

GW - 270

GENERAL CORRESPONDENCE

YEAR(S):

2006-1996

September 7, 2006

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

Subject: Southern Union Gas Services, LP Discharge Plan Modification for West
Eunice Compressor Station (GW-270)

To Whom It May Concern,

Enclosed please find the completed public notice for the modification of the West Eunice Compressor Discharge Plan (GW-270). Pursuant to 20.6.2.3108.A(3) all owner of records within ½ mile where mailed a copy of the notification by certified/return receipt US mail. A copy of the notice, copies of the certified mail receipts, and copies of the return receipts are attached.

Also attached is a copy of the Attachment To The Discharge Permit with an original signature and date.

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

Sincerely



Cale E. Swanson
Environmental Scientist III

NOTICE OF PUBLICATION

Application for Modification of GW-270
West Eunice Compressor Station
Southern Union Gas Services, Ltd.
2021 Main Street, Suite 3000
Fort Worth, TX 76102

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

(GW-270) - Southern Union Gas Services, LP, Mr. Wayne L. Farley, Vice President, Gas Operations, 201 N. Main Street, Fort Worth, Texas 76102, has submitted an application for modification of a previously approved discharge plan for the West Eunice Compressor Station located in the SE/4 SE/4 of Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The compressor station has a horsepower rating of 7153 HP. Approximately 60 gallons per week of wastewater will be stored on site in a tank located in a concrete containment pad. Fluids will be processed and hydrocarbons will be separated prior to wastewater being transported to an OCD approved offsite disposal facility. The discharge plan consists of a waste management plan that addresses how oilfield products and wastes 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. Ground water most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of 1,100 mg/l.

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 permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's website <http://www.emnrd.state.nm.us/oed/>. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	1.85
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.64



Sent To NM State Land Office
 Street, Apt. No., or PO Box No. PO Box 1148
 City, State, ZIP+4 Santa Fe, NM 87504-1148

PS Form 3800, June 2002

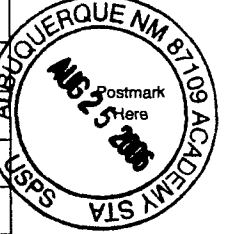
See Reverse for Instructions

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Total Postage & Fees	\$ 4.64



Sent To Eunice City Manager
 Street, Apt. No., or PO Box No. PO Box 147
 City, State, ZIP+4 Eunice, NM 88231-0147

PS Form 3800, June 2002

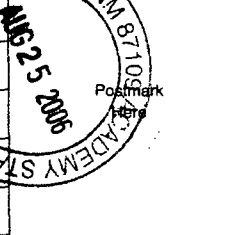
See Reverse for Instructions

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Sent To Bremer Property, c/o Commerce Bank
 Street, Apt. No., or PO Box No. PO Box 419248
 City, State, ZIP+4 Kansas City, MO 64141-6248

PS Form 3800, June 2002

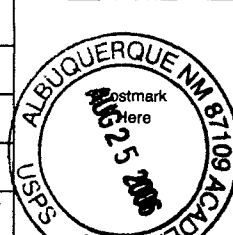
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Sent To BLM - Carlsbad Field Office Manager
 Street, Apt. No., or PO Box No. 680 E Greene St
 City, State, ZIP+4 Carlsbad, NM 88220-6292

PS Form 3800, June 2002

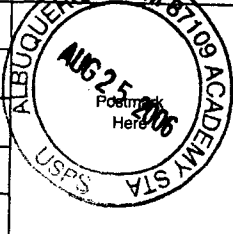
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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.64



Sent To GP Sim
 Street, Apt. No., or PO Box No. PO Box 1046
 City, State, ZIP+4 Eunice, NM 88231-1046

PS Form 3800, June 2002

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

NM State Land Office
Asst. Commissioner for
Surface Resources
PO Box 1148
Santa Fe, NM 87504-1148

2. Article Number

(Transfer from service label)

7004 0550 0000 8424 9475

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

AUG 29 2005

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

SENDER: COMPLETE THIS SECTION

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BLM - Carlsbad Field
Office Manager
630 E. Greene St.
Carlsbad, NM 88210-6292

2. Article Number

(Transfer from service label)

7004 0550 0000 8424 9482

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

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☐ Yes

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1. Article Addressed to:

Eunice City Manager
PO Box 147
Eunice, NM 88231-0147

2. Article Number

(Transfer from service label)

7004 0550 0000 8424 9468

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

SENDER: COMPLETE THIS SECTION

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

GP Sim
PO Box 1046
Eunice, NM 88231-1046

2. Article Number

(Transfer from service label)

7004 0550 0000 8424 9451

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X K.S. McFeynold

☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

08-31-06

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☒ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes**SENDER: COMPLETE THIS SECTION**

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Nymeyer Property
c/o Commerce Bank
PO Box 419248
Kansas City, MO 64141-6248

2. Article Number

(Transfer from service label)

7004 0550 0000 8424 9444

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Joel Pawa

☐ Agent☐ Addressee

B. Received by (Printed Name)

Joel Pawa

C. Date of Delivery

AUG 28 2006

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

August 21, 2006

Mr. Robert Gawlik
Southern Union Gas Services, Ltd.
201 N. Main St., Suite 3000
Fort Worth, Texas 76102

Re: Discharge Permit Modification
West Eunice Compressor Station (GW-270)

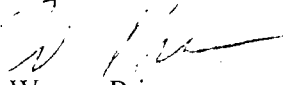
Dear Mr. Robert Gawlik:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Southern Union Gas Services, Ltd. (owner/operator) West Eunice Compressor Station GW-270 located in the SE/4 SE/4 of Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Carl Chavez of my staff at (505-476-3491) or E-mail carlj.chavez@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,)


Wayne Price

Environmental Bureau Chief

LWP/cc

Attachments-1

xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
SOUTHERN UNION GAS SERVICES, LTD., West Eunice Compressor Station (GW-270)
DISCHARGE PERMIT APPROVAL CONDITIONS
August 21, 2006

Please remit all checks 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 and \$1700.00 renewal permit fee for a gas compressor station greater than 1001 horsepower from the owner/operator.
- 2. Permit Expiration and Renewal:** 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 August 21, 2011** 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.
- 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 10, 2006 discharge permit modification 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 20.6.2.3109.G NMAC addresses possible future modifications of a permit. Pursuant WQCC Regulation 20.6.2.3107.C NMAC, 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. Pursuant to WQCC Regulation 20.6.2.3109.E NMAC, 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: The owner/operator shall notify the OCD prior to any transfer of ownership, control or possession of a facility with an approved discharge permit. The purchaser shall submit a written commitment to comply with the terms and conditions of the previously approved discharge permit and shall seek OCD approval prior to transfer.

22. **Closure:** The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. **Certification:** **Certification: Southern Union Gas Services, Ltd.**, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **Southern Union Gas Services, Ltd.** 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. Conditions accepted by:

Southern Union Gas Services, Ltd.

Company Representative- print name

Company Representative- signature

Title_____

Date_____

AFFIDAVIT OF PUBLICATION

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.

of _____ 1 _____

_____ weeks.

Beginning with the issue dated

August 5 2006

and ending with the issue dated

August 5 2006

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 7th day of

August

2006

Dora Montz

Notary Public.

My Commission expires
February 07, 2009

(Seal)



OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO

My Commission Expires: _____

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

LEGAL NOTICE

August 5, 2006

NOTICE OF PUBLICATION

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

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

(GW-270) - Southern Union Gas Services, LP, Mr. Wayne L. Farley, Vice President, Gas Operations, 201 N. Main Street, Fort Worth, Texas 76102, has submitted an application for modification of a previously approved discharge plan for the West Eunice Compressor Station located in the SE/4 SE/4 of Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The compressor station has a horsepower rating of 7153 HP. Approximately 60 gallons per week of wastewater will be stored on site in tanks located on a concrete containment pad. Fluids will be processed and hydrocarbons will be separated prior to wastewater being transported to an OCD approved offsite disposal facility. The discharge plan consists of a waste management plan that addresses how oilfield products and wastes 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. Ground water most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of 1,100 mg/l.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of July 2006.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL
#22562

MARK FESMIRE, Director

01106077000 02587260
NEW MEXICO ENERGY, MINERALS AND
1220 SOUTH ST. FRANCIS DR.
SANTA FE, NM 87505

Advertising Receipt

Hobbs Daily News-Sun

201 N Thorp
P O Box 850
Hobbs, NM 88241-0850
Phone: (505) 393-2123
Fax: (505) 397-0610

P.O. 52100-0000000040

~~NORMA VASQUEZ~~ *Carl G. Chavez*
NEW MEXICO ENERGY, MINERALS AND
NATURAL RESOURCES DEPARTMENT
1220 SO 4TH ST. FRANCIS DR.
SANTA FE, NM 87505

Cust#: 01106077-000
Ad#: 02587260
Phone: (505)476-3200
Date: 08/03/06

Ad taker: HNS **Salesperson:** 08 **Classification:** 673

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	08/05/06	08/05/06	1	90.72		90.72
Bold						1.00
Affidavit for Legals						3.00

Payment Reference:

LEGAL NOTICE
August 5, 2006

NOTICE OF PUBLICATION

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

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

(GW-270) - Southern Union Gas Services, LP, Mr. Wayne L. Farley, Vice President, Gas Operations, 201 N. Main Street, Fort Worth, Texas 76102, has submitted an application for

Total: 94.72
Tax: 0.00
Net: 94.72
Prepaid: 0.00

Total Due 94.72

RECEIVED

AUG 13

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

DATE	Newspaper Ref.	Description / Comments / Charges	SAU Size Bill Units	Times Run	Amount	Total Amount
9/30/2006		BALANCE FORWARD			\$94.72	94.72
<p>Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87501</p>						

We
Accept:



Have a question about your statement ? Please call or fax us at:

Phone: (505) 393-2123 Fax: (505) 393-5724

Billing Period: thru 10/31/2006

Billing Account # 01106077000

Name : NEW MEXICO ENERGY, MINERALS AN

ADVERTISING INVOICE and STATEMENT

Current Amount	30 Days	60 Days	Over 90 Days	Total Amount Due
\$0.00	\$0.00	\$94.72	\$0.00	\$94.72

Hobbs News-Sun

P. O. Box 850

Hobbs NM 88241-0850

Please detach and return bottom portion with your payment.

Hobbs News-Sun

PO Box 850

Hobbs NM 88241-0850

☐ Please check this box and note new address on reverse side.

Tel: (505) 393-2123 (800) 993-0936
Fax: (505) 393-5724

Bill Date	Account #	Page #
10/31/2006	01106077000	1
Amount Due		Enter Amount Paid Below
\$94.72		\$

0110607700020009472

Please put account number on check or money order.

ADDRESSEE



NEW MEXICO ENERGY, MINERALS AN 683

VASQUEZ NORMA *Carl Young*

1220 S SAINT FRANCIS DR

SANTA FE

NM 87505-4000

REMIT TO:



Hobbs News-Sun

PO Box 936

Hobbs NM 88241-0936

*OK to pay
10-27-06
Date: 10/27/06
Hobbs NM
Carl Young*

Carl,

2006 AUG 4 PM 2 22

GW-270

Here is the check for the
balance of the Discharge
Permit Fee for SUGS's West
Eunice Compressor Station.

Cale

6W-270

Description

FUND

CES

DFA
ORGD
ACCTED
ORGED
ACCT

AMOUNT

1	CY Reimbursement Project	Tax	064	01		2329	900000	2329134		1
5	Gross Receipt Tax		064	01						2
3	Air Quality Title V		092	13	1300	1696	900000	4169134		3
4	PRP Prepayments		248	14	1400	9696	900000	4989014		4
2	Climax Chemical Co.		248	14	1400	9696	900000	4989015		5
8	Circle K Reimbursements		248	14	1400	9696	900000	4989248		6
7	Hazardous Waste Permits		339	27	2700	1696	900000	4169027		7
8	Hazardous Waste Annual Generator Fees		339	27	2700	1696	900000	4169339		8
10	Water Quality - Oil Conservation Division		341	29		2329	900000	2329029	1300.00	10
11	Water Quality - GW Discharge Permit		341	29	2900	1696	900000	4169029		11
12	Air Quality Permits		631	31	2500	1696	900000	4169031		12
13	Payments under Protest		651	33		2919	900000	2919033		13
14	Xerox Copies		652	34		2349	900000	2349001		14
15	Ground Water Penalties		652	34		2349	900000	2349002		15
16	Witness Fees		652	34		2349	900000	2439003		16
17	Air Quality Penalties		652	34		2349	900000	2349004		17
18	OSHA Penalties		652	34		2349	900000	2349005		18
19	Prior Year Reimbursement		652	34		2349	900000	2349006		19
20	Surface Water Quality Certification		652	34		2349	900000	2349009		20
21	Jury Duty		652	34		2349	900000	2349012		21
22	CY Reimbursements (i.e. telephone)		652	34		2349	900000	2349014		22
23	UST Owner's List		783	24	2500	9696	900000	4989201		23
24	Hazardous Waste Notifiers List		783	24	2500	9696	900000	4989202		24
25	UST Maps		783	24	2500	9696	900000	4989203		25
26	UST Owner's Update		783	24	2500	9696	900000	4989205		26
28	Hazardous Waste Regulations		783	24	2500	9696	900000	4989207		28
29	Radiologic Tech. Regulations		783	24	2500	9696	900000	4989208		29
30	Superfund CERLIS List		783	24	2500	9696	900000	4989211		30
31	Solid Waste Permit Fees		783	24	2500	9696	900000	4989213		31
32	Smoking School		783	24	2500	9696	900000	4989214		32
33	SWQB - NPS Publications		783	24	2500	9696	900000	4989222		33
34	Radiation Licensing Regulation		783	24	2500	9696	900000	4989228		34
35	Sale of Equipment		783	24	2500	9696	900000	4989301		35
36	Sale of Automobile		783	24	2500	9696	900000	4989302		36
37	Lust Recoveries		783	24	2500	9696	900000	4989814		37
38	Lust Repayments		783	24	2500	9696	900000	4989815		38
39	Surface Water Publication		783	24	2500	9696	900000	4989801		39
40	Exxon Reese Drive Ruidoso - CAF		783	24	2500	9696	900000	4989242		40
41	Emerg. Hazardous Waste Penalties NOV		957	32	9600	1696	900000	4164032		41
42	Radiologic Tech. Certification		987	05	0500	1696	900000	4169005		42
44	Ust Permit Fees		989	20	3100	1696	900000	4169020		44
45	UST Tank Installers Fees		989	20	3100	1696	900000	4169021		45
46	Food Permit Fees		991	26	2600	1696	900000	4169026		46
43	Other									43

Gross Receipt Tax Required

Site Name & Project Code Required

TOTAL

1300

Contact Person:

Wayne Price

Phone:

476-3490

Date:

8/8/06

Received in ASD By:

Date:

RT #:

ST #:

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 8/3/06

or cash received on _____ in the amount of \$ 1300⁰⁰

from Southern Union Gas Services

for GW-270

Submitted by: Lawrence Romo Date: 8/8/06

Submitted to ASD by: Lawrence Romo Date: 8/8/06

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Compressor Fee

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____

Environmental Services, Inc.

8220 Louisiana NE
Suite A
Albuquerque, NM 87113-2121

95-32/1070

Aug 3 20 06


PAY TO THE
ORDER OF

Water Quality Management Fund

\$ 1,300.00

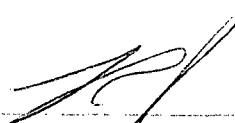
One Thousand three hundred and 00/100

DOLLARS

 Security features
are included.
Details on back.

BANK OF AMERICA
NATIONAL ASSOCIATION
ALBUQUERQUE, NM 87102

FOR SRC 049 - Filing Fee



MP

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, August 03, 2006 11:03 AM
To: 'classifieds@hobbsnews.com'
Subject: Public Notice Request for Posting

Attn: Helen Shockley:

Hi. Could you please post the attached public notice in your newspaper. The Purchase Order Number is 52100-0000000040.

Please respond that you have received this msg. 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
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

NOTICE OF PUBLICATION

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

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

(GW-270) - Southern Union Gas Services, LP, Mr. Wayne L. Farley, Vice President, Gas Operations, 201 N. Main Street, Fort Worth, Texas 76102, has submitted an application for modification of a previously approved discharge plan for the West Eunice Compressor Station located in the SE/4 SE/4 of Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The compressor station has a horsepower rating of 7153 HP. Approximately 60 gallons per week of wastewater will be stored on site in tanks located on a concrete containment pad. Fluids will be processed and hydrocarbons will be separated prior to wastewater being transported to an OCD approved offsite disposal facility. The discharge plan consists of a waste management plan that addresses how oilfield products and wastes 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. Ground water most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of 1,100 mg/l.

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 permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's website <http://www.emnrd.state.nm.us/oed/>. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of July 2006.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**

S E A L

MARK FESMIRE, Director

Chavez, Carl J, EMNRD

From: Cale E. Swanson [cswanson@enservice.com]
Sent: Thursday, August 03, 2006 2:22 PM
To: Chavez, Carl J, EMNRD
Subject: Revised Text for West Eunice DP

Carl,

Attached is the revised text. There are quite a few typo corrections (remember I accidentally submitted an early draft instead of the final). There are a couple of substantive changes though. I think you'll want to check Sections 5 & 6 for those (corrected engines and horsepower and tankage changes). A check for the balance of the fee is on the way.

Thanks,

Cale
Environmental Services, Inc.

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Thursday, August 03, 2006 8:11 AM
To: Cale E. Swanson
Subject: Public Notice Revision

Cale:

Could you please help me make corrections for our public notice? Our link to the public notice is at http://www.emnrd.state.nm.us/emnrd/ocd/documents/PUBNOTGW-270_072406.pdf . Thanks.

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
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

8/3/2006

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West Eunice Compressor Station Discharge Plan

Southern Union Gas Services, Ltd.—West Eunice Compressor Station

This document constitutes a modification application for the groundwater discharge plan for the West Eunice Compressor Station (GW-270). 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 20.6.2 New Mexico Administrative Code (NMAC).

1 TYPE OF OPERATION

The West Eunice Compressor Station (West Eunice) is a natural gas compressor station. Its purpose is to remove excess liquids from field natural gas, measure gas volume, and transport it through pipelines. The site-rated horsepower at the facility is 7153.

2 OPERATOR/LEGALLY RESPONSIBLE PARTY

Operator

Southern Union Gas Services, Ltd.

Attn: David Maness

Box 1311

Jal, NM 88252

(505) 395-2068

Legally Responsible Party

Southern Union Gas Services, Ltd.

Attn: Wayne J. Farley

201 N. Main St., Suite 3000

Fort Worth, TX 76102

(817) 390-8686

3 LOCATION OF DISCHARGE/FACILITY

Lea County, NM

Section 36, Township 21 South, Range 36 East

A portion of the Eunice 7.5' map showing the location of the facility can be found in Figure 1.

4 LANDOWNER

Southern Union Gas Services, Ltd.

201 N Main St., Suite 3000

Fort Worth, TX 76102

(817) 390-8686

5 FACILITY DESCRIPTION

Six C-drip inlet scrubbers are utilized at West Eunice to remove liquids from both the inlet gas to the station and gas piped on to other facilities. The six scrubbers are located south of West Eunice between the facility fence and road. One C-drip inlet scrubber is located on the facility for additional liquid removal from the gas. The gas is routed through a suction scrubber on the compressor for further liquid removal. Liquids from all of the scrubbers at the facility are transported via underground piping to the two scrubber liquids (drip) tanks. The gas then enters the first stage of compression, a Superior 8G825 engine (753 hp) unit that compresses the gas from 10 psig to 50 psig, that gas is then routed to two White Superior 2416 GT engines (3200 hp each), the gas is compressed from 50 psig to 650 psig. The gas discharged from the compressors goes to Southern Union Gas Services, Ltd.'s (SUGS) Jal #3 plant where it is processed. A simplified process flow diagram and facility layout can be found in Figures 2 and 3, respectively.



6 MATERIAL STORED AND USED

Table 1 identifies materials and storage containments for substances used and stored at West Eunice. Material Safety Data Sheets (MSDS) for these substances are in Appendix A.

Table 1
Material Used and Stored

Container	ID	Material	Form	Volume	Location	Containment
AGT Steel	TK-1	Scrubber liquids (drip)	Liquid	500 bbl	Southwest Area of Facility	Secondary containment, dirt berm
AGT Steel	TK-2	Scrubber liquids (drip)	Liquid	500 bbl	Southwest Area of Facility	Secondary containment, dirt berm
AGT Poly	TK-3	PC-396-XL Cleaner	Liquid	325 gal	Southwest Area of Facility	Secondary containment, fiberglass curbed containment pad
AGT Poly	TK-4	PPP-3000 Corrosion Inhibitor	Liquid	325 gal	Southwest Area of Facility	Secondary containment, fiberglass curbed containment pad
AGT Steel	TK-5	Antifreeze	Liquid	379 gal	Southeast Area of Facility	Secondary containment, cement curbed containment pad
AGT Steel	TK-6	Lube Oil	Liquid	550 gal	Southeast Area of Facility	Secondary containment, cement curbed containment pad
AGT Steel	TK-7	Antifreeze	Liquid	1050 gal	Southeast Area of Facility	Secondary containment, fiberglass curbed containment pad
AGT-elev Steel	TK-8	Methanol	Liquid	1000 gal	Northeast Area of Facility	Secondary containment, fiberglass curbed containment pad
AGT Steel	TK-9	Lube Oil	Liquid	1000 gal	Northeast Area of Facility	Secondary containment, cement curbed containment pad
AGT Fiberglass	TK-10	Ambitrol	Liquid	2000 gal	Northeast Area of Facility	Secondary containment, cement curbed containment pad
AGT Fiberglass	TK-11	Washdown Liquids	Liquids	10,500 gal	Northeast Area of Facility	Secondary containment, cement containment pad
AGT Poly	TK-12	Detergent	Liquid	300 gal	Northeast Area of Facility	Secondary containment, cement containment pad
AGT Poly	TK-13	Water	Liquid	6500 gal	North Central Area of Facility	None

AGT - aboveground tank (non-pressurized)

AGT-elev - aboveground tank elevated on a saddle rack

The two 500 barrel aboveground tanks (AGT) receive scrubber liquids (drip) from the C-drip inlet and suction scrubbers via underground piping. The interconnected tanks are surrounded by a single berm. SUGS will evaluate the capacity of this berm to ensure it has been constructed to contain 1.33 times the total volume of both tanks and make any repairs necessary within one year after plan approval.

All of the other tanks are located on impermeable fiberglass or cement pad and curb type containment.

7 SOURCES AND QUANTITIES OF EFFLUENT AND WASTE SOLIDS

Table 2 summarizes the effluent and solid wastes generated at the facility.

Table 2
Effluent and Solid Waste Sources and Quantity

Source	Unit	Type of Waste	Volume	Quality
Compressor	White Superior 8G-825	Used engine oil	160 gal/mo	
		Used filters	4/mo	No additives
		Washdown water	75 gal/mo	Water with detergents, lube oil,
		Sorbent material/rags	varies	No additives
Compressor	Superior 2416 GTL	Used engine oil	160 gal/mo	
		Used filters	4/mo	No additives
		Washdown water	75 gal/mo	Water with detergents, lube oil,
		Sorbent material/rags	varies	No additives
Compressor	Superior 2416 GTL	Used engine oil	160 gal/mo	Used motor oil with no additives
		Used filters	4/mo	No additives
		Washdown water	75 gal/mo	Water with detergents, lube oil,
		Sorbent material/rags	varies	No additives
Scrubbers	C-drip and suction	Scrubber liquids: hydrocarbon	300 bbls/wk	No additives
Miscellaneous	trash	solid waste	varies	Varies

Ambitrol, comprised of 50% water and 50% ethylene glycol, is utilized as coolant for the compressor engine. The amount of Ambitrol used at the facility varies according to need. Very little waste coolant is generated as the cooling system is sealed. What loss does occur is primarily evaporation during engine use. A small amount of Ambitrol may occasionally be found in the washdown water.

The compressor pads are washed once a month using a portable high pressure system. Occasionally, approximately 3 gallons of a biodegradable detergent is added to the wash water for cleaning. Wash water is pumped as generated from the compressor pad or sump into a classifier tank during washing.

8 LIQUID AND SOLID WASTE COLLECTION/STORAGE/DISPOSAL

Table 3 summarizes the effluent collection storage and disposal at the facility.

Table 3
Liquid and solid waste collection/storage/disposal

Type of Waste	Collection	Storage	Hauled by	Disposal
Used oil	Pumped from compressor pad or drum into trailer-mounted tank	Not Stored on-site; removed as generated	SUGS to Jal #3 gas plant. See GW-010.	Used oil stored in waste oil tank at Jal #3. Removed by Industrial Service Corp. See GW-010.
Used filters sorbent materials and rags*	Filters drained into 55-gal drum; filters/rags stored in dumpster. Note: drum is used but not stored at facility.	Central dumpster on-site	SUGS temporarily stored at West Eunice, Procycle Oil and Metals to incinerator	Procycle Oil and Metals-incinerator
Wash water	Drain from compressor pad into sump tank during washing	TK-11	SUGS to Jal #3 gas plant. See GW-010.	Wash water stored in classifier tank. Any hydrocarbons are pumped to scrubber liquid tanks and removed by XL. Water disposed in injection well at Jal #3. See GW-010
Scrubber liquids (drip)/water**	Underground piping from C-drip and suction scrubbers	TK-1 & TK-2	Chaparral Trucking to SUGS Jal #4 compressor station. See GW-107.	Scrubber liquids stored in scrubber liquid tanks. Hydrocarbons are sold to PetroSource. Water is removed by Chaparral Trucking. See GW-107
Solid waste	None on-site	Not Stored on-site; removed as generated	SUGS	Sid Richardson's Jal #3 gas plant, see GW-010

* In addition, used filters from SUGS's Boy, House, C-2, C-2, C-3, and C-4 Compressor Stations are brought to the central dumpster at West Eunice for storage prior to disposal.

** In addition, scrubber liquids from SUGS's C-1, C-3, and C-4 Compressor Stations (approximately 600 gallons/month) are stored in the scrubber liquids tanks at West Eunice until disposal.

Southern Union Gas Services, Ltd., Jal #3 Gas Plant-see GW-010; Jal #4 Compressor Station-see GW-107

Procycle Oil and Metals, 315 Pronto, Odessa, TX 79762, (915) 550-2533.

Chaparral Trucking, PO Drawer 1769, Eunice, NM 88231, (505) 394-2545

Industrial Service Corp., PO Box 711, Slaton, TX 79364, (915) 828-3183

PetroSource Partners Ltd., 129 S. Grimes, Hobbs, NM 88240, (505) 397-7212

XL Transportation Co., PO Drawer A, Jal, NM 88252, (505) 395-2010

9 PROPOSED MODIFICATIONS

SUGS does not propose any modifications at this time.

10 INSPECTION, MAINTENANCE, AND REPORTING

West Eunice is unmanned but inspected at least once per day Monday through Friday.

SUGS will perform pressure testing on underground effluent pipelines within five years of renewal of this discharge plan. A testing timetable will be submitted to the NMOCD for approval six months prior to testing.

The two scrubber liquids (drip) tanks (TK-1 and TK-2) will be cleaned out and visually inspected once every five years, as they are not situated on concrete or gravel pads.

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. SUGS will handle all spills as required by the spill procedures in Appendix B and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and 20.6.2.1203 NMAC. Copies of these regulations are in Appendix C.

