no less than once every two months, and transferred back into the delivery trucks and/or directly into the pipe line system. Finally, paraffin from maintenance activities is currently removed for reclamation by Gandy Corp.

**Item 9: Proposed modifications to existing collection/treatment/disposal systems**

No changes are proposed.

**Item 10: Routine inspection and maintenance plan**

The facility is inspected daily for signs of spills, leaks, or equipment damage. This inspection includes the tank, tank dike, and drip pans.

Item 11: Contingency plan for reporting and clean-up of spills or releases

Should a spill or leak occur, facility personnel will use the Area Emergency Response Plan to ensure the appropriate agencies are notified in accordance with appropriate regulations. This includes both verbal and written notification, when required. Additionally, all free liquid will be immediately recovered and subsequent cleanup performed in accordance with appropriate regulatory requirements.

Item 12: Geological/hydrological information for the facility

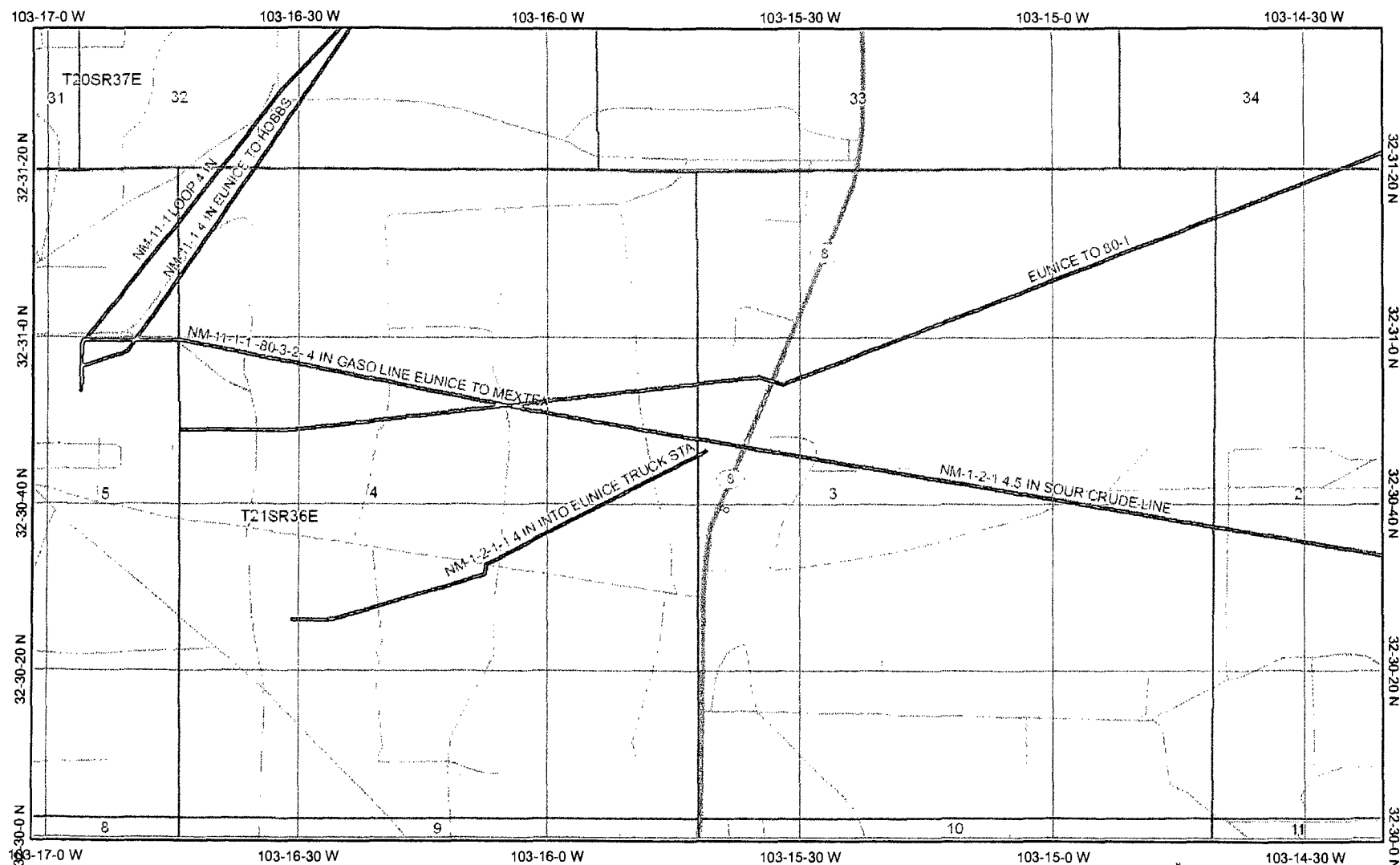
No change from the previous application; there are no navigable waters within one mile, no known wells within one-quarter mile, and the Ogallala is the closest source of potable groundwater at an estimated depth of 234 ft.

