GW - 3

GENERAL CORRESPONDENCE

YEAR(S):

2004-1978

Price, Wayne

From: Price, Wayne
Sent: Tuesday, October 12, 2004 10:44 AM
To: 'Tim Reed'; Price, Wayne
Cc: Scott Toner; Johnson, Larry; Sheeley, Paul
Subject: RE: ChevronTexaco South Plant Work Plan

Approved!

Please be advised that NMOCD approval of this plan does not relieve (ChevronTexaco) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (ChevronTexaco) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Tim Reed [mailto:treed@hec-enviro.com]
Sent: Tuesday, October 12, 2004 9:05 AM
To: Price, Wayne
Cc: Scott Toner
Subject: Re: ChevronTexaco South Plant Work Plan

Wayne:

Here is a copy of a work plan for additional monitor wells at the ChevronTexaco Eunice South Plant. These monitor wells are for further delineation amd monitoring purposes. They are tentatively scheduled for placement in the next 1-2 weeks, so that they may be included in the second semi-annual sampling event. Call if you have any questions.

Thanks,

Tim Reed, P.G.
Vice President
Highlander Environmental Corp.
(432) 682-4559
treed@hec-enviro.com

Price, Wayne

From: Tim Reed [treed@hec-enviro.com]
Sent: Tuesday, October 12, 2004 9:05 AM
To: Price, Wayne
Cc: Scott Toner
Subject: Re: ChevronTexaco South Plant Work Plan


Email OCD workplan 10-04.pdf

Wayne:

Here is a copy of a work plan for additional monitor wells at the ChevronTexaco Eunice South Plant. These monitor wells are for further delineation amd monitoring purposes. They are tentatively scheduled for placement in the next 1-2 weeks, so that they may be included in the second semi-annual sampling event. Call if you have any questions.

Thanks,

Tim Reed, P.G.
Vice President
Highlander Environmental Corp.
(432) 682-4559
treed@hec-enviro.com

Highlander Environmental Corp.

Midland, Texas

September 28, 2004

Mr. Wayne Price
Environmental Bureau
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Re: Work Plan for Investigation of a Pipeline Right-of-Way and Additional Monitoring Wells For Chloride Plume Delineation Activities, Eunice #1 (South) Gas Plant, Lea County, New Mexico.

Dear Mr. Toner:

The following is a work plan to further assess two areas of the Eunice #1 (South) Gas Plant in Lea County, New Mexico.

1.0 Pipeline Right-of-Way Investigation

1.1 Background.

In previous investigation activities performed at this facility, it has been observed that there is dissolved phase hydrocarbon impact to groundwater in the vicinity of Monitor Well #9. This monitor well is located in the southwest corner of the facility, near a pipeline right-of-way. The levels of benzene in this monitor well tend to indicate a possible source to be from the pipeline.

1.2 Monitor Well Placement & Completion.

Highlander proposes to install three (3) monitor wells in the vicinity of Monitor Well #9 to further evaluate the pipeline as a possible source for the groundwater impact in this area. These wells will be installed to define the extent of the hydrocarbon plume, and placed in such a manner as to confirm that this is a localized plume and not an extension of the plume from the plant.

The monitor wells will be drilled by Scarborough Drilling Company, Lamesa, Texas, and constructed in accordance with industry accepted and EPA approved practices. The wells will be completed with 4-inch schedule 40 PVC screw threaded screen and casing. The screened interval will be approximately 20 feet in length and will be placed into the upper fifteen (15) feet of the saturated portion of the aquifer.

2.0 Chloride Plume Delineation

1.1 Background.

A disposal agreement between ChevronTexaco and Versado was signed on January 12, 2004. At that time, the chloride recovery pumps installed in MWD-3 (CRW-1) and MWD-9 (CRW-2) were turned on and have been recovering chloride impacted groundwater. Periodic sampling has been performed to evaluate the chloride remediation and to assess the impact of pumping on the adjacent areas of the plant.

1.2 Monitor Well Placement & Completion.

Highlander proposes to install a total of three (3) monitor wells in the vicinity of the saltwater storage pit and the chloride plume margin to further evaluate the saltwater storage pit and to assess remedial activities. Two of the monitor wells will be placed to evaluate the existing saltwater storage pit as a possible continuing source of chloride impact. The third monitor well will be used to monitor the influence of chloride recovery well pumping on the western portion of the plume.

The monitor wells will be drilled by Scarborough Drilling Company, Lamesa, Texas, and constructed in accordance with industry accepted and EPA approved practices. The wells will be completed with 4-inch schedule 40 PVC screw threaded screen and casing. These monitor wells will be fully penetrating monitor wells to ensure accurate chloride concentrations in the aquifer.

If you have any questions regarding this work plan or require any additional information, please advise.

Respectfully Submitted,
Highlander Environmental Corp.

Timothy M. Reed, P.G.
Vice President

ChevronTexaco Exploration & Production Co.
North America Upstream
Permian Business Unit
15 Smith Road
Midland, Texas 79705
Tel 423 687 7318
Fax 866 718 4709
stoner@chevrontexaco.com

Scott L. Toner
Environmental Specialist

ChevronTexaco

March 9, 2004

Mr. William C. Olson, Hydrogeologist
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, New Mexico 87505

Subject: 2003 Annual Summary of Investigation and Remediation
ChevronTexaco Exploration & Production Company
Eunice #1 (South) Gas Plant, Lea County, New Mexico

Dear Mr. Olson:

Enclosed is the subject report for work completed at the Eunice South Gas Plant (Plant) by Highlander Environmental Corp. (Highlander) in 2003 to delineate, monitor and remediate impacts to groundwater at the Plant. Work completed to date includes:

- Hydrocarbon impacts beneath the west/central part of the Plant – The first part of a Dual Phase Extraction system has been installed that is currently recovering phase separated hydrocarbons (PSH) from groundwater. A pilot study was also completed to evaluate the impacts of a soil vapor extraction (SVE) system on the remediation of the hydrocarbons.

- Chloride impacts to groundwater beneath the east part of the Plant – Facility modifications have been completed, and chloride impacted groundwater is presently being pumped from the aquifer. The water is then sent to Dynegy's on-site SWD well. The impact of this pumping on the hydrocarbon remediation areas is being monitored so that it doesn't adversely impact those remediation efforts.

- Hydrocarbon impacts to groundwater beneath east part of the Plant – Modifications to the Ferret system have been completed, and phase separated hydrocarbons are being recovered.

- Semi-annual monitoring of groundwater

ChevronTexaco and Highlander are proceeding with plans for the following work in 2004:

- Hydrocarbon impacts beneath the west/central part of the Plant – The second part of the Dual Phase Extraction system is being developed to install and operate a SVE unit to remove volatile organic compounds (VOCs) and some semi-volatile organic compounds (SVOCs) from the vadose zone and capillary fringe.

- Continue with semi-annual monitoring of groundwater

Details on work completed to date and planned for this year are included in the enclosed report.

If you have any questions concerning this report or the on-going work, please call me at (432) 687-7318. Or you can contact Gary Miller or Tim Reed with Highlander at (432) 682-4559.

Sincerely,

Scott Jones

SLT/

Enclosure

Cc: Mr. Chris Williams, NMOCD (with copy of report)
Mr. Gary Miller, Highlander (without copy of report)
Mr. Tim Reed, Highlander (without copy of report)

Highlander Environmental Corp.

Midland, Texas

February 28, 2002

Mr. Robert Patterson
Texaco Exploration and Production, Inc.
15 Smith Rd.
Midland, Texas 79705

Re: 2001 Annual Summary Report, Eunice #1 (South) Gas Plant, Lea County, New Mexico.

Dear Mr. Patterson:

Enclosed is a copy of the final report for the above-mentioned project. Copies have also been submitted to the NMOCD in Santa Fe and Hobbs. Please call if you have any questions or require any additional information.

Sincerely,

Tim Reed

Timothy M. Reed, REM
Vice President

cc: Mr. Bill Olson – NMOCD, Santa Fe
Mr. Chris Williams – NMOCD, Hobbs

Olson, William

From: Martin, Ed
Sent: Wednesday, September 19, 2001 2:12 PM
To: Santa Fe New Mexican (E-mail)
Cc: Ford, Jack; Olson, William
Subject: Legal Notices

Please publish the attached 4 legal notices, one time only, by Thursday, September 27, 2001. Upon publication, please forward the following to this office:

1. Publisher's affidavit
2. Invoice. Our purchase order number is **02199000249**

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

Thank you.


Publ. Notice
GW-003,004.doc


Publ. Notice
GW-254,256.doc


Publ. Notice
GW-263.doc


Publ. Notice
GW-206.doc

Olson, William

From: Martin, Ed
Sent: Wednesday, September 19, 2001 2:16 PM
To: Hobbs News-Sun Attn: Brenda Tison (E-mail)
Cc: Ford, Jack; Olson, William; Anaya, Mary
Subject: Legal Notices

Please publish the attached 2 legal notices, one time only, by Thursday, September 27, 2001.

Upon publication, please forward to this office the following:

1. Publisher's affidavit.
2. Invoice. Our purchase order number is **02199000223**

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

Thank you.


Publ. Notice
GW-003,004.doc


Publ. Notice
GW-206.doc

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 (WQCC) Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-004) – Texaco Exploration and Production, Inc., Robert Patterson (Project Manager), 500 North Loraine, Midland, Texas 79702, has submitted a discharge plan application for remediation of contaminated ground water at the Eunice North Gas Plant located in the NE 1/4 of the SE 1/4 of Section 28, Township 21 South, Range 37 East NMPM, Lea County, New Mexico. The application addresses investigation and remediation of petroleum, salt and chromium contaminated soil and ground water related to the former Eunice North Gas Plant. Groundwater at the site is at a depth of approximately 38 feet. The discharge plan addresses a proposed remediation system, ground water quality monitoring and how spills, leaks, and other accidental discharges to the surface will be remediated.

(GW-003) – Texaco Exploration and Production, Inc., Robert Patterson (Project Manager), 500 North Loraine, Midland, Texas 79702, has submitted a discharge plan application for remediation of contaminated ground water at the Eunice South Gas Plant located in the NW 1/4 of the SW 1/4 of Section 27, Township 22 South, Range 37 East NMPM, Lea County, New Mexico. The application addresses remediation of petroleum contaminated soil and ground water related to the former Eunice South Gas Plant. Groundwater at the site is at a depth of approximately 50 feet. The discharge plan addresses remediation system operation and monitoring, ground water quality monitoring and how spills, leaks, and other accidental discharges to the surface will be remediated.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. 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 17th day of September, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

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 Resou

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

Revised January 24, 2001

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

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

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

RECEIVED
JUN 19 2001
Environmental Bureau
Oil Conservation Division

☐ New ☒ Renewal ☐ Modification

1. Type: Eunice-South Gas Plant (GW-003)
2. Operator: Texaco Exploration and Production Inc.

   Address: P. O. Box 3109, Midland, TX 79702

   Contact Person: R. H. Patterson Phone: (915) 688-4836

3. Location: NW /4 SW /4 Section 27 Township -22-S Range -37-E
   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. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Robert H. Patterson Title: Petroleum Engineer

Signature: R H Patterson Date: June 8, 2001

TEXACO EXPLORATION AND PRODUCTION INC

DISCHARGE PLAN RENEWAL APPLICATION FOR EUNICE-SOUTH GAS PLANT (GW-003)

4. Versado Gas Processors, L. L. C.
1000 Louisiana St.
Suite 5800
Houston, Texas 77002-5050

5. – 12. See the report on file at the New Mexico Oil Conservation Division ("NMOCD") entitled, **Subsurface Abatement Work Plan, Texaco Exploration and Production Inc., Eunice #1 (South) Gas Plant, Lea County, New Mexico** submitted by Highlander Environmental Corporation in November 1997.

13. Facility Closure Plan:

After the transfer of operations to Dynegy Midstream Services, LP in June 1998, Texaco Exploration and Production Inc. retained the responsibility pursuant to Discharge Plan (GW-003) for the following items.

a) The current ground water remediation program and any soil remediation programs required by regulatory agencies at the Eunice-South Gas Plant.

b) Any ground water or soil remediation associated with any regulatory agency mandated action associated with closure of waste water pits at the Eunice-South Gas Plant.

A report entitled **Subsurface Abatement Work Plan, Texaco Exploration and Production Inc., Eunice #1 (South) Gas Plant, Lea County, New Mexico** was approved by the NMOCD on March 4, 1998. This plan addresses all of the issues retained by Texaco Exploration and Production Inc. at the South Plant. This report is incorporated into this Discharge Plan Renewal Application by reference and is on file at the NMOCD.

Progress on the approved work plant is documented in the report, **2000 Annual Summary of Investigation & Remediation, Texaco Exploration & Production Inc, Eunice #1 (South) Gas Plant, Lea County, New Mexico.** This report is on file at the NMOCD.

Groundwater extraction volumes are unknown at this time, however, it is anticipated that all water extracted will be suitable for industrial purposes at the plant. The plant's water waste stream is disposed into a permitted disposal well on site.

Highlander Environmental Corp.

Midland, Texas

April 4, 2001

Mr. William C. Olson, Hydrogeologist
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: 2000 Annual Summary of Investigation and Remediation, Texaco Exploration and Production, Inc., Eunice # 1 (South) Gas Plant, Lea County, New Mexico.

Dear Mr. Olson:

Please find enclosed the above-referenced report, which was prepared by Highlander Environmental Corp. (Highlander). The report presents the summary of all activities performed in the year 2000, at former Texaco Eunice # 1 (South) Gas Plant, located in Lea County, New Mexico. This report also proposes recommendations for additional work to be performed at this facility.

Please call if you have questions.

Sincerely
Highlander Environmental Corp.

Tim Reed

Timothy M. Reed, REM
Vice President

Encl.

cc: Chris Williams, OCD-Hobbs
Robert Patterson - Texaco

Price, Wayne

From: Price, Wayne
Sent: Tuesday, June 05, 2001 10:25 AM
To: 'patterh@texaco.com'
Cc: 'cwwr@dynegy.com'
Subject: Texaco Eunice North (GW-004) and Eunice South (GW-003) Plants

Dear Robert:

On April 06, 2001 I sent an E-mail requesting certain information and a Discharge Plan application for the groundwater abatement for the two above captioned sites. As of today the OCD has not received this information. Please submit an application for each site along with the $100 filing fee by June 15, 2001.

Failure to respond will result in OCD maintaining the current discharge plans with Dynegy and requiring Dynegy to fulfill the Abatement operations. As soon as OCD receives your application we will issue Public Notice.

Price, Wayne

From: Price, Wayne

Sent: Wednesday, April 18, 2001 2:55 PM

To: Price, Wayne; 'Patterson, Robert H '

Subject: RE: Discharge Plans for Old Texaco Eunice North & South Plants

Extension approved!

From: *Patterson, Robert H [SMTP:patterh@texaco.com]*

Sent: Wednesday, April 18, 2001 2:57 PM

To: 'Price, Wayne'

Subject: RE: Discharge Plans for Old Texaco Eunice North & South Plants

Importance: High

Wayne,

I have discussed this with Cal and agree that this is the best method. I do, however, need to request an extension on the submittal date to May 30th, 2001. It will take that long to get it written and reviewed before we can submit it.

Robert

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

From: Price, Wayne [mailto:WPrice@state.nm.us]

Sent: Friday, April 06, 2001 4:26 PM

To: 'patterh@texaco.com'; Price, Wayne

Cc: Olson, William; 'cwwr@dynegy.com'

Subject: RE: Discharge Plans for Old Texaco Eunice North & South Plants

> Eunice-South Gas Plant (GW-003) and Eunice-North Gas Plant (GW-004).
> Please commit to the investigation and remediation of all existing
> contamination. Please submit a $100 discharge plan application fee with
> the discharge plan application. Give general details of agreement with
> Dynegy, including which pieces of property, equipment, wells, remediation
> areas,etc will be operated by Texaco. The fee for each of these
> facilities will be an abatement plan fee of $2600 each for a period of 5
> years to be paid upon discharge plan approval.
>
>
>

Price, Wayne

From: Price, Wayne
Sent: Friday, April 06, 2001 3:26 PM
To: 'patterh@texaco.com'; Price, Wayne
Cc: Olson, William; 'cwwr@dynegy.com'
Subject: RE: Discharge Plans for Old Texaco Eunice North & South Plants

Correction: Underlined for Texaco

From: Price, Wayne
Sent: Friday, April 06, 2001 3:07 PM
To: 'patterh@texaco.com'
Cc: Olson, William; 'cwwr@dynegy.com'
Subject: Discharge Plans for Old Texaco Eunice North & South Plants

Gentlemen: If agreeable to both parties please following the instructions listed below and complete no later than April 30, 2001.

