1R - 206

GENERAL CORRESPONDENCE

YEAR(S):

1999-1998

OCD ENVIRONMENTAL BUREAU SITE INSPECTION SHEET

| DATE: 6/17/99 Time: #5 PM |
|---|
| Type of Facility: Refinery Gas Plant Compressor St. Brine St. OilField Service Co. Surface Waste Mgt. Facility E&P Site Crude Oil Pump Station Other Compressor St. Surface Waste Mgt. Facility Surface Waste |
| Discharge Plan: No Yes DP# |
| FACILITY NAME: JAL STRT JON PAS DESTINATION 105 PHYSICAL LOCATION: Legal: QRT_QRT_NE_Sec_6_TS_29_S R_37_E County LEA |
| PHYSICAL LOCATION: |
| Legal: QRT QRT NE Sec 6 TS 243 R 37c County LEA |
| OWNER/OPERATOR (NAME) PHILLIPS PET ROLEUR CORPANY Contact Person: TONY QUALITER Tele:# 9/8-66/-3557 |
| |
| MAILING ADDRESS: State ZIP Owner/Operator Rep's: ON SITE REP. KIRPY SHIP |
| Owner/Operator Rep 1: OP 07/02 10/7. 11/10-1 Office |
| OCD INSPECTORS: W. PRICE & J. FORD 1. 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. |
| o K |
| 2. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design. |
| OK |
| |
| |
| 3. 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. BERMED NO LINER |
| OCD Inspection Sheet Page 1 of 3 |

7

| Number of Photos taken at this site: 2 - 0\ ENVR\ PIC_CAM 20042 \ PIC 060 12 |
|--|
| ANY FUTURE ASTO SHOULD HAVE LINEAS MUDER TAVAS! |
| ANY LUTURE ASTA SHOULD HAVE LINERS MUDER TANKS! |
| Misseller and Comments |
| 14. ANY WATER WELLS ON SITE? NO Ø YES 🗇 IF YES, HOW IS IT BEING USED? |
| 13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.? |
| NOVE OBSERVED |
| 12. Does the facility have any other potential environmental concerns/issues? NOVE OBSERVED |
| NO SPIUS OBSERVEO |
| 11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office. |
| GOOD TO EXCELLANT |
| 10. <u>Housekeeping</u> : All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for period of five years. |
| ANT CLASS V WELLS NO E TES D' IT TES DESCRIBE BELOW! |
| The State of Class V will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foresceable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department. ANY CLASS V WELLS NO YES I IF YES DESCRIBE BELOW! |

OCD Inspection Sheet Page 3 of 3

OCD ENVIRONMENTAL BUREAU SITE INSPECTION SHEET

| DATE: 6/6/99 Time: |
|---|
| Type of Facility: Refinery Gas Plant Compressor St. Brine St. OilField Service Co. Surface Waste Mgt. Facility E&P Site Crude Oil Pump Station Other |
| Discharge Plan: No Yes DP# |
| FACILITY NAME: PHULPS P.L. MAL JAR MAN PHYSICAL LOCATION: Legal: QRT QRT Sec TS R County |
| OWNER/OPERATOR (NAME) |
| Contact Person: |
| MAILING ADDRESS: State ZIP |
| Owner/Operator Rep's: |
| |
| OCD INSPECTORS: 1. <u>Drum Storage</u> : All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. A empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other contains such as sacks or buckets will also be stored on an impermeable pad and curb type containment. |
| |
| |
| 2. 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. |
| 3. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain 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. |
| OCD Inspection Sheet Page of |

| 4. 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. |
|---|
| |
| |
| |
| 5. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information. |
| |
| 6. 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. |
| |
| |
| |
| 7. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. 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. |
| |
| |
| |
| 8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? Yes No |
| ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ON NO OF IF NO DETAIL BELOW. |
| |
| |
| |
| |
| |
| |

OCD Inspection Sheet Page ___ of ___

| 9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardor fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic waste will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foresecable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department. |
|---|
| ANY CLASS V WELLS NO D YES DESCRIBE BELOW! |
| |
| 10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm even to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for period of five years. |
| |
| 11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office. |
| |
| 12. Does the facility have any other potential environmental concerns/issues? |
| |
| 13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.? |
| 14. ANY WATER WELLS ON SITE? NO D YES D IF YES, HOW IS IT BEING USED? |
| Miscellaneous Comments: |
| |
| |
| Number of Photos taken at this site: |
| attachments- |
| OCD Inspection Sheet Page of |



June 18, 1999

NE/4 6-24-37

Jal Unloading Station NMOCD Inspection New Mexico Crude Oil Trucking Phillips Pipe Line Company

Wayne Price
State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco St.
Santa Fe, New Mexico 87505

Dear Mr. Price:

Phillips Pipe Line Company appreciated the opportunity to show you around our Jal Unloading Facility on June 17, 1999. Per your request, we are providing a copy of the Report of Contact completed by PPL regarding the inspection. Please direct any requests, questions or reports for this inspection to my attention or contact me at 918-661-3557.