12 SITE CHARACTERISTICS

The West Eunice Compressor Station is located on dune sands of the Eunice Plain in the Capitan Basin. The Eunice Plain is underlain by a hard caliche surface and is almost entirely covered by reddish-brown dune sand 20—40 feet high (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).

Unnamed arroyos are located 0.2 miles south/southwest and 0.6 miles north/northwest of the facility. These appear to be the only groundwater discharge sites on the Eunice 7.5' U.S.G.S. quadrangle within 1 mile of the facility.

As of October 1996, one well was recorded with the New Mexico State Engineer Office in Roswell that is within one-half mile of the perimeter of the facility. The well, used for stock, was drilled in 1954. The highest recorded water level in this well was 100 feet; the lowest was 101 feet below grade.

Water from a well located approximately 4 miles northwest of the compressor station was analyzed in 1954 and 1958 (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). Total dissolved solids concentration recorded at this well for each year the water was analyzed was 74 and 73 parts per million, respectively. Typically, as described below, water from the aquifer under the compressor station has a much higher total dissolved solids concentration. This concentration, 1100 parts per million, may more closely represent the total dissolved solids concentration at the facility.

A piezometric map of the water table (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) shows the elevation of the water table at the site to be about 3400 feet. The elevation of the facility is 3500 feet, placing the depth to the water table at the site at 100 feet.

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. Water in the Ogallala Formation has total dissolved solids of less than 1100 ppm. The total dissolved solids in the Dockum Group are higher than that of the Ogallala. The deeper Paleozoic aquifers do not contain usable water and are brine-injected (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).

The soil type at the facility is the Berino-Cacique loam fine sands association, which is typically found on uplands in southern Leas County. The Berino soils are well-drained soils that have a light sandy clay loam subsoil. The Cacique soils are well-drained soils that have a sandy clay loam subsoil underlain by indurated caliche at a depth of 20 to 34 inches (Soil Survey, Lea County, New Mexico, 1974, U.S.D.A., Soil Conservation Survey). Any runoff from the facility would probably collect in a shallow area 300 yards south of the facility.

13 ADDITIONAL INFORMATION

Closure Plan

Should SUGS choose to permanently close the West Eunice Compressor Station, all reasonable and necessary measures will be taken to prevent the exceedance of 20.6.2.3103 NMAC 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 20.2.1203 NMAC will be made, and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

Chavez, Carl J, EMNRD

From: Cale E. Swanson [cswanson@enservice.com]
Sent: Thursday, August 03, 2006 10:25 AM
To: Chavez, Carl J, EMNRD
Subject: RE: Public Notice Revision

Carl

I think the attached will work. I'll e-mail the revised text as soon as it is triple checked by SUGS and mail the check for the balance of the fee.

Cale
Environmental Services, Inc.

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Thursday, August 03, 2006 8:11 AM
To: Cale E. Swanson
Subject: Public Notice Revision

Cale:

Could you please help me make corrections for our public notice? Our link to the public notice is at http://www.emnrd.state.nm.us/emnrd/ocd/documents/PUBNOTGW-270_072406.pdf . Thanks.

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
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

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8/3/2006

NOTICE OF PUBLICATION

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

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

(GW-270) - Southern Union Gas Services, LP, Mr. Wayne L. Farley, Vice President, Gas Operations, 201 N. Main Street, Fort Worth, Texas 76102, has submitted an application for modification of a previously approved discharge plan for the West Eunice Compressor Station located in the SE/4 SE/4 of Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. The compressor station has a horsepower rating of ~~560~~7153 HP. Approximately 60 gallons per week of wastewater will be stored on site in a closed top bermed tanks located in a concrete containment pad. Fluids will be processed and hydrocarbons will be separated prior to wastewater being transported to an OCD approved offsite disposal facility. The discharge plan consists of a waste management plan that addresses how oilfield products and wastes 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. Ground water most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of 1,100 mg/l.

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 permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's website <http://www.emnrd.state.nm.us/o cd/>. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of July 2006.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

MARK FESMIRE, Director

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, July 21, 2006 1:39 PM
To: Stone, Ben, EMNRD
Cc: 'Cale E. Swanson'
Subject: Public Notice GW-270

Ben:

Could you please post the attachment and feel free to edit if necessary. Thanks.

By receipt of this msg., Southern Union Gas Services, LP will also need to satisfy its public notice requirements.

Thanks.

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
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, July 18, 2006 2:07 PM
To: 'Cale E. Swanson'
Subject: RE: West Eunice Compressor Station Discharge Plan

Cale:

It appears that your discharge plan submittal is administratively complete. I have attached a sample of a public notice (PN) from Targa that may help SUGS in the development of its Public Notice. The OCD requires an affidavit from the newspaper that SUGS posts its Public Notice and I have attached a sample of the PN. I may be seeking your assistance with the OCD's PN today or tomorrow. Please contact me if you have questions. Please share this administratively complete determination with the appropriate SUGS staff. 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
Website: <http://www.emnrd.state.nm.us/oed/>
(Pollution Prevention Guidance is under "Publications")

From: Cale E. Swanson [mailto:cswanson@enservice.com]
Sent: Tuesday, July 18, 2006 8:57 AM
To: Chavez, Carl J, EMNRD
Subject: RE: West Eunice Compressor Station Discharge Plan

Mr. Farley is the VP in charge of signing stuff. If you send it to his attention there is a chance it will be lost. Please send correspondence to SUGS's Ft. Worth address sent to the attention of Robert Gawlik. Also please cc me at ESI's Albuquerque address.

Thanks,
Cale

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Tuesday, July 18, 2006 8:23 AM
To: Cale E. Swanson
Subject: RE: West Eunice Compressor Station Discharge Plan

Cale:

I am processing your compressor station discharge plan modification. The OCD will determine whether the discharge plan is administratively complete, at which point, the OCD will issue public notice on its Internet and in the newspaper. Southern Union Gas Services, LP (SUGS) should also follow the public notice provisions. If after the 30 public comment period, the OCD approves the discharge plan, it will issue a couple of final draft versions for SUGS's signature.

One question is who the OCD should respond to? For example, the discharge plan application is signed by Wayne Farley with a Fort Worth TX address. Should the OCD direct our correspondence to Mr. Farley or to your address in Albuquerque? Our computer system has the Fort Worth TX address. Thanks.

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

7/18/2006

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
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

From: Cale E. Swanson [<mailto:cswanson@enservice.com>]
Sent: Tuesday, July 18, 2006 7:25 AM
To: Chavez, Carl J, EMNRD
Subject: RE: West Eunice Compressor Station Discharge Plan

Carl,

Try GW-270.

Cale
Environmental Services, Inc.

From: Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]
Sent: Thursday, July 13, 2006 3:49 PM
To: cswanson@enservice.com
Subject: West Eunice Compressor Station Discharge Plan

Mr. Swanson:

Please find below my contact information. Also, I have attached a file for public notice (PN) and example of a PN for your PN to a newspaper. The link below may assist you with public notice information.

http://www.nmenv.state.nm.us/NMED_Regs/gwb/20_6_2_NMAC.pdf

Please provide the GW# for the discharge plan so we may process your modification. 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
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

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7/18/2006

July 10, 2006

2006 JUL 11 AM 10 21

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

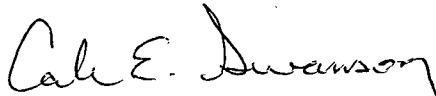
Subject: Southern Union Gas Services, LP Discharge Plan Modification for West
Eunice Compressor Stations

To Whom It May Concern,

Enclosed please find an Application for Modification of Discharge Plan for
Southern Union Gas Services, LP (formerly Sid Richardson Energy Services)
West Eunice Compressor Stations. Attached to this letter you will also find a
check for \$500 to cover the filing fee for the application.

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

Sincerely



Cale E. Swanson
Environmental Scientist III

July 10, 2006

2006 JUL 11 AM 10 21

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Subject: Southern Union Gas Services, LP Discharge Plan Modification for West
Eunice Compressor Stations (GW-~~270~~)
270

To Whom It May Concern,


Enclosed please find an Application for Modification of Discharge Plan for
Southern Union Gas Services, LP (formerly Sid Richardson Energy Services)
West Eunice Compressor Stations. Attached to this letter you will also find a
check for \$500 to cover the filing fee for the application.

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

Sincerely

Cale E. Swanson

Cale E. Swanson

Environmental Services, Inc. 8220 Louisiana NE Suite A Albuquerque, NM 87113-2121		July 10 20 06 95-32/1070
PAY TO THE ORDER OF <u>NM Oil Conservation Division</u>		\$ 500.00
<u>Five hundred and 00/100</u>		DOLLARS
BANK OF AMERICA NATIONAL ASSOCIATION ALBUQUERQUE, NM 87102		
FOR <u>SR049 - Filing Fee</u>		

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 7/10/06
00

or cash received on _____ in the amount of \$ 500

from Southern Union Gas Services (GW-270)

for GW-010

Submitted by: Lawrence Romero Date: 7/12/06

Submitted to ASD by: Rivera Romero Date: 7/12/06

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____

Modification _____ Other Compressor Fee 400⁰⁰

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

Environmental Services, Inc.

8220 Louisiana NE
Suite A
Albuquerque, NM 87113-2121

July 10 20 04

95-32/1070

PAY TO THE ORDER OF NM Oil Conservation Division \$ 500.00

Five hundred and 00/100 DOLLARS

BANK OF AMERICA
NATIONAL ASSOCIATION
ALBUQUERQUE, NM 87102

FOR SR049-Filing Fee

[Signature]

Description	FUND	CEB	DFA ORG	DFA T	ED ORG	ED ACCT	AMOUNT	
1 CY Reimbursement Project Tax	064	01		2328	900000	2328134		1
5 Gross Receipt Tax	084	01		1896	900000	4168134		2
3 Air Quality Title V	092	13	1300	9696	900000	4989014		3
4 PRP Prepayments	248	14	1400	9696	900000	4989015		4
2 Climax Chemical Co.	248	14	1400	9696	900000	4989248		5
8 Circle K Reimbursements	248	14	1400	9696	900000	4169027		6
7 Hazardous Waste Permits	339	27	2700	1698	900000	4169038		7
8 Hazardous Waste Annual Generator Fees	339	27	2700	1698	900000	2328029	500 ⁰⁰	8
10 Water Quality - Oil Conservation Division	341	29		2328	900000	4169029		10
11 Water Quality - GW Discharge Permit	341	29	2900	1698	900000	4169031		11
12 Air Quality Permits	631	31	2500	1698	900000	2919033		12
13 Payments under Protest	651	33		2349	900000	2349001		13
14 Xerox Copies	652	34		2349	900000	2349002		14
15 Ground Water Penalties	652	34		2349	900000	2439003		15
16 Witness Fees	652	34		2349	900000	2349004		16
17 Air Quality Penalties	652	34		2349	900000	2349005		17
18 OSHA Penalties	652	34		2349	900000	2349006		18
19 Prior Year Reimbursement	652	34		2349	900000	2349009		19
20 Surface Water Quality Certification	652	34		2349	900000	2349012		20
21 Jury Duty	652	34		2349	900000	2349014		21
22 CY Reimbursements (i.e. telephone)	783	24	2500	9696	900000	4989201		22
23 UST Owner's List	783	24	2500	9696	900000	4989202		23
24 Hazardous Waste Notifiers List	783	24	2500	9696	900000	4989203		24
25 UST Maps	783	24	2500	9696	900000	4989205		25
26 UST Owner's Update	783	24	2500	9696	900000	4989207		26
28 Hazardous Waste Regulations	783	24	2500	9696	900000	4989208		28
29 Radiologic Tech. Regulations	783	24	2500	9696	900000	4989211		29
30 Superfund CERLIS List	783	24	2500	9696	900000	4989213		30
31 Solid Waste Permit Fees	783	24	2500	9696	900000	4989214		31
32 Smoking School	783	24	2500	9696	900000	4989222		32
33 SWQB - NPS Publications	783	24	2500	9696	900000	4989228		33
34 Radiation Licensing Regulation	783	24	2500	9696	900000	4989301		34
35 Sale of Equipment	783	24	2500	9696	900000	4989302		35
36 Sale of Automobile	783	24	2500	9696	900000	4989814		36
37 Lost Recoveries	783	24	2500	9696	900000	4989815		37
38 Lost Repayments	783	24	2500	9696	900000	4989801		38
39 Surface Water Publication	783	24	2500	9696	900000	4989242		39
40 Exxon Reese Drive Ruidoso - CAF	957	32	9600	1698	900000	4164032		40
41 Emerg. Hazardous Waste Penalties NOV	987	05	0500	1698	900000	4169005		41
42 Radiologic Tech. Certification	989	20	3100	1698	900000	4169020		42
44 Ust Permit Fees	989	20	3100	1698	900000	4169021		44
45 UST Tank Installers Fees	991	28	2600	1698	900000	4169026		45
46 Food Permit Fees								46
43 Other								43

Gross Receipt Tax Required

Site Name & Project Code Required

TOTAL

500⁰⁰

Contact Person:

Wayne Price

Phone:

476-3490

Date:

7/12/06

Received in ASD By:

Date:

RT #:

ST #:

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

ROBERT L. GAWLIK

Manager, Environmental
Health & Safety

CERTIFIED MAIL – Return Receipt
7000 0520 0024 3418 7232

May 29, 2002
RLG-46-02

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
West Eunice Compressor Station GW-270

Dear Mr. Anderson:

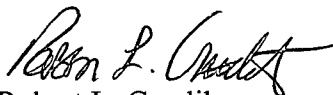
This letter is in response to the Discharge Plan Renewal Approval GW-270. In the letter of approval the Oil Conservation Division (OCD) requested that Sid Richardson Energy Services Co. submit a storm water run-off plan for approval by OCD.

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

cc: MRR/WJF/CPO/HH
Randall Dunn

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

Certified Mail – Return Receipt
7000 1670 0005 7285 8183

ROBERT L. GAWLIK

Manager, Environmental
Health & Safety

January 23, 2002
RLG-03-02

Mr. Roger Anderson
Oil Conservation Division
New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Subject: Groundwater Discharge Plan Renewal Approval

- • **Boyd Compressor Station GW-269**
- • **West Eunice Compressor Station GW-270**

Dear Mr. Anderson:

Please find attached one signed copy of the Discharge Plan Approval Conditions for the Boyd (GW-269) and the West Eunice (GW-270) Compressor Stations located in Lea County, New Mexico. The filling fees, as indicated in your letter, have been received by the OCD in Santa Fe for both of these locations. Please note that a copy of this letter has also been sent to Mr. Chris Williams in the OCD Hobbs District office.

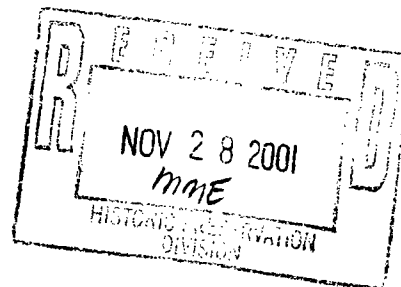
If there are any questions, please do not hesitate to give me a call at the number indicated above.

Sincerely,



Robert L. Gawlik
Manager, Environmental Health and Safety

c: RLD – Lea County office
Mr. Chris Williams, Oil Conservation Division, New Mexico Energy, Minerals, and Natural Resources Department
1625 N. French Drive
Hobbs, New Mexico 88240



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:

(GW-269) – Sid Richardson Energy Services, Inc., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their Boyd Compressor Station located in the NE/4 SE/4, Section 26, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 30 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 37 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-270) – Sid Richardson Energy Services, Inc., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their West Eunice Compressor Station located in the SE/4 SE/4, Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 60 gallons per week 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 approximately 100 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 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 14th day of November, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

Madelle Ensey
NO COMMENT
12/28/07
MICHIE



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

January 9, 2002

Lori Wrotenbery

Director

Oil Conservation Division

CERTIFIED MAIL

RETURN RECEIPT NO. 5051 7341

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

**RE: Discharge Plan Renewal Approval GW-270
Sid Richardson Energy Services, Ltd.
West Eunice Compressor Station
Lea County, New Mexico**

Dear Mr. Farley:

The ground water discharge plan renewal GW-270 for the Sid Richardson Energy Services, Ltd. West Eunice Compressor Station located in the SE/4 SE/4 of Section 36, Township 21 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 October 29, 1996 and approved December 18, 1996. The discharge plan renewal application, dated October 19, 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-270 West Eunice Compressor Station
January 9, 2002
Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **December 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 West Eunice Compressor Station.

The discharge plan application for the Sid Richardson Energy Services, Ltd. West Eunice 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 plan review.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		FORD 200	
OFFICIAL USE			
Postage	\$	Postmark Here JAN 10 2002 SANTA FE, NM	
Certified Fee			
Return Receipt Fee (Endorsement Required)			
Restricted Delivery Fee (Endorsement Required)			
Total Postage & Fees	\$		
Sent To		W. Farley	
Street, Apt. No., or PO Box No.		S. Richardson	
City, State, ZIP+4		GW-270	
PS Form 3800, January 2001 See Reverse for Instructions			

7001 1940 3929 7341

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-270
SID RICHARDSON ENERGY SERVICES, LTD.
WEST EUNICE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(January 9, 2002)

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. Sid Richardson Energy Services, Ltd. Commitments: Sid Richardson Energy Services, Ltd. will abide by all commitments submitted in the discharge plan renewal application dated October 19, 2001 and these conditions for approval.
3. 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.
4. Drum Storage: 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. 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.
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. 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.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. 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.
10. Underground Process/Wastewater Lines: 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. Class V Wells: 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. Housekeeping: 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. 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.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the West Eunice Compressor Station are discontinued for a period in excess of six months. Prior to closure of the West Eunice 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. Certification: 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:

SID RICHARDSON ENERGY SERVICES, LTD.

by _____
Title

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

AFFIDAVIT OF PUBLICATION

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.

of 1
_____ weeks.

Beginning with the issue dated

December 1 2001
and ending with the issue dated

December 1 2001

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 3rd day of

December 2001

Joni Benson

Notary Public.

My Commission expires
October 18, 2004
(Seal)

This newspaper is duly qualified
to publish legal notices or adver-
tisements within the meaning of
Section 3, Chapter 167, Laws of
1937, and payment of fees for

Notice is hereby given that pursuant to the New Mexico
Water Quality Control Commission Regulations, the follow-
ing 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:

(GW-269) - Sid Richardson Energy Services, Inc., Mr.
Wayne J. Farley, 201 Main Street, Suite 3000, Fort
Worth, Texas 76102-3131, has submitted a discharge
plan renewal application for their Boyd Compressor
Station located in the NE/4 SE/4, Section 26, Township
22 South, Range 37 East, NMPM, Lea County, New
Mexico. Approximately 30 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. Groundwa-
ter most likely to be affected by an accidental dis-
charge is at a depth of 37 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-270) - Sid Richardson Energy Services, Inc., Mr.
Wayne J. Farley, 201 Main Street, Suite 3000, Fort
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pressor Station located in the SE/4 SE/4, Section 36,
Township 21 South, Range 36 East, NMPM, Lea Coun-
ty, New Mexico. Approximately 60 gallons per week of
waste water will be stored on site in closed top
bermed tanks. Fluids will be processed and hydrocar-
bons will be separated prior to waste water being
transported to an OCD approved off-site disposal fa-
cility. Groundwater most likely to be affected by an
accidental discharge is at a depth of approximately
100 feet with a total dissolved solids concentrations of
approximately 1100 mg/l. The discharge plan address-
es 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 com-
ments 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 hear-
ing 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 deter-
mines that there is significant public interest.

If no hearing is held, the Director will approve or disap-
prove 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 pre-
sented at the hearing.

GIVEN under the Seal of New Mexico Conservation Com-
mission at Santa Fe, New Mexico, on this 14th day of No-
vember, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
(seal)
#18582

01100060000 02551937

State of New Mexico Oil &
1220 S. St. Francis
Santa Fe, NM 87505

**NOTICE OF
PUBLICATION**

**STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL RE-
SOURCES DEPARTMENT
OIL CONSERVATION DI-
VISION**

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:

(GW-269) - Sid Richardson Energy Services, Inc., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their Boyd Compressor Station located in the NE/4 SE/4, Section 26, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 30 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 37 feet with a total dissolved solids concentration of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-270) - Sid Richardson Energy Services, Inc., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their West Eunice Compressor Station located in the SE/4 SE/4, Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 60 gallons per week of waste water will be stored on site in closed top bermed tanks. Fluids

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Any interested person may obtain further infor-

mation 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 14th day of November, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY,
Director
SEAL
Legal #70476
Pub. December 3, 2001

Ford, Jack

From: Martin, Ed
Sent: Monday, November 26, 2001 1:44 PM
To: Santa Fe New Mexican (E-mail)
Cc: Anaya, Mary; Ford, Jack
Subject: Legal Notice

Please publish the attached legal notice, one time only, by Tuesday, December 3, 2001.

After publication, please send to this office:

1. Publisher's affidavit
2. Your invoice. Purchase order # is **02199000249**

If you have any questions, do not hesitate to contact me.

Thank you.



Publ. Notice
GW-269,270.doc

Ed Martin
New Mexico Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505
Phone: (505) 476-3492
11/15/2001

9,20,21,22,23,26,27,
28,29,30, December
3,4,5,6,7,10,11 &
12, 2001

**CITY OF SANTA FE
NOTICE OF PUBLIC
HEARING**

Notice is hereby given that the governing body of the City of Santa Fe will hold a public hearing on Wednesday, December 12, 2001 at its regular Council Meeting, 7:00 p.m. session, at City Hall Council Chambers, 200 Lincoln Avenue.

The purpose of this hearing is to discuss a request from Nerio S. Gonzales for a transfer of location only of Dispenser License #2517 from Lola's, 34-B Old Santa Fe Trail to the Santa Fe Bar & Grill, 187 Paseo del Peralta.

All interested citizens are invited to attend this public hearing.

Yolanda Y. Vigil
City Clerk
Legal #70461
Pub. December 3 & 10,
2001

**CITY OF SANTA FE
NOTICE OF PUBLIC
HEARING**

Notice is hereby given that the governing body of the City of Santa Fe will hold public hearing regarding a request for a restaurant (beer and wine) license on Wednesday, December 12, 2001 at its regular City Council Meeting, 7:00 p.m. session, at City Hall Council Chambers, 200 Lincoln Avenue.

The purpose of these public hearings is to discuss a request from Cinecafe, Ltd. for the following:

1. Pursuant to §60-6B-10 NMSA 1978, a request for a waiver of the 300 foot location restriction to allow the sale of alcoholic beverages at the Cinemacafe, 1614-1616 St. Michael's Drive, which is within 300 feet of the College of Santa Fe, 1600 St. Michael's Drive;
2. If the waiver of the 300 foot restriction is granted, a request for a Restaurant (Beer & Wine) License to be located at the Cinemacafe, 1614-1616 St. Michael's Drive, Santa Fe.

All interested citizens are invited to attend these public hearings.
Yolanda Y. Vigil
City Clerk
Legal # 70442
Pub. December 3, & 10,
2001

**FIRST JUDICIAL
DISTRICT COURT
COUNTY OF SANTA FE
STATE OF NEW MEXICO**

**NO.
D-0101-PB-02001-00269**

**IN THE MATTER OF THE
ESTATE OF FRED FRANK**

New Mexico, as shown on plat entitled "Revised Final Development Plan Los Chamisos Subdivision" filed on the office of the County Clerk, Santa Fe County, New Mexico on November 11, 1982, in Plat book 123, page 21, as Document No. 506,604.

commonly known as 2221 Paseo de Los Chamisos, Santa Fe, New Mexico; subject to rights of redemption; easements, reservations and restrictions of record; taxes and governmental assessments; any liens or encumbrances not foreclosed in this proceeding; environmental contamination, if any, and zoning violations concerning the property, if any.

ALL PROSPECTIVE PURCHASERS AT THE SALE ARE ADVISED TO MAKE THEIR OWN EXAMINATION OF TITLE AND THE CONDITION OF THE PROPERTY AND TO CONSULT THEIR OWN ATTORNEY BEFORE BIDDING.

This action is a suit to foreclose a mortgage against the real property described above. The current total amount awarded by the Judgment to Los Alamos National Bank, with interest to the date of sale, is \$144,086.15 plus any amounts advanced by Los Alamos National Bank to protect its interest in the property before sale, including maintenance, taxes, assessments or other expenses relating to the property; plus any additional attorney's fees and cost incurred through the date of sale by Los Alamos National Bank.

The proceeds from the judicial sale will be applied first to the payment of the costs and expenses of the sale; then to the payment of the judgment in favor of Los Alamos National Bank, including additional fees, costs and expenses as stated in the foregoing paragraph. Any excess funds shall be deposited with the Clerk of Court. Los Alamos National Bank may apply all or a portion of its judgment towards the purchase price. Otherwise, terms of sale shall be cash or certified funds.

Plaintiff's attorney is James R. Jurgens, 100 La Salle Circle, Suite A, Santa Fe, New Mexico 87505 (505) 984-2020.

Jonathan Morse, Special Master
P.O. Box 8387
Santa Fe, NM 87504
505-982-3305
Legal #70401
Pub. November 19, 26,
December 3 & 10,
2001

FIRST JUDICIAL DIS-

December, 2001 for a court ORDER FOR CHANGE OF NAME from Destanie Rae Apodaca to Destanie Rae Gurule.

JOANNE VIGIL QUINTANA, District Court Clerk
By: Eric Erb
Deputy Court Clerk
Submitted by: Bernice Gurule
Petitioner, Pro Se
Legal #70443
Pub. November 26 & December 3, 2001

**FIRST JUDICIAL DISTRICT COURT
COUNTY OF SANTA FE/
RIO ARRIBA/LOS ALAMOS STATE OF NEW MEXICO**

NO. D101-CU-2001-2650

**IN THE MATTER OF A
PETITION FOR CHANGE
OF NAME OF Luis Alberto Arreola**

NOTICE OF CHANGE OF NAME

TAKE NOTICE that in accordance with the provisions of §§40-8-1 through 40-8-3 NMSA 1978, the Petitioner Margarita Vega will apply to the Honorable James A. Hall, District Judge of the First Judicial District at the Santa Fe Judicial Complex at Santa Fe, New Mexico at 1:00 p.m. on the 21st day of December, 2001 for a court ORDER FOR CHANGE OF NAME from Luis Alberto Arreola to Jose Luis Orozco.

JOANNE VIGIL QUINTANA, District Court Clerk
By: Jessica Encinias, Deputy Court Clerk
Submitted by: Margarita Vega, Petitioner, Pro Se
Legal #70446
Pub. November 26, 2001 & December 3, 2001

NOTICE is hereby given that Application No. 0869 (subfile 28.38 & 28.37) into RG-20080 was filed on October 31, 2001, by Reynaldo Romero, 73 A Camino Capilla Vieja, La Cienega, NM 87505, with the OFFICE OF THE STATE ENGINEER, for Permit to Change Point of Diversion & Place of Use from Surface to Ground Water in the Rio Grande Underground Basin within Santa Fe County. The applicant seeks to discontinue use of the Acequia de La Cienega, which diverts water from La Cienega Creek within Small Holding Claim No. 348 in the SW1/4 NE1/4 NE1/4, Sec. 33, Township 16 North, Range 8 East, NMPM, for the diversion of 1.0 acre-foot of water to be severed from 0.13 acre located within Tract 28.38 of Map Sheet No. 6, Santa Fe River Hydrographic Survey, and 0.2 acre located within Tract 28.37 of Map Sheet No. 6, Santa Fe River Hydrographic Survey. The applicant further seeks to

**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:

(GW-269) - Sid Richardson Energy Services, Inc., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their Boyd Compressor Station located in the NE/4 SE/4, Section 26, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 30 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 37 feet with a total dissolved solids concentration of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-270) - Sid Richardson Energy Services, Inc., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their West Eunice Compressor Station located in the SE/4 SE/4, Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 60 gallons per week 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. Ground water most likely to be affected by an accidental discharge is at a depth of approximately 100 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.