Dynegy-Cal Wrangham:

Provide letter requesting your previously submitted DP applications dated Nov. 9, 2000 for Eunice-South Compressor Station (GW-003) and Eunice-North Compressor station (GW-004) be assigned new discharge plan numbers. Commit to a gas plant decommission plan and give general details of agreement with Texaco, including which pieces of property, equipment, wells, etc will be operated by Dynegy. The fee for these facilities will be if (>10001 hp) will be $1700 each for a period of 5 years to be paid upon discharge plan approval.

Texaco-Robert Patterson:

Please submit a discharge plan renewal application for the Texaco formal Eunice-South Gas Plant (GW-003) and Eunice-North Gas Plant (GW-004). Please commit to the investigation and remediation of all existing contamination. Please submit a $100 discharge plan application fee with the discharge plan application. Give general details of agreement with Dynegy, including which pieces of property, equipment, wells, remediation areas,etc will be operated by Texaco. The fee for each of these facilities will be an abatement plan fee of $2600 each for a period of 5 years to be paid upon discharge plan approval.

Price, Wayne

From: System Administrator[SMTP:postmaster@texaco.com]
Sent: Friday, April 06, 2001 3:27 PM
To: WPrice@state.nm.us
Subject: Delivered: RE: Discharge Plans for Old Texaco Eunice North & Sout h Plants

RE: Discharge Plans for Old Texaco E...

<<RE: Discharge Plans for Old Texaco Eunice North & South Plants>> Your message

To: 'patterh@texaco.com'; Price, Wayne
Cc: Olson, William; 'cwwr@dynegy.com'
Subject: RE: Discharge Plans for Old Texaco Eunice North & South Plants
Sent: Fri, 6 Apr 2001 16:26:09 -0500

was delivered to the following recipient(s):

Patterson, Robert H on Fri, 6 Apr 2001 17:27:40 -0500
MSEXCH:MSExchangeMTA:MSXUSA:MSX01021

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and ending with the issue
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Mexico
2002

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications 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-199) - Champion Technologies, Inc., Ralph Corry, Environmental Specialist, P.O. Box 450499, Houston, Texas 77245-0499, has submitted a discharge plan application for renewal of their previously approved discharge plan for the Hobbs oilfield chemical distribution site located in the NE/4 SE/4, Section 15, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 44 feet with a total dissolved solids concentration of approximately 1,036 mg/l. The discharge plan consists of a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-004) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-North Gas Plant located in the SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-003) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-South Gas Plant located in the SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-191) - Kinder-Morgan Inc., John Greer, Environmental Coordinator, One Allen Center 500 Dallas Street Suite 1000, Houston, Texas 77002, has submitted an application for renewal of their previously approved discharge plan for the former Hobbs Gas Plant located in the SE/4 of Section 28, Township 18 South, Range 36 East, NMPM, Lea County, New Mexico. The discharge plan consists of a groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-230) - T&C Tank Rental and Anchor Services, Mark Spolton, P.O. Box 1197, Denver City, Texas 79323, has submitted an application for renewal of their previously approved discharge plan for the oil field service facility located in the NE/4 NE/4 of Section 30, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 55 feet with a total dissolved solids concentration between 300 mg/l and 700 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 plan 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 February 2001.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
S/LORI WROTENBERY,
Director

SEAL

Published in the Lovington Daily Leader February 11, 2001.

Approved 2/26/01

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 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-199) - Champion Technologies, Inc., Ralph Corry, Environmental Specialist, P.O. Box 450499, Houston, Texas 77245-0499, has submitted a discharge plan application for renewal of their previously approved discharge plan for the Hobbs oilfield chemical distribution site located in the NE/4 SE/4, Section 15, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 44 feet with a total dissolved solids concentration of approximately 1,036 mg/l. The discharge plan consists of a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-004) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-North Gas Plant located in the SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-003) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-South Gas Plant located in the SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-191) - Kinder-Morgan Inc., John Greer, Environmental Coordinator, One Allen Center 500 Dallas Street Suite 1000, Houston, Texas 77002, has submitted an application for renewal of their previously approved discharge plan for the former Hobbs Gas Plant located in the SE/4 of Section 28, Township 18 South, Range 36 East, NMPM, Lea County, New Mexico. The discharge plan consists of a groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-230) - T&C Tank Rental and Anchor Services, Mark Spolton, P.O. Box 1197, Denver City, Texas 79323, has submitted an application for renewal of their previously approved discharge plan for the oil field service facility located in the NE/4 NE/4 of Section 30, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to off-site disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 55 feet with a total dissolved solids concentration between 300 mg/l and 700 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 plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8 Th. day of February 2001.

STATE OF NEW MEXICO
SERVATION DIVI
SION

S/ LORI WROTENBERY,
Director

Legal #68848
Pub. February 19, 2001

Price, Wayne

From: Price, Wayne

Sent: Wednesday, February 07, 2001 3:06 PM

To: 'Cal.Wrangham@dynegy.com'

Subject: RE: Dynegy Discharge Plans

Approved!

From: Cal.Wrangham@dynegy.com[SMTP:Cal.Wrangham@dynegy.com]

Sent: Wednesday, February 07, 2001 2:48 PM

To: WPrice@state.nm.us

Subject: Dynegy Discharge Plans

Because of the resent pending policy changes on used filter disposal Dynegy requests to revise NMOCD Discharge Plans. This includes permit # GW-003, 004, 005, 025, 026, 027, and 029. The Discharge Plans Waste Management Sections list the used filters to be transported and disposed of by Waste Management Inc. at the Lea County landfill. Dynegy would like to utilize E&E Environmental, PO Box 683, Brownfield TX. 79731. E&E will transport the filters to their Childress,Texas facility for processing/recycling. The filters are a non-hazardous waste stream.

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 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-199) - Champion Technologies, Inc., Ralph Corry, Environmental Specialist, P.O. Box 450499, Houston, Texas 77245-0499, has submitted a discharge plan application for renewal of their previously approved discharge plan for the Hobbs oilfield chemical distribution site located in the NE/4 SE/4, Section 15, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 44 feet with a total dissolved solids concentration of approximately 1,036 mg/I. The discharge plan consists of a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-004) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-North Gas Plant located in the SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-003) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-South Gas Plant located in the SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-191) - Kinder-M[redacted]an Inc., John Greer, Environmenta[redacted]oordinator, One Allen Center 500 Dallas Street Suite 1000, Houston, Texas 77002, has submitted an application for renewal of their previously approved discharge plan for the former Hobbs Gas Plant located in the SE/4 of Section 28, Township 18 South, Range 36 East, NMPM, Lea County, New Mexico. The discharge plan consists of a groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-230) - T&C Tank Rental and Anchor Services, Mark Spolton, P.O. Box 1197, Denver City, Texas 79323, has submitted an application for renewal of their previously approved discharge plan for the oil field service facility located in the NE/4 NE/4 of Section 30, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to off-site disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 55 feet with a total dissolved solids concentration between 300 mg/I and 700 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 plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8 Th. day of February 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555 • Fax 915.688.0552
www.dynegy.com

DYNEGY

January 29, 2001

Mr. Chris Williams
New Mexico Oil Conservation Division
1625 French Dr.
Hobbs, NM 88240

RE: Asbestos disposal at Eunice South Plant
OCD Discharge Plan GW-003

Mr. Williams:

Dynegy Midstream Services, L. P. has accumulated approximately 49 barrels of scraps of pipe insulation that contains asbestos at the Eunice South Gas Plant located 5 mile South of Eunice, NM. As per the facility Discharge Plan this is notification of the waste disposal and location. Dynegy will utilize Keer Environmental Inc. to transport and dispose of the material at their facility located near Mountainair, NM. Our contact there is Ed at (505) 823-9006. The insulation was removed from piping by qualified personnel during maintenance projects.

If you require further information please contact me at (915) 688-0542.

Sincerely,

Cal Wrangham
ES&H Advisor PB Region

Cc: James Lingnau / Dynegy
Ronnie Baucom / Dynegy
Kem Miller ⇨ Eunice Plant Discharge Plan file

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

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

Memorandum of Meeting or Conversation

Telephone ___X__
Personal _____
E-Mail __X____
Time: 3:30 pm
Date: October 2, 2000

Originating Party: **Wayne Price-OCD**

Other Parties: **Cal Wrangham-Dynegy**

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

GW-029	**Buckeye Gas Plant**	**expires**	**1/16/2001 *****
GW-003	**Eunice South Plant**	**expires**	**3/16/2001**
GW-004	**Eunice North Plant**	**expires**	**3/16/2001**
GW-005	**EUNICE Middle Plant**	**expires**	**5/16/2001**

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

Discussion: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with $50.00 filing fee for the above listed facilities.

Conclusions or Agreements:
***** OCD will honor the WQCC 3106.F if plan and filing fee is submitted by October 15, 2000 for the GW-029 facility.**

Signed: Wayne Price

CC: OCD Hobbs Office

Price, Wayne

From: Price, Wayne
Sent: Monday, October 02, 2000 10:30 AM
To: 'Tim Reed'
Cc: Patterson, Robert H
Subject: RE: Former Texaco Eunice South Plant Pond Closure Report

Approved!

From: Tim Reed[SMTP:treed@hec-enviro.com]
Sent: Monday, October 02, 2000 9:31 AM
To: Price, Wayne
Cc: Patterson, Robert H
Subject: Former Texaco Eunice South Plant Pond Closure Report

October 2, 2000

To: Wayne Price
NMOCD

From: Tim Reed
Highlander Environmental

Wayne:

This e-mail is sent to confirm our conversation this morning regarding the report deadline for the North and South Ponds at the former Texaco Eunice South Plant in Lea County, New Mexico. Your letter to Texaco dated September 19, 2000 requested a report on pit closure activities and additional monitor well placement be submitted by December 15, 2000. As we discussed this morning, there is a comprehensive annual report due on the South Plant in January, and you agreed that we could include the report of the pit closure in the annual report, to eliminate duplication. Thank you for your help in this matter.

Tim

cc: Robert Patterson, Texaco

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

September 19, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 4898

Mr. Robert Patterson
Texaco Exploration and Production, Inc.
P.O. Box 3109
500 North Loraine
Midland, Tx 79702

Re: POND CLOSURE INVESTIGATION REPORT , FORMER TEXACO EXPLORATION AND PRODUCTION, INC., EUNICE #1 (SOUTH) GAS PLANT, LEA, COUNTY, NEW MEXICO.

Dear Mr. Patterson:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Highlander Environmental Corp.'s letter dated September 24, 2000 and investigation report submitted on Texaco's behalf concerning the above captioned site. It appears the North Pond might have contributed to groundwater contamination at the site. The report reflects high chlorides (2300 -7400 mg/l) were found in all of the North Pond borings at or near the underlying groundwater table. Therefore, the NMOCD hereby approves of the closure work plan with the following conditions:

1. Texaco shall install one additional monitor well between the south and north ponds to be used as a potential groundwater contamination source well. This well shall be installed and completed pursuant to previously approved OCD procedures and will be included in the existing overall groundwater investigation plan for the facility. Please collect a groundwater sample from the monitor well and analyze for BTEX (EPA Method 8021), WQCC Metals and General Chemistry parameters i.e. Major Cations, Anions, Ph and TDS.

2. Texaco will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

3. Please submit a final closure report for the North and South ponds, and the results from the monitor well sampling **by December 15, 2000.**

Please be advised that NMOCD approval of this plan does not relieve Texaco of liability should their operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Texaco of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

October 5, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. P 410 425 199

Mr. Robert Patterson
Texaco Exploration and Production, Inc.
P.O. Box 3109
500 North Loraine
Midland, Tx 79702

RE: REVISED POND CLOSURE INVESTIGATION PLAN, FORMER TEXACO EXPLORATION AND PRODUCTION, INC., EUNICE #1 (SOUTH) GAS PLANT, LEA, COUNTY, NEW MEXICO.

Dear Mr. Patterson:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Highlander Environmental Corp.'s revised letter dated September 29, 1999 submitted on Texaco's behalf concerning the above captioned site. The NMOCD hereby approves of the investigation work plan with the following conditions:

1. Texaco will notify the OCD Santa Fe office and the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

2. QA/QC calibration records shall be maintained for all field instrumentation and submitted in the investigation report.

3. Samples being collected for laboratory analysis shall be placed immediately into sample jars and properly preserved all pursuant to EPA type sampling protocols.

Please be advised that NMOCD approval of this plan does not relieve Texaco of liability should their operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Texaco of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD Hobbs Office
FAX TO HIGHLANDER

Highlander Environmental Corp.

Midland, Texas

September 29, 1999

VIA FACSIMILE: (505) 827-8177

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

Re: Revised Pond Closure Investigation Plan, Former Texaco Exploration and Production, Inc., Eunice #1 (South) Gas Plant, Lea County, New Mexico

Dear Mr. Price:

Per our telephone conversation today, Texaco Exploration and Production, Inc. (Texaco) has requested Highlander Environmental Corp. (Highlander) to revise the closure investigation plan for two (2) lined surface impoundments (Ponds) at its former Eunice # 1 (South) Gas Plant (Site), located near Eunice, New Mexico. The initial closure investigation work plan was submitted to the New Mexico Oil Conservation Division (NMOCD) on September 2, 1999, and included a soil sampling scenario, whereby four borings would be drilled in each impoundment (2). Soil samples would be collected from five (5) horizons, and soil samples from the same horizon for each boring would be composited into a single sample. A total of five (5) samples were proposed for each impoundment. Based on our telephone conversation, the work plan was revised, so the individual samples collected from each boring will be submitted to the laboratory, and analyzed for the proposed list of constituents. The proposed sampling plan is discussed further in the section titled, **Pond Closure Investigation Plan**.

The impoundments, commonly referred to as the North (#2) and South (#4) Disposal Water Surge Ponds, are located in the southeast quarter (SE/4) of the NW/4, Section 27, Township 22 South, Range 37 East, Lea County, New Mexico. Figure 1 presents a location and topographic map. The North Pond was previously used for temporary storage of brine water used to displace LPG products stored in underground storage caverns at the Site. The North Pond was taken out of service in early 1998. The South Pond was used for temporary storage of water from the plant process area (i.e., cooling tower, boilers, sumps, etc.) and was taken out of service in mid 1998. In mid 1998, water was removed from the ponds and disposed in an onsite disposal well that is permitted by the New Mexico Oil Conservation Division (NMOCD). Water is currently collected in aboveground tanks and disposed in an onsite disposal well. A brine water retention pond (Pond # 3) is located west of the North Pond, and will remain in service. Figure 2 presents a Site drawing and location of the ponds.

BACKGROUND

The North Pond (# 2) was designed with a capacity of 75,000 barrels (bbl.), and measures approximately 243 ' x 243 ' x 15 '. The pond is constructed with leak detection and 45 Mill nylon reinforced butyl liner. The leak detection system consists of a one-foot square trench that rims the floor of the impoundment, which is connected to a four (4) inch diameter PVC lateral that connects to a riser pipe west of the pond. Figure 3 presents a generalized cross section for the North Pond.

The South Pond (Pit # 4) was designed with a capacity of approximately 52,000 bbl, and measures approximately 190' x 240' x 16'. The South Pond was constructed with leak detection

and 45 Mill nylon reinforced butyl liner. The leak detection system consists of a PVC lateral that connects to a riser pipe west of the pond. Figure 4 presents a generalized cross section for the South Pond.

POND CLOSURE INVESTIGATION PLAN

Currently, the Ponds contain water collected from precipitation. The water will be pumped into the aboveground tanks for disposal in the onsite disposal well. Following dewatering, composite samples of sediment will be collected from each pond and analyzed for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chloride. An evaluation of remediation or disposal options will be performed following review of the laboratory report.