Sincerely,

Anthony "Tony" C. Walker Phillips Pipe Line Company Staff Environmental Representative

3 B11 Adams Building

Chothony C. Walls

ACW: JalInspection.doc

cc: W. J. Ford

State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco St.
Santa Fe, New Mexico 87505

REPORT OF CONTACT

| 511-001 (115.01) Acm | LETTER NO. | | DE-12-99 |
|--------------------------------------|---|------------------------|---|
| oc A.C.Walker ® to File | CONTACTED BY | 0.0 | PERSONAL PHONE |
| cc | SITE INSPE | 000 | |
| cc | SITE ENSPE | dion | |
| COMPANY | | | DATE OF CONTACY |
| PHILLIPS PIPE LINE CE | Bustony (CD) | ,) | 06-17-89 |
| 1515 W. MARLAND | | | PHONE 305/397-5571 |
| | 88240 | | 2.73711 |
| PERSONNEL CONTACTED | 00240 | | |
| KIRBY M. SHIPP | , | | |
| BACKGROUND | | STATE OF NEW MEXICO | |
| | | | |
| | | AS | WAYNE PRICE ENVIRONMENTAL BUREAU |
| | | account of | 2040 S. PACHECO |
| | | DIL | \$ANTA FE. NEW MEXICO 875050 PHONE: (506) 827-7155 E-MAIL: WPRICE@atate.nm.us |
| | | NOIEIVID | INTERNET: http://www.amnrd.stata.nm.ua/ocd/ |
| | | | |
| precuseron | | - | |
| DISCUSSION 6/17/99 751 | ^ | | A |
| UMOCO INSPECT | EED PHILLIPS JAC | 5t. 2166 3 | 5 501 500 |
| phicips of | f REPORT - OC | co a price / | 5 (a) |
| 7/1.2 4.3 | PKIL | 415 K SKIP | ۴ |
| | · | | |
| PLEATE SEND | SCP A COPY of | + THIS PEP | act, |
| 001 0 0 0 | INSTALLING 30 ~ | N.C. PLASTIC | TUSIDE |
| PPL - RECOMMENDED TANK DIKE ARCA. | <i>\$7777.1-277.</i> | | |
| 1 JAMP WING THOUSE | | | |
| SIGNED A | | | |
| MAN Jan | | Kil A | Can l |
| | | | <i>VIII</i> |

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

April 10, 1999

CERTIFIED MAIL RETURN RECEIPT NO. P 288 259 117

Mr. Tony Walker Phillips Pipe Line Company # 3 B11 Adams Building Bartlesville, Oklahoma 74004

Re: Jal Unloading St. & Maljamar Pump St.

The New Mexico Oil Conservation Division (NMOCD) is in receipt of your letters dated August 31 & December 1, 1998 concerning Discharge Plans for the above facilities. In order to assist you in the future we have enclosed a set of conditions that NMOCD normally requires under our Discharge Plan Permits. Please note we have not officially adopted these conditions as "Best Management Practices" but could certainly be a factor for determining if a Discharge Plan is required. We encourage you to incorporate these type of conditions in your new designs.

NMOCD will file your letters in our Environmental files and will be performing routine site inspections in the future for these type of facilities. You may be required to submit a Discharge Plan application if NMOCD determines these operations pose a threat to public health, fresh waters and/or the environment.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.

Environmental Bureau

cc: OCD Hobbs office

attachments-1

TYPICAL DISCHARGE PLAN APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees: NONE IF NO DP IS REQUIRED.
- 2. <u>Commitments:</u> (COMPANY) will abide by all commitments submitted in the discharge plan application dated January 15, 1999.
- 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 characterization per 40 CFR Part 261.
- 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
- 9. 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. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. Class V Wells: 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. All 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. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. 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 weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site 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 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. 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.
- 16. <u>Certification:</u> (COMPANY) by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein and 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:

| . | |
|------------------------|--|
| Company Representative | |
| Print Name: | |
| Signature: | |
| Title: | |
| Date: | |

This Document is for Training & Demonstration purposes only.



August 31, 1998

SEP - 4 1999

Discharge Plan
Maljamar Pump Station
Phillips Pipe Line Company

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

Dear Mr. Anderson:

The purpose of this letter is to notify the New Mexico Oil Conservation Division of the construction of Phillips Pipe Line Company's (PPL) Maljamar Pump Station. As we discussed in our telephone conversation during the week of August 24, 1998, PPL intends to construct a new facility located in Eddy County near Maljamar, New Mexico.

PPL filed a Notice of Intent (for air permitting purposes) with the NMED - Air Quality Bureau on August 31, 1998. The facility will consist of one 470 bbl cone roof crude oil storage tank, one pump, one sump, and various fugitive components, such as valves and connectors. The facility will serve as temporary storage for crude oil prior to shipment via pipeline.

According to our conversation, it is PPL's understanding that a Discharge Plan will not be required for this facility at this time.

If you have any questions regarding this notification, please contact me at 918-661-3557.

Sincerely,

Anthony "Tony" C. Walker Phillips Pipe Line Company Environmental Representative

authory C. walker

3 B11 Adams Building

ACW: MalPSDisPlan.doc

Wayne: Need to inspend location to Sea of DP is needed



December 1, 1998

DEC = 3 %

Discharge Plan
Jal Unloading Station
Phillips Pipe Line Company

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

Dear Mr. Anderson:

The purpose of this letter is to notify the New Mexico Oil Conservation Division of the construction of Phillips Pipe Line Company's (PPL) Jal Truck Unloading Station. From our telephone conversation during the week of August 24, 1998, PPL understands that no discharge plan is required for facilities such as these at this time.

PPL filed a Notice of Intent (for air permitting purposes) with the NMED - Air Quality Bureau on December 1, 1998. The facility will consist of one 467 bbl cone roof crude oil storage tank, one sump, and various fugitive components, such as valves pump seals, and connectors. The facility will serve as temporary storage for crude oil prior to shipment via pipeline.

If you have any questions regarding this notification, please contact me at 918-661-3557.

Sincerely,

Anthony "Tony" C. Walker

authory C. Walker

Phillips Pipe Line Company

Environmental Representative

3 B11 Adams Building

ACW: JalUSDisPlan.doc