Ford, Jack

From: Martin, Ed
Sent: Monday, November 26, 2001 1:47 PM
To: Hobbs News-Sun Attn: Brenda Tison (E-mail)
Cc: Anaya, Mary; Ford, Jack
Subject: Legal Notice

Please publish the attached legal notice, one time only, by Tuesday, December 4, 2001.

After publication, please send to this office:

1. Publisher's affidavit.
2. Your invoice. Purchase order # is **02199000223**

If you have any questions, do not hesitate to contact me.

Thank you.



Publ. Notice
GW-269,270.doc

Ed Martin
New Mexico Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505
Phone: (505) 476-3492
11/15/2001

Ford, Jack

From: Martin, Ed
Sent: Monday, November 26, 2001 1:49 PM
To: Bruce S. Garber; Chris Shuey; Colin Adams; Director, State Parks; Gerald R. Zimmerman; Jack A. Barnett; James Bearzi; Jay Lazarus; Lee Wilson & Associates; Marcy Leavitt; Mike Matush; Mike Schultz; Ned Kendrick; Regional Forester; Ron Dutton; Secretary, NMED
Cc: Ford, Jack
Subject: OCD Discharge Plan Applications



Publ. Notice
GW-269,270.doc

Ed Martin
New Mexico Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505
Phone: (505) 476-3492
11/15/2001

Ford, Jack

From: Ford, Jack
Sent: Wednesday, November 14, 2001 9:12 AM
To: Martin, Ed
Subject: Public Notice for GW-269 & GW-270



269PUB.DOC

NOTICE OF PUBLICATION

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

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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.

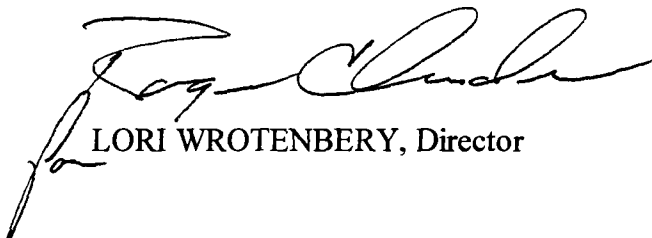
The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication 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 14th day of November, 2001.

SEAL

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

October 31, 2001

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

Subject: Sid Richardson Discharge Plan Renewals for West Eunice and Boyd
Compressor Stations

Dear Roger,

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

GW-270

GW-269

Attached to this letter you will also find a check for \$200 to cover the \$100 filing
fee for each of the applications.

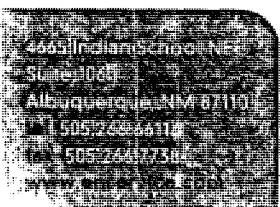
If you have any questions regarding this application please feel free to contact me
at (505) 266-6611.

Sincerely



Cale E. Swanson
Environmental Scientist II

cc: OCD District 1 Office



ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 11-1-01
or cash received on in the amount of \$ 200.00
from Environmental Services for Sid Richardson Energy Serv.
Boyd C.S. 6W-269
for W. Eunice C.S. 6W-270

Submitted by: (Family Name) M. F. F. Date: (DP No.) 11-5-01
Submitted to ASD by: Date:
Received in ASD by: Date:

Filing Fee ☒ New Facility ☐ Renewal ☒
Modification ☐ Other
(optional)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment ☐

ENVIRONMENTAL SERVICES, INC. 04-96
PH. 505-266-6611
4665 INDIAN SCHOOL RD. NE, SUITE 106
ALBUQUERQUE, NM 87110

Date Nov 1, 2001

95-32/1070 NM
2260

Pay to the order of NM Oil Conservation Division \$ 200.00

Two hundred and 00/100 Dollars

Bank of America.



ACH R/T 107000327

For Boyd & West Eunice DP payments

Sally Cudrey NP



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.

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.

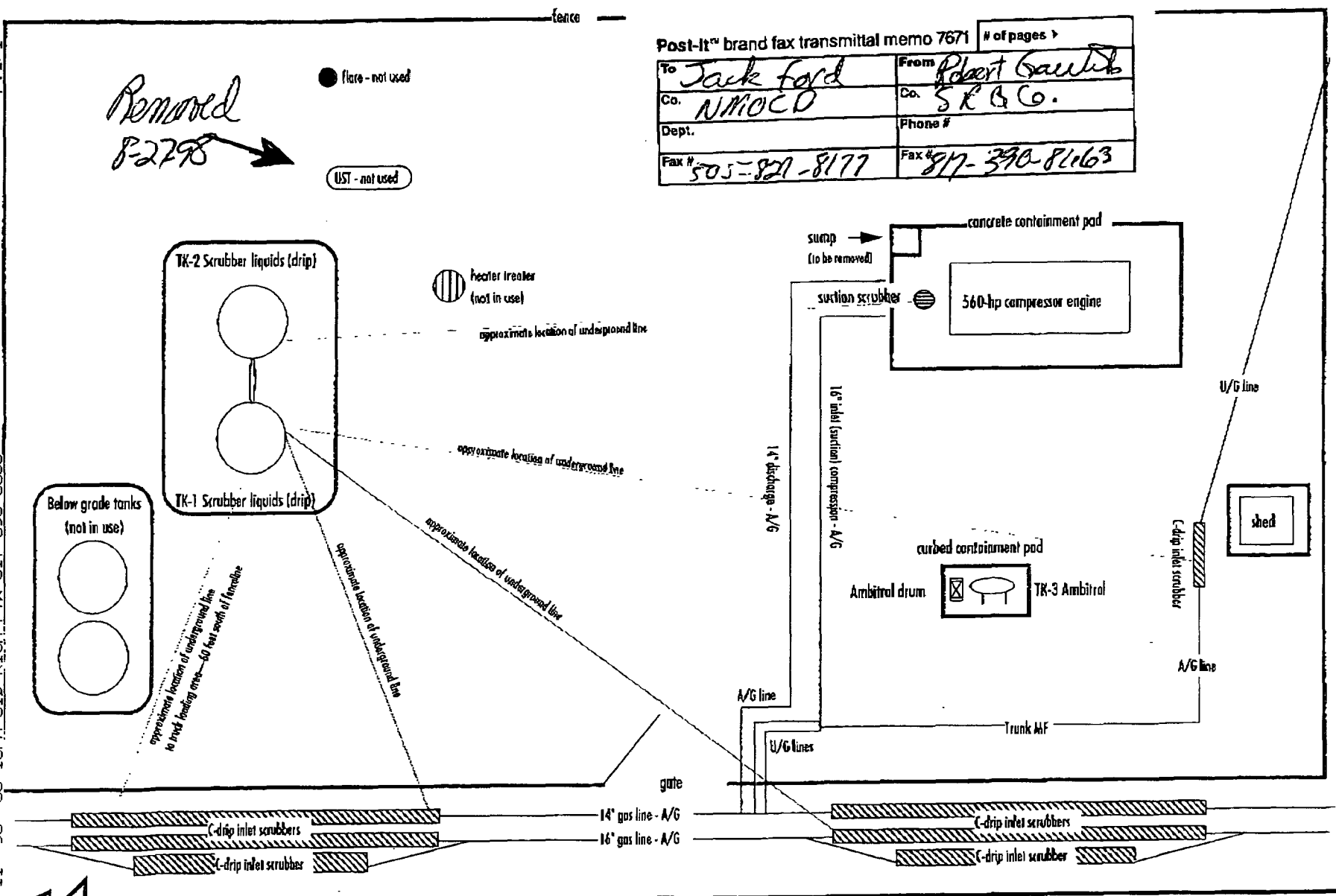
Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office

P. 1/1
SEP 11 '98 03:10PM SID RICH, FTW 817 390 8663



Post-It™ brand fax transmittal memo 7671 # of pages >

To Jack Ford	From Robert Gault
Co. NMOCD	Co. S R & Co.
Dept.	Phone #
Fax # 505-821-8177	Fax # 817-390-8163

West Eunice Compressor
Site Diagram

JOHN RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102
817-390-8600



FACSIMILE TRANSMISSION COVER SHEET

DATE: September 10, 1998 TO: Mr. W. Jack Ford

COMPANY: New Mexico Oil Conservation Division

LOCATION: Santa Fe, New Mexico

FAX #: 505-827-8177 TOTAL PAGES INCLUDING COVER: 4

MESSAGE: This is in reference to the same location that we discussed on September 8, 1998, concerning the open topped storage tanks. Please refer to the information supplied to you in that fax that shows the site location and the United States Geological Survey Ground Water Report 6. I appreciated the quick review and response to the data provided on 9-8-98 by the OCD and you.

On August 20-27, 1998, as time allowed, we conducted an integrity inspection of the single closed-topped, atmospheric pressure storage tank at our West Eunice site. The area around the tank was dug out and the soil was placed onto plastic and maintained covered until the analysis was received. During the time of the excavation observations were made as to soil conditions for any leakage that may have occurred. Prior to the removal of the empty tank from the ground, the tank was hot water washed and vacuumed out to insure that if there was any thing at all that might be lying in the bottom did not spill onto the ground. All above grade inlet and outlet piping to this tank were cleaned out prior to excavation. There were no underground inlet and outlet lines that connected into the tank.

When the tank was removed from the ground, it was discovered that it was setting on a compacted clay bed. There were four corrosion holes in the bottom of the tank and very minimal soil contamination in those areas. Otherwise, the entire sight appeared to be in very good condition. There were a total of two composite samples taken, one from the area below the tank and one from the spoil pile. These two composite soil samples were sent to TraceAnalysis, Inc. in Lubbock, Texas. The analysis was completed on 9-2-98 and supervised by Dr. Blair Leftwich. The analysis showed that the TPH, BTEX and Benzene on both tanks was at acceptable levels as follows:

Composite Soil Analysis	Spoil Pile (SP-1)	BGST (Hole-1)
Total Petroleum Hydrocarbon (TPH)	<50 ppm	<50 ppm
BTEX (Total)	0.348 ppm	5.05 ppm
Benzene	<.050 ppm	<.050 ppm
Tank Depth	NA	12 ft.
% of tank below grade	NA	80.%
Sample depth (from ground level)	Side wall composite	10-13 ft.

The water table as indicated in the United States Geological Survey Ground Water Report 6 indicates that this location is 113 feet above any ground water. According to this information, no further remediation or testing is required for this project. The data obtained through soil analysis and USGS Report 6 and applied to the New Mexico Oil Conservation Division ranking criteria for unsaturated contaminated soils indicates that the total ranking (category 0-9) is 0. According to the ranking of 0, the cleanup level for this site is TPH 5000- PPM, Benzene -10 PPM and BTEX - 50 PPM and we are well below these levels.

Our current plan now, that this tank is out of the ground and the analysis of the soil sample for this BGST is well below the ranking criteria as specified by the OCD, is to backfill the hole with clean soil (inert solid material).

No further steps will be taken until we have had an opportunity to visit on the phone tomorrow. If you would, please call me at your convenience.

C: CPO/HH w/o att
MRR WJF w/o att
KCC HEH JDP w/att

FROM: Robert Gawlik, Environmental Health and Safety Associate
PHONE: 817-390-8685 OUR FAX NUMBER IS: 817-390-8663
IF YOU NEED A RESEND, PLEASE CALL: 817-390-8632

TRACEANALYSIS, INC.

670: Aberdeen Avenue, Suite 9 Lockport, Texas 75428 800-378-1296 806-734-1236 FAX 806-734-1236
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888-968-3443 915-585-3443 FAX 915-585-4944
E-Mail: lab@tracanalysis.com

ANALYTICAL RESULTS FOR Sid Richardson Gasoline Co. Attention Harold Hicks Box 1226 Jal NM 88252

Date: Sep 09, 1998
Date Rec: 9/3/98
Project: AFB 61847
Proj Name: W. Eunice Buried Tank
Proj Loc: Lea Co. Gathering System

Lab Receiving #: 9809000065
Sampling Date: 9/2/98
Sample Condition: Intact and Cool
Sample Received By: VW

TA#	Field Code	MATRIX	DRO (mg/Kg)
106546	SP-1 Comp	Soil	<50
106547	HOLE-1 Comp	Soil	<50
Method Blank			<50
Reporting Limit			50
QC			491

RPD 0
% Extraction Accuracy 81
% Instrument Accuracy 98

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPRKE: (mg/Kg)
DRO	BPA 3550B	9/3/98	EPA 8015B	9/3/98	SLR	500	500


Director, Dr. Blair Leftwich

5-5-98
Date

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806-794-1796

FAX 806-794-1298

ANALYTICAL RESULTS FOR
Sid Richardson Gasoline Co.
Attention Harold Hicks
Box 1726
Jal NM 86252

Lab Receiving # : 9809000065
Sampling Date: 9/2/98
Sample Condition: Intact and Cool
Sample Received By: VM

Date: Sep 03, 1998
Date Rec: 9/3/98
Project: AFE 61847
Proj Name: W. Eunice Buried Tank
Proj Loc: Lea Co. Gathering System

TAN	Field Code	MATRIX	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	M,P,O XYLENE (mg/Kg)	TOTAL BTX (mg/Kg)
106546	SP-1 Comp	Soil	<0.050	<0.050	0.059	0.289	0.348
106547	HOLE-1 Comp	Soil	<0.050	0.587	0.561	3.98	5.05
	Method Blank		<0.050	<0.050	<0.050	<0.050	
	Reporting Limit		0.05	0.05	0.05	3.05	
	QC		0.011	0.111	0.118	0.346	

RPD	1	1	1	1
% Extraction Accuracy	109	107	110	109
% Instrument Accuracy	11	113	118	115

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
BTX	EPA 5030	9/8/98	EPA 8621B	9/8/98	CS	0.100 ea	See

Director, Dr. Blair Leftwich

Date

Sent by: TRACEANALYSIS

7841253

10 Sep '98 12:24PM; Job 648; Page 2/2

SEP 10 '98 01:16PM

09/10/98 04:22PM SIDH FTW 817 390 8663SID FIELD

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102
817-390-8600



FACSIMILE TRANSMISSION COVER SHEET

DATE: September 8, 1998 TO: Mr. W. Jack Ford

COMPANY: New Mexico Oil Conservation Division

LOCATION: Santa Fe, New Mexico

FAX #: 505-827-8177 TOTAL PAGES INCLUDING COVER: 7

MESSAGE: As discussed with you on the phone today, during a recent inspection of the below grade storage tanks at our West Eunice site, it was determined that each tank had some corrosion in the very bottom. When this corrosion was removed it was discovered that each tank had a couple of small holes that went through the metal. At that time plans were made to cut holes in the bottom of each tank and retrieve samples of the soil in the area of these corrosion spots.

On 8-21-98, the soil below each below grade storage tank was sampled. A total of three spot samples were taken in each tank and a composite was made up for analysis. Each tank had one composite sample ran. These two composite soil samples were sent to TraceAnalysis, Inc. in Lubbock, Texas. The analysis was completed on 8-26-98 and supervised by Dr. Blair Leftwich. The analysis showed that the TPH, BTEX and Benzene on both tanks was at acceptable levels as follows:

Composite Soil Analysis	North BGST	South BGST
Total Petroleum Hydrocarbon (TPH)	1,380 ppm	840 ppm
BTEX (Total)	7.01 ppm	0.417 ppm
Benzene	0.103 ppm	<0.050 ppm
Tank Depth	8 ft.	12 ft.
% of tank below grade	66%	75%
Sample depth (from ground level)	5 ft.	9 ft.

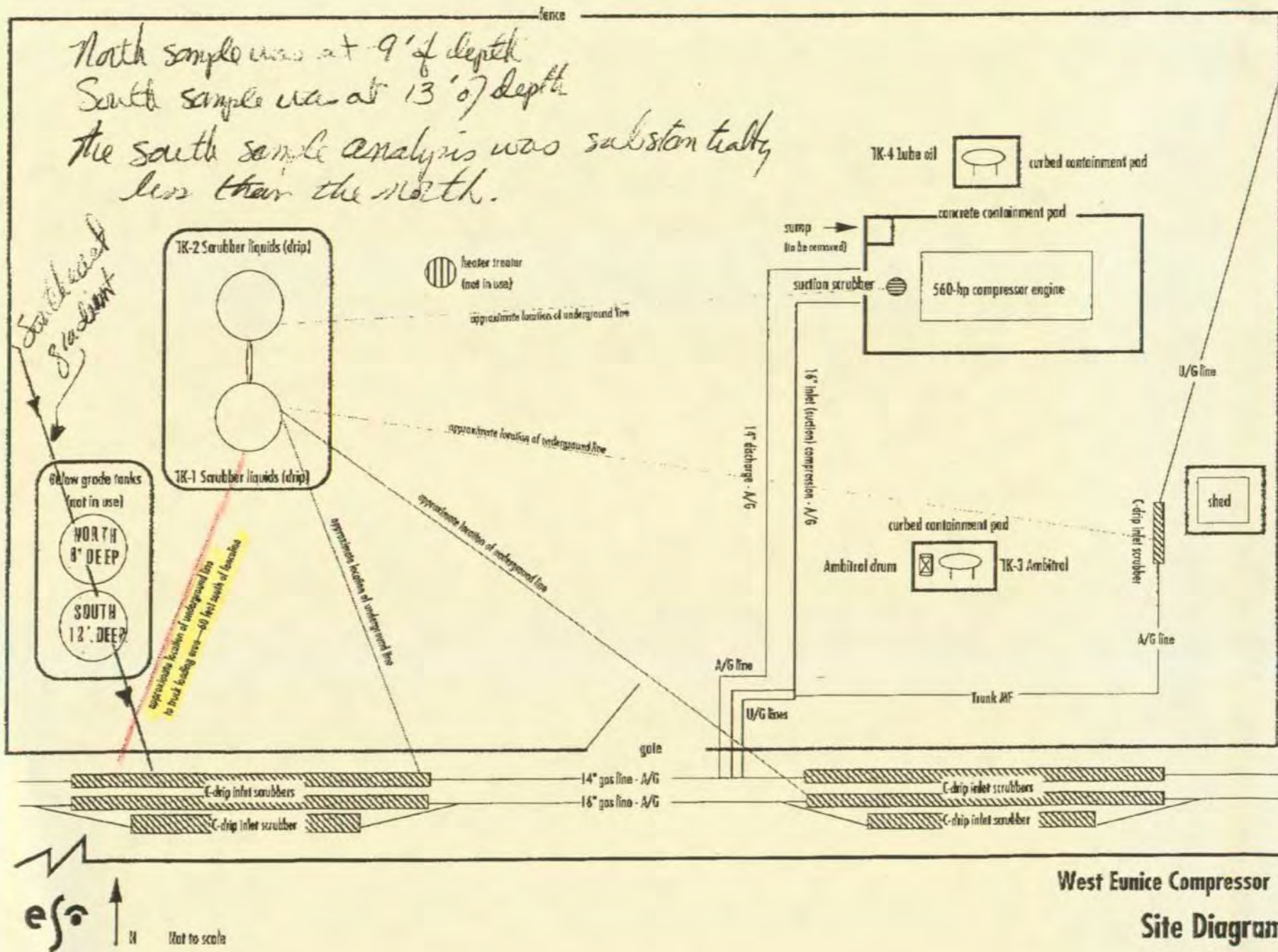
The water table as indicated in the United States Geological Survey Ground Water Report 6 indicates that this location is 113 feet above any ground water. As also discussed, down gradient would be to the south-southeast. As indicated on the above chart, the south would actually be down gradient of the north tank and the soil sample of the south tank was substantially less than the north tank. As per our discussion, this would indicate that since the south is 4 foot deeper than the north, this would in my opinion be indicative that our vertical depth of contamination would not increase if we went any deeper.

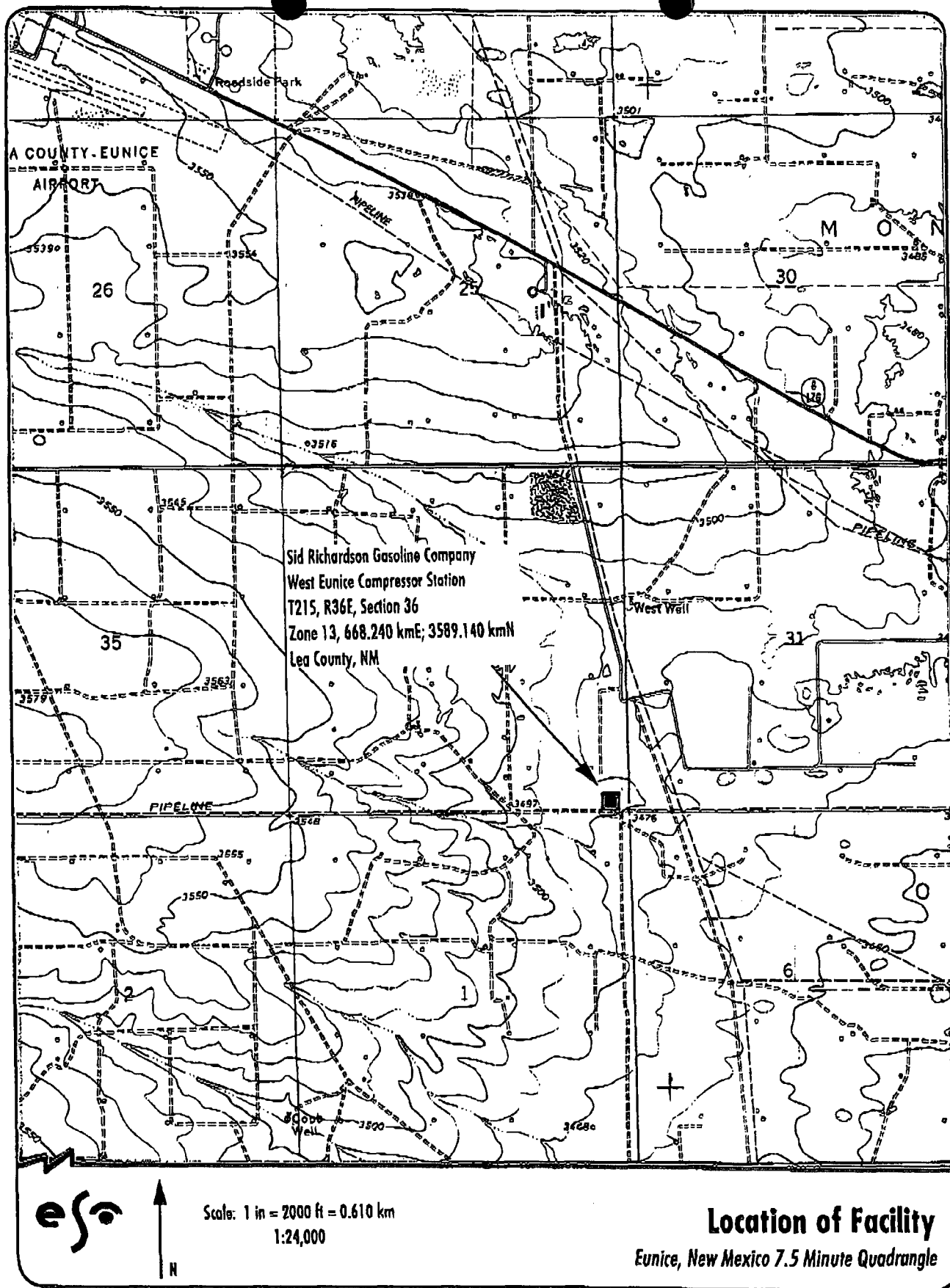
According to this information, no further remediation is required for this project. The data obtained through soil analysis and USGS Report 6 and applied to the New Mexico Oil Conservation Division ranking criteria for unsaturated contaminated soils indicates that the total ranking (category 0-9) is 0. According to the ranking of 0, the cleanup level for this site is TPH 5000- PPM, Benzene -10 PPM and BTEX -50 PPM and we are well below these levels.

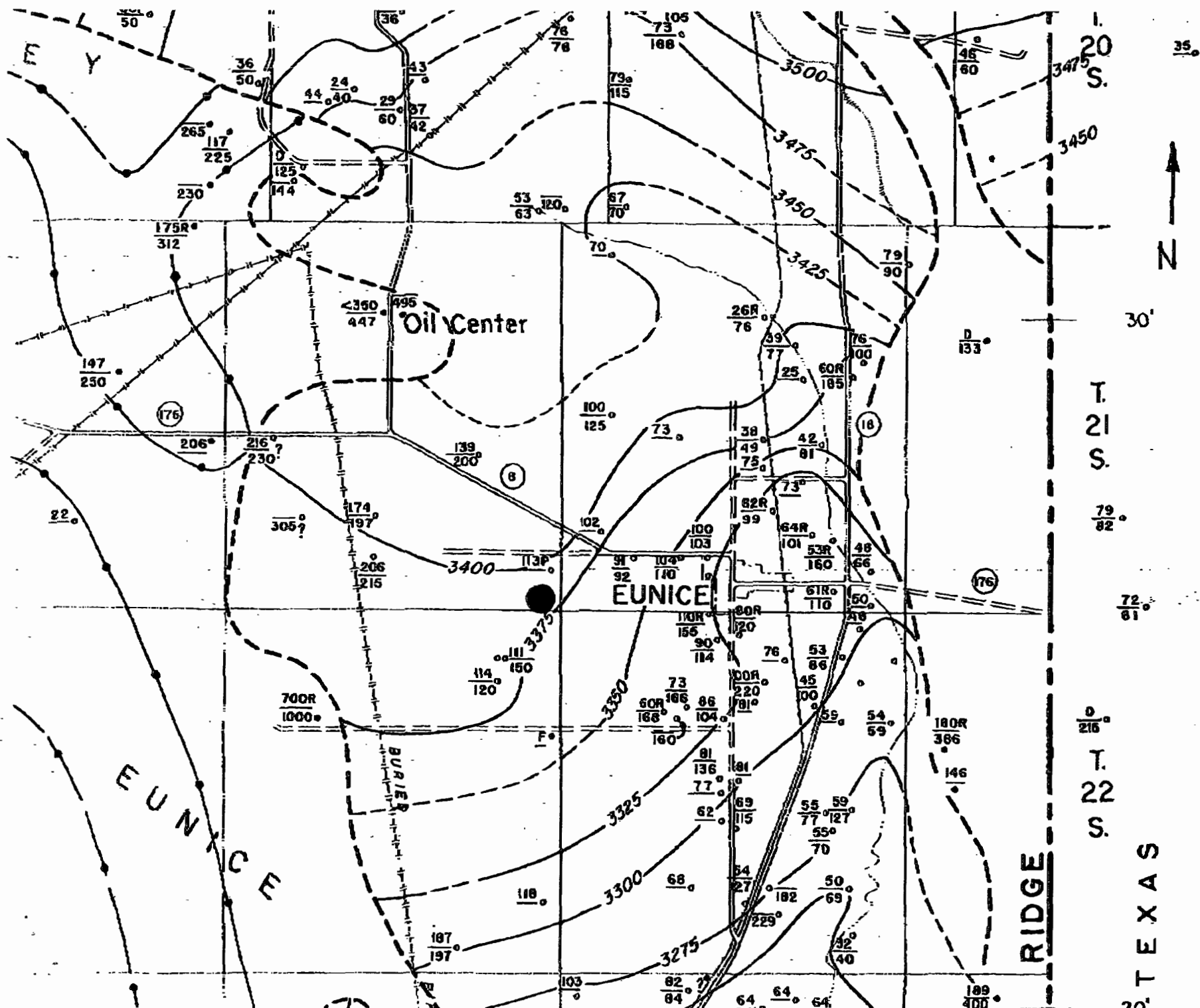
Our current plan for these two below grade storage tanks is to fill with clean soil (inert solid material) rather than to remove from the ground.