Soil samples will be collected from borings drilled beneath the liner of each pond. Each pond will be divided into four (4) quadrants, and a borehole will be placed near the center of each quadrant. The boreholes will be advanced to approximately forty (40) feet below the bottom of the ponds. Soil samples will be collected approximately every ten feet (i.e., 0 to 2 feet, 8 to 10, 18 to 20, 28 to 30 and 38 to 40 feet). A total of five (5) soil samples will be collected from each boring, and field screened for petroleum hydrocarbons using the Ambient Temperature Headspace (ATH) method. The method consists of collecting a discrete or composite soil sample, placing the sample in a clean plastic sample bag, leaving a vacant headspace in the top of the bag for hydrocarbon vapors to accumulate. The organic vapor in the sample bag headspace is measured using a photoionization detector (PID), after approximately 15 minutes at ambient temperature. The sample from each boring exhibiting the highest PID reading, and the deepest sample interval will be submitted to the laboratory analysis. The soil samples will be submitted to the laboratory under chain-of-custody control, and preserved in accordance with EPA protocol. The soil samples will be analyzed for BTEX, TPH and chloride. A total of eight (8) samples will be analyzed from each pond. The soil samples will be collected using a split sampler, however, if soil conditions prohibit use of the spit spoon sampler, samples of drill cuttings will be collected for each interval.

All downhole sampling equipment (i.e., drill bits, rods, etc.) will be decontaminated following

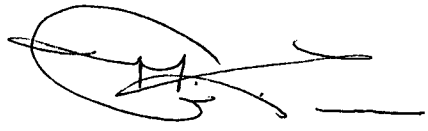
use at each location using a high-pressure hot water washer and rinse. The split spoon sampler and hand sampling equipment will be decontaminated following each use by washing with a laboratory grade detergent and rinsing with distilled water. Soil displaced from the borings during drilling will be stockpiled adjacent to the borehole until disposal is arranged. The boreholes will be plugged with cement and bentonite grout.

REPORTING

Highlander will prepare a report following receipt of reports from the analytical laboratory. The report will include a discussion of the investigation findings, and options for remediation or disposal of sediment and soil, if necessary. Field and laboratory data will be presented in data tables, and geologic logs will be prepared for each boring, showing lithology and PID readings.

Please call Mr. Robert Patterson with Texaco at (915) 688-4836 or myself at (915) 682-4559, if you have questions.

Sincerely,
Highlander Environmental Corp.



Mark J. Larson
Senior Project Manager

Encl.

cc: Robert Patterson - Texaco
Chris Williams - NMOCD - Hobbs

Highlander Environmental Corp.

Midland, Texas

September 2, 1999

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

Re: Pond Closure Investigation Plan, Former Texaco Exploration and Production, Inc., Eunice #1 (South) Gas Plant, Lea County, New Mexico

Dear Mr. Price:

Highlander Environmental Corp. (Highlander) has been requested by Texaco Exploration and Production, Inc. (Texaco) to prepare a closure investigation plan for two (2) lined surface impoundments (Ponds) at its former Eunice # 1 (South) Gas Plant (Site), located near Eunice, New Mexico. The impoundments, commonly referred to as the North (#2) and South (#4) Disposal Water Surge Ponds, are located in the southeast quarter (SE/4) of the NW/4, Section 27, Township 22 South, Range 37 East, Lea County, New Mexico. Figure 1 presents a location and topographic map.

The North Pond was previously used for temporary storage of brine water used to displace LPG products stored in underground storage caverns at the Site. The North Pond was taken out of service in early 1998. The South Pond was used for temporary storage of water from the plant process area (i.e., cooling tower, boilers, sumps, etc.) and was taken out of service in mid 1998. In mid 1998, water was removed from the ponds and disposed in an onsite disposal well that is permitted by the New Mexico Oil Conservation Division (NMOCD). Water is currently collected in aboveground tanks and disposed in an onsite disposal well. A brine water retention pond (Pond # 3) is located west of the North Pond, and will remain in service. Figure 2 presents a Site drawing and location of the ponds.

BACKGROUND

The North Pond (# 2) was designed with a capacity of 75,000 barrels (bbl.), and measures approximately 243 ' x 243 ' x 15 '. The pond is constructed with leak detection and 45 Mill nylon reinforced butyl liner. The leak detection system consists of a one-foot square trench that rims the floor of the impoundment, which is connected to a four (4) inch diameter PVC lateral that connects to a riser pipe west of the pond. Figure 3 presents a generalized cross section for the North Pond.

The South Pond (Pit # 4) was designed with a capacity of approximately 52,000 bbl, and measures approximately 190' x 240' x 16'. The South Pond was constructed with leak detection

and 45 Mill nylon reinforced butyl liner. The leak detection system consists of a PVC lateral that connects to a riser pipe west of the pond. Figure 4 presents a generalized cross section for the South Pond.

POND CLOSURE INVESTIGATION PLAN

Currently, the Ponds contain water collected from precipitation. The water will be pumped into the aboveground tanks for disposal in the onsite disposal well. Following dewatering, composite samples of sediment will be collected from each pond and analyzed for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chloride. An evaluation of remediation or disposal options will be performed following review of the laboratory report.

Soil samples will be collected from boreholes drilled beneath the liner of each pond. Each pond will be divided into four (4) quadrants, and a borehole will be placed near the center of each quadrant. The boreholes will be advanced to approximately forty (40) feet below the bottom of the ponds. Soil samples will be collected approximately every ten feet (i.e., 0 to 2 feet, 8 to 10, 18 to 20, 28 to 30 and 38 to 40 feet). The samples from each horizon will be combined into a single soil sample for that horizon. A total of five (5) composite soil samples will be collected
for each pond. The soil samples will be collected using a split sampler, however, if soil conditions prohibit use of the spit spoon sampler, samples of drill cuttings will be collected for each interval. The soil samples will be submitted to the laboratory under chain-of-custody control, and preserved in accordance with EPA protocol. The soil samples will be analyzed for BTEX, TPH and chloride.

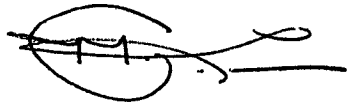
All downhole sampling equipment (i.e., drill bits, rods, etc.) will be decontaminated following use at each location using a high-pressure hot water washer and rinse. The split spoon sampler and hand sampling equipment will be decontaminated following each use by washing with a laboratory grade detergent and rinsing with distilled water. Soil displaced from the boreholes during drilling will be stockpiled adjacent to the borehole until disposal is arranged. The boreholes will be plugged with cement and bentonite grout.

REPORTING

Highlander will prepare a report following receipt of reports from the analytical laboratory. The report will include a discussion of the investigation findings and options for remediation or disposal of sediment and soil, if necessary.

Please call Mr. Robert Patterson with Texaco at (915) 688-4836 or myself at (915) 682-4559, if you have questions.

Sincerely,
Highlander Environmental Corp.



Mark J. Larson
Senior Project Manager

Encl.

cc: Robert Patterson - Texaco
Chris Williams - NMOCD - Hobbs

Figures

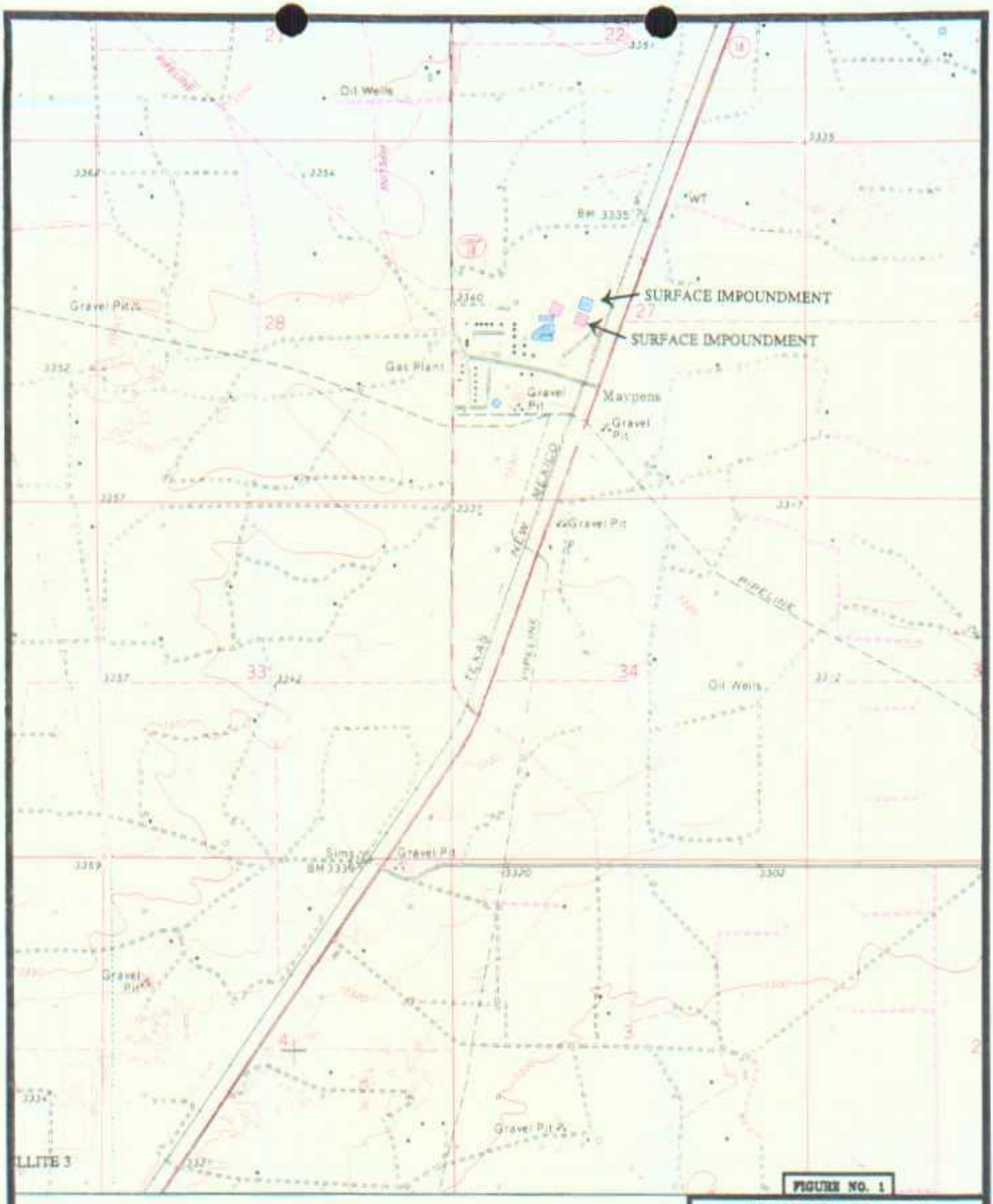


FIGURE NO. 1

LEA COUNTY, NEW MEXICO

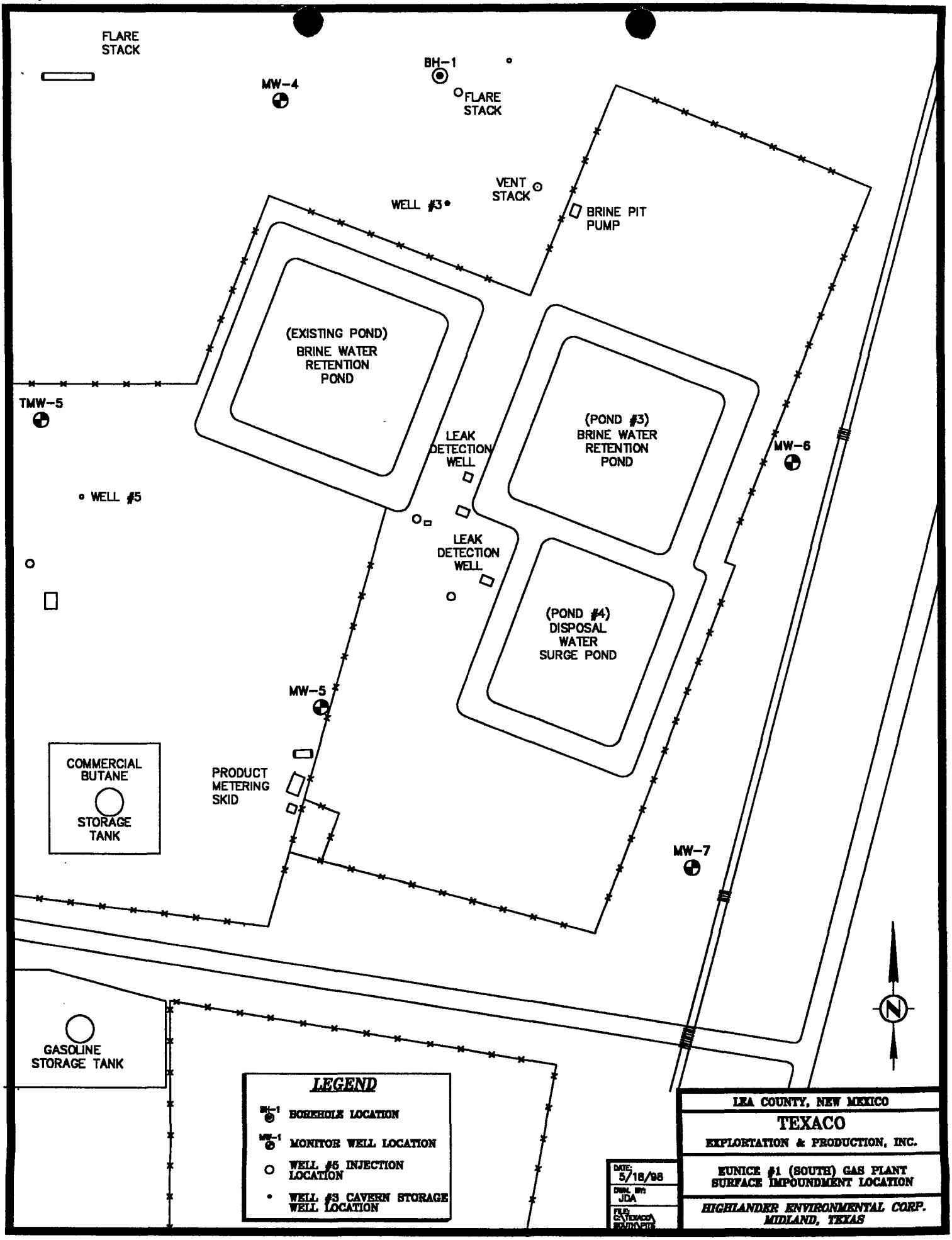
TEXACO - EUNICE #1 SOUTH GAS PLANT

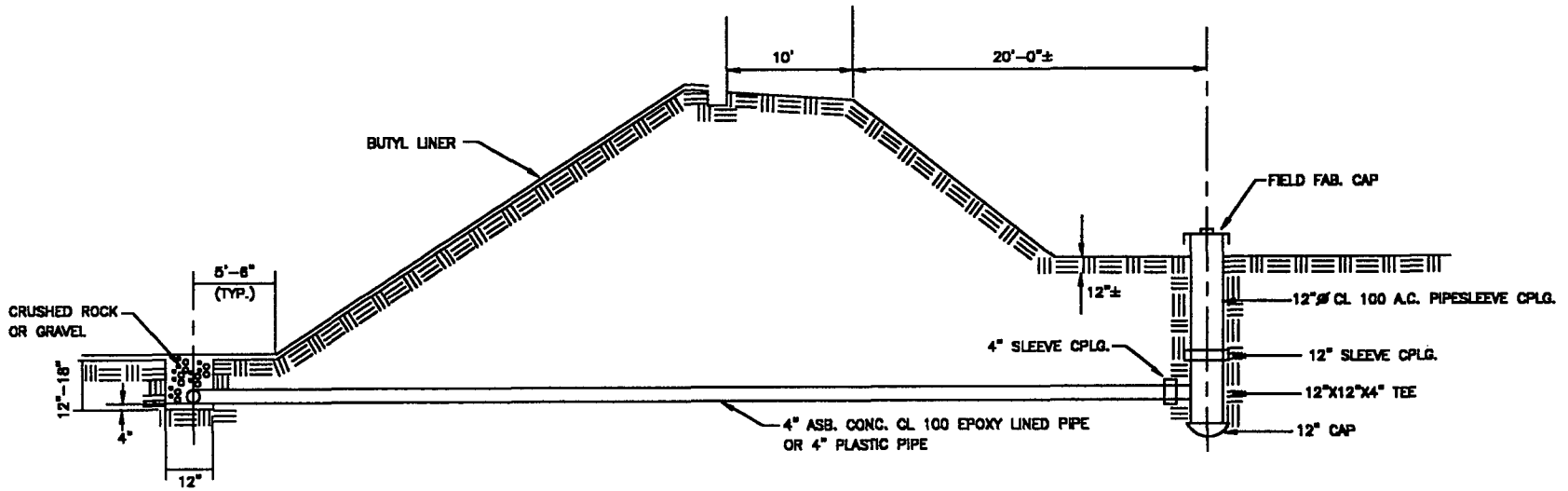
TOPOGRAPHIC MAP

HIGHLANDER ENVIRONMENTAL
MIDLAND, TEXAS

TAKEN FROM U.S.G.S.
RATTLESNAKE CANYON,
NEW MEXICO
7.5' QUADRANGLES

SCALE: 1"=2,000'