Item 13: Facility closure plan, and other information as is necessary to demonstrate compliance with any other  
OCD rules, regulations and/or orders

No change from the previous application; there are no future modifications or changes planned for this facility.



# Eunice Truck Station



Map center: 32° 30' 48" N, 103° 15' 41" W



Scale: 1:21,045

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

MILE POST 10  
 HWY STA. 169+02.46

NEW MEXICO

USGLO  
B.C.

**T-20-S**

T-21-S

STATE LAND

1.722 ACRE  
TRACT

PIPELINE

NOTE: "SHOULDER WORK AHEAD" and "BE PREPARED TO STOP" signs shall remain in place from the time the construction starts until it is completed.

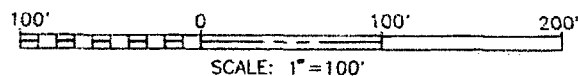
\*"FLAGMAN AHEAD" signs will be in place during the hours construction men and equipment are working. A flagman will be on duty all the time that construction men and/or equipment are working.

Signs will be 48"x48" in size. Color will be black on orange and will meet the reflective quality specified in the New Mexico State Highway & Transportation Standard Specifications.

NOTE: Warning Signs Will Be Placed  
1500 Feet In Both Direction  
During Construction

NOTE:

- = Shoulder Work Ahead
- = Be Prepared To Stop
- = Flagman Ahead



**ATTACHMENT TO THE DISCHARGE PLAN GW-266 APPROVAL**  
**Phillips Pipe Line Company, Eunice Unloading Station**  
**DISCHARGE PLAN APPROVAL CONDITIONS**  
**July 24, 2002**

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee of \$1200.00 for crude oil pump stations. The flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.
2. Commitments: Phillips Pipe Line Company will abide by all commitments submitted in the discharge plan renewal application dated March 06, 2002, including attachments and these conditions for approval.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2002 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by February 10, of each year.
9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2002 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by February 10, 2003.
10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspections will be retained on site for a period of five years.
12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. And WQCC 1203. to the OCD Hobbs District Office.
13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712 disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge plan, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

Mr. Thomas R. Wynn

July 24, 2002

Page 5

the waste stream is identified in the discharge plan, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
15. Storm Water Plan: Stormwater runoff controls shall be maintained. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off, then immediate actions shall be taken to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal stormwater run-off containment plan and submit for OCD approval within 15 days.
16. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
17. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
18. Certification: **Phillips Pipe Line Company** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Phillips Pipe Line Company** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by:

**Phillips Pipe Line Company**

T2W Dave Ysebaert  
Company Representative- print name

Dave Ysebaert  
Company Representative- Sign

Date 8-2-02

Title

President



ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 8/5/02,

or cash received on                      in the amount of \$ 1200.00

from Phillips Petr. Co.

for Junie Unloading Station 610-266

Submitted by:                      (Facility Name)                      Date: 8-8-02 (DP No.)