No further steps will be taken until we have had an opportunity to visit on the phone tomorrow. If you would, please call me at your convenience.

FROM: Robert Gawlik, Environmental Health and Safety Associate
PHONE: 817-390-8685 OUR FAX NUMBER IS: 817-390-8663
IF YOU NEED A RESEND, PLEASE CALL: 817-390-8632







TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9
4725 Ripley Avenue, Suite A

Lubbock, Texas 79424
El Paso, Texas 79922

800-378-1298
888-588-3443
E-Mail: lab@traceanalysis.com

808-794-1298
915-585-3443

FAX 808-794-1298
FAX 915-585-4944

ANALYTICAL RESULTS FOR
Sid Richardson Gasoline Co.
Attention Harold Hicks
Box 1226
Jal NM 88252

Date: Aug 31, 1998

Date Rec: 8/21/98

Project: N/A

Proj Name: West Eunice Compressor Site

Proj Loc: Lea County Gathering

Lab Receiving #: 9808000424

Sampling Date: 8/20/98

Sample Condition: Intact and Cool

Sample Received By: VW

TA#	Field Code	MATRIX	DRO (mg/Kg)
105698	BGST-N-COMP	Soil	1,380
105702	BGST-S-COMP	Soil	840
Method Blank			<50
Reporting Limit			50
QC			459

RPD	3
% Extraction Accuracy	84
% Instrument Accuracy	92

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
DRO	EPA 5030	8/27/98	EPA 8015B	8/27/98	SLR	500	500

TLB
Director, Dr. Blair Leftwich

8-31-98
Date



TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806-794-1296

FAX 806-794-1298

ANALYTICAL RESULTS FOR

Sid Richardson Gasoline Co.

Attention Harold Hicks

Box 1226

Jal

NM 88252

Lab Receiving #: 9806000424

Date Rec: 8/21/98

Sampling Date: 8/20/98

Sample Condition: Intact and Cool

Sample Received By: VW

Date: Aug 27, 1998

Project: N/A

Proj Name: West Eunice Compressor Site

Proj Loc: Lea County Gathering

TA#	Field Code	MATRIX	MTBE (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL- BENZENE (mg/Kg)	M,P,O XYLENE (mg/Kg)	TOTAL BTEX (mg/Kg)
105698	EGST-N-COMP	Soil	<0.050	0.103	0.497	0.472	5.94	7.01
105702	EGST-S-COMP	Soil	<0.050	<0.050	<0.050	0.083	0.334	0.417
Method Blank			<0.050	<0.050	<0.050	<0.050	<0.050	
Reporting Limit			0.05	0.05	0.05	0.05	0.05	
QC			0.106	0.106	0.107	0.107	0.315	

RPD	2	3	4	3	4
% Extraction Accuracy	101	105	106	107	105
% Instrument Accuracy	106	106	107	107	105

TEST	PREP METHOD	PREP DATE	ANALYSIS METHOD	ANALYSIS COMPLETED	CHEMIST	QC: (mg/L)	SPIKE: (mg/Kg)
BTEX	EPA 5030	8/26/98	EPA 8021B	8/26/98	CS	0.100 ea	5 ea


Director, Dr. Blair Leftwich

8-27-98
Date

Sent by: SEP 08 '98 04:32PM SID RICH FTW 812.390 8663
TRACE ANALYSIS, INC.

2 Sep '98 11:22AM: Job 259; Pgs 2/23

Environmental Services Inc.

Application for Renewal
Groundwater Discharge Plan
West Eunice Comp. Station
Sid Richardson Energy Services, Co.
201 N. Main St.
Fort Worth, TX 76102

October 2001 SRC 019

4665 Indian School NE, Suite 106, Albuquerque, NM 87110
tel 505.266.6611 fax 505.266.7738

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 FACILITIES
AND CRUDE OIL PUMP STATIONS**

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

☐ New

☒ Renewal

☐ Modification

1. Type: West Eunice 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: SE /4 SE /4 Section 36 Township 21S 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 hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Wayne Farley

Title: Director of Gas Operations

Signature: Wayne Farley

Date: 10/19/01

Contents

Sid Richardson Energy Services, Co.—West Eunice Compressor Station

1	Type of Operation.....	1
2	Operator/Legally Responsible Party.....	1
	Operator.....	1
	Legally Responsible Party.....	1
3	Location of discharge/facility	1
4	Landowner	1
5	Facility Description.....	1
6	Material Stored and Used.....	2
7	Sources and Quantities of effluent and waste Solids	2
8	Liquid and solid waste collection/storage/disposal	3
9	Proposed Modifications.....	3
10	Inspection, Maintenance, and reporting	3
11	Spill/Leak Prevention and Reporting (contingency plans)	4
12	Site characteristics.....	4
13	Additional Information	5
	Closure Plan.....	5
	Affirmation.....	6

West Eunice Compressor Station Discharge Plan

Sid Richardson Energy Services, Ltd.—West Eunice Compressor Station

This document constitutes a renewal application for the groundwater discharge plan for the West Eunice Compressor Station. 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 West Eunice Compressor Station (West Eunice) is a natural gas compressor station. Its purpose is to remove excess liquids from field natural gas, measure gas volume, and transport it through pipelines. The site-rated horsepower at the facility is 560.

2 OPERATOR/LEGALLY RESPONSIBLE PARTY

Operator

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

Legally Responsible Party

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

3 LOCATION OF DISCHARGE/FACILITY

Lea County, NM
Section 36, Township 21 South, Range 36 East

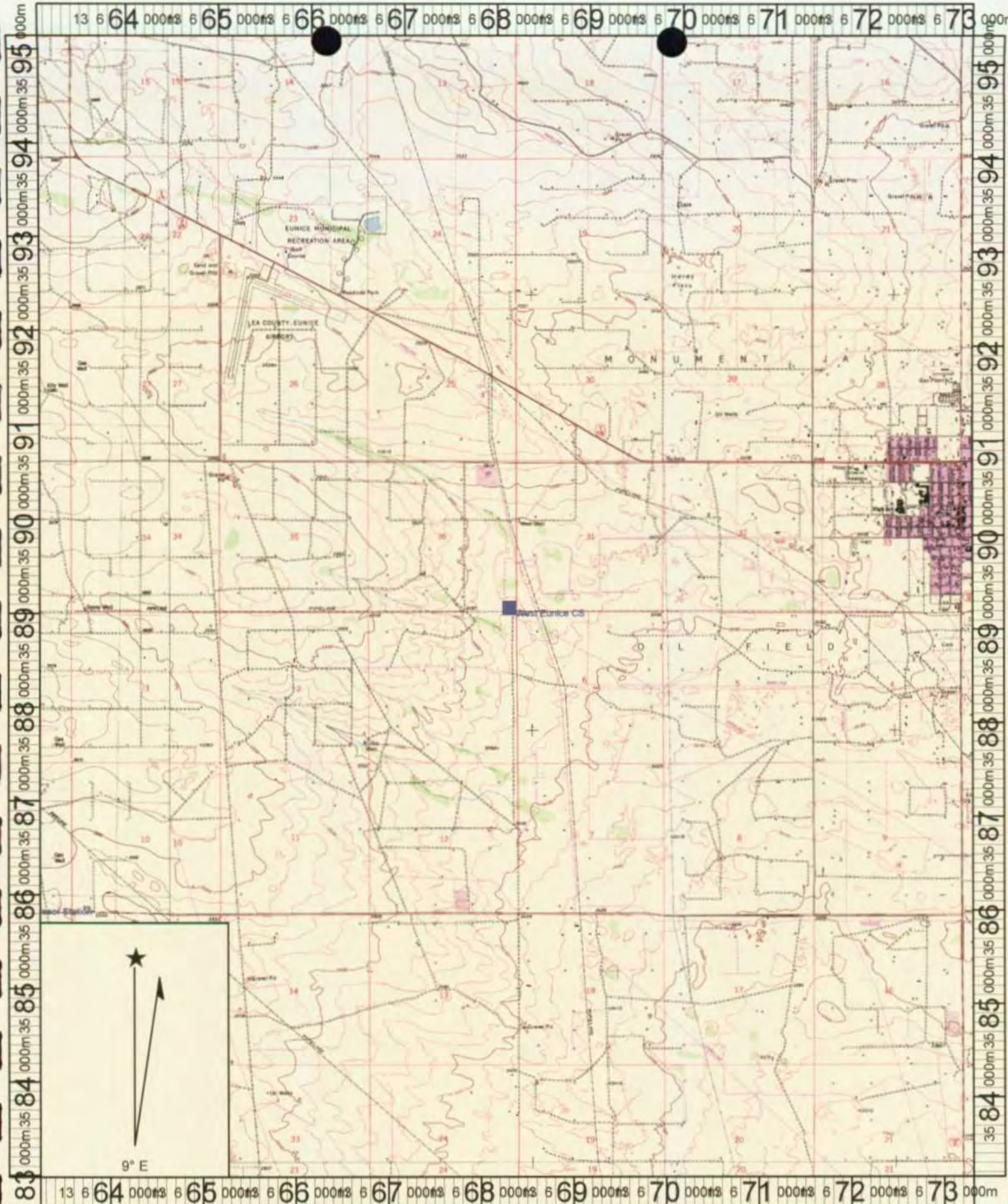
A portion of the Eunice 7.5' map showing the location of the facility can be found in Figure 1.

4 LANDOWNER

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

5 FACILITY DESCRIPTION

Six C-drip inlet scrubbers are utilized at West Eunice to remove liquids from both the inlet gas to the station and gas piped on to other facilities. The six scrubbers are located south of West Eunice between the facility fence and road. One C-drip inlet scrubber is located on the facility for additional liquid removal from the gas. The gas is routed through a suction scrubber on the compressor for further liquid removal. Liquids from all of the scrubbers at the facility are transported via underground piping to the two scrubber liquids (drip) tanks. The gas then enters the compressor, which is driven by a 560-horsepower natural gas-fired engine (a Caterpillar 398). The gas discharged from the compressor goes to Sid Richardson's Jal #4 plant where it is recompressed and sent to another Sid Richardson facility. A simplified process flow diagram and facility layout can be found in Figures 2 and 3, respectively.



Name: EUNICE
Date: 10/30/2001
Scale: 1 inch equals 4444 feet

Location: 13 668176 E 3589151 N
Caption: Figure 1
Site Location

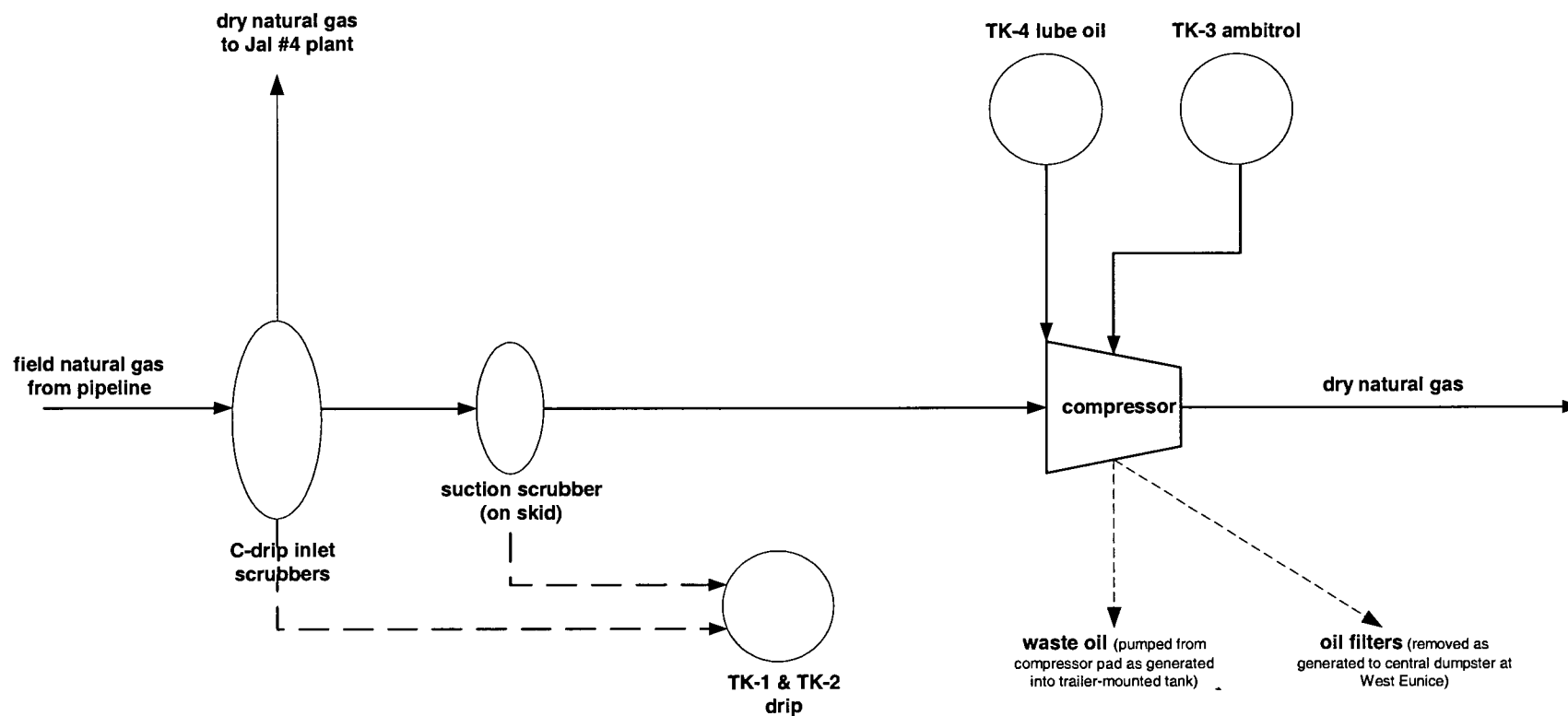
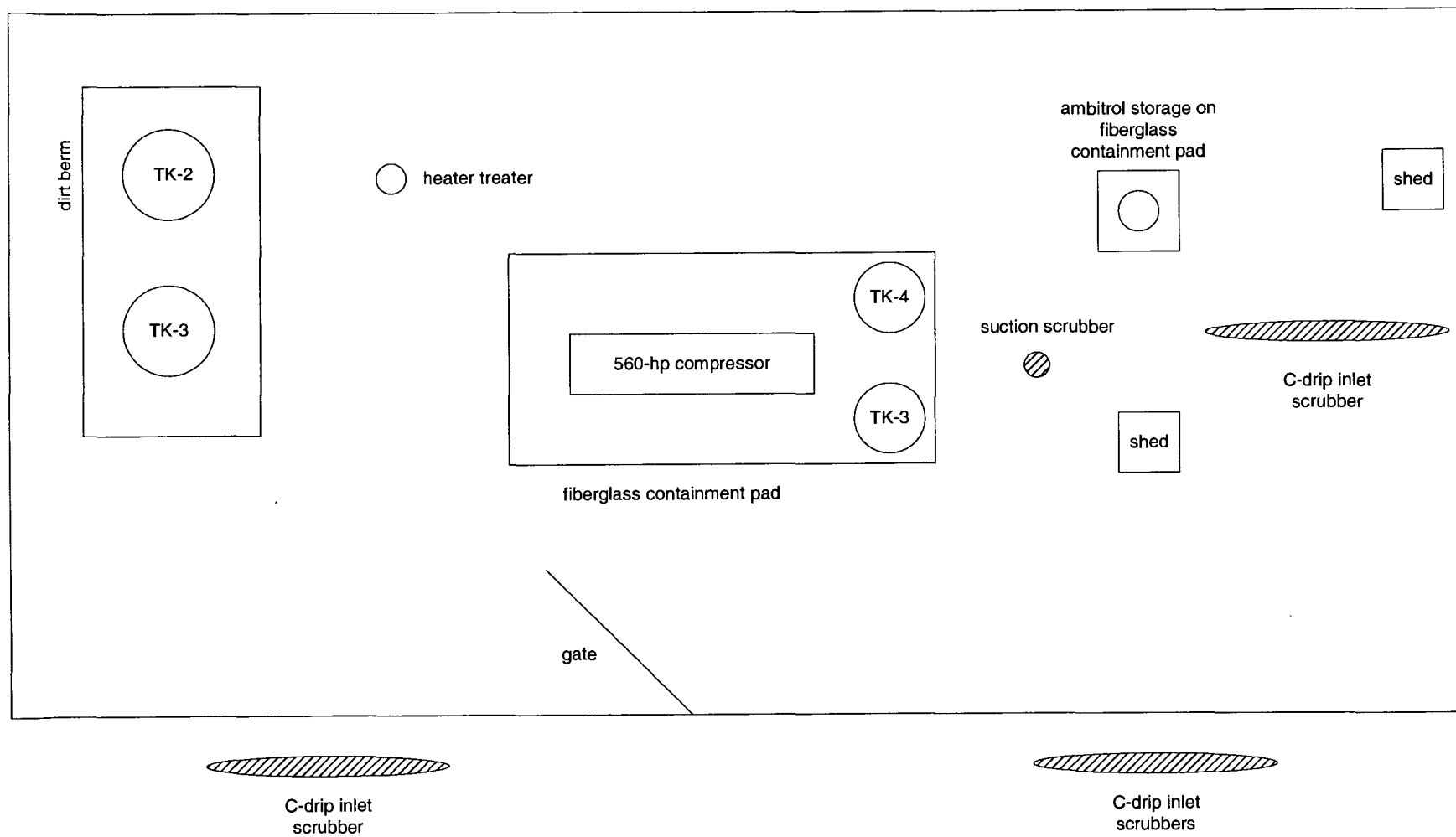


Figure 2
Block Flow Diagram
Sid Richardson Energy Services, Co. - West Eunice Compressor Station



Not to scale

Figure 3
Site Diagram
Sid Richardson Energy Services, Co. - West Eunice Compressor Station

6 MATERIAL STORED AND USED

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

Table 1
Material Used and Stored

Container	ID	Material	Form	Volume	Location	Quantity	Containment
AGT Steel	TK-1	Scrubber liquids (drip)	Liquid	500 bbl	West-central area of facility	1270 gal	Secondary containment, dirt berm
AGT Steel	TK-2	Scrubber liquids (drip)	Liquid	500 bbl	West-central area of facility	300 gal	Secondary containment, dirt berm
AGT-elev Steel	TK-3	Ambitol	Liquid	500 gal	South of compressor	21,000 gal	Impermeable (fiberglass) curbed containment pad
AGT-elev Steel	TK-4	Lube Oil	Liquid	300 gal	North of Compressor	8820 gal	Impermeable (fiberglass) curbed containment pad
Drum Steel		Ambitol	Liquid	55 gal	North-east of Compressor		Impermeable (fiberglass) curbed containment pad

AGT - aboveground tank (non-pressurized)

AGT-elev - aboveground tank elevated on a saddle rack

Drum - 55-gallon drum

The two 500 barrel aboveground tanks (AGT) receives scrubber liquids (drip) from the C-drip inlet and suction scrubbers via underground piping. The interconnected tanks are surrounded by a single berm. Sid Richardson will evaluate the capacity of this berm to ensure it has been constructed to contain 1.33 times the total volume of both tanks and make any repairs necessary with one year after plan approval.

Each of the aboveground elevated tanks (Ambitol and lube oil) are located on impermeable fiberglass pad and curb type containment. The Ambitol drum is also stored on impermeable pad and curb type containments.

7 SOURCES AND QUANTITIES OF EFFLUENT AND WASTE SOLIDS

Table 2 summarizes the effluent and solid wastes generated at the facility.

Table 2
Effluent and Solid Waste Sources and Quantity

Source	Unit	Type of Waste	Volume	Quality
Compressor	Caterpillar 398 560-hp	Used engine oil	50 gal/mo	Used motor oil with no additives
		Used filters	5/mo	No additives
		Washdown water	75 gal/mo	Water with detergents, lube oil, coolant
		Sorbent material/rags	varies	No additives
Scrubbers	C-drip and suction	Scrubber liquids: hydrocarbon liquids & water	10 bbls/wk	No additives
Miscellaneous	trash	solid waste	varies	Varies

Ambitol, comprised of 50% water and 50% ethylene glycol, is utilized as coolant for the compressor engine. The amount of Ambitol used at the facility varies according to need. Very little waste coolant is generated as the cooling system is sealed. What loss does occur is primarily evaporation during engine use. A small amount of Ambitol may occasionally be found in the washdown water.

The compressor pad is washed once a month using a portable high pressure system. Occasionally, approximately 3 gallons of a biodegradable detergent, F218, is added to the wash water for cleaning. The detergent is not stored at the facility but is brought in as needed. Wash water is pumped as generated from the compressor pad or sump into a trailer-mounted tank during washing.

8 LIQUID AND SOLID WASTE COLLECTION/STORAGE/DISPOSAL

Table 3

Liquid and solid waste collection/storage/disposal

Type of Waste	Collection	Storage	Hauled by	Disposal
Used oil	Pumped from compressor pad or drum into trailer-mounted tank	Not Stored on-site; removed as generated	Sid Richardson to Jal #3 gas plant. See GW-010.	Used oil stored in waste oil tank at Jal #3. Removed by Industrial Service Corp. See GW-010.
Used filters sorbent materials and rags*	Filters drained into 55-gal drum; filters/rags stored in dumpster. Note: drum is used but not stored at facility.	Central dumpster on-site	Sid Richardson; temporarily stored at West Eunice, Procycle Oil and Metals to incinerator	Procycle Oil and Metals-incinerator
Wash water	Pumped from compressor pad into trailer-mounted tank during washing	Not Stored on-site; removed as generated	Sid Richardson to Jal #3 gas plant. See GW-010.	Wash water stored in classifier tank. Any hydrocarbons are pumped to scrubber liquid tanks and removed by XL. Water disposed in injection well at Jal #3. See GW-010
Scrubber liquids (drip)/water**	Underground piping from C-drip and suction scrubbers	TK-1 & TK-2	Chaparral Trucking to Sid Richardson's Jal #4 compressor. See GW-107.	Scrubber liquids stored in scrubber liquid tanks. Hydrocarbons are sold to PetroSource. Water is removed by Chaparral Trucking. See GW-107
Solid waste	None on-site	Not Stored on-site; removed as generated	Sid Richardson	Sid Richardson's Jal #3 gas plant, see GW-010

* In addition, used filters from Sid Richardson's Boy, House, C-2, C-2, C-3, and C-4 Compressor Stations are brought to the central dumpster at West Eunice for storage prior to disposal.

** In addition, scrubber liquids from Sid Richardson's C-1, C-3, and C-4 Compressor Stations (approximately 600 gallons/month) are stored in the scrubber liquids tanks at West Eunice until disposal.

Sid Richardson Energy Services Co., Jal #3 Gas Plant-see GW-010; Jal #4 Compressor Station-see GW-107

Procycle Oil and Metals, 315 Pronto, Odessa, TX 79762, (915) 550-2533.

Chaparral Trucking, PO Drawer 1769, Eunice, NM 88231, (505) 394-2545

Industrial Service Corp., PO Box 711, Slaton, TX 79364, (915) 828-3183

PetroSource Partners Ltd., 129 S. Grimes, Hobbs, NM 88240, (505) 397-7212

XL Transportation Co., PO Drawer A, Jal, NM 88252, (505) 395-2010

9 PROPOSED MODIFICATIONS

Sid Richardson does not propose any modifications at this time.

10 INSPECTION, MAINTENANCE, AND REPORTING

West Eunice is unmanned but inspected at least once per day Monday through Friday.

Sid Richardson will perform pressure testing on underground effluent pipelines within five years of renewal of this discharge plan. A testing timetable will be submitted to the NMOCD for approval six months prior to testing.

The two scrubber liquids (drip) tanks (TK-1 and TK-2) will be cleaned out and visually inspected once every five years, as they are not situated on concrete or gravel pads.

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 West Eunice Compressor Station is located on dune sands of the Eunice Plain in the Capitan Basin. The Eunice Plain is underlain by a hard caliche surface and is almost entirely covered by reddish-brown dune sand 20—40 feet high (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).

Unnamed arroyos are located 0.2 miles south/southwest and 0.6 miles north/northwest of the facility. These appear to be the only groundwater discharge sites on the Eunice 7.5' U.S.G.S. quadrangle within 1 mile of the facility.

As of October 1996, one well was recorded with the New Mexico State Engineer Office in Rowell within one-half mile of the perimeter of the facility. The well, used for stock, was drilled in 1954. The highest recorded water level in this well was 100 feet; the lowest was 101 feet below grade.

Water from a well located approximately 4 miles northwest of the compressor station was analyzed in 1954 and 1958 (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). Total dissolved solids concentration recorded at this well for each year the water was analyzed was 74 and 73 parts per million, respectively. Typically, as described below, water from the aquifer under the compressor station has a much higher total dissolved solids concentration. This concentration, 1100 parts per million, may more closely represent the total dissolved solids concentration at the facility.

A piezometric map of the water table (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) shows the elevation of the water table at the site to be about 3400 feet. The elevation of the facility is 3500 feet, placing the depth to the water table at the site at 100 feet.

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. Water in the Ogallala Formation has total dissolved solids of less than 1100 ppm. The total dissolved solids in the Dockum Group is higher than that of the Ogallala. The deeper Paleozoic aquifers do not contain usable water and are grine-injected (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).

The soil type at the facility is the Berino-Cacique loam fine sands association, which is typically found on uplands in southern Lea County. The Berino soils are well-drained soils that have a light sandy clay loam subsoil. The Cacique soils are well-drained soils that have a sandy clay loam subsoil underlain by indurated caliche at a depth of 20 to 34 inches. (Soil Survey, Lea

County, New Mexico, 1974, U.S.D.A., Soil Conservation Survey). Any runoff from the facility would probably collect in a shallow area 300 yards south of the facility.

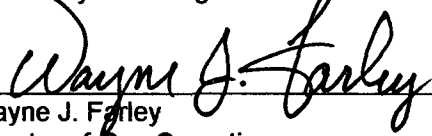
13 ADDITIONAL INFORMATION

Closure Plan

Should Sid Richardson choose to permanently close the West Eunice Compressor Station, all reasonable and necessary measures will be taken to prevent the exceedance 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 West Eunice 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.



Date



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 CPS232331

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

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

EMERGENCY TELEPHONE NUMBERS

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 Low Ash Gas Engine Oil and HDAX LFG

CONTAINING

COMPONENTS	AMOUNT	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%

ZINC ALKARYL DITHIOPHOSPHATE

Chemical Name: ZINC ALKARYL DITHIOPHOSPHATE

CAS54261675

< 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.

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) 399F (204C) min.