FLARE STACK
BH-1
MW-4
FLARE STACK
VENT STACK
WELL #3
BRINE PIT PUMP
(EXISTING POND) BRINE WATER RETENTION POND
TMW-5
LEAK DETECTION WELL
(POND #3) BRINE WATER RETENTION POND
MW-6
WELL #5
LEAK DETECTION WELL
(POND #4) DISPOSAL WATER SURGE POND
MW-5
COMMERCIAL BUTANE STORAGE TANK
PRODUCT METERING SKID
MW-7
GASOLINE STORAGE TANK
N
LEGEND
BH-1 BOREHOLE LOCATION
MW-1 MONITOR WELL LOCATION
WELL #6 INJECTION LOCATION
WELL #3 CAVERN STORAGE WELL LOCATION
DATE: 5/18/98
DRWN. BY: JDA
FILE: C:\TEXACO\EUNICE\SITE
LEA COUNTY, NEW MEXICO
TEXACO
EXPLORTATION & PRODUCTION, INC.
EUNICE #1 (SOUTH) GAS PLANT SURFACE IMPOUNDMENT LOCATION
HIGHLANDER ENVIRONMENTAL CORP. MIDLAND, TEXAS



NOT TO SCALE

FIGURE NO. 3

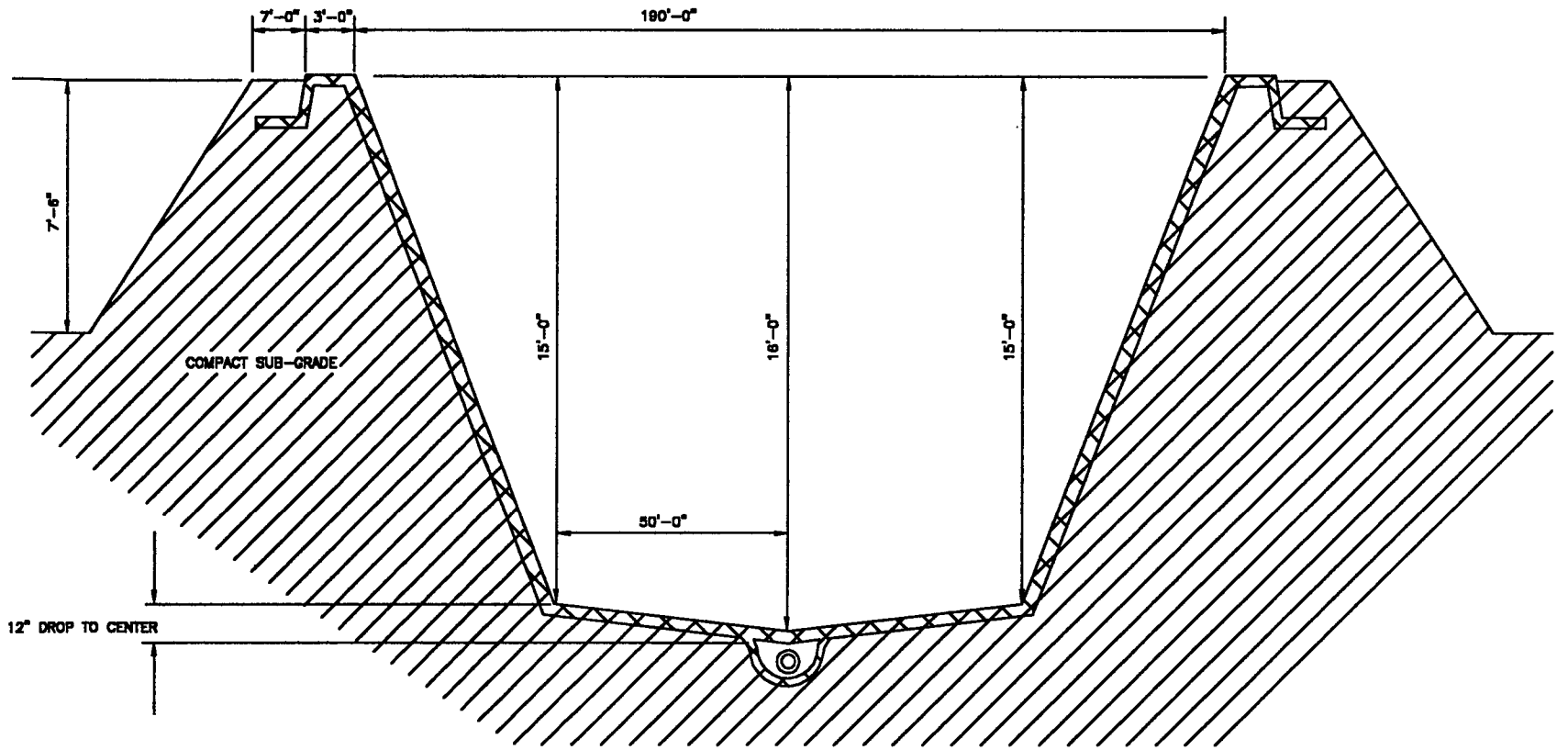
LEA COUNTY, NEW MEXICO

TEXACO
EXPLORATION & PRODUCTION INC.

NORTH POND
CROSS SECTION

DATE 05/19/98
DRN. BY JDA
FILE G:\TEXACO\NORTH-POND

HIGHLANDER ENVIRONMENTAL
MIDLAND, TEXAS



NOT TO SCALE

FIGURE NO. 4

LEA COUNTY, NEW MEXICO

TEXACO
EXPLORATION & PRODUCTION INC.

GENERALIZED CROSS SECTION
OF SOUTH POND

DATE: 05/19/98
DRN. BY: JDA
FILE: G:\TEXACO\TEXA-S-POND

HIGHLANDER ENVIRONMENTAL
MIDLAND, TEXAS

FAX

DATE: September 30, 1999

TO: Wayne Price

WITH: NMOCD
Santa Fe, New Mexico

FAX: (505) 827-8177

Re: **Revised Pond Closure Investigation Plan, Texaco Exploration and Production, Inc., Eunice # 1 (South) Plant, Lea County, New Mexico**

FROM: Mark J. Larson

WITH: Highlander Environmental Corp.
Midland, Texas

PAGES: 4 (Including Cover Page)

Wayne: Per our telephone conversation, please find attached, the revised work plan for the above-referenced project. I will put a hard copy in the mail (Airborne). Also, have you had a chance to review the Turner Pit Investigation Report? Please review and call if you have questions.
Thanks,
Mark

HIGHLANDER ENVIRONMENTAL CORP.
1910 N. BIG SPRING
MIDLAND, TEXAS 79705
(915) 682-4559
e mail: mjlarson@hec-enviro.com

If this fax is not legible please call Mark J. Larson at (915) 682-4559

915 - 557 - 2390

Highlander Environmental Corp.
Midland, Texas

September 29, 1999

VIA FACSIMILE: (505) 827-8177

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

Re: Revised Pond Closure Investigation Plan, Former Texaco Exploration and Production, Inc., Eunice #1 (South) Gas Plant, Lea County, New Mexico

Dear Mr. Price:

Per our telephone conversation today, Texaco Exploration and Production, Inc. (Texaco) has requested Highlander Environmental Corp. (Highlander) to revise the closure investigation plan for two (2) lined surface impoundments (Ponds) at its former Eunice # 1 (South) Gas Plant (Site), located near Eunice, New Mexico. The initial closure investigation work plan was submitted to the New Mexico Oil Conservation Division (NMOCD) on September 2, 1999, and included a soil sampling scenario, whereby four borings would be drilled in each impoundment (2). Soil samples would be collected from five (5) horizons, and soil samples from the same horizon for each boring would be composited into a single sample. A total of five (5) samples were proposed for each impoundment. Based on our telephone conversation, the work plan was revised, so the individual samples collected from each boring will be submitted to the laboratory, and analyzed for the proposed list of constituents. The proposed sampling plan is discussed further in the section titled, **Pond Closure Investigation Plan**.

The impoundments, commonly referred to as the North (#2) and South (#4) Disposal Water Surge Ponds, are located in the southeast quarter (SE/4) of the NW/4, Section 27, Township 22 South, Range 37 East, Lea County, New Mexico. Figure 1 presents a location and topographic map. The North Pond was previously used for temporary storage of brine water used to displace LPG products stored in underground storage caverns at the Site. The North Pond was taken out of service in early 1998. The South Pond was used for temporary storage of water from the plant process area (i.e., cooling tower, boilers, sumps, etc.) and was taken out of service in mid 1998. In mid 1998, water was removed from the ponds and disposed in an onsite disposal well that is permitted by the New Mexico Oil Conservation Division (NMOCD). Water is currently collected in aboveground tanks and disposed in an onsite disposal well. A brine water retention pond (Pond # 3) is located west of the North Pond, and will remain in service. Figure 2 presents a Site drawing and location of the ponds.

BACKGROUND

The North Pond (# 2) was designed with a capacity of 75,000 barrels (bbl.), and measures approximately 243 ' x 243 ' x 15 '. The pond is constructed with leak detection and 45 Mill nylon reinforced butyl liner. The leak detection system consists of a one-foot square trench that rims the floor of the impoundment, which is connected to a four (4) inch diameter PVC lateral that connects to a riser pipe west of the pond. Figure 3 presents a generalized cross section for the North Pond.

The South Pond (Pit # 4) was designed with a capacity of approximately 52,000 bbl, and measures approximately 190' x 240' x 16'. The South Pond was constructed with leak detection

and 45 Mill nylon reinforced butyl liner. The leak detection system consists of a PVC lateral that connects to a riser pipe west of the pond. Figure 4 presents a generalized cross section for the South Pond.

POND CLOSURE INVESTIGATION PLAN

Currently, the Ponds contain water collected from precipitation. The water will be pumped into the aboveground tanks for disposal in the onsite disposal well. Following dewatering, composite samples of sediment will be collected from each pond and analyzed for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chloride. An evaluation of remediation or disposal options will be performed following review of the laboratory report.

Soil samples will be collected from borings drilled beneath the liner of each pond. Each pond will be divided into four (4) quadrants, and a borehole will be placed near the center of each quadrant. The boreholes will be advanced to approximately forty (40) feet below the bottom of the ponds. Soil samples will be collected approximately every ten feet (i.e., 0 to 2 feet, 8 to 10, 18 to 20, 28 to 30 and 38 to 40 feet). A total of five (5) composite soil samples will be collected from each pond, and field screened for petroleum hydrocarbons using the Ambient Temperature Headspace (ATH) method. The method consists of collecting a discrete or composite soil sample, placing the sample in a clean plastic sample bag, leaving a vacant headspace in the top of the bag for hydrocarbon vapors to accumulate. The organic vapor in the sample bag headspace is measured using a photoionization detector (PID), after approximately 15 minutes at ambient temperature. The sample from each boring exhibiting the highest PID reading, and the deepest sample interval will be submitted to the laboratory analysis. The soil samples will be submitted to the laboratory under chain-of-custody control, and preserved in accordance with EPA protocol. The soil samples will be analyzed for BTEX, TPH and chloride. A total of eight (8) samples will be analyzed from each pond. The soil samples will be collected using a split sampler, however, if soil conditions prohibit use of the spit spoon sampler, samples of drill cuttings will be collected for each interval.

All downhole sampling equipment (i.e., drill bits, rods, etc.) will be decontaminated following

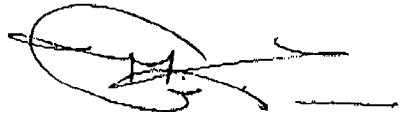
use at each location using a high-pressure hot water washer and rinse. The split spoon sampler and hand sampling equipment will be decontaminated following each use by washing with a laboratory grade detergent and rinsing with distilled water. Soil displaced from the borings during drilling will be stockpiled adjacent to the borehole until disposal is arranged. The boreholes will be plugged with cement and bentonite grout.

REPORTING

Highlander will prepare a report following receipt of reports from the analytical laboratory. The report will include a discussion of the investigation findings, and options for remediation or disposal of sediment and soil, if necessary. Field and laboratory data will be presented in data tables, and geologic logs will be prepared for each boring, showing lithology and PID readings.

Please call Mr. Robert Patterson with Texaco at (915) 688-4836 or myself at (915) 682-4559, if you have questions.

Sincerely,
Highlander Environmental Corp.



Mark J. Larson
Senior Project Manager

Encl.

cc: Robert Patterson - Texaco
Chris Williams - NMOCD - Hobbs

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555
Fax 915.688.0552
www.dynegy.com

DYNEGY

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 67505

Attn. Mr. Wayne Price
Environmental Engineer

June 28, 1999

Dear Sir:

Dynegy would like to request a minor modification permit for the drain system at the South Eunice gas processing facility. The facility operates under Discharge Plan # GRW-03. The waste stream contains some solids, which we would like to remove before they enter the drain system vessels. These solids are mostly sand that is being blown into the open drain system.

A below grade tank will be utilized. It has a capacity of approximately 1000 gallons and is constructed from fiberglass, which is resistant to waste water fluids. The tank has two inner compartments separated by a weir to separate the solids. A pump operated by a level control switch will maintain the liquid level. The tank is constructed with an attached secondary containment outer shell with a float warning system to indicate a leak or overfill condition in the primary tank.

The tank will be installed per attached drawing. The process operators will visually inspect the tank during their normal daily rounds.

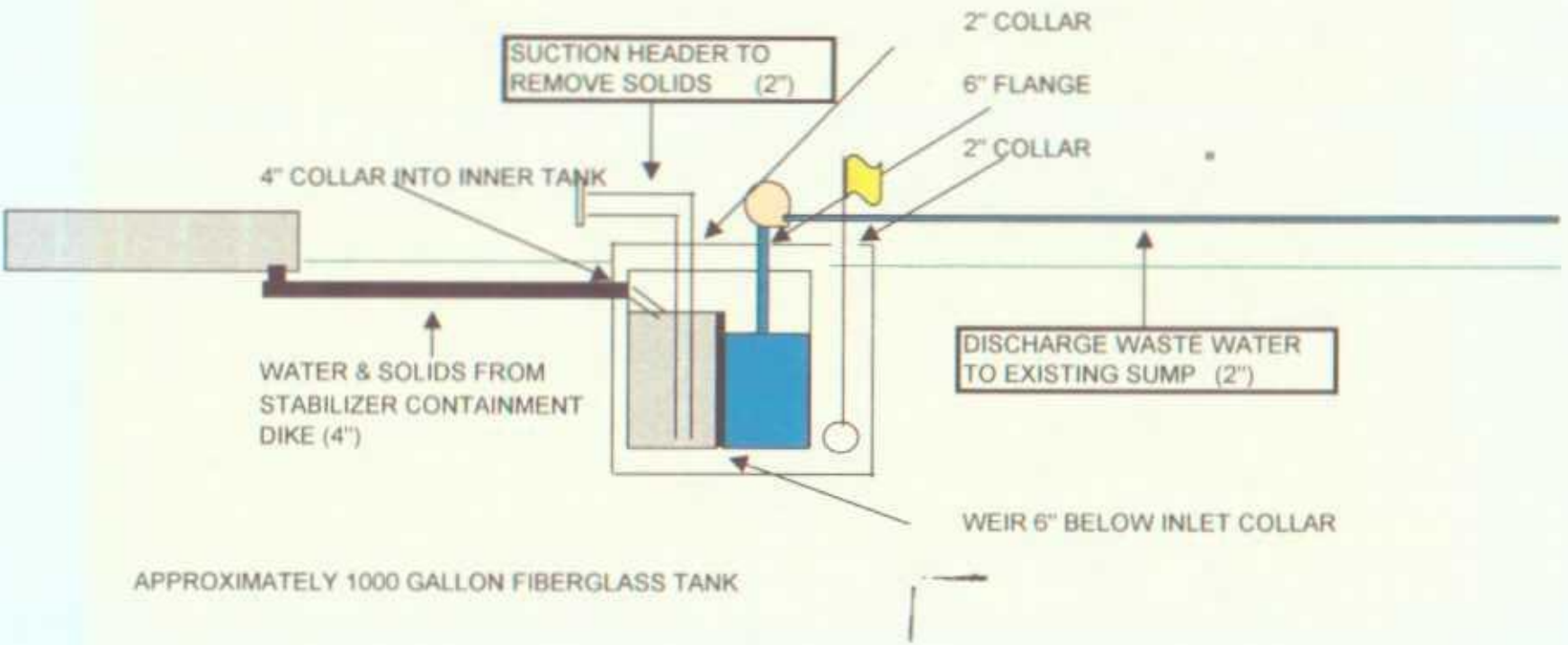
The contingency plan is as follows: if a leak or overfill condition occurs in the primary tank it will be bypassed using upstream and downstream valves. The fluids will then be recovered from the secondary containment with a vacuum truck.