Submitted to ASD by:                      Date:                     

Received in ASD by:                      Date:                     

Filing Fee            New Facility            Renewal ✓

Modification            Other                     

(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment           

THIS IS WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

ORDER

08/05/2002

PAY TO THE ORDER OF

GRANTY

WATER QUALITY MANAGEMENT FUND  
WATER CONSERVATION DIVISION  
ENVIRONMENTAL SERVICES  
1420 SOUTH SAINT FRANCIS DRIVE  
SPRINGFIELD, AR 72704

*[Signature]*



August 5, 2002

Re: Eunice Unloading Station  
Groundwater Discharge Plan  
Application Fee

Roger Anderson  
Environmental Bureau Chief  
Oil Conservation Division  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

Phillips Pipe Line Company is submitting a check payable to the Water Quality Management Fund in the amount of \$1200.00 for the Groundwater Discharge Plan at the above referenced site. Also please find a signed Groundwater Discharge Plan as requested in the July 24, 2002 letter.

Should you have any questions or concerns please contact me at 918-661-4855.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas R. Wynn', written over a horizontal line.

Thomas R. Wynn  
Environmental Representative  
3B10 Adams Building

Enclosures

DATE	INVOICE NO.(DESCRIPTION)	CO DOCUMENT NO.	GROSS	DISCOUNT	NET
08/01/02		G9 1200004131 USD	1,200.00	0.00	1,200.00
EUNICE PERMIT FEE					
	PAYEE NUMBER	CHECK DATE	CHECK NO	CHECK AMOUNT	
	91931	08/05/2002	158156	1200.00	

If you have questions about this check, call (918)661-5746.



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

February 10, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-897**

Mr. D.C. Gill, Jr.  
Phillips Pipe Line Company  
3B11 Adams Building  
Bartlesville, OK 74004

**Re: Discharge Plan GW-266  
Eunice Unloading Station  
Lea County, New Mexico**

Dear Mr. Gill:

The groundwater discharge plan, GW-266, for the Phillips Pipeline Company (Phillips) Eunice Unloading Station located in Section 3, Township 21 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 original application dated October 7, 1996, and additional information dated December 6, 1996. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Phillips of liability should operations result in pollution of surface water, ground water, or the environment.

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

Mr. D. C. Gill, Jr.  
February 10, 1997  
Page 2

Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. Phillips 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.

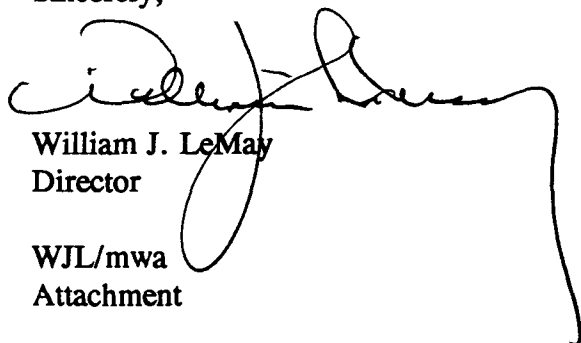
Pursuant to Section 3109.G.4., this plan is for a period of five years. This approval will expire on February 10, 2002, and Phillips should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application 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 plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the Phillips Pipeline Company Eunice Unloading Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$1,380 for oil field service companies. The OCD received the \$50 filing fee on September 30, 1996. The \$1,380 flat fee is due upon receipt of this approval. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval.

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

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

Sincerely,



William J. LeMay  
Director

WJL/mwa  
Attachment

xc: OCD Hobbs Office



ATTACHMENT TO THE DISCHARGE PLAN GW-266  
PHILLIPS PIPE LINE COMPANY  
EUNICE UNLOADING STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(February 10, 1997)

1. Payment of Discharge Plan Fees: The \$1,380 flat fee shall be submitted upon receipt of this approval. 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. Phillips Commitments: Phillips will abide by all commitments submitted in the discharge plan application dated November 14, 1996.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in 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.
4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must 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. Test results will be submitted to the OCD Santa Fe Division office within 30 days of testing.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. Test results will be submitted to the OCD Santa Fe Division office within 30 days of testing.
10. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
- Any non-exempt 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.
11. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
12. 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.
13. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
14. Certification: Phillips, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Phillips further acknowledges that these conditions and requirements of this permit modification may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

PHILLIPS PIPE LINE COMPANY

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

P 255 255 597

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

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

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	

PS Form 3800, April 1995