AUTOIGNITION: NDA

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

EXTINGUISHING MEDIA:

CO2, Dry Chemical, Foam, Water Fog

NEPA 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

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.

pH: NDA

VAPOR PRESSURE: NA

VAPOR DENSITY

(AIR=1): NA

BOILING POINT: NDA

FREEZING POINT: NDA

MELTING POINT: NA

SOLUBILITY: Soluble in hydrocarbon solvents; insoluble in water.

SPECIFIC GRAVITY: 0.87 - 0.88 @ 15.6/15.6C

EVAPORATION RATE: NA

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.

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:

1. 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:	NO

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	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

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
RQ - Reportable Quantity	PEL - Permissible Exposure Limit
C - 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 (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

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

EMERGENCY TELEPHONE NUMBERS

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	
(AIR=1):	NA
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:	1. 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:	NO

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	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.

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
C - 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 (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

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

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

EMERGENCY TELEPHONE NUMBERS

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	
(AIR=1):	NA
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:	1. 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:	NO

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

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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 Id.).

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

C - 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 (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. Chemical Product and Company Identification

Common Name	Coastalguard 50%	Code	37172
Supplier	COASTAL CHEMICAL CO., L.L.C. 3520 Veterans Memorial Drive ABBEVILLE, LA 70510 318-893-3862	MSDS#	Not available.
Trade Name	Not available.	Validation Date	1/9/97
Material Uses	Industrial applications: Coolant and antifreeze.	Print Date	7/13/99
Manufacturer	Coastal Chemical Co., Inc. 3520 Veterans Memorial Drive Abbeville, La.	In case of Emergency Transportation Emergency Call CHEMTREC 800-424-9300 Other Information Call Joe Hudman 713-477-6675	

Section 2. Composition and Information on Ingredients

Ingredient Name	CAS #	% by Weight	TLV/PEL	LC ₅₀ /LD ₅₀
Ethylene Glycol	107-21-1	50	CEIL: 39.4 (ppm) CEIL: 100 (mg/m ³)	ORAL (LD50): Acute: 4700 mg/kg [Rat]. DERMAL (LD50): Acute: 9530 mg/kg [Rabbit].

Section 3. Hazards Identification

Emergency Overview	CAUTION! 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

Contact	IMMEDIATELY flush eyes with running water for at least 15 minutes, keeping eyelids open. COLD water may be used.
On 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.
Dangerous Skin Contact	No additional information.
Inhalation	Allow the victim to rest in a well ventilated area. Seek immediate medical attention.
Dangerous Inhalation	No additional information.
Ingestion	DO NOT induce vomiting. Have conscious person drink several glasses of water or milk. Seek immediate medical attention.

Hazardous Ingestion

DO NOT induce 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 Explosion Data

Flammability of the Product

Combustible.

Auto-Ignition Temperature

The lowest known value is 398°C (748.4°F) (Ethylene Glycol).

Flash Points

The lowest known value is CLOSED CUP: 116°C (240.8°F) OPEN CUP: 232°C (240.8°F) (Cleveland) (Ethylene Glycol)

Flammable 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 Glycol)

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 disposal container. Finish cleaning by spreading water on the contaminated surface and dispose of according to local and regional authority requirements.

Large Spill

Combustible material.
Keep away from heat. Keep away from sources of ignition. Stop leak if without risk. Finish cleaning by spreading 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 tightly closed. Keep in a cool, well-ventilated place. Combustible materials should be stored away from extreme heat and away from strong oxidizing agents.

Section 8. Exposure Controls/Personal Protection

Engineering Controls

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.

Personal Protection

Safety glasses. Lab coat. Gloves (impervious). Wear appropriate respirator when ventilation is inadequate.

Personal Protection in Case of a Large Spill

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

Chemical Name or Product Name

CAS

Exposure Limits

2-Ethanedio

107-21-1

CEIL: 39.4 (ppm) CEIL: 100 (mg/m³)

Section 9. Physical and Chemical Properties

Physical state and appearance	Liquid.	Odor	Not available.
Molecular Weight	Not applicable.	Taste	Not available.
(1% soln/water)	Neutral.	Color	Not available.
Boiling Point	The lowest known value is 198°C (388.4°F) (Ethylene Glycol).		
Melting Point/Pour Point	May start to solidify at -13.5°C (7.7°F) based on data for: Ethylene Glycol.		
Critical Temperature	Not available.		
Specific Gravity	1.06 (Water = 1)		
Vapor Pressure	The highest known value is 0.05 mm of Hg (@ 20°C) (Ethylene Glycol).		
Vapor Density	The highest known value is 2.1 (Air = 1) (Ethylene Glycol).		
Volatility	Not available.		
Flammability	Not available.		
Evaporation rate	Not available.		
Viscosity	Not available.		
Water/Oil Dist. Coeff.	The product is much more soluble in water.		
Conductivity (in Water)	Not available.		
Dispersion Properties	See solubility in water, methanol, diethyl ether.		
Solubility	Easily soluble in cold water, hot water, methanol, diethyl ether. Very slightly soluble in n-octanol.		
Physical Chemical Comments	Not available.		

Section 10. Stability and Reactivity Data

Chemical Stability	The product is stable.
Conditions of Instability	No additional remark.
Incompatibility with various substances	Slightly reactive to reactive with oxidizing agents, alkalis.
Hazardous Decomposition products	Not available.
Hazardous Polymerization	Not available.

Section 11. Toxicological Information

Toxicity to Animals	Acute oral toxicity (LD50): 4700 mg/kg (Rat) Acute dermal toxicity (LD50): > 5000 mg/kg (Rabbit.)
Chronic Effects on Humans	The substance is toxic to kidneys, the nervous system, the reproductive system, liver.
Other Toxic Effects on Humans	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.
Special Remarks on Toxicity to Animals	Toxic for humans or animal life. (Ethylene Glycol)
Special Remarks on Chronic Effects on Humans	No additional remark.
Special Remarks on other Toxic Effects on Humans	Exposure can cause nausea, headache and vomiting. (Ethylene Glycol)

Continued on Next Page

Section 12. Ecological Information

toxicity	Not available.
BOD5 and COD	Not available.
Products of Biodegradation	Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.
Toxicity of the Products of Biodegradation	The products of degradation are less toxic than the product itself.
Special Remarks on the Products of Biodegradation	No additional remark.

Section 13. Disposal Considerations

Waste Disposal

Section 14. Transport Information

Proper 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. Regulatory Information

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

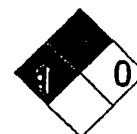
Section 16. Other Information

HMIS (U.S.A.)

Health Hazard	*	2
Fire Hazard		1
Reactivity		0
Personal Protection		B

National Fire Protection Association (U.S.A.)

Health



Fire Hazard

Reactivity

Specific hazard

References	Not available.
Other Special Considerations	No additional remark.

Validated by Joe Hudman on 1/9/97.

Verified by Joe Hudman.

Printed 7/13/99.

Continued on Next Page

ransportation Emergency Call
HEMTREC 800-424-9300
er Information Call
Hudman
13-477-6675

Notice to Reader

best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. 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.

**SID 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.

RESPONSIBILITY

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

DEFINITIONS

Immediate notification - 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

Subsequent notification - 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.

Major Release - 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.

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

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

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

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

**SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE**

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.

**SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE**

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 desorption 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.

**SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE**

**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.
- (5) Past experience should be used in determining the need for other preventive measures.

**SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE**

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

**SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE**

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 _____
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: ¼ ____ ¼ ____ 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: _____
- 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.

**SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE**

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 not 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.

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]

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 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]

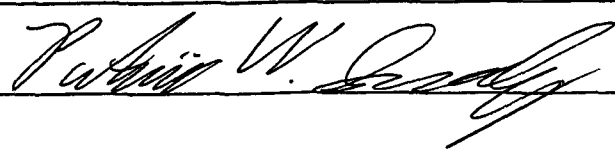
4. "Operator" means the person or persons responsible for the overall operations of a facility; and [12-24-87]

5. "Owner" means the person or persons who own a facility, or part of a facility. [12-24-87]

© n v i r o n m e n t a l
© e r v i c e s
© n c.

4665 Indian School NE, Suite 106
Albuquerque, NM 87110
tel 505.266.6611 fax 505.266.7738

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 8:20 AM	Date 12/16/96
<u>Originating Party</u>		<u>Other Parties</u>
Pat Sanchez - OCD		Ross Boyd - Sid Richardson 915-367-2867
<u>Subject</u> Wash water characterization - D.P. Approvals for GW-269, GW-270 (GW-243, 259, 260, 261, 262, 269, 270)		
<u>Discussion</u> Mr. Boyd said they had received the letter dated December 12, 1996 (VIA FAX) From OCD (Royer Anderson) and were in the process of sampling/ characterizing the "wash water" per the OCD letters direction. Also, Mr. Boyd said that upon obtaining the sample analysis of the water, Sid Richardson would submit the analysis and amend GW-243, 259, 260, 261, and GW-262. I let Mr. Boyd know that the 12/12/96 letter from OCD would be part of the approval for GW-269, & GW-270.		
<u>Conclusions or Agreements</u>		
Mr. Boyd will submit the information outlined above as soon as possible. OCD will probably issue the discharge plan approvals for GW-269 & GW-270 on 12/18/96.		
<u>Distribution FILE:</u> GW-243, GW-259, GW-260, GW-261, GW-262, GW-269, GW-270, WAYNE PRICE - OCD Hobbs.		<u>Signed</u> 



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 827-7131

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 Station"
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

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 10/29/96
or cash received on _____ in the amount of \$ 100.00
from Environmental Services for Sid Richard
for Boyd C.S. GW-269
West Eunice C.S. GW-270

Submitted by: _____ Date: _____
Submitted to ASD by: [Signature] Date: 12/11/96
Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ENVIRONMENTAL SERVICES, INC. 4665 INDIAN SCHOOL RD. NE, STE. 106 PH. 266-6611 ALBUQUERQUE, NM 87110		DATE <u>10-29-96</u> 95-32/1070 0109676338
PAY TO THE ORDER OF	<u>NM Water Quality Management Fund</u> \$ <u>100.00</u>	
	<u>one hundred and 00/100</u> DOLLARS	
SUNWEST		
SUNWEST BANK OF ALBUQUERQUE, N.A. ALBUQUERQUE, NEW MEXICO 87125-0500 (505) 765-2600		
MEMO	<u>West Eunice + Boyd</u>	<u>[Signature]</u>



OIL CONSERVATION DIVISION
RECEIVED

NOV 26 1996

November 22, 1996

RECEIVED

NOV 26 1996

Environmental Bureau
Oil Conservation Division

Pat Sanchez
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Subject: Additional Information for Discharge Plan Applications, West Eunice and Boyd
Compressor Stations, Lea County, NM

Dear Mr. Sanchez

On behalf of our client, Sid Richardson Gasoline Company, I am sending you the additional information you requested on November 1, 1996. I have enclosed replacement pages for Item 8 of both applications. Item 8 has been revised to include the additional information regarding the disposal of West Eunice and Boyd's used oil, wash water, and scrubber liquids. I have also enclosed a replacement page for Item 11 of both applications which corrects the "ppb" to "ppm" in reference to the BTEX Total Ranking Score. I am forwarding a letter from the Sid Richardson Gasoline Company concerning the characterization of the wash water. If you have any questions, please don't hesitate to contact me or Ross Boyd at (915) 367-2867. You may also speak with RC Cudney at ESI.

Sincerely

Robin K. DeLapp

Robin K. DeLapp
Environmental Scientist

cc: Harold Hicks, Sid Richardson Gasoline Company
Ross Boyd, Sid Richardson Gasoline Company
Wayne Farley, Sid Richardson Gasoline Company
Wayne Price, OCD Hobbs

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611

Item 8

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

<i>Type of waste</i>	<i>Collection</i>	<i>Storage</i>	<i>Hauled by</i>	<i>Disposal</i>
Used oil	Pumped from compressor pad or drum into trailer-mounted tank	Not stored on-site; removed as generated	Sid Richardson to Jal #3 gas plant. See GW-010.	Used oil stored in waste oil tank at Jal #3. Removed by Industrial Service Corp. See GW-010.
Used filters sorbent materials and rags*	Filters drained into 55-gal drum (see above); filters/rags stored in dumpster. Note: drum is used but not stored at facility.	Central dumpster on-site	Quell Petroleum Services	Quell Petroleum Services-incinerator
Wash water	Pumped from compressor pad into trailer-mounted tank	Not stored on-site; removed as generated	Sid Richardson to Jal #3 gas plant. See GW-010.	Wash water stored in classifier tank. Any hydrocarbons are pumped to scrubber liquid tanks and removed by XL. Water disposed in injection well at Jal #3. See GW-010.
Scrubber liquids (drip)/water**	Underground piping from C-drip and suction scrubbers	TK-1 TK-2	Chaparral Trucking to Sid Richardson's Jal #4 compressor. See GW-107.	Scrubber liquids stored in scrubber liquid tanks. Hydrocarbons are sold to PetroSource. Water is removed by Chapparral Trucking. See GW-107.
Solid waste	None on-site	Removed as generated	Sid Richardson	Sid Richardson's Jal #3 gas plant, see GW-010

* In addition, used filters from Sid Richardson's Boyd, House, C-1, C-2, C-3, and C-4 Compressor Stations are brought to the central dumpster at West Eunice for storage prior to disposal.

** In addition, scrubber liquids from Sid Richardson's C-1, C-3, and C-4 Compressor Stations (approximately 600 gallons/month) are stored of in the scrubber liquids tanks at West Eunice until disposal.

Sid Richardson Gasoline Company, Jal #3 Gas Plant-see GW-010, expiration 11/21/98; Jal #4 Compressor Station-see GW-107, expiration 2/13/97.

Quell Petroleum Services, PO Box 1552, Monahans, TX 79756, (915) 943-8400.

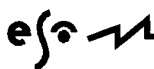
Chaparral Trucking, PO Drawer 1769, Eunice, NM 88231, (505) 394-2545.

Industrial Service Corp., PO BOX 711, Slaton, TX 79364, (915) 828-3183.

PetroSource Partners Ltd., 129 S. Grimes, Hobbs, NM 88240 (505) 397-7212.

XL Transportation Co., P. O. Drawer A, Jal, NM 88252 (505) 395-2010.

A 15-gallon concrete sump is currently located on the northwest corner of the compressor skid. The sump was installed approximately one year ago. Sid Richardson



Attachment A

Contaminated Soils Ranking Criteria

(circle one)

A) Depth of 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 Body

< 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 (ppm)	50	50	50
TPH (ppm)	100	1000	5000

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

November 19, 1996

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


RE: West Eunice Compressor Discharge Plan
Boyd Compressor Discharge Plan

Dear Mr. Anderson:

In each of the above discharge plans, compressor engine wash water is listed as generated waste stream.

Sid Richardson Gasoline Co. has an M.S.D.S. for the detergent, the wash water and the engine lube oil. As part of a preventative maintenance program for the engines, lube oil analyses are routinely made. Together this information is sufficient to determine that the compressor engine wash water is not a hazardous waste as defined by 40 CFR.261.

Sincerely,



Ross Boyd
Area Engineer

RB/je

cc: Curtis Clark
Harold Hicks

NOV 26 1996

Oil Conservation Division

Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

Notice Of Publication

~~XXXXXXXXXX~~ ~~XXXXXX~~

~~XXXXXXXXXX~~ ~~XXXXXXXXXX~~

~~XXXXXXXXXX~~, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~XXXXXX~~

~~XXXXXX~~, for one (1) day

~~XXXXXXXXXX~~, beginning with the issue of

November 13, 1996

and ending with the issue of

November 13, 1996

And that the cost of publishing said notice is the sum of \$ 61.60

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

Joyce Clemens

Subscribed and sworn to before me this 18th day of November, 1996

Jean Serier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-269) - Sid Richardson Gasoline Co., Mr. Wayne Farley, (817)-390-8686, 201 N. Main, Fort Worth, TX, 76102, has submitted a Discharge Plan Application for their "Boyd" compressor station located in the NE/4 SE/4, Section 26, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 37 feet with a total dissolved solids concentration of approximately 1,150 mg/L. The discharges

spills, leaks, and other accidental discharges to the surface will be managed.

(GW-270) - Sid Richardson Gasoline Co., Mr. Wayne Farley, (817)-390-8686, 201 N. Main, Fort Worth, TX, 76102, has a Discharge Plan Application for their "West Eunice" compressor station located in the SE/4 SE/4, Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 100 feet to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 100 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.

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

8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the 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 4th day of November, 1996.

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

SEAL
Published in the
Lovington Daily Leader
November 13, 1996.

RECEIVED

NOV 26 1996

Environmental Bureau
Oil Conservation Division

The Santa Fe New Mexican

Since 1849. We Read You.

NEW MEXICO OIL DIVISION
ATTN: SALLY MARTINEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 577406

ACCOUNT: 56689

LEGAL NO: 60728

P.O. #: 9619900299

207 LINES once at \$ 82.80

Affidavits: 5.25

Tax: 5.50

Total: \$ 93.55

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

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(GW-270) - Sir Richardson Gasolina, Co., Mr. Wayne Farley, (817)-390-8686, 201 N. Main, Fort Worth, TX, 76102, has submitted a Discharge Plan Application for their "West Eunice" compressor station located in the SE/4 SE/4, Section 36, Township 21 South, Range 38 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most

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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 a.m. and 4:00 p.m. Monday through Friday. Prior to ruling on any proposed discharge plan or its modifications, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of November 1996.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
Legal #60728
Pub. November 12, 1996

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 New paper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 60728 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 12th day of NOVEMBER 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

vit.

/s/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
12th day of NOVEMBER A.D., 1996

Environmental Bureau
Oil Conservation Division

NOV 15 1996

RECEIVED



OFFICIAL SEAL

Candace C. Ruiz

NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 7/29/99

Candace C. Ruiz

• P.O. Box 2048 • Santa Fe, New Mexico 87501

983-3303 • (FAX) 505-984-1785

NOTICE OF PUBLICATION

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

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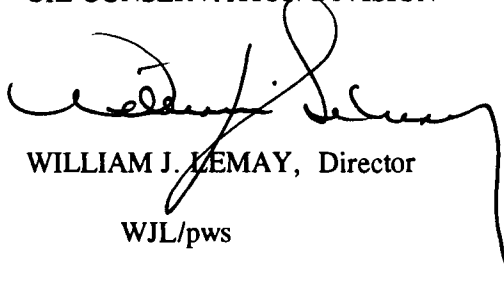
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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of November, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L

WJL/pws

Pat Sanchez

From: Pat Sanchez
Sent: Friday, November 01, 1996 9:56 AM
To: Wayne Price
Subject: DISCHARGE PLAN APPLICATION FROM SID RICHARDSON GASOLINE CO.
Importance: High

MR. PRICE, I HAVE RECEIVED TWO APPLICATIONS FOR NEW PERMITS FOR SID RICHARDSON GASOLINE CO. GW-269 OR BOYD, AND GW-270 OR WEST EUNICE. PLEASE PROVIDE ANY COMMENTS YOU MAY HAVE REGARDING THESE APPLICATIONS BY E-MAIL, BY MONDAY NOV. 3, 1996 AT 7:30 AM. I HOPE TO HAVE THE PUBLIC NOTICE READY FOR ISSUANCE BY MID MORNING MONDAY NOV. 3, 1996.

THANKYOU IN ADVANCE FOR YOUR TIME!!!!!! HAVE A GREAT WEEKEND,

Pat Sanchez

From: Wayne Price
Sent: Friday, November 01, 1996 11:35 AM
To: Pat Sanchez
Subject: Registered: Wayne Price

Your message

To: Wayne Price
Subject: DISCHARGE PLAN APPLICATION FROM SID RICHARDSON GASOLINE CO.
Sent: 11/1/96 9:56:00 AM

was read on 11/1/96 11:35:00 AM

Pat Sanchez

From: Wayne Price
Sent: Friday, November 01, 1996 1:02 PM
To: Pat Sanchez
Cc: Jerry Sexton
Subject: RE: DISCHARGE PLAN APPLICATION FROM SID RICHARDSON GASOLINE CO.

Comments:

All waste that leaves site should be classified, and if non-exempt a waste determination for hazardous characteristics should be made at the point of generation. All waste that are transported to another facility should be identified and the final disposal indicated on the DP.

Otherwords each DP is a stand along plan and is not contingent upon another plan.

From: Pat Sanchez

To: Wayne Price

Subject: DISCHARGE PLAN APPLICATION FROM SID RICHARDSON GASOLINE CO.


Date: Friday, November 01, 1996 9:56AM

Priority: High

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THANKYOU IN ADVANCE FOR YOUR TIME!!!!!! HAVE A GREAT WEEKEND,

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 11:15 AM	Date 11-1-96
<u>Originating Party</u>		<u>Other Parties</u>
Pat Sanchez - OCD		Robin DeLapp w/ ESI representing Sid Richardson.
<u>Subject</u> Sid Richardson Gasoline Co. Boyd and West Eunice compressors - GW-269, GW-270		
<u>Discussion</u>		
(1) Need to sample/determine Regulatory Status of Non-Exempt water for Itaz. charact./const. before removal offsite. Also, what happens to the Non-Exempt water at the Jal No. 3 Plant - Cannot be injected in Class II UIC well.		
(2) What happens to the used lube oil, how is it recycled at the Jal No. 3 Plant.		
(3) Need to change soil clean-up Standards, OCD requires 50 mg/kg not 50 ug/kg for RCRA Exempt Benzene/Toluene/Xylene/Ethylbenzene.		
<u>Conclusions or Agreements</u>		
Ms. DeLapp will submit the clarifications to both permits. OCD can issue public notice on Monday.		
<u>Distribution</u> GW-269, GW-270 Files, Wayne Price.	<u>Signed</u> 	



October 30, 1996

RECEIVED

NOV 01 1996

Environmental Bureau
Oil Conservation Division

Roger Anderson, Bureau Chief
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Subject: Discharge Plan Applications, West Eunice and Boyd Compressor Stations, Lea County,
NM,

Dear Mr. Anderson

On behalf of our client, Sid Richardson Gasoline Company, I am enclosing two copies of groundwater discharge plan applications for the West Eunice and Boyd Compressor Stations. A check for \$100.00 (\$50 fee for each application) is also enclosed. If you have any questions, please don't hesitate to contact me or Ross Boyd at (915) 367-2867.

Sincerely

Robin K. DeLapp

Robin K. DeLapp
Environmental Scientist

*Boyd # GW-269
West Eunice GW-270*

cc: Harold Hicks, Sid Richardson Gasoline Company
Ross Boyd, Sid Richardson Gasoline Company
Wayne Price, OCD Hobbs

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611

FAX 505 266 7738

Application for Groundwater Discharge Plan

West Eunice Compressor Station

GW-270

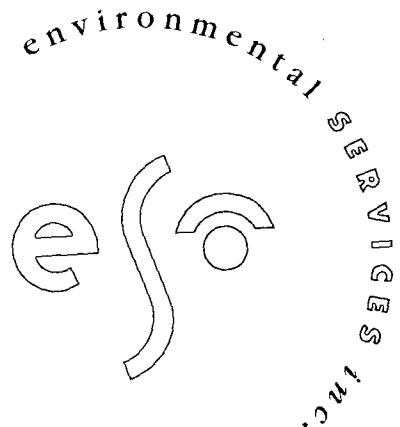
RECEIVED

NOV 01 1996

Environmental Bureau
Oil Conservation Division

prepared for

Sid Richardson Gasoline Company
October 1996



4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110



October 30, 1996

Roger Anderson, Bureau Chief
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

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Robin K. DeLapp

Robin K. DeLapp
Environmental Scientist

cc: Harold Hicks, Sid Richardson Gasoline Company
Ross Boyd, Sid Richardson Gasoline Company
Wayne Price, OCD Hobbs

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611

Application for Groundwater Discharge Plan

West Eunice Compressor Station

prepared for

Sid Richardson Gasoline Company

October 1996



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

December 18, 1996

CERTIFIED MAIL

RETURN RECEIPT NO. P-288-258-729

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

**RE: Approval of Discharge Plan GW-270
"West Eunice" Compressor Station
Lea County, New Mexico**

Dear Mr. Harless:

The discharge plan GW-270 for the Sid Richardson Gasoline Co. West Eunice Compressor Station located in SE/4 SE/4, Section 36, 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 application dated October 29, 1996, the additional information dated November 22, 1996 both from ESI on behalf of Sid Richardson Gasoline Company, the letter from OCD dated December 12, 1996, and this approval letter with conditions of approval from OCD dated December 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 ten (10) 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. Herb Harless
Sid Richardson Gasoline Co.
GW-270
December 18, 1996
Page 2

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.

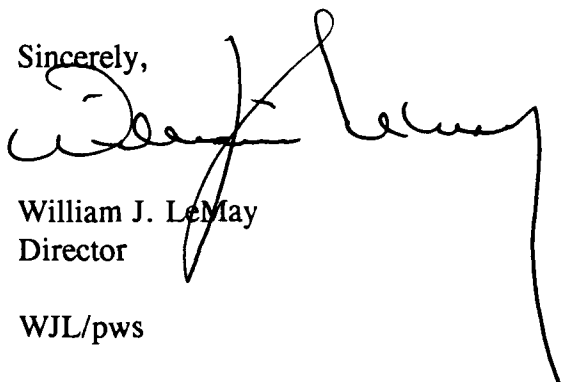
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. This approval will expire December 18, 2001, and an application for renewal should be submitted in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval.

The discharge plan for the Sid Richardson Gasoline Co. West Eunice Compressor Station GW-270 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 - Hobbs, OCD District Office.

P 288 258 729

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

Sent to	S: Richardson - Mr. Harless
Street & Number	D.P. APR
Post Office, State, & ZIP Code	GW-270
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Mr. Herb Harless
Sid Richardson Gasoline Co.
GW-270
December 18, 1996
Page 3

ATTACHMENT TO DISCHARGE PLAN GW-270
Sid Richardson Gasoline Co. West Eunice Compressor Station
DISCHARGE PLAN REQUIREMENTS
(December 18, 1996)

1. **Sid Richardson Gasoline Co. Commitments:** Sid Richardson Gasoline Co. will abide by all commitments submitted in the application dated October 29, 1996, the additional information dated November 22, 1996 both from ESI on behalf of Sid Richardson Gasoline Company, the letter from OCD dated December 12, 1996, and this approval letter with conditions of approval from OCD dated December 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. **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.
4. **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.
5. **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.
6. **Tank Labeling:** 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. **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 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. Herb Harless
Sid Richardson Gasoline Co.
GW-270
December 18, 1996
Page 4

8. **Underground Process/Wastewater Lines:** 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 soils contaminated with a non-exempt waste 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. **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.

13. **Certification:** Sid Richardson Gasoline Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Sid Richardson Gasoline 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 groundwater, human health and the environment.

Accepted:
Sid Richardson Gasoline Company

by _____
Title

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)

☒ New

☐ Renewal

☐ Modification

1. Type: West Eunice - Natural Gas Compressor Station
2. Operator: Sid Richardson Gasoline Company
Address: 201 N. Main Street, Fort Worth, TX 76102
Contact Person: Wayne Farley Phone: 817-390-8686
3. Location: SE 1/4 SE 1/4 Section 36 Township 21S Range 36E
Submit large scale topographic map showing exact location. see attached item 3
4. Attach the name, telephone number and address of the landowner of the facility site. see attached item 4
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. see attached item 5
6. Attach a description of all materials stored or used at the facility. see attached item 6
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. see attached item 7
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. see attached item 8
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. see attached item 9
10. Attach a routine inspection and maintenance plan to ensure permit compliance. see attached item 10
11. Attach a contingency plan for reporting and clean-up of spills or releases. see attached item 11
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. see attached item 12
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. see attached item 13
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: Wayne Farley

Date: 10/29/96

Item 1

Indicate the major operational purpose of the facility. If the facility is a compressor station include the total combined site rated horsepower.