Please feel free to contact me with any questions or concerns at (915) 688-0542.

Sincerely,

Cal Wrangham
Permian Basin ES&H Advisor

Cc R. Baucom- S Eunice
M. Hicks- Eunice
Plant File


SUCTION HEADER TO REMOVE SOLIDS (2")
2" COLLAR
6" FLANGE
2" COLLAR
4" COLLAR INTO INNER TANK
WATER & SOLIDS FROM STABILIZER CONTAINMENT DIKE (4")
DISCHARGE WASTE WATER TO EXISTING SUMP (2")
WEIR 6" BELOW INLET COLLAR
APPROXIMATELY 1000 GALLON FIBERGLASS TANK

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555
Fax 915.688.0552
www.dynegy.com

DYNEGY

October 27, 1998

State of New Mexico
Energy, Minerals and Natural Resources Dept.
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 67505

Attn. Mr. Roger C. Anderson
Environmental Bureau Chief

Dear Sir:

Effective July 1, 1998, Versado Gas Processors, L.L.C. was formed as a joint venture of Dynegy Midstream Services, Limited Partnership and Texaco Exploration and Production. Dynegy Midstream Services, Limited Partnership will serve as the operator of the facilities listed on the attached table. The Table lists the previous owner, new owner, previous operator, and plan/administrative numbers.

Dynegy Midstream Services, Limited Partnership is the new name for Warren Petroleum Company, Limited Partnership. This is a name change only. Warren's parent company NGC Corporation has changed its name to Dynegy Inc. effective June 6, 1998. Concurrent with this change, Warren Petroleum Company, Limited Partnership has changed its name to Dynegy Midstream Services, Limited Partnership.

Please feel free to contact me at (915) 688-0542.

Sincerely,

Cal Wrangham
Permian Basin ES&H Advisor

Cc C. Williams-OCD District 1 Supervisor, Hobbs, NM
C White- Midland
M. Hicks- Eunice
T Jordan- Saunders

NMOCD DISCHARGE PLANS, ANNUAL STORAGE WELL REPORTS, AND SWD ADMINISTRATIVE ORDERS

FACILITY	PREVIOUS OWNER	NEW OWNER	NEW OPERATOR	UNIT NUMBERS
South Eunice Natural Gas Plant	Texaco Exploration and Production Inc.	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GRW-03
Eunice Gas Processing Plant	Warren Petroleum Company, Limited Partnership	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GW-05, and SWD 1.
Eunice North Gas Processing Plant	Texaco Exploration and Production Inc.	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GRW-04
Monument Gas Plant	Warren Petroleum Company, Limited Partnership	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GW-25, SWD 561, Propane Storage Well 1,and LPG Storage Well 2.
Saunders Gas Processing Plant	Warren Petroleum Company, Limited Partnership	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GW-26, SWD 225

Highlander Environmental Corp.

Midland, Texas

August 27, 1998

Mr. William C. Olson, Hydrogeologist
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Disposal of Groundwater From Remediation Well, Texaco Exploration & Production, Inc., Eunice # 1 (South) Gas Plant, Lea County, New Mexico

Dear Mr. Olson:

This letter is written on behalf of Texaco Exploration and Production, Inc. (Texaco) and confirms our telephone conversation on August 24, 1998. On August 24, 1998, Highlander Environmental Corp. (Highlander) notified the New Mexico Oil Conservation Commission (OCD) of its intent to conduct a pumping test of recovery well RW-1, recently installed at the above-referenced facility. The pumping test will be conducted from August 26 to August 27, 1998. Permission was requested during our telephone call to discharge groundwater from the recovery well into a Class II disposal well. Approval was granted by the OCD. Discharge of groundwater recovered from remediation wells at the facility to Class II disposal well was proposed in the document titled, "Subsurface Abatement Work Plan, Texaco Exploration and Production, Inc., Eunice # 1 (South) Gas Plant, November 1997", which was approved by the OCD. Please call if you have questions.

Sincerely,
Highlander Environmental Corp.

Mark J. Larson
Senior Project Manager

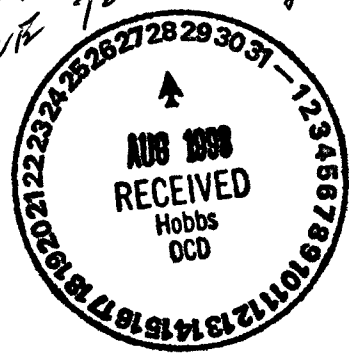
cc: Mr. Bob Foote
Mr. Bill Smith
Mr. Wayne Price

1910 N. Big Spring • Midland, Texas 79705 • (915) 682-4559 • Fax (915) 682-3946

Texaco Exploration
and Production Inc.
Denver Region

P. O. Box 2100
Denver, CO 80201-6510
303 793 4000

CC: ROGER ANDERSON
IF THIS IS ORIGINAL IT SHOULD HAVE GONE TO S.F.



August 25, 1998

Mr. Wayne Price
Environmental Bureau
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
P. O. Box 1980
Hobbs, NM 88241

Re: Status Report, Drain System Installation, Former Texaco Exploration and Production, Inc., Eunice # 1 (South) and Eunice # 2 (North) Gas Plants, Lea County, New Mexico

Dear Mr. Price:

Texaco Exploration and Production, Inc. (TEPI) would like to give the OCD a status report on the installation of the new drain systems at our former Eunice # 1 (South) and # 2 (North) Gas Plants (Sites), located in Lea County, New Mexico.

As you are aware, on July 1, 1998, Dynegy Midstream Services, Inc. assumed majority ownership and operation of Texaco's former Eunice Gas Complex which included the Eunice North and South Gas Plants, and the Grobe and Teague Booster Stations. Texaco is still operating the Buckeye Gas Plant at this time.

Our schedule for completion of the drain systems is as follows:

- North Plant drain system is approximately 80% complete and scheduled for completion by November 1, 1998.

- South Plant drain system is approximately 80% complete and scheduled for completion by November 1, 1998.

We are developing our plan for pressure testing both drain systems. We will be submitting this plan to you for approval. If you have any questions, please contact Mr. Robert W. Foote at 303-793-4959.

Sincerely,

Roy W. Hamilton
Gas Plants Operating Unit Manager

cc: William Hicks (Dynegy)
Bill Smith

RWP
wp

Texaco Exploration and Production Inc.
Denver Region

P. O. Box 2100
Denver, CO 80201-6510
303 793 4000

RECEIVED

AUG 2 8 1998

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

August 25, 1998

Mr. Wayne Price
Environmental Bureau
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
P. O. Box 1980
Hobbs, NM 88241

Re: Status Report, Drain System Installation, Former Texaco Exploration and Production, Inc., Eunice # 1 (South) and Eunice # 2 (North) Gas Plants, Lea County, New Mexico

Dear Mr. Price:

Texaco Exploration and Production, Inc. (TEPI) would like to give the OCD a status report on the installation of the new drain systems at our former Eunice # 1 (South) and # 2 (North) Gas Plants (Sites), located in Lea County, New Mexico.

As you are aware, on July 1, 1998, Dynegy Midstream Services, Inc. assumed majority ownership and operation of Texaco's former Eunice Gas Complex which included the Eunice North and South Gas Plants, and the Grobe and Teague Booster Stations. Texaco is still operating the Buckeye Gas Plant at this time.

Our schedule for completion of the drain systems is as follows:

- North Plant drain system is approximately 80% complete and scheduled for completion by November 1, 1998.

- South Plant drain system is approximately 80% complete and scheduled for completion by November 1, 1998.

Bill,
As we discussed on 8/26/98
update ... will keep you posted
on our progress.

Bob Foote

We are developing our plan for pressure testing both drain systems. We will be submitting this plan to you for approval. If you have any questions, please contact Mr. Robert W. Foote at 303-793-4959.

Sincerely,

Roy W. Hamilton
Gas Plants Operating Unit Manager

cc: William Hicks (Dynegy)
Bill Smith

Texaco Exploration
and Production Inc

500 North Loraine
Midland TX 79701

P O Box 3109
Midland TX 79702

8-7-97
Verbally replied
by RCA and PWS
-proposal denied

July 11, 1997

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

RE: TEXACO EUNICE SOUTH GAS PLANT
LEA COUNTY, NEW MEXICO

Dear Mr. Anderson,

As you are well aware, Texaco Exploration and Production, Inc., is in the process of renovating its drain and oil/water storage system at the Eunice South Gas Plant in response to the November 12, 1996 letter from your office. As we proceed with these efforts Texaco is attempting to utilize existing, out-of-service, equipment and vessels where possible. Part of the initial design concept for the new drain system in the plant will allow us to use some of the existing saddle tanks that are currently not in service. Additionally it is planned to utilize one of the existing sphere tanks for the storage of plant waste water.

As per our previous discussions these would meet your office's definition of Above Ground Storage Tanks (AST's). The spherical and saddle tanks are constructed on supports allowing the bottom and sides of each vessel to be visually inspected with ease. When the new drain system is put into service, these tanks will contain water, oil and condensate. Additionally, a new oil/water skim tank (gunbarrel) and two (2) heavy oil storage tanks will be installed as a part of the new system.

In referencing Item No. 2 (AST's) of the November 12, 1996 letter, Texaco recognizes that design of the new oil/water skim tank and heavy oil tanks must *"...include the standard 1 1/3 berm ...as well as the tanks must be be set on an impermeable type surface/liner."* It is our interpretation that the entire bermed area is not required to be lined with an impervious material. As a result, it is planned to place the tanks on impervious liners which will extend beyond the tank chime, but that the entire bermed area will not be lined. This type of installation will allow plant personnel to visually inspect the area for tank leakage. In the event of a catastrophic event, the berm will contain all fluids to facilitate the removal of the liquids prior to further clean-up activities as well as minimize the vertical impact of soil by a release.

In review of **Note No. 2** under this same section, however, it specifies that *"...All saddle tanks are required to be placed over an impermeable type pad/curb containment."* On Wednesday, June 25, 1997 I visited with Mr. Pat Sanchez concerning whether this requirement was applicable to existing saddle tanks or if it applied only to new or replacement saddle tanks. He stated that existing saddle tanks would be required to be placed over an impermeable pad/curbed surface.

Texaco respectfully requests your review of the apparently different requirements for the installation of impervious liners within containment areas. As discussed above, it appears that tanks sitting directly on the ground are required to be placed on impervious liners but that the entire containment area can remain unlined. However, tanks (such as saddle tanks) situated above the ground must be placed within a containment area which must be completely impervious. **It is our desire to propose that the existing saddle and spherical tanks be placed within containment, but that the provision requiring the construction of the containment to be of an impervious material be waived based on the following comments:**

- The intended purposes of the liners under the ground-supported tanks is different than that of the above-ground supported tanks. Liners beneath the ground-supported tanks (skim and heavy oil storage) facilitate early leak detection from the bottom side and chime of the tank. This will not prevent soil from being impacted in the event of a catastrophic incident. Meanwhile, the purpose of the liner beneath the above-ground tanks (saddle tanks) appears to be to prevent fluid from impacting bare soil. Leak detection is facilitated by the ability to visually inspect all sides of the tank.

- The same types of substances (oil, water, and condensate) that will be held in the saddle and spherical tanks will also be held in the new skim and heavy oil tanks. Therefore, it seems unreasonable that the vessels would be held to different installation requirements.

- As previously discussed, leaks from the spherical and saddle tanks would be easily visible because these tanks are completely supported above the ground. Routine visual inspection by plant operating personnel would be adequate to detect leaks, drips, etc. These would be immediately repaired and the affected soil (if any) within the containment area remediated upon discovery. The containment berm/wall will provide the necessary protection against significant vertical impact by fluids in the event of a major release. Fluids will be removed from the berm upon discovery and the affected soils remediated. It should be noted that the plant is continually manned and that vacuum truck services are available from various service companies in the city of Eunice within a few minutes.

- The installation of an impervious containment area beneath the saddle and spherical tanks is not economically feasible. The cost of lining the entire contained area beneath the two existing saddle tanks will range from $8,000 to $15,000. The additional cost for providing similar containment/liner beneath the spherical tank has been conservatively estimated at an $25,000 to $50,000. The cost estimates are dependent on the material used.

Texaco wishes to express its gratitude to you and the entire staff at the NMOCD - Environmental Bureau as you continue to provide guidance to us in matters related to the Eunice Gas Plant

Complex. Your consideration of our proposal is greatly appreciated. Please feel free to contact me at (915) 688-4804 should you have questions or comments concerning this matter. Should you require specific information related to the engineering/design aspects of this project please feel to contact Mr. Mike Cadet, Texaco, Midland at (915) 688-2978.

Sincerely,

Robert W Browning

Robert W. Browning
EH&S Professional - Environmental
Texaco Exploration and Production, Inc.

Pat Sanchez

From: Wayne Price
Sent: Friday, April 18, 1997 3:18 PM
To: Bill Olson; Pat Sanchez
Cc: Gary Wink; Jerry Sexton
Subject: Texaco S. Plant SWD casing leak
Importance: High

Texaco's SWD which is on-site and in close proximity to the pits, and other MW's has experienced a casing leak somewhere above 1000'. I will call Larry Lehmann and obtain details to see if there is a connection with the existing groundwater investigation.

Texaco Exploration and Production Inc P O Box 1929
Eunice NM 88231 1929

OIL CONSERVATION DIVISION
RECEIVED
'96 DEC 24 AM 8 52

DATE: 12-6-96

TO: P.W. Sanchez

FROM: R.G. Bailey

Spoke w/ Mr. Robert Browning on 2-17-97 - told him the substance/timelines of this letter are fine. gwb

SUBJECT: EUNICE SOUTH PLANT WORK PLAN

Note: Bill also working on the groundwater portion

The Eunice South Gas Plant work plan for the items stated in the OCD letter dated November 12, 1996 are as follows.

1.) Sumps:

- Replace H2S Flare Sump
- Modify #30 & #31 Sump
- Remove Treater Stabilizer Sump
- Remove Sump East of Tank # 14
- Remove Sump North West of Tank # 14
- Remove Oil/Water Sump
- Install one new Sump, or Oil /Water Separator, equipped with Leak Detection as described in attachments.
- One or all of the proposed methods will be utilized.

2.) Above Ground Storage Tanks: (See Attachments)

- Install new Oil/Water Skimmer tank.
- Utilize existing Saddle Tanks with New Skimmer System
- Reroute existing Oil Collection System in order to discontinue the use of current collection tanks.
- *Construct Containment around the Oil Collection Tanks, existing Saddle Tanks, which* will hold 1 1/3 the volume of the largest tank.

- Stabilizer Condensate will be rerouted to new Skimmer System in order to discontinue use of Tanks number 29 &30.

- Liquids from the Pressure Drain System will be rerouted to the Oil Collection Tanks, existing Saddle Tanks, in order to discontinue use of Tanks # 12,13.

3.) Drain System:

- Inventory all drains and blowdowns. Characterize as gravity, pressure, slop oil, flare, condensate or to be plugged.

- Segregate drain systems as per above mentioned characterization.
  (Attachment)

- Discontinue the use of all existing below grade drain lines upon completion of new system.

- New below grade drain lines will be constructed in one or both of the following methods:
  a.) PVC using a " Conduct" type method whereby the active line is encased with secondary containment. These lines will be equipped with line of vision leak detection systems.
  b.) Steel, Polyethylene, or PVC lines equipped with the appropriate valves and connections to facilitate periodic pressure testing.