The West Eunice Compressor Station (West Eunice) is a natural gas compressor station. Its purpose is to remove excess liquids from field natural gas, measure gas volume, and transport it through pipelines. The site-rated horsepower at the facility is 560.

West Eunice is temporarily out of service as a compressor station. It has not been operated as a compressor station since May 3, 1996. It is currently utilized as a pipeline drip collection site for Sid Richardson's field gas gathering system. The operating scenario presented in this discharge plan application is based on how the compressor station was last operated. When West Eunice recommences operating as a compression station, the size and horsepower of the compressor will be equal to or less than the previous compressor. Sid Richardson will notify the Oil Conservation Division prior to recommencing compression at West Eunice.



Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party

Sid Richardson Gasoline Company
Attn: Wayne Farley
201 N. Main Street
Fort Worth, TX 76102
817-390-8686

Operator

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



Item 3

Give a legal description of the location and county. Attach a large scale topographic map.

Lea County, New Mexico

Township 21 South, Range 36 East, SE/4 SE/4 SE/4 sec. 36



Item 4

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

Sid Richardson Gasoline Company
201 N. Main Street
Fort Worth, TX 76102
817-390-8686

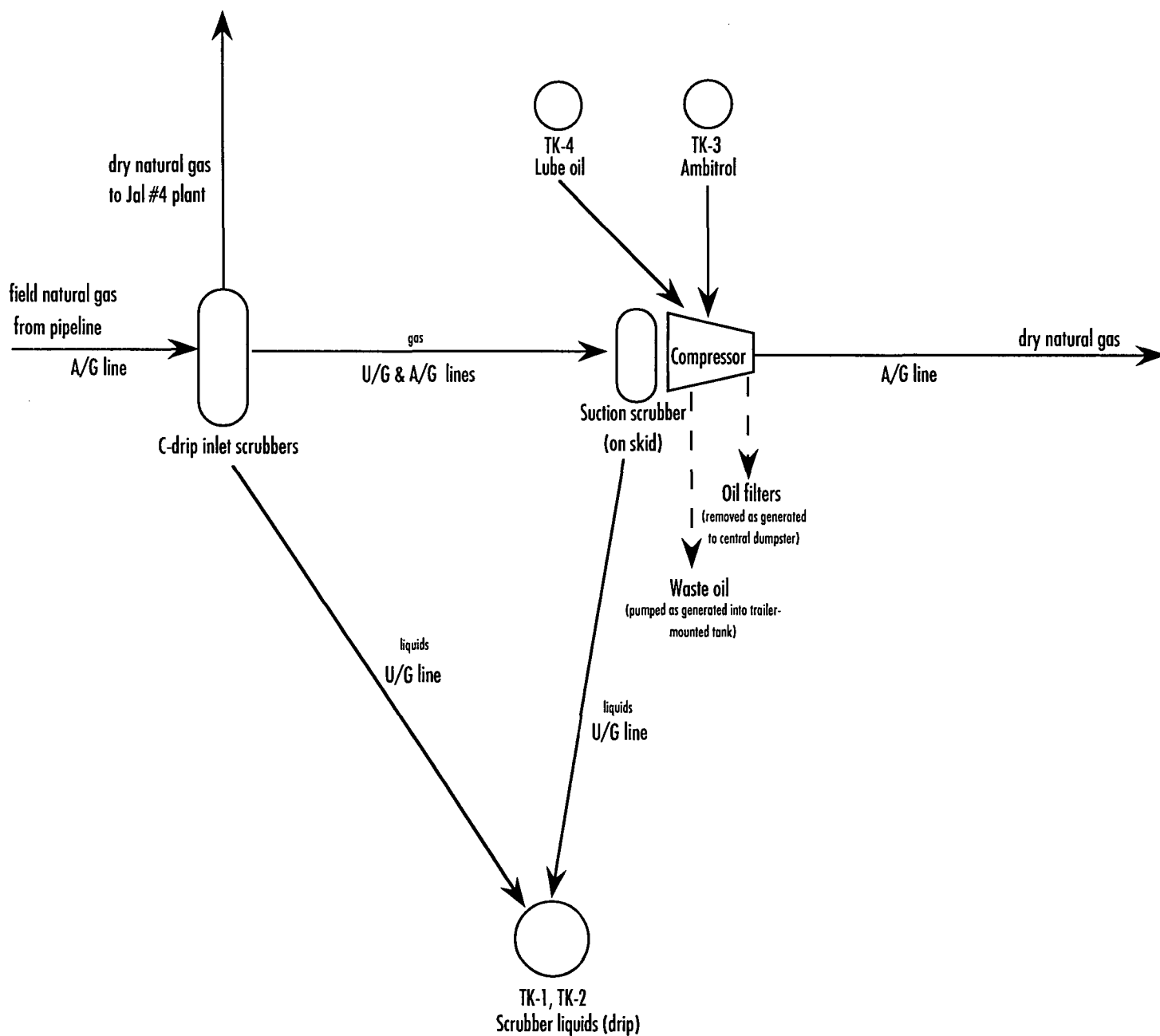


Item 5

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

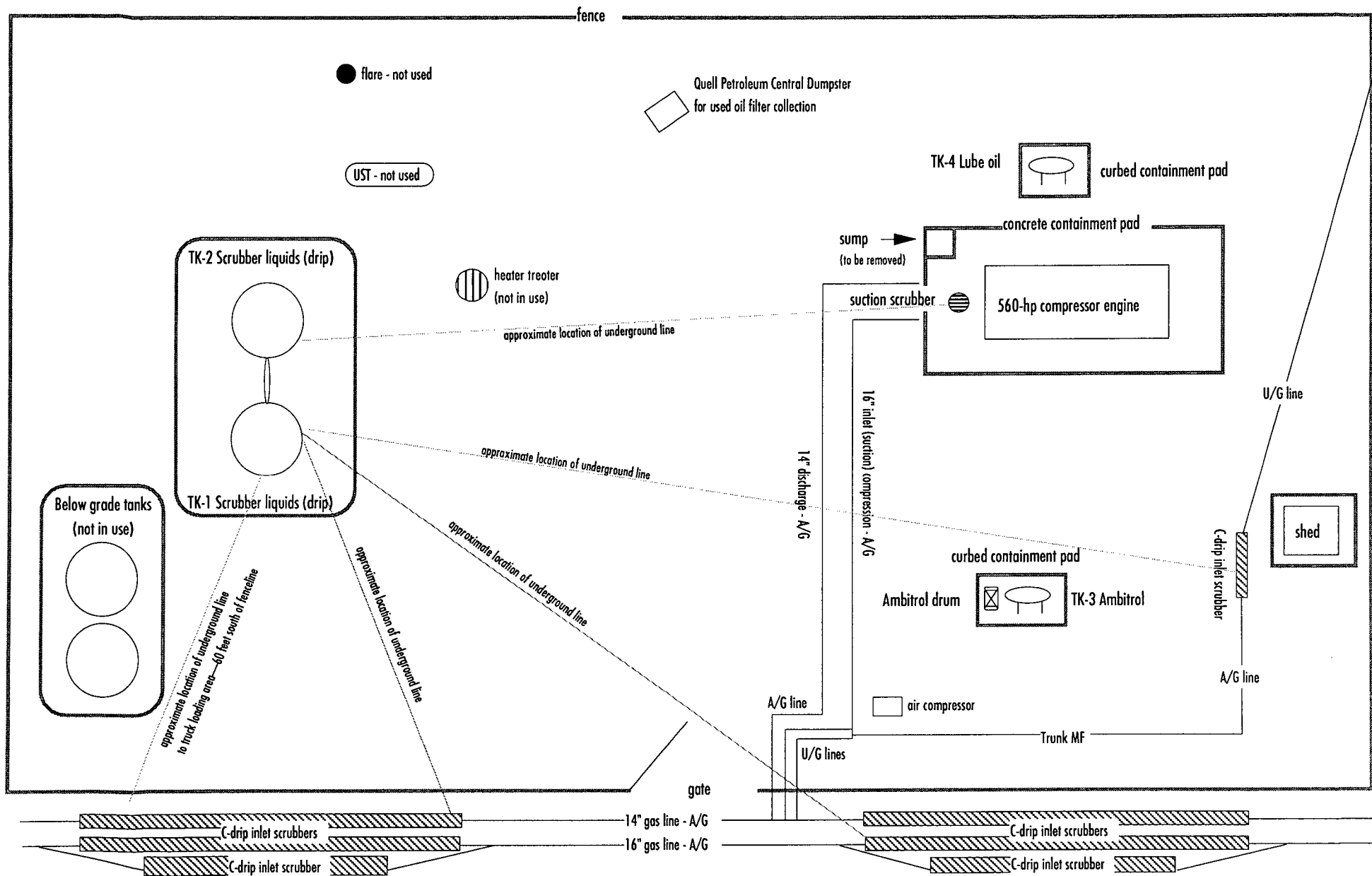
Six C-drip inlet scrubbers are utilized at West Eunice to remove liquids from both the inlet gas to the station and gas piped on to other facilities. The six scrubbers are located south of West Eunice between the facility fence and road. One C-drip inlet scrubber is located on the facility for additional liquid removal from the gas. The gas is routed through a suction scrubber on the compressor for further liquid removal. Liquids from all of the scrubbers at the facility are transported via underground piping to the two scrubber liquids (drip) tanks. The gas then enters the compressor, which is driven by a 560-horsepower natural gas-fired engine (a Caterpillar 398). The gas discharged from the compressor goes to Sid Richardson's Jal #4 plant where it is recompressed and sent to another Sid Richardson facility. A simplified process flow diagram and a facility layout are attached.





West Eunice Compressor

Effluent and Solid Waste Production Diagram



N Not to scale

West Eunice Compressor
Site Diagram

Item 6

Attach a description of all materials stored or used at the facility.

<i>Container</i>	<i>ID</i>	<i>Material</i>	<i>Form</i>	<i>Volume</i>	<i>Location</i>	<i>Containment</i>
AGT Steel	TK-1	Scrubber liquids (drip)	Liquid	500 bbl	West-central area of facility	Secondary containment, dirt berm
AGT Steel	TK-2	Scrubber liquids (drip)	Liquid	500 bbl	West-central area of facility	Secondary containment, dirt berm
AGT-elev Steel	TK-3	Ambitrol	Liquid	500 gal	South of compressor	Impermeable (fiberglass) curbed containment pad
AGT-elev Steel	TK-4	Lube Oil	Liquid	300 gal	North of compressor	Impermeable (fiberglass) curbed containment pad
Drum Steel	-	Ambitrol	Liquid	55 gal	On pad under Ambitrol AGT	Impermeable (fiberglass) curbed containment pad

AGT - aboveground tank (non-pressurized)

AGT-elev - aboveground tank elevated on a saddle rack

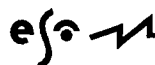
Drum - 55-gallon drum

The two 500 barrel aboveground tanks (AGT) receives scrubber liquids (drip) from the C-drip inlet and suction scrubbers via underground piping. The interconnected tanks are surrounded by a single berm. Sid Richardson will evaluate the capacity of this berm to ensure it has been constructed to contain 1.33 times the total volume of both tanks and make any repairs necessary within one year after plan approval.

Each of the aboveground elevated tanks (Ambitrol and lube oil) are located on impermeable fiberglass pad and curb type containment. The Ambitrol drum is also stored on impermeable pad and curb type containments.

MSD sheets for the materials stored and used at the facility are maintained in Sid Richardson's local office and are available upon request.

Two fiberglass below grade storage tanks (BGST) and one steel underground storage tank (UST), which are no longer used, are also located on the facility (see diagram). When in use, the BGSTs, one 80-barrel and one 100-barrel, contained waste water which had been separated from the hydrocarbons in the scrubber liquids tanks. Both tanks have now been drained, cleaned, and inspected. These tanks are not expected to be returned to service. The UST has not been used since Sid Richardson began operating the facility in 1990. Sid Richardson will not return the UST to service.



Item 7

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

<i>Source</i>	<i>Unit</i>	<i>Type of waste</i>	<i>Volume</i>	<i>Quality</i>
Compressor	Caterpillar 398 560-hp	Used engine oil	50 gal/mo	Used motor oil with no additives
		Used filters	5/mo	No additives
		Washdown water	75 gal/mo	Water with detergents, lube oil, coolant
		Sorbent material/rags	varies	No additives
Scrubbers	C-drip and suction	Scrubber liquids: hydrocarbon liquids & water	10 bbls/wk	No additives
Miscellaneous	trash	solid waste	varies	varies

Ambitrol, comprised of 50% water and 50% ethylene glycol, is utilized as coolant for the compressor engine. The amount of Ambitrol used at the facility varies according to need. Very little waste coolant is generated as the cooling system is sealed. What loss does occur is primarily evaporation during engine use. A small amount of Ambitrol may occasionally be found in the washdown water.

The compressor pad is washed once a month using a portable high pressure system. Occasionally, approximately 3 gallons of a biodegradable detergent, F218, is added to the wash water for cleaning. The detergent is not stored at the facility but is brought in as needed. Wash water is pumped as generated from the compressor pad or sump into a trailer-mounted tank during washing.



Item 8

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

Type of waste	Collection	Storage	Hauled by	Disposal
Used oil	Pumped from compressor pad or drum into trailer-mounted tank	Not stored on-site; removed as generated	Sid Richardson	Sid Richardson's Jal #3 gas plant, see GW-010
Used filters sorbent materials and rags*	Filters drained into 55-gal drum (see above); filters/rags stored in dumpster. Note: drum is used but not stored at facility.	Central dumpster on-site	Quell Petroleum Services	Quell Petroleum Services-incinerator
Wash water	Pumped from compressor pad into trailer-mounted tank	Not stored on-site; removed as generated	Sid Richardson	Sid Richardson's Jal #3 gas plant, see GW-010
Scrubber liquids (drip)/water**	Underground piping from C-drip and suction scrubbers	TK-1 TK-2	Chaparral Trucking	Sid Richardson's Jal #4 compressor, see GW-107
Solid waste	None on-site	Removed as generated	Sid Richardson	Sid Richardson's Jal #3 gas plant, see GW-010

* In addition, used filters from Sid Richardson's Boyd, House, C-1, C-2, C-3, and C-4 Compressor Stations are brought to the central dumpster at West Eunice for storage prior to disposal.

** In addition, scrubber liquids from Sid Richardson's C-1, C-3, and C-4 Compressor Stations (approximately 600 gallons/month) are stored of in the scrubber liquids tanks at West Eunice until disposal.

Sid Richardson Gasoline Company, Jal #3 Gas Plant-see GW-010, expiration 11/21/98; Jal #4 Compressor Station-see GW-107, expiration 2/13/97.

Quell Petroleum Services, PO Box 1552, Monahans, TX 79756, (915) 943-8400.

Chaparral Trucking, PO Drawer 1769, Eunice, NM 88231, (505) 394-2545.

A 15-gallon concrete sump is currently located on the northwest corner of the compressor skid. The sump was installed approximately one year ago. Sid Richardson will permanently removed this sump from service by sealing it with epoxy and filling it with concrete within one year after plan approval.



Item 9

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

Sid Richardson will evaluate the site berm capacity for the scrubber liquids tanks and make any necessary repairs per NMOCD guidelines within one year of plan approval.



Item 10

Attach a routine inspection and maintenance plan to ensure permit compliance.

West Eunice is unmanned but inspected at least once per day Monday through Friday.

Sid Richardson will perform pressure testing on underground effluent pipelines within five years of issuance of this discharge plan. A testing plan and timetable will be submitted to the NMOCD for approval six months prior to testing.

The two scrubber liquids (drip) tanks (TK-1 and TK-2) will be cleaned out and visually inspected once every five years, as they are not situated on concrete or gravel pads.



Item 11

Attach a contingency plan for reporting and clean-up of spills or releases.

The process area of the facility 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 attached spill procedures and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and WQCC Section 1203. Copies of these regulations are attached.



SID RICHARDSON GASOLINE CO.

INTER-COMPANY CORRESPONDENCE

DATE: July , 1994

TO: Curtis Clark FROM: Robert Gawlik

SUBJECT: New Mexico Leak, Spill, and Release Requirements

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 interfere 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	> 25	No	Immediate ²
	> 5	No	Subsequent ³
	< 5	No	None
	> 1	Yes	Immediate
Saltwater	> 100	No	Immediate
	> 25	Yes	Immediate
	> 25	No	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.

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.

B) Summary - Reporting requirements

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

- 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 horizontal 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) All 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:

i) 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
- solidification
- thermal treatment
- composting
- bioremediation

Attachment A

Contaminated Soils Ranking Criteria

(circle one)

A) Depth of 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 Body

< 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	50	50
TPH (ppm)	100	1000	5000

Attachment B

SID RICHARDSON GASOLINE CO.

Leak, Spill, or Release Report

Facility _____

Person Filing Report _____

Report Date _____

Time _____ AM PM

Responsible Party: Sid Richardson Gasoline Co.

City _____ State _____ Zip _____

Telephone _____

Discharge Date _____ Time _____ Duration _____ Quantity _____

Source and/or Cause of Discharge _____

Type of Discharge: Gas _____ Crude Oil _____ Condensate _____ *Soft water*

Note: If 'other' give chemical composition and physical characteristics on back of page or attach MSDS.

Quarter-Quarter _____ Section _____ Township _____ Range _____ Survey _____ Block _____

Distance from nearest town and/or landmark _____

Site Characteristics are as follows:

Precipitation _____
Wind Conditions _____
Temperature _____
Soil Type _____
Depth of Penetration _____
Nearest Residence _____
*Nearest Fresh Water _____

*Any water well or water course, i.e. any river, lake, stream, playa, arroyo, draw, wash, gully, natural or man-made channel.

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 not 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) Well Blowouts. 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) Tank Fires. 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.

(6) 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) 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) SUBSEQUENT NOTIFICATION. "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) CONTENT OF NOTIFICATION. 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 actions 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,

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.

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.

RULE 113. - SHOOTING AND CHEMICAL TREATMENT OF WELLS

(as of 3-1-91)

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.

DUE TO BE REVISED, still current as of 10/3/96

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.

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) Well Blowouts. 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) Tank Fires. 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.

(6) 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) 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.

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) SUBSEQUENT NOTIFICATION. "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) CONTENT OF NOTIFICATION. 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.

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 (H_2S) 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 H_2S or any other related facility where H_2S 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 H_2S 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 H_2S gas producing areas, or where there is substantial probability of encountering H_2S 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 H_2S 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 H_2S safety and the use of H_2S 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]

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

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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 a 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]

Item 12

Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

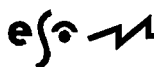
The West Eunice Compressor Station is located on the dune sands of the Eunice Plain in the Capitan Basin. The Eunice Plain is underlain by a hard caliche surface and is almost entirely covered by reddish-brown dune sand 20-40 feet high (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6).

Unnamed arroyos are located 0.2 miles south/southwest and 0.6 miles north/northwest of the facility. These appear to be the only groundwater discharge sites on the Eunice 7.5' U.S.G.S. quadrangle within 1 mile of the facility.

As of October, 1996, one well was recorded with the New Mexico State Engineer Office in Roswell within one-half mile of the perimeter of the facility. The well, used for stock, was drilled in 1954. The highest recorded water level in this well was 100 feet; the lowest was 101 feet below grade.

Water from a well located approximately 4 miles northwest of the compressor station was analyzed in 1954 and 1958 (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). Total dissolved solids concentration recorded at this well for each year the water was analyzed was 74 and 73 parts per million, respectively. Typically, as described below, water from the aquifer under the compressor station has a much higher total dissolved solids concentration. This concentration, 1100 parts per million, may more closely represent the total dissolved solids concentration at the facility.

A piezometric map (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) shows the elevation of the water table at the site to be about 3400 feet. The elevation of the facility is 3500 feet, placing the depth to the water table at the site at 100 feet.



The aquifers below the compressor station 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 has total dissolved solids of less than 1100 ppm. The total dissolved solids in the Dockum Group is higher than that of the Ogallala. 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 soil type at the facility is the Berino-Cacique loam fine sands association, which is typically found on uplands in southern Lea County. The Berino soils are well-drained soils that have a light sandy clay loam subsoil. The Cacique soils are well-drained soils that have a sandy clay loam subsoil underlain by indurated caliche at a depth of 20 to 34 inches (Soil Survey, Lea County, New Mexico, 1974, U.S.D.A., Soil Conservation Survey).

Flooding potential at the facility is low as the site is located on moderately permeable soils with very slow runoff (Soil Survey, Lea County, New Mexico, 1974, U.S.D.A., Soil Conservation Survey). Any runoff from the facility would probably collect in a shallow area 300 yards south of the facility.



Item 13

Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

Closure Plan

All reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC 6.2.3103 quality standards should Sid Richardson choose to permanently close the facility. 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.

History of Ownership and Compliance

The facility has been operated by Sid Richardson since 1990. West Eunice was operated by El Paso Natural Gas prior to 1990. This discharge plan is being submitted as requested by the NMOCD on July 2, 1996. On July 11, 1996, Sid Richardson requested an exemption for the requirement to provide a discharge plan for West Eunice. The site has not been utilized as a compressor station since May 3, 1996; it has only been used as a pipeline drip collection site for the field gas gathering system. On August 28, 1996, Sid Richardson withdrew the exemption request (see attachment 1).

In September 1995, Sid Richardson submitted a plan to the NMOCD for removal of soil contaminated with lube oil and wash water at the facility. Upon determination by the NMOCD that the contaminated soil was a non-exempt waste, a new plan for removal was submitted and approved in January 1996. Sid Richardson completed removal of the soil in accordance with the NMOCD approved methods on July 22, 1996 (see attachment 2).

Sid Richardson is submitting a work plan addressing the cleaning and inspection of the two below grade storage tanks and of the steel UST at the facility (see attachment 3).



Item 13, Attachment 1



West Eunice Compressor Station



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

RECEIVED

JUL 8 1996

R & D DEPARTMENT
Sid Richardson Carbon & Gasoline Co.

July 2, 1996

CERTIFIED MAIL

RETURN RECEIPT NO. P-594-835-271

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

Re: Discharge Plan Requirement
West Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Gawlik:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, and as a result of the April 11, 1996 facility inspection by the New Mexico Oil Conservation Division (See the OCD inspection report dated May 2, 1996.) You are hereby notified that the filing of a discharge plan is required for the West Eunice Compressor Station located in Lea County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3104 and 3106 of the WQCC regulations. The discharge plan, defined in Section 1101.N of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Please submit the original 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.

The Director shall allow a period of thirty days from the date of this letter for requesting an exemption from filing a discharge plan. Requests for an exemption shall be in writing and shall set forth the reasons why an exemption should be granted.

A copy of the regulations have been enclosed for your convenience. Also enclosed is a copy of the OCD guideline for the preparation of discharge plans at "Gas Plants, Refineries, Compressor,

Mr. Robert Gawlik
Sid Richardson Gasoline
W. Eunice Compressor Station
July 2, 1996
Page 2

and Crude Oil Pump Stations.”

The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 for compressor stations that are site rated for less than 1,000 horsepower. The \$50 dollar filing fee is due when the discharge plan is submitted.

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

If you have any questions, please feel free to contact Pat Sanchez at (505) - 827-7156.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief
(505) - 827 - 7152

RCA/pws

XC: Mr. Wayne Price

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

July 11, 1996
RLG-41-96

CERTIFIED MAIL - Z 378 134 267

Mr. Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Discharge Plan Requirement
West Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Anderson:

The notice of discharge plan requirement was received in this office on July 8, 1996. This letter is to acknowledge receipt of the notices for our two (2) compressor sites in Lea County, New Mexico.

Also at this time I would like to request an exemption from the requirement to provide a discharge plan for our West Eunice Compressor Site. As of May 3, 1996, this site is no longer a compressor site but will continue to be utilized as a pipeline drip collection site for our field gas gathering system. Your attention to this matter would be appreciated, and we will await your response.

If there are any questions, please do not hesitate to call.

Sincerely,



Robert L. Gawlik
Environmental Health & Safety Associate

RLG:gad

cc: C. P. O'Farrell/H. Harless
W. J. Farley
K. C. Clark
R. Boyd
H. E. Hicks
Wayne Price (OCD - Hobbs, NM)

11-1-96

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

August 28, 1996
RLG-50-96

CERTIFIED MAIL - Z 378 134 271

Mr. Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco Street
Santa Fe, New Mexico 87505

Re: Discharge Plan
West Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Anderson:

In response to Sid Richardson Gasoline Co.'s (SRGCo.) request for exemption and the Oil Conservation Division's approval of same, SRGCo. would like to withdraw that request.

Due to some rapidly changing conditions and activities in the industry, SRGCo. is considering returning compression to this site. The size and horsepower of the compressor will be equal to or less than the previous compressor. SRGCo. will file for permits and supply necessary data to the Oil Conservation Division prior to commencing these activities.

We would like to file a discharge plan at this time for this site, along with the Boyd Compressor Site. To file for both sites at the same time will make it more cost-effective for our Company. SRGCo. will submit both discharge plans on or prior to the OCD due date of November 1, 1996.

Your attention to this matter will be appreciated. If there are any questions, please do not hesitate to call.

Sincerely,



Robert L. Gawlik
Environmental Health & Safety Associate

RLG:gad

c: C. P. O'Farrell/H. Harless
W. J. Farley
K. C. Clark
R. Boyd
H. E. Hicks
Wayne Price (OCD - Hobbs, NM)

Item 13, Attachment 2



West Eunice Compressor Station

(3)

SID RICHARDSON GASOLINE CO.
5030 East University Blvd.
Suite C-104
Odessa, Texas 79762
(915) 367-2867
FAX (915) 367-2862

Mr. Bill Olson
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Sante Fe, New Mexico 87505

9-13-95

Mr Olson,

As per our telephone conversation on 9-14-95, I am sending you this written request for your consideration. Again, thank you for returning my call as promptly as you did and taking the time to visit with me on this matter.

Our area of operation in New Mexico is in the very southeastern portion of the state. Sid Richardson Gasoline Co. gathers raw natural gas in this area for processing at our plant near Jal, NM.

Recently we undertook a program at our field compressor sites to clean up around the compressors and construct concrete containments. Naturally the clean up generated some washdown and compressor oil contaminated soil that we need to remediate. Most of these compressor sites are too small for on site remediation. We would like OCD permission to move approximately 40-60 cubic yards of soil from the smaller sites to one large compressor site located west of Eunice, NM, and south of the Eunice landfill.

Please note that this is an **EXEMPT** waste. The water table in the immediate area is 145 ft. deep and there are no watercourses near this proposed site. This site is a remote location, approximately 2.5 miles west of the city of Eunice, NM. This site is fenced and locked with signs posted as to the ownership and emergency phone numbers. Soil brought onto the site will be spread on the surface in 6 inch lifts or less. The soil will be disked to enhance biodegradation of any contaminants.

Your help and prompt attention to this request is appreciated. If you should have any further questions please do not hesitate to call me.