4.) Surface Impoundments:

- Use of existing Waste Water Pit has been discontinued due to past liner leaks. All waste water has been diverted to the North Pit.

- Leak Detection for the North Pit is monitored Periodically.

- The out-of-service Waste Water Pit will be evaluated for the following Abatement Option;
  1. The Liner will be repaired and the pit returned to service
  2. The pit will be closed and replaced with a new pit constructed as per NMOCD Guidelines
  3. The pit will be closed and all waste water directed to a Commercial Water Disposal System.

5.) Time Line:

- 2/1/97 - Complete inventory of drains and blowdowns

- 3/1/97 - Send out bids for design of system

- 6/1/97 - Complete design of system, develop cost estimate, submit to management for approval.

- 9/1/97 - Commence installation of new system

- 11/1/97 - Commence utilization of new system

- Abatement activities for some parts of the system will coincide with construction activities. Abatement will not be possible without the shutdown of parts of the plant for extended periods of time unless allowed to complete the installation of key elements of the system first.

6.) Remediation:

- As the Eunice Plants eliminate sources of contamination with new installation, 9-1-97 & 11-1-97, sampling will be conducted and an action plan for Remediation completed.

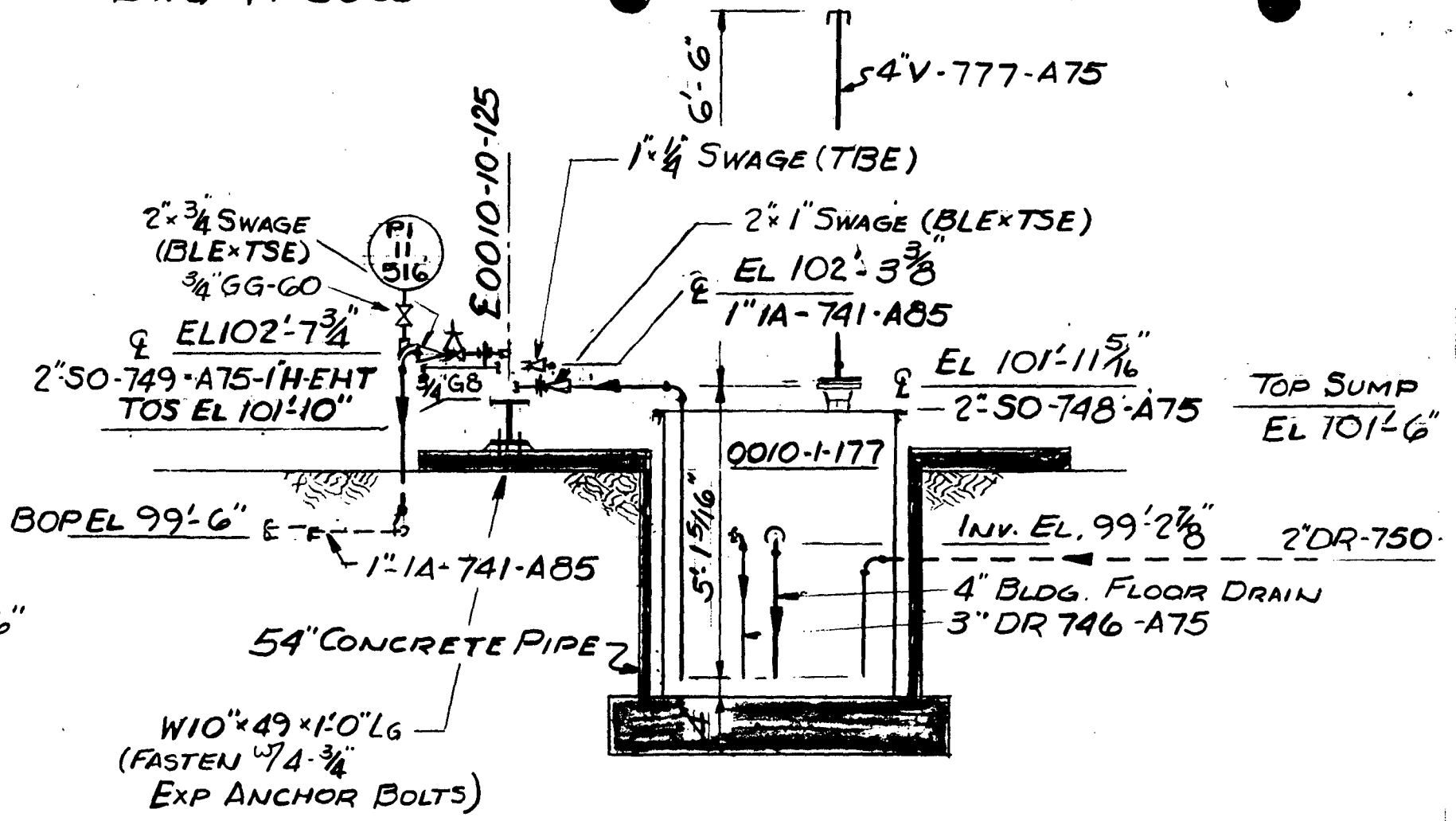
If you have any questions please call me at 505-394-2516.

R.G. Bailey

R.G. Bailey
Eunice Gas Complex
EHS Coordinator

SECTION "G G"

DWG 74-5023



SECTION "H H"

DWG 74-5023

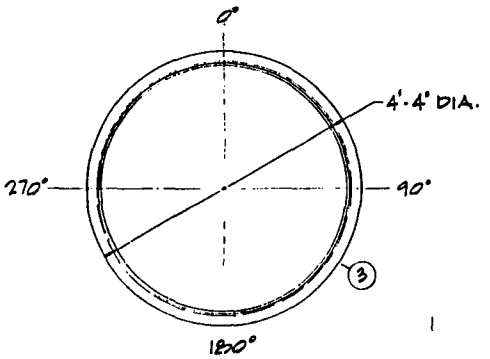
LG 13 121

℄ EL. 104'-3

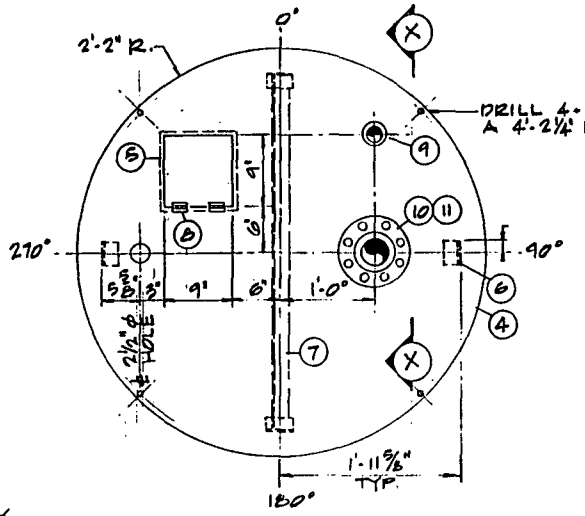
)C EL 101'-6"

DE 100'-6"

HT

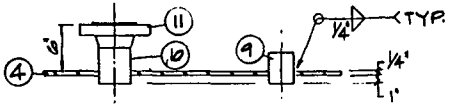


PLAN VIEW

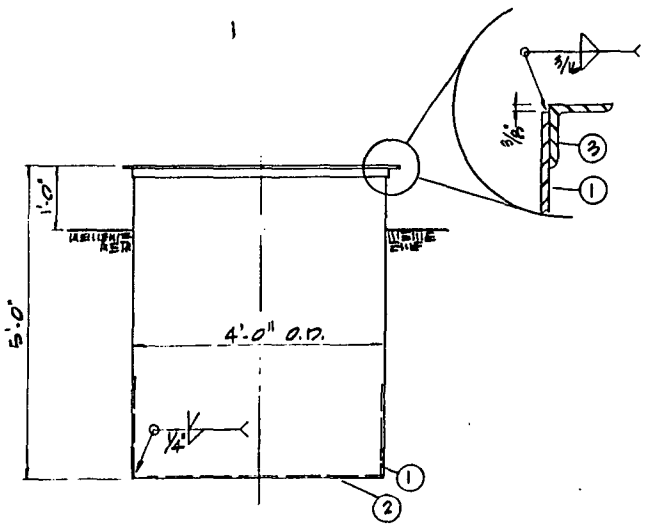


COVER PLATE

1 REQ'D SCALE: 3/4"=1'-0"



SECTION "X-X"



ELEVATION

SUMP DETAIL

1 REQ'D SCALE: 1/2"=1'-0"

BILL OF MATERIAL

MK.	QTY.	DESCRIPTION	
1	1	PL: 1/4" X 4'-11 5/8" X 12'-6 7/16" LG.	A-36
2	1	PL: 1/4" X 3'-11 1/2" DIA.	A-36
3	1	L 2 X 2 X 1/4" X 13'-1 1/16" LG. - ROLL TO 4'-0" I.D.	A-36
4	1	PL: 1/4" X 4'-4" DIA.	A-36
5	1	FB: 1/4" X 1" X 3'-6" LG.	A-36
6	4	L 2 X 2 X 1/4" X 4" LG.	A-36
7	1	L 2 X 2 X 1/4" X 3'-10 3/4" LG.	A-36
8	2	HINGE	
9	1	2"-3000# THRD. FULL CPLG.	A-105
10	1'	4" S/40 SMLS. PIPE	A-53.B
11	1	4"-150# RF. WN. FLG. (S/40 BORE)	A-105
12	4	1/2" ø X 3" LG. STUDS W/ 2 - H.H. NUTS EA.	A-193.B7 / A-194.2H

NOTES
1. COMMERCIAL BLAST & PRIME W/ ZINC CHROMATE, 3 MIL DFT

MK	DATE	REVISIONS
B		ISSUE FOR BIDS

NUMBER	REFERENCE DRAWINGS

		DATE
DWN	JK	5/93
CH.KD		
PIPE		
INSTR		
ELECT		
STR.		
APP.		
CODE	-	

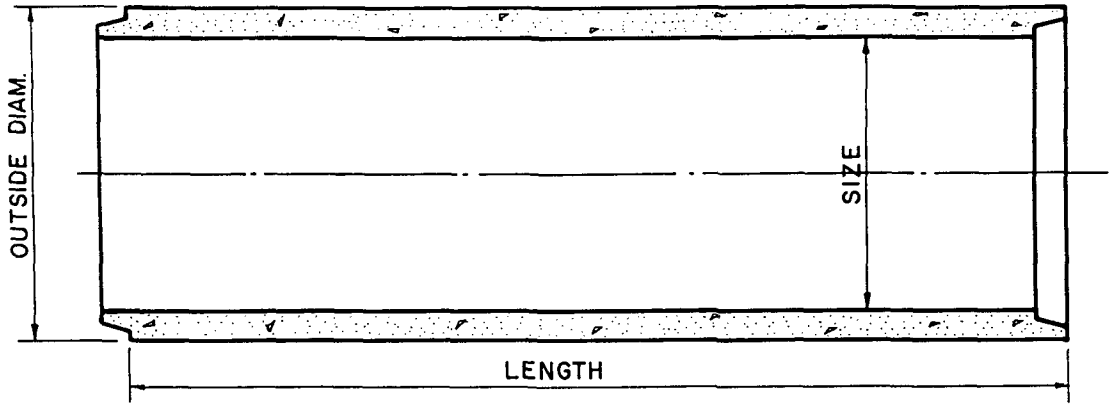
0010-1-177
SUMP

EUNICE SOUTH GAS PLANT
LEA CO. N.M.

TEXACO U S A
NATURAL GAS PLANTS & LIQUIDS DIVISION

DWG NO B-0010-32-52235 REV B

320804



TONGUE AND GROOVE C-76

REINFORCED CONCRETE PIPE

LENGTHS AND WEIGHTS						
SIZE (INCHES)	OUTSIDE DIAM.	WT./FT. (LBS.)	WEIGHT PER JOINT			END AREA
			4' JT.	6' JT.	7'-6" JT.	
12	16	94	376	564		.79
15	19	113	452	678		1.23
18	22 1/2	149	596	894	1118	1.77
21	26	190	760	1140	1425	2.41
24	29 1/2	244	976	1464	1830	3.14
27	33	295	1180	1770	2213	3.98
30	37	385	1540	2310	2888	4.91
33	40 1/2	461	1844	2766	3458	5.94
36	44	529	2116	3174	3968	7.07
39	47 1/2	610	2440	3660	4575	8.29
42	51	696	2784	4176	5220	9.62
45	54 1/2	800	3200	4800	6000	11.04
48	58	881	3524	5286	6608	12.57
51	61 1/2	986		5916		14.18

R1.180 TG

TONGUE AND GROOVE C-76

REINFORCED CONCRETE PIPE

(CON'TD)

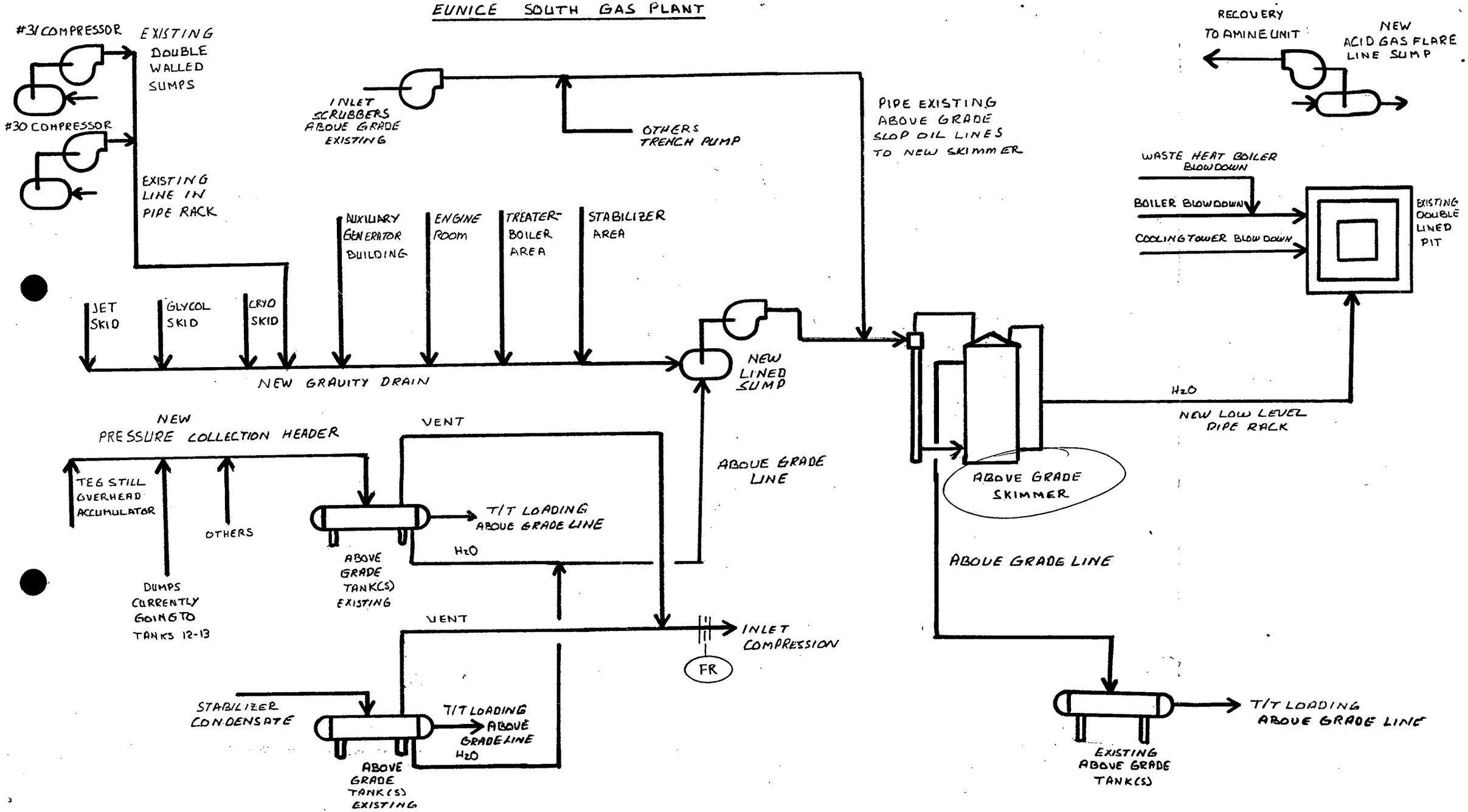
LENGTHS AND WEIGHTS						
SIZE (INCHES)	OUTSIDE DIAM.	WT./FT. (LBS.)	WEIGHT PER JOINT			END AREA
			4' JT.	6' JT.	7'-6" JT.	
54	65	1100	4400	6600	8250	15.90
60	72	1360	5440	8160	10200	19.62
60 (c)	73 1/2	1552		9312	11640	19.62
66	79	1590	6360	9540		23.76
66 (c)	80 1/2	1860		11160	13950	23.76
72	86	1872	7488	11232	14040	28.27
72 (c)	87 1/2	2110			15825	28.27
78	93	2170		13020		33.18
78 (c)	94 1/2	2445		14670	18338	33.18
84	100	2500		15000		38.49
84 (c)	101 1/2	2760		16560	20700	38.49
90 (c)	108 1/2	3100			23250	44.16
96 (b)	114	3150		18900	23625	50.27
108 (c)	129 1/2	4320			32400	63.62
120 (a)	140	4438			33285	78.54

(a) DENOTES WALL A

(b) DENOTES WALL B

(c) DENOTES WALL C

EUNICE SOUTH GAS PLANT



J.B.
12-4-96

P 288 258 681

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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

November 12, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-681

Mr. Robert W. Browning
Texaco Exploration and Production, Inc.
P.O. Box 3109
Midland, Texas 79702

RE: DISCHARGE PLAN - SOURCE REMOVAL/POLLUTION PREVENTION
EUNICE SOUTH GAS PLANT
DISCHARGE PLAN GW-003
LEA COUNTY, NEW MEXICO

Dear Mr. Browning:

The New Mexico Oil Conservation Division (OCD) met with Texaco Exploration and Production, Inc. (TEPI) on November 5, 1996 to discuss the results of the recent TEPI Eunice #1 (South) Gas Plant soil and ground water investigations.