Sincerely,

Robert Lee Gawlik


WTA Safety Manager

cc: Curtis Clark
Herb Harless
Harold Hicks

OIL CONSERVATION DIVISION

September 25, 1995

CERTIFIED MAILRETURN RECEIPT NO. Z-765-963-059

Mr. Robert Lee Gawlik
WTA Safety Manager
Sid Richardson Gasoline Co.
5030 East University Blvd. Suite C-104
Odessa, TX 79762

RE: Contaminated Soil from Compressor Stations.
Lea County, New Mexico

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) has received the letter from Sid Richardson Gasoline Co. (see enclosed letter from Sid Richardson Gasoline Co.) As proposed the NMOCDC will require the following information and clarification from Sid Richardson Gasoline before approval can be given.

1. Provide the following information with regards to each compressor site that the soil is coming from:
 - A. The legal location. (1/4, 1/4, section, township, range, county)
 - B. The amount of soil coming from the location?
 - C. To what levels were the soils cleaned up to - i.e types of testing ran etc.

Note: Enclosed you will find the "Leak and Spill " guidelines - and since this soil is lube oil contaminated it must also be non-hazardous by characteristics per 40 CFR part 261 and TCLP. (i.e. these are NON-EXEMPT spills)

- D. Do each of these facilities have discharge plans? Please provide the GW numbers for each facility?
2. Provide the following with regards to the proposed site of remediation/management of the contaminated soils:
 - A. The legal location.(1/4, 1/4, section, township, range, county)
 - B. The final amount of soil to be remediated?
 - C. Monitoring of the soil remediation and sampling periods as well as the proposed closure plan of the remediation site?
 - D. What materials if any are going to be used to remediate the soil?

RECEIVED

SEP 27 1995

Mr. Robert Gawlik
September 25, 1995
Page 2

- E. Provide more specific data regarding the groundwater at the site: i.e. soil types, geological/hydrological data and water quality?
- F. Does the site in question have a discharge plan? If so what is the GW number?
- G. What monitoring will be conducted to ensure that contaminants are not leaching into underlying groundwater?
- H. What methods will be used to control run-off/run-on at the facility?

If you have any questions regarding this matter feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer

XC: Wayne Price and Jerry Sexton

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 SOUTH PACHECO

SANTA FE, NM 87505

January 2, 1996

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-962-996

Mr. Robert Lee Gawlik
WTA Safety Manager
Sid Richardson Gasoline Co.
5030 East University Blvd. Suite C-104
Odessa, TX 79762

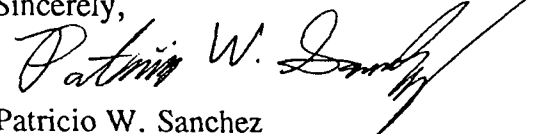
**RE: Contaminated Soil from Compressor Stations.
Lea County, New Mexico**

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) on September 25, 1995 sent Sid Richardson Gasoline Co. a letter requesting additional information with regards to the above captioned facilities. As of this date January 2, 1996 the OCD has not received any information with regards to this subject from Sid Richardson Gasoline Inc. The OCD would like an update on the status of the above mentioned project - note the OCD can not approve of any contaminated soil clean-up operations with regards to the above captioned facilities unless Sid Richardson Gasoline Co. submits the information as requested in the September 25, 1995 letter from OCD to Sid Richardson Gasoline Inc.

Sid Richardson shall therefore provide the OCD with an update on the proposed project and an explanation with regards to the delay of this project and a proposed time table which outlines Sid Richardson Gasoline Inc. time frame for submitting the data so that the OCD may obtain the proposal in an approvable format - to include all of the data and information requested by OCD in the September 25, 1995 letter to Sid Richardson Gasoline Inc. Provide this time line within 30 days of receipt of this letter. Send the information to the above OCD address to my attention. If Sid Richardson Gasoline Inc. has any questions regarding this matter please feel free to call me at (505)-827-7156.

Sincerely,


Patricio W. Sanchez
Environmental Bureau-OCD.

RECEIVED

JAN 4 1996

WTA Odessa

JAN 4 1996

XC: Mr. Wayne Price.

30 day

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

January 8, 1996

Patricio Sanchez
State of New Mexico
Oil Conservation Division -EB
2040 S. Pacheco
Santa Fe, New Mexico 87505

ATTN: Contaminated Soil from Compressor Stations
Lea County, New Mexico

Dear Mr. Sanchez:

On 9-15-95 I sent you a follow up letter to my telephone conversation with Bill Olson. The letter requested permission to land farm some soil from two (2) small compressor sites to one (1) larger compressor site where there was more room to work. Your response to this letter was on 9-25-95 requesting more information on the larger compressor site.

Sid Richardson Gasoline Co. no longer intends to pursue land farming the soil in question. However we do wish to secure permission or a minor permit to move this same soil (approximately 40-60 cu. yds.) to Quell Petroleum Services in Penwell, Texas for thermal treatment. After incineration is complete a copy of the certificate of disposal will be sent to your attention.

Attached is a copy of the analysis that was ran from the spoil piles for TCLP (8 metals). Also attached for your convenience is a copy of the original request from 9-15-95 that was sent to Mr. Bill Olson.

Please advise if the information contained is adequate for the request to transport this non-hazardous waste for thermal treatment. Also I want this letter to serve as a response to your January 2, 1996 correspondence.

I appreciate your time and assistance on this matter. If you should need anything else please do not hesitate to call.

Sincerely,


Robert Gawlik
Area Safety Manager

RG/je

Enclosure

cc: Curtis Clark
Herb Harless
Harold Hicks

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

January 8, 1996.

Quell Petroleum Services
P. O. Box 1552
Monahans, Texas 79756

ATTN: David Cutbirth

Dear David:

As per our telephone conversation I am enclosing the Non PST Waste Profile, analytical and chain-of-custody documentation and site location maps.

We have also requested permission for the State of New Mexico and are awaiting their approval to move this soil from our compressor sites. I will inform you as soon as this approval is received.

If you need any further information please do not hesitate to call me.

Sincerely,



Robert Gawlik
Area Safety Manager

RG/je

Enclosure

cc: Curtis Clark
Herb Harless
Harold Hicks

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

NON PST WASTE PROFILE

ID No. 81011 ST ID Phone No. 915-943-8400
Volume of Soil 50 Cubic Yards / Tons Fax No. 915-943-4716

GENERATOR FACILITY INFORMATION

Name Sid Richardson Gasoline Co. ID No. _____
Source of Contamination Compressor oil & wash down water

ANALYTICAL INFORMATION

Is the waste non-hazardous? Hazardous waste is defined as, "Any solid waste identified or listed as a hazardous waste by the administrator of the United States Environmental Protection Agency (EPA) pursuant to the federal Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, 42 United States Code 6901 et seq., as amended." ☒ Yes ☐ No

List the contaminants for which analysis was conducted. TPH - TCLP

Test the highest levels of the following constituents.

TPH 55,800 Metals Non-Detect Benzene N/A BTEX N/A Others _____

Attach all analytical, chain-of-custody documentation, and a site map.

I certify, under penalty of the law, that the above information is true and correct. I understand that pursuant to the Texas Water Code, Section 26.2121 I am subject to criminal penalties if I intentionally or knowingly make a false statement, representation, or certification on this document.

Ramon Lee Quintanilla
Signature of Generator Owner/Operator

1-8-96
Date

Signature of Treatment Facility Owner/Operator

Date

This section for TNRCC personnel only.

☐ Approved

☐ Denied

☐ Additional Information Requested

Signature

Date

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
PETROLEUM STORAGE TANK DIVISION/RPR
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087
PHONE # (512) 239-2200 FAX # (512) 239-2216

SID RICHARDSON GASOLINE CO.
201 MAIN STREET
FORT WORTH, TEXAS 76102-3131
817 / 390-8600

February 1, 1996
RLG-03-96

CERTIFIED MAIL - P 028 615 792

Mr. Roger Anderson
Bureau Chief, Environmental Bureau OCD
State of New Mexico
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Contaminated Soil
Sid Richardson Compression Sites
Lea County, New Mexico

Dear Mr. Anderson:

In response to your letter requesting that additional information be provided regarding the sites where the soil was removed, the following information is attached:

1. Legal location of each site in terms of Quarter-Quarter Section, Township and Range.
2. Analysis for TPH and TCLP.

Final clean-up levels are not available for the bottom of the leveled off area. Enough soil was removed at each site to facilitate the construction of concrete containments around the compressors. The soil samples that were analyzed are from the spoil piles from each site.

If there is any further information needed or questions, please do not hesitate to call me at (817) 390-8685.

Sincerely,



Robert L. Gawlik
Environmental Health & Safety Associate

RLG:gad

cc: K. C. Clark - w/attachment
H. E. Hicks - w/attachment
H. Harless - w/attachment

Lea County New Mexico
West Eunice Compressor Station

Sec. 36
TS ~~22~~ 21
R 36
SE4 SE4 SE4

Lea County New Mexico
Boyd Compressor Station

Sec. 26
TS 22
R 37
NE4 of SE4

Eunice



F48

6701 Aberdeen Avenue Lubbock, TEXAS 79424
Tel (806) 794 1296 Fax (806) 794 1298

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Phone #: 505-395-2116

FAX H: 505-395-2326

STD RICHARDSON GASOLINE CO. P. O. BOX 1226, JAL, NEW MEXICO 88252

Project Name :

COMPRESSOR SITES

Sampler's Signature:

LEA COUNTY GATHERING COMPRESSORS

Sanjour Signature: 

[illegible]

REMARKS

347AK

347AK

Sept 1933

Dec-20-95 05:24P

P.01

6701 Aberdeen Avenue

Lubbock, Texas 79424

806-794-1296

FAX 806-794-1298

ANALYTICAL RESULTS FOR
SID RICHARDSON GASOLINE CO.
Attention: Harold Hicks
P. O. Box 1226
Jal, NM 88252

December 14, 1995

Receiving Date: 12/13/95

Sample Type: Soil

Project No: NA

Project Location: Lea County Gathering Compressors

Extraction Date: 12/13/95

Analysis Date: 12/14/95

Sampling Date: 12/11/95

Sample Condition: Intact & Cool

Sample Received by: ML

Project Name: Compressor Sites

TA#	FIELD CODE	TRPHC (mg/kg)
T45531	HCSP-1	55,800
T45532	WCSP-1	44,500
T45533	BCSP-1	46,300
QC	Quality Control	101

REPORTING LIMIT

10

RPD

3

% Extraction Accuracy

111


% Instrument Accuracy

101

METHODS: EPA SW 846-3550 High Level; EPA 418.1.

TRPHC SPIKE: 250 mg/kg TRPHC.

TRPHC SPIKE: 100 mg/L TRPHC.



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

12-14-95

DATE


TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis

TRACE ANALYSIS, INC.

6791 Abercree Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
SID RICHARDSON GASOLINE COMPANY
Attention: Harold Hicks

December 20, 1995
Receiving Date: 12/13/95
Sample Type: Soil

Project No: NA

Project Location: Lea County Gathering Compressors

P. O. Box 1226
Jal, NM 88252

Extraction Date: 12/13/95
Analysis Date: 12/15/95
Sampling Date: 12/11/95
Sample Condition: Intact & Cool
Sample Received by: ML
Project Name: Compressor Sites

TCLP METALS (mg/L)

TA#	Field Code	As	Se	Cr	Cd	Pb	Ba	Ag	Hg
	EPA LIMIT =	5.0	1.0	5.0	1.0	5.0	100.0	5.0	0.20
T45531	HCSP-1	0.1	<0.1	<0.05	0.04	<0.1	1.4	<0.01	<0.01
T45532	WECSP-1	0.1	<0.1	<0.05	0.03	<0.1	1.3	<0.01	<0.01
T45533	BCSP-1	0.1	<0.1	<0.05	0.03	<0.1	1.4	<0.01	<0.01
QC	Quality Control	4.8	4.9	4.8	4.9	4.7	4.8	0.9	0.049
	Reporting Limit	0.1	0.1	0.05	0.02	0.10	0.20	0.01	0.01
RPD		2	14	8	0	22	4	16	6
% Extraction Accuracy		106	116	108	100	89	96	90	105
% Instrument Accuracy		96	98	96	98	94	96	90	98

METHODS: EPA SW 846-1311, 6010, 7470.

TCLP METALS SPIKE: 8.0 mg/L As, Se, Ba; 0.8 mg/L Cr; 0.2 mg/L Cd, Ag; 2.0 mg/L Pb; and 0.05 mg/L Hg.

TCLP METALS QC: 5.0 mg/L As, Se, Cr, Cd, Pb, Ba; 1.0 mg/L Ag; 0.05 mg/L Hg.



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

12-20-95

Date

DEC-20-95 05:24P

P.O.N

SID RICHARDSON GASOLINE CO.
Lea County Gathering

Inter-Company Correspondence

TO: Contaminated Soil-Compressor Site File
FROM: Harold Hicks
DATE: October 21, 1996
SUBJECT: Removal of all contaminated soil at West Eunice, Boyd
and House Compressor sites.

On July 22, 1996, Rhino Environmental Services, Inc.,
Box 2327, Hobbs, NM 88241 (Ph: 505-392-4498) loaded all soil in
question on trucks and hauled to their Goo Yea Land Farm. This
completes the project.

Attached are copies of invoice to haul material, truck
manifest and letter from OGD, State of New Mexico, clearing Rhino
to haul.


Harold Hicks
Field Manager

HH/kd

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	530-112
3. Generator's Name and Mailing Address Sid Richardson Gasoline Co. PO Box 1226 Jalisco NM 88252			West Eunice Station WECSP-2 Sec 36 T21 R36		
5. Transporter 1 Company Name Walton Construction		6. US EPA ID Number N/A			
7. Transporter 2 Company Name		8. US EPA ID Number			
9. Designated Facility Name and Site Address Terra Landfarm #NM-01-0015 SE/4 OF SECTION 14, TOWNSHIP 11 SOUTH RANGE 38 EAST, NMPM, LEA COUNTY, NM.		10. US EPA ID Number		A. Transporter's Phone B. Transporter's Phone 505-393-3174 C. Facility's Phone 800-762-0241	
11. Waste Shipping Name and Description			12. Containers	13. Total Quantity	14. Unit Wt/Vol
a. Non-exempt soils from around compressors. Soils were dug to build containment around compressors.			No. 1	Type Bulk	244
b.					
c.					
d.					
D. Additional Descriptions for Materials Listed Above Non-Hazardous Materials			E. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name		Signature		Month	Day Year
		Norval Hark		12	23 98
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month	Day Year
Jim Cooper		Jim Cooper		12	23 98
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month	Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of waste materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month	Day Year
ROYCE COOPER		Royce Cooper		12	23 98

ORIGINAL - RETURN TO GENERATOR

12-BLS-C5 Rev. 4/94



Tightness Tests
Removals
New Installations
Repairs
Remedial Services
Contaminated Site Disposal
Leak Detection

Wayne Price
Oil Conservation Division
PO Box 1940
Hobbs, NM 88240

June 3, 1996

Re: Request for Approval to Accept Solid Waste
Sid Richardson
Lea County, NM

Dear Wayne,

I am requesting approval to dispose of the attached non-exempt materials from 3 of Sid Richardson's locations at Goo-Yea Landfarm. The Request for Approval Forms C-138 along with the analytical reports are attached.

If you have any questions, please call me at 505-392-4498.

Sincerely,

Royce Cooper, Jr.

cc: Harold Hicks/Sid Richardson

(505) 393-6161
 1940
 NM 88241-1980
 District II - (505) 748-1283
 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

Form C-138
 Originated 4/18/95

Submit Original
 Plus 1 Copy
 to appropriate
 District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator <u>Sid Richardson</u> 5. Originating Site <u>WEST SERVICE COMPANY</u> <u>STATION WE 05A2</u>
2. Management Facility Destination <u>Gas Y. Landfarm</u>	6. Transporter <u>Rhino Environmental Service</u>
3. Address of Facility Operator <u>4007 Louisiana Ave</u> <u>Horns, NM</u>	8. State <u>New Mexico</u>
7. Location of Material (Street Address or ULSTR) <u>SEC 36, TS 21 South</u> <u>R36 EAST SE1/4</u>	
9. <u>Circle One:</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Hydrocarbon Contaminated Soils From Around
 Compressors. Soils were dug to Build A
 Containment Around Compressor.

Estimated Volume 25 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: [Signature] TITLE: Vice President DATE: 6/13/98
Waste Management Facility Authorized Agent
 TYPE OR PRINT NAME: Royce Cooper, Jr. TELEPHONE NO. 505-392-4458

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

SID RICHARDSON GASOLINE CO.

P. O. BOX 1226

JAL, NM 88252

Phone: (505) 395-2116

Fax: (505) 395-2326

CERTIFICATE OF WASTE STATUS
NON-EXEMPT WASTE MATERIAL

Originating Location: West Eunice Compressor WECSP-1

Section: 36 Township: 21 S Range: 36 E

County: Lea State: N.M.

Source: Soil excavated to pour concrete containment
around compressor

Disposal Location: Gooyea Land Farm operated by Rhino Environmental
Services

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Agency's (EPA) July 1986 Regulatory Determination. To my knowledge, this waste has been analyzed pursuant to the provisions of 40 CFR Part 261 to verify that the waste is non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3 (b).

Name Harold HicksTitle Field Mgr.Company Sid Richardson Gasoline Co.Signature Harold HicksDate 6-7-96

OCT-22-1996 09:29

RHINO ENV. SUCS.

585 247 4941 P.04

43-6161

48241-1980
73057 748-1283

Alamogordo, NM 85210
District III - (505) 334-6178
1000 Rio Bravo Road
Alamogordo, 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

Form C-
Originated 4/1

Submit On
Plus 11
to appropriate
District C

Environmental Bureau
Oil Conservation Division

RECEIVED

JUN 13 1996

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>Sid Richardson</u>
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <u>WEST OILFIELD CO.</u>
2. Management Facility Destination <u>Goodyear Landfill</u>	6. Transporter <u>Rhino Environmental Services</u>
3. Address of Facility Operator <u>4007 Louisiana Hwy, Harts, NM</u>	8. State <u>New Mexico</u>
7. Location of Material (Street Address or ULSTR) <u>52036, Box 21, Santa Fe, NM 87505</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.	
All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Hydrocarbon Contaminated Soils From Aerial
Compressors. Soils were dug to Build A
Containment Around Compressor.

NEED CERT OF WASTE STATUS BY GENERATOR
CPL REC 6/15/96

JUN 17 1996

JULY 1996
OFFICE

JUN 25 1996

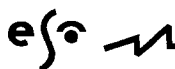
JULY 1996
OFFICEEstimated Volume 25 cy Known Volume (to be entered by the operator at the end of the haul) _____ cySIGNATURE: [Signature] TITLE: Vice President DATE: 6/13/96TYPE OR PRINT NAME: ROYCE COOPER, JR. TELEPHONE NO. 505-392-4458

(This space for State Use)

APPROVED BY: [Signature] TITLE: Env. Mgr. DATE: 6/13/96APPROVED BY: [Signature] TITLE: Per. Eng. DATE: 6/13/96

TOTAL P.04

Item 13, Attachment 3



West Eunice Compressor Station

**WORK PLAN
WEST EUNICE COMPRESSOR SITE
SE 1/4, SE 1/4, OF S-36, T-21S, R-36E
LEA COUNTY, NEW MEXICO**

**I. CLEAN AND INSPECT STEEL UST BY SEPTEMBER 1, 1997.
EVALUATE DISPOSITION OF UST AFTER INSPECTION**

This tank has been pumped dry as of 9-30-96. This tank has been isolated from any process or drain lines.

**II. CLEAN AND INSPECT BOTH BGSTS' BY SEPTEMBER 1, 1997.
EVALUATE DISPOSITION OF BGSTS' AFTER INSPECTION**

These tanks have been pumped dry as of 7-22-96. These tanks have been isolated from any process or drain lines.

III. SAMPLE FOUR AREAS FOR POTENTIAL HYDROCARBON CONTAMINATION BY JULY 1, 1997. RE-EVALUATE AFTER SAMPLING

- 1. AREA AROUND BGST**
- 2. INSIDE BERM FOR AST**
- 3. TRUCK LOADING AREA**
- 4. COMPRESSOR SITE PROPER**

Areas 1 through 3 to be tested for TPH only
TPH and TCLP analysis of 12-15-96 to be representative of Area 4.
(See Item 13, Attachment 2 of Discharge plan)

**IV. SUMP INSIDE COMPRESSOR CONTAINMENT TO BE SEALED AND
FILLED BY NOVEMBER 15, 1997**

V. CLEAN AND INSPECT AST'S TK-1 AND TK-2 BY APRIL 1, 1997

**VI. PRESSURE TEST UNDERGROUND EFFLUENT PIPING BY JANUARY
1, 1999**

**VII. EVALUATE AND REPAIR BERMS FOR AST'S TK-1 AND TK-2 BY
JUNE 1, 1998**



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 3:00pm	Date 9-6-96
<u>Originating Party</u>		<u>Other Parties</u>
Pat Sanchez - OGD		Mr. Robert Gawlik - Sid Richardson Gasoline Co.
<u>Subject</u> Permit for W. Eunice compressor		

Discussion Talked w/ Mr. Gawlik regarding his August 28, 1996 letter about submitting a discharge Plan for the W. Eunice site. I told him his date of Nov. 1, 1996 was okay with us and asked if he wanted a letter from us - he said okay. (OGD doesn't need to send a letter.)

Conclusions or Agreements

Mr. Gawlik will submit a D.P. on Nov. 1, 1996 for both W. Eunice and Bayd compressor stations.

Distribution File.

Signed

Robert W. Gawlik

SID RICHARDSON GASOLINE CO.

201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

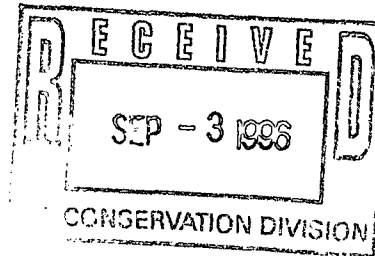
ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

August 28, 1996
RLG-50-96

CERTIFIED MAIL - Z 378 134 271

Mr. Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco Street
Santa Fe, New Mexico 87505



**Re: Discharge Plan
West Eunice Compressor Station
Lea County, New Mexico**

Dear Mr. Anderson:

In response to Sid Richardson Gasoline Co.'s (SRGCo.) request for exemption and the Oil Conservation Division's approval of same, SRGCo. would like to withdraw that request.

Due to some rapidly changing conditions and activities in the industry, SRGCo. is considering returning compression to this site. The size and horsepower of the compressor will be equal to or less than the previous compressor. SRGCo. will file for permits and supply necessary data to the Oil Conservation Division prior to commencing these activities.

We would like to file a discharge plan at this time for this site, along with the Boyd Compressor Site. To file for both sites at the same time will make it more cost-effective for our Company. SRGCo. will submit both discharge plans on or prior to the OCD due date of November 1, 1996.

Your attention to this matter will be appreciated. If there are any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert L. Gawlik".

Robert L. Gawlik
Environmental Health & Safety Associate

RLG:gad

c: C. P. O'Farrell/H. Harless
W. J. Farley
K. C. Clark
R. Boyd
H. E. Hicks
Wayne Price (OCD - Hobbs, NM)

RECEIVED

SEP 04 1996

Environmental Bureau
Oil Conservation Division



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

August 14, 1996

P 594 835 303

CERTIFIED MAIL

RETURN RECEIPT NO. P-594-835-303

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

**Re: Discharge Plan Exemption
West Eunice Compressor Station
Lea County, New Mexico**

Dear Mr. Gawlik:

The OCD has received and considered the request of Sid Richardson Gasoline Co. dated July 11, 1996 for the exemption of the West Eunice Compressor site located in Lea County, New Mexico. **You are hereby notified that the filing of a discharge plan will no longer be required for the West Eunice Compressor Station located in Lea County, New Mexico, under the following requirements:**

1. A contamination investigation and remediation plan will be submitted to the OCD Santa Fe office for review and approval by October 15, 1996.
2. Any remediation/clean-up of soils and/or groundwater at the site must be completed by August 1, 1997, with a final report submitted to the OCD Santa Fe office for review and approval by August 15, 1997.
3. If Sid Richardson Gasoline Co. wishes to re-start compression operations at the facility in the future, a discharge plan must be submitted to and approved by the OCD Santa Fe office before compression operations can begin.

Please be advised that the approval of this exemption 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.

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

Sent to <i>Mr. Robert Gawlik</i>	
Street & Number <i>Sid Richardson Gas. Co.</i>	
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	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Mr. Robert Gawlik
Sid Richardson Gasoline
W. Eunice Compressor Station
August 14, 1996
Page 2

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.

If you have any questions, please feel free to contact myself at (505)-827-7152 or Pat Sanchez at (505) - 827-7156.

Sincerely,

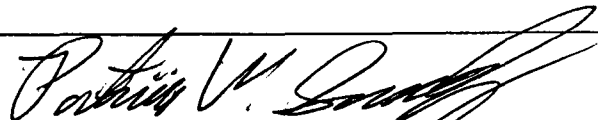


Roger C. Anderson
Environmental Bureau Chief

RCA/pws

XC: Mr. Wayne Price

MEMORANDUM OF MEETING OR CONVERSATION

<input type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Personal	Time 8:30 AM	Date 6/12/96
<u>Originating Party</u>		<u>Other Parties</u>	
Pat Sanchez - OCD		Bill LeMay and Roger Anderson OCD.	
<u>Subject</u> Sid Richardson Gasoline Co. "West Eunice Compressor" Request from Mr. Gawlik w/ Sid Richardson Gasoline Co. dated July 11, 1996.			
<u>Discussion</u> Brought up July 11, 1996 letter from Sid Richardson and my (Pat Sanchez.) Memo date July 16, 1996 to Roger Anderson. Bill and Roger decided not to require a discharge plan or abatement plan pursuant to part 4 of WRCC regulations. Instead require Sid Richardson to submit a contamination investigation and put in a statement from OCD that if compression is to begin at the facility again that Sid Richardson must have a discharge plan in place before compression begins.			
<u>Conclusions or Agreements</u>			
Pat Sanchez will draft up a letter for Roger Andersons signature addressing the items discussed above.			
<u>Distribution</u> File		<u>Signed</u> 	

Pat Sanchez

From: Roger Anderson
Sent: Tuesday, July 16, 1996 10:02 AM
To: Pat Sanchez
Subject: Read: West Eunice Compressor Discharge Plan Exemption
Importance: High

Your message

To: Wayne Price
Cc: Roger Anderson
Subject: West Eunice Compressor Discharge Plan Exemption
Sent: 7/16/96 9:57:00 AM

was read on 7/16/96 10:02:00 AM

Pat Sanchez

From: Wayne Price
Sent: Tuesday, July 16, 1996 10:13 AM
To: Pat Sanchez; Roger Anderson
Subject: FW: West Eunice Compressor Discharge Plan Exemption
Importance: High

I agree looks good!

From: Pat Sanchez
To: Wayne Price
Cc: Roger Anderson
Subject: West Eunice Compressor Discharge Plan Exemption
Date: Tuesday, July 16, 1996 9:57AM
Priority: High

Wayne, Pasted below is the memo I gave Roger this morning regarding the West Eunice Compressor of Sid Richardson Gasoline Co. , If you have any other feed back please E-mail/phone either Roger or myself.
Thanks for your time.