As discussed in this meeting the following source removal/pollution prevention measures will be taken by TEPI in order to be in compliance with Discharge Plan GW-003 permit conditions.

1. TEPI will prioritize which sumps and below grade areas pose the greatest possible threat to groundwater. This priority list will include a time line for sump replacement/repair, and will provide a generic design that TEPI will implement at the facility, as well as soil remedial options.

Note: The design of sumps and below-grade areas, must include secondary containment and leak detection, as well as a means of monitoring the secondary containment area. (OCD prefers line of site leak detection methods.)

2. TEPI will prioritize AST's (Above Ground Storage Tanks) which may pose the greatest threat to groundwater. This priority list will include a time line for AST inspection and/or possible AST replacement. The priority list will also include soil remedial options.

Note: The design of new/or replacement tanks will include the standard 1 1/3 berm for all AST's, as well as the tank must be set on an impermeable type surface/liner. (This does not apply to AST's which contain fresh water, or a volatile liquid such as LPG.) **Note2:** All saddle tanks will are required to be placed over an impermeable type pad/curb containment, excluding saddle tanks which contain fresh water or a volatile liquid such as LPG.

3. Below-grade waste water/effluent lines - TEPI will submit a time line/plan for testing and replacing the above mentioned. TEPI will also include a remedial option to address soil contamination.

4. The surface impoundments that handle waste water/effluent shall be monitored for integrity. (All surface impoundments shall be constructed with secondary containments and leak detection) If the current impoundments are indicating leakage TEPI will submit a time line and plan for repairing the impoundments. The plan will also include an investigation/remediation of soils below the impoundment(s) if the secondary liner has been breached.

5. Any sources/soils that are not exempt from RCRA subtitle C (40CFR261) will be properly characterized for the presence of hazardous characteristics/and constituents of concern.

The OCD requires that the five above listed items (compliance plan) be submitted to the OCD by December 17, 1996. Please submit the compliance plan to the OCD Santa Fe Office and a copy to the OCD Hobbs District Office.

Note: All OCD rules, regulations, and guidelines are available on the Internet at the following website address: **www.emnrd.nm.us/ocd.htm**

If you have any questions, please contact me at (505) 827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau, OCD

xc: Mr. Wayne Price, OCD Hobbs Office
Mr. Rodney G. Bailey, Texaco Exploration and Production, Inc.

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

November 6, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-211

Mr. Robert W. Browning
Texaco Exploration and Production, Inc.
P.O. Box 3109
Midland, Texas 79702

RE: DISCHARGE PLAN MODIFICATION FOR WATER POLLUTION
EUNICE SOUTH GAS PLANT
DISCHARGE PLAN GW-003
LEA COUNTY, NEW MEXICO

Dear Mr. Browning:

The New Mexico Oil Conservation Division (OCD) met with Texaco Exploration and Production, Inc. (TEPI) on November 5, 1996 to discuss the results of the recent TEPI Eunice #1 (South) Gas Plant soil and ground water investigations as contained in the following documents:

- September 1996 "SUBSURFACE ENVIRONMENTAL ASSESSMENT, TEXACO EXPLORATION AND PRODUCTION, INC., EUNICE #1 (SOUTH) GAS PLANT, LEA COUNTY, NEW MEXICO".

- August 1996 "GROUNDWATER INVESTIGATION, TEXACO EUNICE SOUTH GAS PLANT AND NORTHERN NATURAL GAS EUNICE COMPRESSOR STATION, LEA COUNTY, NEW MEXICO.

As discussed in this meeting and OCD's October 23, 1996 correspondence with you, these reports show that:

1. A number of current and past potential ground water contaminant source areas exist at the facility.

2. Free phase product contamination of ground water exists directly beneath several of the surface contaminant source locations within the gas plant.

3. Dissolved phase petroleum contaminants in excess of New Mexico Water Quality Control Commission (WQCC) standards can be found in ground water in these source areas and on the south side of the facility.

4. High levels of total dissolved solids and chloride are present in monitor well TMW-5 adjacent to the brine water retention ponds and waste water ponds which have had liner leaks.

5. Free phase product and dissolved phase petroleum contaminants are found in ground water at the TEPI Gas Plant/NNG Compressor Station boundary.

Therefore, pursuant to WQCC regulation 3109.E, the OCD requires that TEPI modify the facility discharge plan to abate water pollution. As an initial action the OCD requires that TEPI submit a comprehensive facility investigation work plan to determine the extent of soil and ground water contamination related to TEPI's activities. Please use the Stage 1 WQCC Abatement Regulations (20 NMAC 6.2.4106) as a guide in preparation of the investigation work plan. The OCD requires that the work plan be submitted to the OCD by January 17, 1997. Please submit the work plan to the OCD Santa Fe Office and a copy to the OCD Hobbs District Office.

If you have any questions, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office
Rodney G. Bailey, Texaco Exploration and Production, Inc.
Bill Kendrick, ENRON

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PS Form **3800**, April 1995

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☐ Telephone ☒ Personal	Time 1:00 PM	Date 11-5-96

Originating Party	Other Parties
TEPI, Mr. Robert Browning / Mr. Rodney Bailey	OCD - Bill Olson, Pat Sanchez, and Roger Anderson.

Subject: Groundwater Investigations / site Assessment(s). For TEPI N. & S. Eunice Gas Plants.

Discussion: (1) Discussed Source removal / Discharge Plan requirm. i.e. AST, Drainlines, and impondment Integrity.

(2) Potential RCRA issues with metals - particula Hg. (Note: Cr in groundwater as well as Hydrocarbons.)

(3) Area Review of wells - 1 mile within the perimeter of the facilities. Locate these and provide in Stage 1.

(4) Background levels on metals need to be established - through literature / and analysis.

(5) OCD - per 3109.E will require a D.P. Modificatia to address groundwater contamination / Delineation / Remmediation.

Conclusions or Agreements: (A) TEPI agreed w/ (1) through (6), OCD will send (5) letter - staggered, S. Plant first, N. Plant Second. (B) OCD will send two seperate letters (Pat Sancho requiring implementation of Source removal / Pollution Prevention as agreed to by TEPI in the D.P. Renewals of GW-003 & GW-00

Distribution: File, Bill Olson, Wayne Price.

Signed: Patricia W. Sanchez

Pat Sanchez

From: Wayne Price
Sent: Wednesday, October 16, 1996 11:11 AM
To: Pat Sanchez
Subject: Registered: Wayne Price

Your message

To: Wayne Price
Subject: TEXACO SOUTH PLANT GW-003 - VADOSE/GROUNDWATER INV./REM.
Sent: 10/16/96 9:50:00 AM

was read on 10/16/96 11:11:00 AM

Pat Sanchez

From: Pat Sanchez
Sent: Wednesday, October 16, 1996 9:50 AM
To: Wayne Price
Cc: Bill Olson
Subject: TEXACO SOUTH PLANT GW-003 - VADOSE/GROUNDWATER INV./REM.
Importance: High
Sensitivity: Confidential

Mr. Price, Bill Olson and I in discussing the activites at the Texaco South Plant have decided that he should take over the oversite on the facilities clean-up and investigation since he is already working on the case. It appears that Texaco is using two consultants for this site-i.e. Gerighty and Miller and Highlander Environmental Corp. I will continue oversite on the Texaco North Plant investigation GW-004. Thanks.

Pat Sanchez

From: Bill Olson
Sent: Wednesday, October 16, 1996 9:52 AM
To: Pat Sanchez
Subject: Read: TEXACO SOUTH PLANT GW-003 - VADOSE/GROUNDWATER INV./REM.
Importance: High

Your message

To: Wayne Price
Cc: Bill Olson
Subject: TEXACO SOUTH PLANT GW-003 - VADOSE/GROUNDWATER INV./REM.
Sent: 10/16/96 9:50:00 AM

was read on 10/16/96 9:52:00 AM

Texaco Exploration
and Production Inc

500 North Loraine
Midland TX 79701

P O Box 3109
Midland TX 79702

September 26, 1996

Mr. Pat Sanchez
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Subsurface Environmental Assessment
Texaco Exploration and Production, Inc.
Eunice No. 1 (South) Gas Plant and
Eunice No. 2 (North) Gas Plant
Lea County, New Mexico

Dear Mr. Sanchez,

As requested, please find enclosed copies of the subsurface environmental assessments conducted at the referenced facilities. Texaco Exploration and Production, Inc. (TEPI) has retained the services of Highlander Environmental Corp., Midland, Texas to conduct the investigations that were required by the NMOCD following its review of the Groundwater Discharge Plans (GW-003 and GW-004).

It is TEPI's desire that following your review of the report, that representatives of TEPI, Highlander and the NMOCD can meet at your office to further review the contents of these reports and discuss future remedial activities. Based on current scheduling difficulties, it is anticipated that this meeting would take place during the month of November.

Please feel free to contact me at (915) 688-4804 or Messrs. Tim Reed or Ike Tavarez (Highlander Environmental) at (915) 682-4559 should you have questions or desire additional information concerning this matter.

Robert W. Browning
EH&S Professional - Environmental

cc: Wayne Price
NMOCD - District I
Hobbs, New Mexico

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

Certified Mail No. P-288-258-612

☒ Telephone ☐ Personal	Time 11:00 AM	Date 9-4-96

Originating Party	Other Parties
Pat Sanchez - NMOCD	Mr. Robert Browning - Texaco E&P, Inc.

Subject GW-004, Eunice #2 N. Gas Plant.
GW-003, Eunice #1 S. Gas Plant.

Discussion I called Mr. Browning to touch base with him regarding the two above mentioned facilities and see if OCD/Texaco were on the same page as far as permit Renewals and Contamination Investigations at both sites. I also made Mr. Browning aware of the Sep. 1, 1996 deadline regarding GW-004 (N. Plant).

Conclusions or Agreements (1) Mr. Browning and I agreed that two seperate reports would be submitted by Texaco by Oct. 1, 1996 regarding the two above mentioned plants. GW-004 will address June 17, 96 letter from Highlander and *July 2, 1996 from Texaco as well as the June 17, 1996 letter from OCD

Distribution File, Wayne Price, Mr. Robert Browning.

Signed Patricia L. Sanchez

* over →

(2) GW-003 will address June 17, 1996 from Highlander and the July 2, 1996 letter from Texaco.

Note: Each facility will submit separate reports for the OCD to review and approve, each report will be due on Oct. 1, 1996 to the OCD Santa Fe Division office for approval, with a copy of each report sent to the Hobbs OCD District office.

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PS Form **3800**, April 1995

Texaco Exploration and Production Inc
500 North Loraine
Midland TX 79701
P O Box 3109
Midland TX 79702

July 2, 1996

Rec. on
8-15-96
by DWB

Mr. Chris Eustace
Geologist
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico, 87504-2088

Re: Attachments to Discharge Plans GW-003 and GW-004
Texaco E&P, Inc. Eunice No. 1 and No. 2 Gas Plants
Lea County, New Mexico.

Dear Mr. Eustace,

As requested in your correspondence dated April 15, 1996 and May 1, 1996, please find attached Texaco Exploration and Production, Inc.'s (TEPI) proposed work plan(s) to address the special provisions found in the Attachments to the Discharge Plans GW-003 and GW-004 Approval notification letters. You will note that TEPI has retained the services of Highlander Environmental Corp., Midland, Texas, to assist in the development and implementation of these plans. In addition to the utilization of an outside consultant, TEPI has assembled a project team consisting of environmental professionals, engineering/facilities support as well as involving plant maintenance/operations personnel in order to address each of the items noted in the above referenced correspondence.

You will be pleased to know that Mr. Rodney Bailey, Environmental, Health and Safety Coordinator for the Eunice Gas Plants has been aggressive in addressing many of the issues you raised not only through your correspondence but also during your site visit earlier in the year. This includes the scheduling of asbestos removal for July 10, 1996, the removal and disposal of some of the RCRA exempt waste materials located in the Junk Yard area, removal of some miscellaneous junk/surplus materials as well as other housekeeping related issues.

You will recall that in your approval letters, it was stated that all underground process/wastewater lines at both plants would be tested immediately in order to demonstrate mechanical integrity. A review of the drain systems at both plants indicates that the drain lines are not equipped so that this is possible without a major modification to the current system. Additionally, it is suspected that some of the lines may not be able to demonstrate integrity at this time due to age and the unknown condition of the lines. Therefore, please be advised that TEPI is proposing the replacement of most, if not all of the underground process/wastewater lines at both plants. This will be done in conjunction with the modifications to the below grade tanks/sumps which is outlined in the attached work plan. Be assured that the new drain system will incorporate the

necessary equipment/connections needed to conduct mechanical integrity testing on a five year cycle.

Texaco is prepared to begin sampling activities around the Jet Turbine Skid, Waste Water/Slop Oil area and various sumps, pits etc. in order to define the horizontal and vertical extent of the the hydrocarbon impacted soils at these locations. Based on previous telephone conversations between you and Rodney Bailey as well as our own conversations, **it is TEPI's understanding that we have your verbal approval to begin such investigation work on the condition that we conduct no remedial activities until such time as we have received written approval from your office of the attached work plan.** In addition to the previously mentioned asbestos removal to be conducted on July 10, 1996, TEPI will begin drilling the required groundwater monitoring well at the North Gas Plant on July 22, 1996. TEPI is now in receipt of your written approval for the installation of the subject well. Following the completion of the installation of the monitoring well, TEPI plans to utilize the services of the water well drilling rig, where feasible, to conduct sampling at some of the above referenced locations.

As usual, TEPI appreciates your cooperation and assistance in this matter. Please feel free to contact me at (915) 688-4804 or Rodney Bailey at (505) 394-2516 should you have questions or comments concerning this matter.

Robert W. Browning
EH&S Professional - Environmental
Texaco Exploration and Production, Inc.

Attachments

cc: Wayne Price
NMOCD District I
Hobbs, New Mexico

Highlander Environmental Corp.

Midland, Texas

June 17, 1996

Rec. by DMB on 8-15-96

Mr. Chris E. Eustice
Geologist
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico, 87504-2088

Re: Work Plan Attachments to Discharge Plans GW-003 dated April 15, 1996 and GW-004 dated May 1, 1996 for the Texaco Eunice #1 and #2 Gas Plants.

Dear Mr. Eustice:

Highlander Environmental Corp. has been retained By Texaco Exploration and Production, Inc. to prepare and implement the above mentioned work plans. Please review the attached work plans at your earliest convenience. If you have any questions or comments, please advise.