INTEROFFICE MEMORANDUM

July 16, 1996

TO: Roger C. Anderson, Bureau Chief

FROM: Pat Sanchez, Petroleum Engineering Specialist

Subject: Sid Richardson Gasoline Co. Request for Exemption of Discharge Plan for the
Eunice Compressor Station, Lea County, New Mexico.

West

Roger, Attached you will find the request letter from Sid Richardson Gasoline Co. to be exempted from filing a discharge plan for their West Eunice Compressor station. The reason for the request from them is that the compressor is no longer in service. I have no problem with the none filing of a discharge plan for the site provided Sid Richardson Gasoline Co. commit to the following:

1. If they ever wish to begin compression operations at the facility again they would required by OCD to have submitted a discharge plan with a request to discharge without an approved discharge plan before operations begin.
2. They would in the meantime have to submit a WQCC Part 4 "Abatement Plan" to address the contamination in the vadose zone at the site - i.e. see July 2, 1996 inspection report from OCD to Sid Richardson Gasoline Co.

I do not feel that simply submitting a closure plan referring to OCD "Surface Impoundment" Closure guidelines would adequately address the contamination potential at the site.

Thanks for your attention to this matter!

Patricio W. Sanchez

Attachment

XC: Wayne Price - Hobbs.

Pat Sanchez

From: Wayne Price
Sent: Tuesday, July 16, 1996 10:01 AM
To: Pat Sanchez
Subject: Registered: Wayne Price

Your message

To: Wayne Price
Subject: West Eunice Compressor Discharge Plan Exemption
Sent: 7/16/96 9:57:00 AM

was read on 7/16/96 10:01:00 AM

Pat Sanchez

From: System Administrator
Sent: Tuesday, July 16, 1996 9:57 AM

To: Wayne Price
Cc: Roger Anderson
Subject: Delivered: West Eunice Compressor Discharge Plan Exemption
Importance: High

Your message

To: Wayne Price
Cc: Roger Anderson
Subject: West Eunice Compressor Discharge Plan Exemption
Sent: 7/16/96 9:57:51 AM

was delivered to the following recipient(s):

Wayne Price on 7/16/96 9:57:55 AM
Roger Anderson on 7/16/96 9:57:55 AM



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

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

INTEROFFICE MEMORANDUM

July 16, 1996

TO: Roger C. Anderson, Bureau Chief

FROM: Pat Sanchez, Petroleum Engineering Specialist

Subject: Sid Richardson Gasoline Co. Request for Exemption of Discharge Plan for the West Eunice Compressor Station, Lea County, New Mexico.

Roger, Attached you will find the request letter from Sid Richardson Gasoline Co. to be exempted from filing a discharge plan for their West Eunice Compressor station. The reason for the request from them is that the compressor is no longer in service. I have no problem with the none filing of a discharge plan for the site provided Sid Richardson Gasoline Co. commit to the following:

1. If they ever wish to begin compression operations at the facility again they would required by OCD to have submitted a discharge plan with a request to discharge without an approved discharge plan before operations begin.
2. They would in the meantime have to submit a WQCC Part 4 "Abatement Plan" to address the contamination in the vadose zone at the site - i.e. see July 2, 1996 inspection report from OCD to Sid Richardson Gasoline Co.

I do not feel that simply submitting a closure plan referring to OCD "Surface Impoundment" Closure guidelines would adequately address the contamination potential at the site.

Thanks for your attention to this matter!

A handwritten signature in dark ink, appearing to read "P. Sanchez".

Patricio W. Sanchez

Attachment

XC: Wayne Price - Hobbs.

OIL CONSERVATION DIVISION
RECEIVED
SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

July 11, 1996
RLG-41-96

CERTIFIED MAIL - Z 378 134 267

Mr. Roger C. Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

RECEIVED

JUL 15 1996

Environmental Bureau
Oil Conservation Division

Re: Discharge Plan Requirement
West Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Anderson:

The notice of discharge plan requirement was received in this office on July 8, 1996. This letter is to acknowledge receipt of the notices for our two (2) compressor sites in Lea County, New Mexico.

Also at this time I would like to request an exemption from the requirement to provide a discharge plan for our West Eunice Compressor Site. As of May 3, 1996, this site is no longer a compressor site but will continue to be utilized as a pipeline drip collection site for our field gas gathering system. Your attention to this matter would be appreciated, and we will await your response.

If there are any questions, please do not hesitate to call.

Sincerely,



Robert L. Gawlik
Environmental Health & Safety Associate

RLG:gad

cc: C. P. O'Farrell/H. Harless
W. J. Farley
K. C. Clark
R. Boyd
H. E. Hicks
Wayne Price (OCD - Hobbs, NM)



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

July 2, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-271

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

**Re: Discharge Plan Requirement
West Eunice Compressor Station
Lea County, New Mexico**

Dear Mr. Gawlik:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, and as a result of the April 11, 1996 facility inspection by the New Mexico Oil Conservation Division (See the OCD inspection report dated May 2, 1996.) You are hereby notified that the filing of a discharge plan is required for the West Eunice Compressor Station located in Lea County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3104 and 3106 of the WQCC regulations. The discharge plan, defined in Section 1101.N of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Please submit the original 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.

The Director shall allow a period of thirty days from the date of this letter for requesting an exemption from filing a discharge plan. Requests for an exemption shall be in writing and shall set forth the reasons why an exemption should be granted.

A copy of the regulations have been enclosed for your convenience. Also enclosed is a copy of the OCD guideline for the preparation of discharge plans at "Gas Plants, Refineries, Compressor,

Mr. Robert Gawlik
Sid Richardson Gasoline
W. Eunice Compressor Station
July 2, 1996
Page 2

and Crude Oil Pump Stations."

The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 for compressor stations that are site rated for less than 1,000 horsepower. The \$50 dollar filing fee is due when the discharge plan is submitted.

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

If you have any questions, please feel free to contact Pat Sanchez at (505) - 827-7156.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief
(505) - 827 - 7152

RCA/pws

XC: Mr. Wayne Price

P 594.835.271	
US Postal Service	
Receipt for Certified Mail	
No Insurance Coverage Provided.	
Do not use for International Mail (See reverse)	
Sent to	Sid Richardson - Gawlik
Street & Number	D.P.R.E.K.
Post Office, State, & ZIP Code	W. Eunice.
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

May 2, 1996

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-963-142

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

**RE: Discharge Plan Inspections
"West Eunice & Boyd" Compressor Stations.
Lea County, New Mexico**

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) on April 11, 1996 inspected the following compressor stations that are owned and operated by Sid Richardson Gasoline Co. - "Boyd", located in NE/4 SE/4, Section 26, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico; and the "West Eunice", located in SE/4, SE/4, SE/4, Section 36, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico.

- "Boyd Compressor Station"
- 1. Mr. Gawlik sampled piled soils for TCLP Volatiles/semi-Volatiles and RIC. Already had sampled for TCLP Metals. Upon receipt of the TCLP analysis Sid Richardson Gasoline Co. to dispose of properly according to OCD requirements.
- 2. See Photo. No. 1 and No.2 for the Boyd compressor.

Sid Richardson Gasoline Co. needs to address contaminated soils at the sites and determine proper waste classification of these soils - i.e. Non-Exempt or Exempt for RCRA Subtitle C regulations and also consider WQCC Section 3103 A., B., and C. for possible Groundwater and Vadose zone impacts. The work plan addressing the possible contamination may be submitted with the Discharge Plan if the NMOCD requires one to be submitted. The OCD will notify Sid Richardson Gasoline Co. of the Discharge Plan requirement in the next few weeks. If a discharge plan is not required-Sid Richardson Gasoline Co. must still submit a work plan to address possible contamination at the site. The work plan would be submitted to the Santa Fe OCD Division office for approval with a copy sent to the Hobbs OCD District office.

Mr. Robert L. Gawlik
Sid Richardson Gasoline Co.
May 2, 1996
Page 2

3. Mechanical Integrity of Above ground storage tanks (AST) and Below grade storage tank (BGST) needs to be verified. The AST appears to have caused possible contamination due to either leakage or tank run-overs. A plan to address this possible contamination shall be submitted as outlined in (2.) above. The BGST needs to be cleaned and inspected annually; It is recommended that all BGST that do not have secondary containment and leak-detection be removed as soon as possible and replaced with a properly bermed and padded AST or a BGST with secondary containment and leak-detection.

4. During the inspection it was stated by Sid Richardson Gasoline Co. that the Engine Oil goes to the Jal#3 Discharge plan facility - please list all wastes that go to Jal #3 ; examples maybe washdown water, used engine coolant, scrubber produced water, etc. include as part of the list the a statement certifying the waste status-i.e. Exempt from RCRA Subtitle C or Non-Exempt from RCRA Subtitle C. This list shall also be included in the Discharge plan if one is required. It is the OCD's understanding that no solvents are used at this site - but a biodegradable soap is, please include an MSDS sheet for this soap.

5. It is also OCD's understanding that Quell petroleum in Texas handles the disposal of all filters from all three of the Sid Richardson Gasoline Co. sites - please submit the location and phone number of this facility and the name and address of the regulatory authority in Texas who permits the Quell facility.

6. All discharges of lube oil off the compressor pad/curb area shall cease- at all three compressor sites.

- "West Eunice Compressor"

Same as 1 through 6 above for the "Boyd Compressor."

Enclosed, you will find the photos that were taken by the NMOCD as well as some paperwork regarding the "House Compressor Station" for its discharge plan file GW-243.

If you have any questions regarding this inspection report feel free to give me a call at (505)-827-7156.

Sincerely,



Patricio W. Sanchez

xc: Wayne Price and Mr. Harold Hicks Z-765-963-143

Sid Richardson Gasoline, Inc.
"WEST EUNICE Compressor Station"
SE/4, SE/4, SE/4, Sec. 36, T21S, R36E, NMPM
LEA COUNTY, N. M.

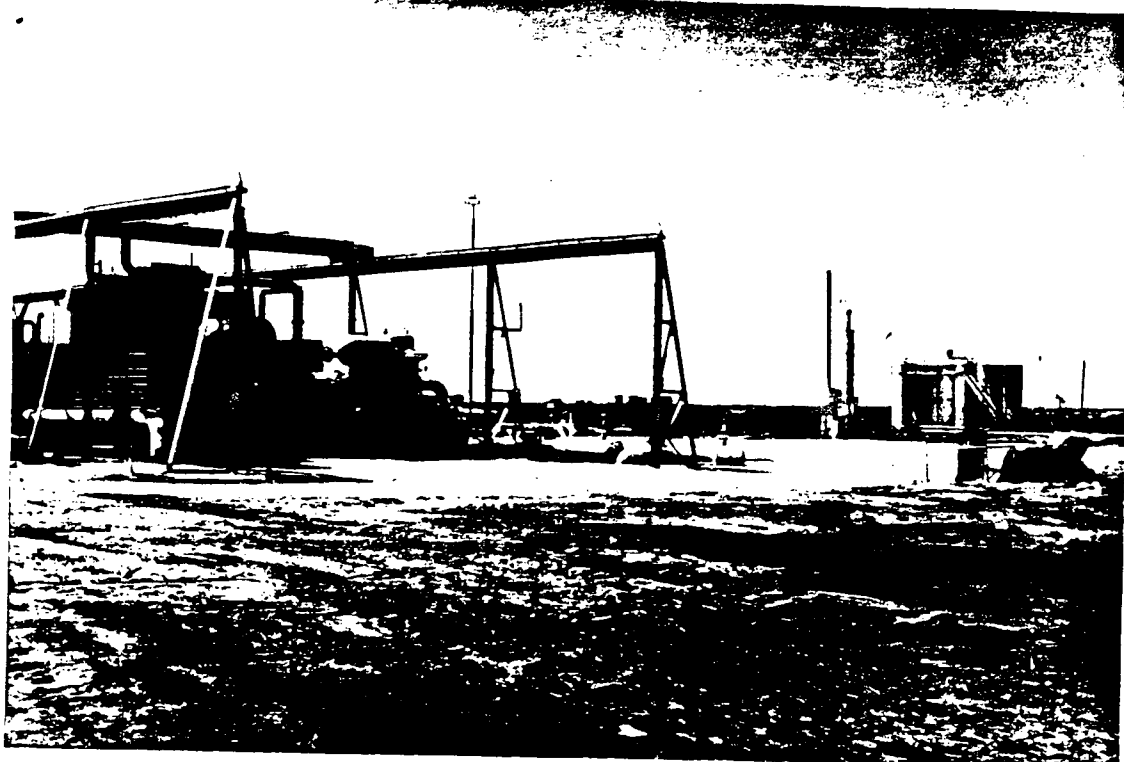


Photo No. 1 4-11-96

"WEST EUNICE COMPRESSOR STATION"

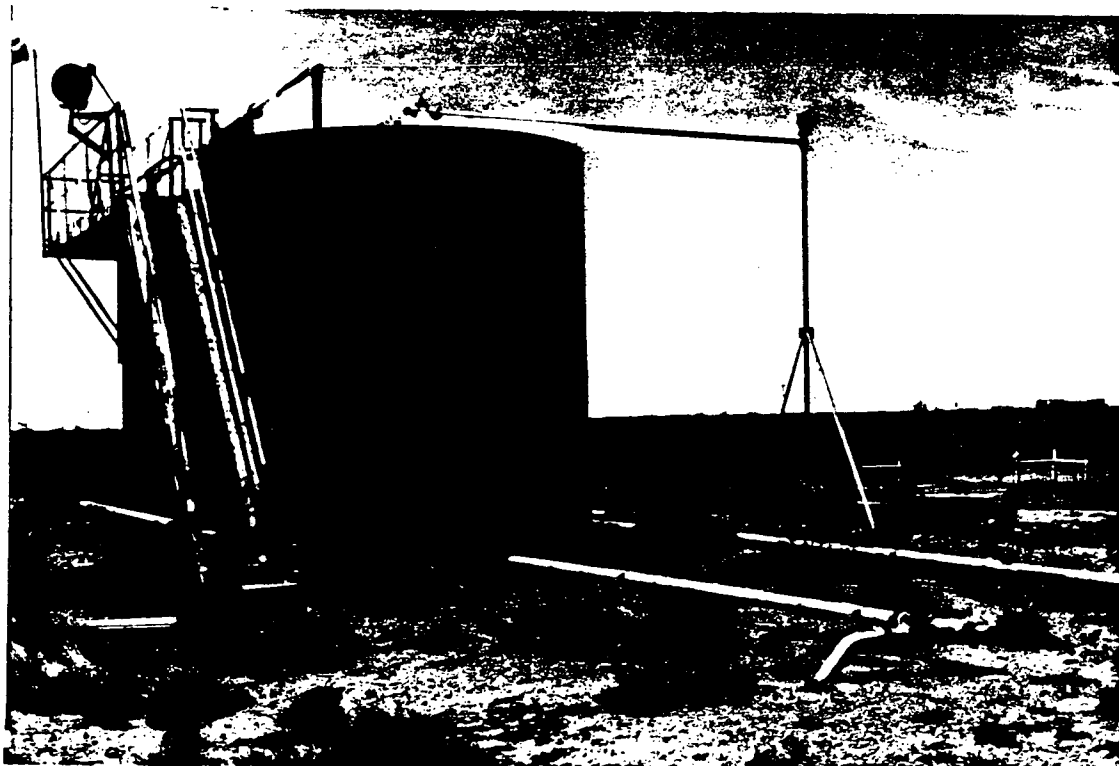


Photo No. 2 4-11-96

Sid Richardson Gasoline, Inc.

"Boyd Compressor Station"

NE 1/4, SE 1/4, Sec. 26, T 22S, R 37E, NMPM
LEA County, N.M.

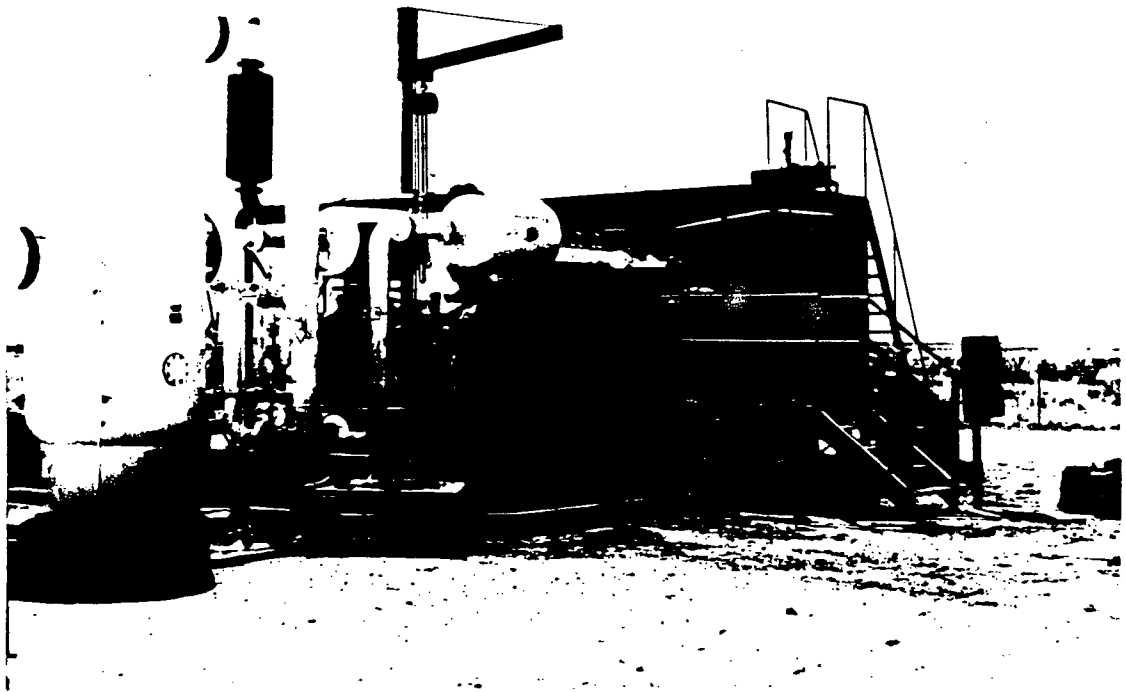


Photo No. 1 4-11-96
"BOYD COMPRESSOR STATION"

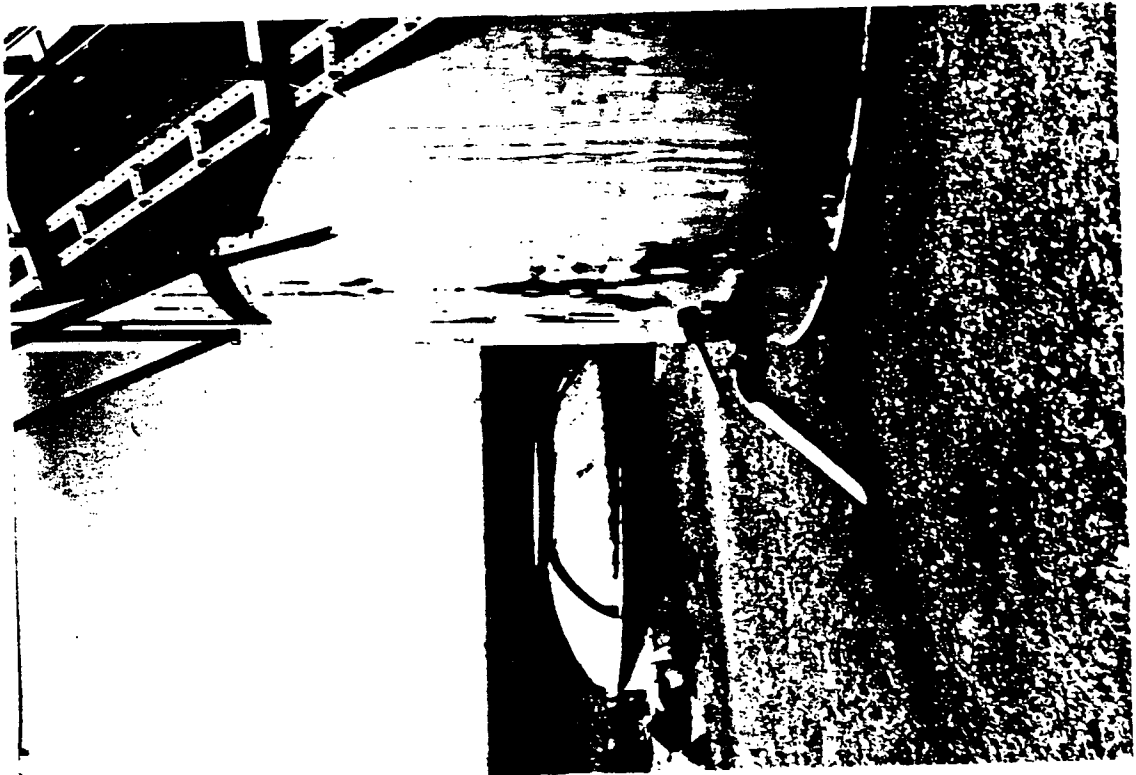


Photo No. 2 4-11-96

Sid Richardson Gasoline Co.
"House Compressor Station"

The Santa Fe New Mexican

Since 1849. We Read You.

NEW MEXICO OIL CONSERVATION
ATTN: SALI Y MARTINEZ
2040 S. PACHECO
SANTA FE, N.M. 87505

AD NUMBER: 491260

ACCOUNT: 56689

LEGAL NO: 59477

P.O. #: 96199027997

170 LINES once at \$ 68.00

Affidavits: 5.25

Tax: 4.58

Total: \$ 77.83

24 1996

OIL CONSERVATION DIVISION

NOTICE OF PUBLICATION 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 8:30 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 time comments may be submitted to the Director of the Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico, 87505. Telephone for a public hearing shall be (505) 822-7131. A hearing shall be held. A hearing (GW-243) - Sid Richardson will be held if the Director of Gasoline Co., Mr. Wayne Farley, (817) 390-6664, 201 N. Main St., Fort Worth, TX, 76102, has submitted a Discharge Plan Application for the Director will approve or the House Compressor to disapprove the proposed discharge plan based on the information in the NW/4 SE/4, Sec. 11, Township 20 South, Range 38 East, NMPM. A hearing is held, the director will approve or disapprove the proposed plan based on the information in the discharge plan application and information stored onsite in a closed top tank and disposed of at an approved facility. Groundwater most likely to be affected by a spill, leak, or discharge to the surface is at a depth of approximately 28 feet with a concentration of approximately 1,100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information Pub. April 18, 1996

AFFIDAVIT OF PUBLICATION

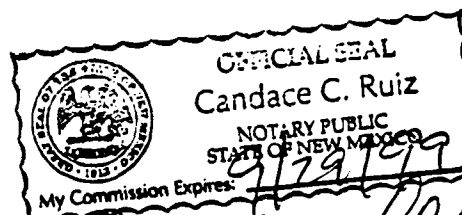
STATE OF NEW MEXICO
COUNTY OF SANTA FE

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 News paper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 59477 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 18th day of APRIL 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
18th day of APRIL A.D., 1996



Affidavit of Publication

RECEIVED

APR 30 1996

Environmental Bureau
Oil Conservation Division

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

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

That the notice which is hereto attached, entitled

Notice Of Publication

and published in the issue of

County of New Mexico, was published in a regular and

entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, for

one (1) day,

consecutive weeks, beginning with the issue of

April 19, 1996

and ending with the issue of

April 19, 1996

And that the cost of publishing said notice is the sum of \$ 32.00

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

Joyce Clemens

Subscribed and sworn to before me this 24th

day of April, 1996

Jean Serier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-243) - 814 Richardson Gasoline Co., Mr. Wayne Farley, (517)-390-8688, 201 N. Main St., Fort Worth, TX, 76102, has submitted a Discharge Plan Application for the House Compressor located in the NW/4 SE/4, Section 11, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 90 gallons per day of scrubber water will be stored on site in a closed top tank and disposed of at an OCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 28 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.

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 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 a public hearing may be requested by any interested person. Requests for a 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 public 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 discharge plan application and information presented at the hearing.

Given under the Seal of the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico on this 8th day of April, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
William J. LeMay, Director

SEAL

Published in the Lovington Daily Leader April 19, 1996.

RECEIVED

APR 16 1996

4184
USFWS - NMESO

NOTICE OF PUBLICATION

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

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

(GW-243) - Sid Richardson Gasoline Co., Mr. Wayne Farley, (817)-390-8686, 201 N. Main St., Fort Worth, TX, 76102, has submitted a Discharge Plan Application for the House Compressor located in the NW/4 SE/4, Section 11, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 90 gallons per day of scrubber water will be stored onsite in a closed top tank and disposed of at an OCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 28 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.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the 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 8th day of April, 1996.

NO EFFECT FINDING

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

Date April 18, 1996

Consultation # SEAL GWOCD96-1

Approved by [Signature]
U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

[Signature]
WILLIAM J. LEMAY, Director

WJL/pws

Environmental Bureau
Oil Conservation Division

APR 22 1996

PROCESSED

NMOCD Inter-Correspondence

To: Chris Eustice-Environmental Geologist
From: Wayne Price-Environmental Engineer District I
Date: Dec. 04, 1995
Reference: Sid Richardson-House Compressor St.
sec 11-Twp 20s-R 38e 1mi e of hwy 18
1/4 mi s of race dirt track.
Subject: Site Inspection

Comments:

Dear Chris,

Per your request, I am enclosing the results of my site inspection and telephone conversation with Harold Hicks of Sid Richardson.

Site Inspection: 11/30/95 4:26pm

Small compressor st.; Compressor sits on a concrete pad with small curb. Two small separators, two small tanks (small berm no pad). The facility is fenced and has signs. There is one waste tank which is 90% sub-surface. This tank appears to be receiving misc liquid fluids, it is designed with a grate on top for draining buckets etc. There were two buckets being drained at the time.

Noted discharges: There was a small oil\water emulsion being discharged onto the ground from the SE corner of the compressor pad.

There was a small pile of contaminated dirt just north of the two storage tanks. There is visual contamination still remaining inside of the berm area. There was a large pile of contaminated dirt (est 100-200 yds) outside of the fence south of the st. This dirt was on and covered with plastic. There is an excavated area just south of the Comp. St. south fence.

Telephone Conversation with Harold Hicks Field Mgr. Sid Richardson.
3:30 pm Dec. 04, 1995.

Discussed operations, history of site, WQCC reg's for compressor stations, E&P exempt and non-exempt issues, pit closures, etc., and waste disposal from Discharge Plan sites.

Mr. Hicks informed me that they had one of the AST's leak gas/crude, oil/condensate and it saturated the berm area and flowed outside of the fence. This leak was reported to NMOCD on 10/05/95. It was their opinion that since this material would be classified as exempt it would not require any "special" approval from the NMOCD for disposal. They have been in contact with Rhino for the disposal of this material.

In the process of removing the contaminated soils from the leak they discovered that the excavation of the leak soils included an old blowdown pit which had been covered by the previous operator.

To further complicate the issue this excavation area lies inside of Rhino's UST landfarm NMED permit area.

Sid Richardson has plans on removing the UST type waste tank and improving the berming around the AST type tanks.

I Informed him he will have to modify the discharge plan before he does this. Mr. Hicks was unaware that Comp. St's might be required to have a Discharge Plan and wasn't sure if they had one, but would get with their environmental dept. (Robert Gawlik). He ensured me that they will comply with all of our regulations.

Mr. Hicks requested a list of the area NMOCD permitted disposal facilities.

cc: Jerry Sexton-District I Supervisor
Roger Anderson-Environmental Bureau Chief