Very truly yours,

Jim Reed

Timothy M. Reed, REM
Vice President

306 W. Wall • Suite 320 • Midland, Texas 79701 • (915) 682-4559 • Fax (915) 682-3946

WORK PLAN
ATTACHMENT TO DISCHARGE PLAN GW-003
DISCHARGE PLAN REQUIREMENTS
TEXACO EXPLORATION AND PRODUCTION, INC.
EUNICE #1 (SOUTH) GAS PLANT

The following items were stated as attachments requiring work plans for the discharge plan approval:

1. **Item #2 Waste Water Ponds** - Inspection of the leak detection system on the #4 pond showed the primary liner leaking. Immediately the water streams were diverted to the North brine water retention pond which at that time was idle and empty. Work began on draining the #4 pond. On May 31, it was noted that the North brine retention pond was leaking and a tear had developed in the liner. At this time Texaco diverted all of the waste water stream back to pond #4. Repair work on the liner in the North brine water retention pond began June 6, 1996. Repair on the #4 pond will begin as soon as water can be diverted back to the North pond.

2. **Item #3 Jet Turbine Skid Area** - Boreholes will be advanced around and under the Jet Turbine Skid. The boreholes will be placed in order to define the vertical and horizontal extents of soil contamination from historical leaks and spills around the skid. Due to limited accessibility, the borings will be placed utilizing a bucket type hand auger or power assisted auger system. During borehole placement, the samples extracted will be visually inspected for obvious contamination and lithologic description. The samples will be split and a portion placed into a laboratory prepared container which will then be immediately chilled to 4°C. The soil sample selected will be analyzed for Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) and Total Petroleum Hydrocarbon (TPH).

   The other portion of the sample will be placed into a resealable plastic bag and the volatile organics allowed to concentrate in the headspace of the bag. After a sufficient amount of time for volatilization has elapsed, the concentration in the headspace will be measured using a Thermo 580-B Organic Vapor Meter (OVM). Borings will be advanced until visual and OVM readings have indicated clean native soil, or until auger refusal or depth forces cessation of the borehole advancement. All cuttings generated will be placed on plastic for later disposal and all boreholes will be properly plugged.

3. **Item #4 Slop Sump** - Boreholes will be placed around the Slop Oil Sump to determine the depth of any contamination from sump overflows as well as determine if the sump has leaked. The boreholes will be placed utilizing an air

rotary rig and be advanced to a depth greater than the bottom of the sump. Soil samples will be logged and preserved for possible analysis of volatile organics, semi-volatile organics, and total (RCRA 8) metals. The depths of the boreholes will be dependent upon the depth of visual impact or OVM readings, if contamination is encountered below the bottom of the sump. The sump will be evaluated for replacement with a fiberglass tank equipped with leak detection.

4. **Item #12 Below Grade Tanks/Sumps** - All of the additional sumps in the plant will be evaluated for leakage by excavating trenches down beside the sumps to a depth below the bottom of the sump. The integrity of the sumps will be visually inspected and soil samples taken for OVM screening. If it appears that a sump has leaked, soil samples will be selected for analysis. The samples will be analyzed for volatile organic, semi-volatile organics, and total (RCRA 8) metals. If it is determined that no leakage has occurred, the sump will be removed and replaced with a double walled fiberglass tank equipped with leak detection. If it is determined that the sump has leaked, then the site will be evaluated to determine the extent of contamination and the best treatment method for that soil prior to removal of the sump for replacement with the double walled tank previously mentioned. It is imperative that the sump down time be kept to a minimum as these tanks are used in the daily operations of the facility.

5. **Flare sump/pit (Transferred From #2 Plant Plan)** - Backhoe trenches or hand auger holes will be placed at the inactive flare sump/pit to evaluate the vertical and horizonal extents of the impact. During borehole placement, the samples extracted will be visually inspected for obvious contamination and lithologic description. The samples will be split and a portion placed into a laboratory prepared container which will then be immediately chilled to 4°C. The other portion of the sample will be placed into a resealable plastic bag and the volatile organics allowed to concentrate in the headspace of the bag. After a sufficient amount of time for volatilization has elapsed, the concentration in the headspace will be measured using a Thermo 580-B Organic Vapor Meter (OVM). If it appears that the sump has leaked, a soil sample will be selected and analyzed for volatile organics, semi-volatile organics, and total (RCRA 8) metals.

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

OIL CONSERVATION DIVISION
RECEIVED

96 JUN 17 AM 8 52

June 14, 1996

Mr. Rodney Bailey
EHS Professional-Eunice Complex
P.O. Box 1929
Eunice NM 88231 1929

RE: Texaco Eunice South Gas Plant GW-003

Subject: Release of Waste Water from Pond #4

Dear Rodney,

The New Mexico Oil Conservation Division (NMOCD) is in receipt of your letter dated June 7, 1996 (attached for reference) in which Texaco request clarification from the OCD on whether this release should be reported as a spill.

The New Mexico Oil Conservation Division (NMOCD) considers this a release in the form of a leak reportable as a "discharge" by WQCC definition and/or a leak, spill or release by NMOCD rule 116.

Therefore we will consider your telephone call as your immediate notification and the resultant letter as your subsequent report as required by our regulations and your discharge plan GW-003 requirements.

Your letter will be placed in the spill report file and a copy sent to Santa Fe for your discharge plan file.

Any resultant corrective actions, if any are necessary, will be handled out of the NMOCD Environmental Bureau. If you have any questions concerning this please contact Mr. Chris Eustice in Santa Fe 505-827-7153.

If you require any further assistance from the NMOCD District I office concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Chris Eustice-Geologist NMOCD Environmental Bureau

attachments-1

Texaco Exploration and Production Inc
Box
Eunice NM 88231

Date: June 7. 1996

Wayne Price
Environmental Engineer
State of New Mexico
Energy and Minerals Department
Oil Conservation Division

RE: Texaco Eunice South Gas Plant

In April 1996 fluid was detected in the leak detection system of waste water pond # 4 at the Texaco Eunice South Gas plant. Immediately streams were diverted to the brine water retention pond North of # 4. May 31, 1996 it was noted that the liner in the brine water retention pond was leaking. Waste water streams were diverted back to pond # 4. A tear was detected in the brine water retention ponds liner and repair procedures are under way. Texaco has estimated that between 23 barrels and 35 barrels of waste water leaked through the tear in the brine water retention pond liner.

The brine water retention pond was constructed in 1972 meeting the requirements stated in the OCD " Specifications for the Design and Construction of Lined Evaporation Pits " which consist of the drainage and sump method of leak detection. With this type of system, which met all regulations in 1972, Texaco is requesting clarification from the OCD if this should be reported as a spill.

Thank you for your cooperation in this matter. If you have any questions please call me at 505-394-2516.

Sincerely,

Rodney Bailey

Rodney Bailey
EHS Professional
Eunice Complex

Wayne Price

From: Wayne Price
To: Chris Eustice
Cc: Jerry Sexton
Subject: Texaco S. Plant- Leak under liner of Brine Pit.
Date: Thursday, June 06, 1996 10:19AM

Dear Chris,

Rodney Bailey called yesterday and notified our office that they are using one of the old lined brine ponds for a temporary holding pond for the plant effluent water until they can determine why the leak detection system was full which was discovered during our inspection.

However, he noted that the old brine pond has a rip in the liner and the water level had reached the point of the rip and they suspect they had some water go under the liner. They confirmed this when they checked the leak detection system on this pond.

Since the old brine systems did not have secondary containment for the leech systems but was actually an open vadose monitor well they wanted to know if this would be considered a spill.

Since it was not contained in a secondary system I informed them it would be considered a release. They are going to fill out a spill report. I suggested to them to pump as much water out of the monitor system to reduce their impact.

Texaco will make up a report and send in.

Chris Eustice

From: Wayne Price
Sent: Monday, April 15, 1996 1:46 PM
To: Chris Eustice
Cc: Jerry Sexton
Subject: Texaco Eunice N & S Plants-Plant inspections on April 2, 1996
Importance: High

Chris per your request, below is the following important items which I feel needs to be addressed at the two plants beyond your normal standard conditions:

Eunice South Plant:-GW-003

1. Waste water pond leak detection and liner system. Leak detection was full of water.
2. Turbine area oil leaks. Need containment and investigate the soil contamination.
3. Main plant waste water and slop oil sump. Needs secondary containment and investigate under it for contamination.

Eunice North Plant.-GW-004

1. The junk yard area. Classify all waste and properly dispose of; the old trash pit needs to be closed.
2. The waste water and slop oil treater area. Needs secondary containment and investigate the soil contamination & possible ground water contamination.
3. Compressor bldg. soil and ground water investigation. Provide the location where the new MW is to be located.
4. Sample the on-site water well and determine depth to ground water.
5. The old flare sump/pit.

Since both plants co-mingle all of their waste streams in their respective waste water systems , they should demonstrate that their waste water streams which are being disposed of down class II wells are either exempt or non-hazardous by sampling or testing. I recommend that this determination be placed on them to demonstrate to the NMOCD.

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

and numbered ..... in the ..... Court of Lea County, New Mexico was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week for one (1) day consecutive weeks, beginning with the issue of February 22, 1996 and ending with the issue of February 22, 1996.

And that the cost of publishing said notice is the sum of $ 98.40 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 26th day of February, 1996

Jean Senier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

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

(GW-237)-PanEnergy Field Services, Robert Pearson, Manager of Environmental Affairs, 900 Republic Plaza, 370 17th St., Denver, Colorado, 80202, has submitted a Discharge Plan Application for the Pecos Diamond Gas Plant located in the SW/4 SW/4 Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Approximately 15 gallons per day of process wastewater with a total dissolved solids concentration of approximately 13,600 mg/l is stored in above ground, closed top steel tanks prior to transportation to an OCD approved offsite disposal facility. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of 10,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges will be managed.

(GW-071-1) - El Paso Field Services, David Bays, Environmental Specialist, P.O. Box 99234, El Paso, Texas, 79999-9234, has submitted a Discharge Plan Application for the Ballard Hydrocarbon Recovery Facility located in the SW/4 Section 16, Township 28 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2336 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5000 mg/l is stored in above ground, closed top steel tanks prior to being discharged into two evaporation ponds, that are double lined with a leak detection system, for evaporation. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 220 feet with a total dissolved solids concentration of 560 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges will be managed.

(GW-67) - Bull Dog Tool Company, Inc., Barry Antwell, Manager, 2807 W. County Road, Hobbs, New Mexico 88240, has submitted a Discharge Plan Renewal Application for their Hobbs service facility located in the NE/4 SW/4 of Section 20, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 50 gallons per day of wastewater from washing operations are stored in an above ground, closed top storage tank prior to disposal at an offsite OCD approved disposal facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 700 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-3) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #1 Gas Plant located in the NW/4 SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 46,000 gallons per day of process wastewater with a total dissolved solids concentration of 7000 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-4) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Appli-

AFFIDAVIT OF PUBLICATION

No. 35935

STATE OF NEW MEXICO
County of San Juan:

ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Wednesday, February 21, 1996

and the cost of publication is: $119.50

Robert Lovett

On 2/23/96 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Mary G. Snead

My Commission Expires March 21, 1998

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION

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

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(GW-4) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #2 Gas Plant located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 46,000 gallons per day of process wastewater with a total dissolved solids concentration of 7100 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

Any interested person may obtain further information from the Oil Conservation Division and m submit written comments to the Director of the Oil Conservation Division at the address giv

The Santa Fe New Mexican
Since 1849. We Read You.

NM OIL CONSERVATION
ATTN: SALLY MARTINEZ
P O BOX 6429
SANTA FE, NM 87505-6429

AD NUMBER: 470545 ACCOUNT: 56689
LEGAL NO: 59119 P.O. #: 96-199-0C

369	LINES once	at $	147.60
Affidavits:			5.25
Tax:			9.55
Total:		$	162.40

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 Santa Fe and Los Alamos, State of New Mexico and being a Ne paper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws o 1937; that the publication # 59119 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the no tice was published in the newspaper proper and not in any supplement; the first publication being on the 21 day o February 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affida vit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 21 day of February A.D., 1996

OFFICIAL SEAL
LAURA E. HARDING
NOTARY PUBLIC -- STATE OF NEW MEXICO
MY COMMISSION EXPIRES 11/23/97
Laura E Harding

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

Energy, Minerals and Natural Resources Department
Oil Conservation Division

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(GW-3) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #1 Gas Plant located in the NW/4 SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 44,000 gallons per day of process wastewater with a total dissolved solids concentration of 7000 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-4) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #2 Gas Plant located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 44,000 gallons per day of process wastewater with a total dissolved solids concentration of 7100 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges 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 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 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 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 13th day of February, 1996.

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

Legal #59119
Pub. February 21, 1996

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, New Mexico 87113
Phone: (505) 761-4525 Fax: (505) 761-4542

March 13, 1996

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

Dear Mr. Lemay:

This responds to the Energy, Minerals, and Natural Resources Department Oil Conservation Division's public notices dated February 13, 1996, and February 23, 1996, regarding the State of New Mexico's proposal to approve the ground water discharge plans for the applicants listed below.

Permit #	Applicant	County / Location NMPM
GW- 237	PanEnergy Field Services	Eddy / Section 3, T18S, R27E
GW-71-1	El Paso Field Services	San Juan / Section 16, T26N, R12W
GW- 67	Bull Dog Tool Company, Inc.	Lea / Section 20, T18S, R38E
GW- 3	Texaco Exploration and Production, Inc.	Lea / Section 27, T22S, R37E
GW- 4	Texaco Exploration and Production, Inc.	Lea / Section 28, T21S, R37E
GW- 78	Williams Field Services	San Juan / Section 8, T25N, R.W.
GW- 79	Williams Field Services	San Juan / Section 34, T26N, R4W
GW-49-1	El Paso Field Services	San Juan / Section 15, T26N, R11W

The U.S. Fish and Wildlife Service (Service) has no objection to the Oil Conservation Division (Division) approving discharge plans that utilize bermed, closed top tanks. The use of berms may help prevent migration of hydrocarbon-contaminated water into a surface water of New Mexico during accidental breach, and the use of closed top tanks prevents wildlife access to potentially toxic chemicals.

The Service has the following recommendations for discharge plans that use lined or unlined evaporation ponds. During flight, migratory birds may not distinguish between an evaporation pond and a natural waterbody. Therefore, rather than allow migratory birds access to a waterbody that may act as an attractive nuisance, the Service recommends that the applicant or the Division demonstrate that the evaporation ponds are "bird-safe" (e.g., can meet New Mexico general water quality standards 1102B, 1102F, and 3101K or 3101L), or that the evaporation ponds be constructed in a manner that prevents bird access (e.g., netted, fenced, closed top tanks, forced-air evaporation systems).

Migratory birds that land on waterbodies with an oil sheen (or pesticide residue) have the potential to contaminate their eggs during nesting season. Hydrocarbon pollutants carried to the nest on breast feathers, feet, or nesting materials can cause reduced hatchability of contaminated eggs. As little as 1 to 10 microliters of crude or refined oil topically applied to eggs of various bird species can be embryotoxic or teratogenic. We recommend that the Division or the applicant demonstrate that the pond will have no oil sheen and continue periodic testing to characterize the water quality and determine if any bioaccumulation or ecological risks seem imminent.

Our intent is to inform and intercede before any migratory bird deaths occur as migratory birds are beneficial (e.g., they hold pest populations in check) and are protected by law. The Migratory Bird Treaty Act (MBTA) makes it unlawful for anyone at anytime or in any manner to take (i.e., pursue, hunt, take, capture, kill, transport, or possess) any migratory bird unless authorized by a permit issued by the Department of the Interior. The courts have interpreted "illegal take" to include accidental poisoning or accumulation of harmful concentrations of contaminants by migratory birds, even if the contamination event was accidental or the perpetrator was unaware of the fact that his/her actions (or failure to take action) could ultimately prove harmful to migratory birds. The liability provisions of the MBTA preclude the necessity of proving intent and permits criminal prosecution of persons, associations, partnerships, or corporations that inadvertently or intentionally kill or illegally take one or more migratory birds. Therefore, if the creation and operation of an evaporation pond results in migratory bird deaths and the problem is not addressed, the operators may be held liable under the enforcement provisions of the MBTA.

If you have any questions, please contact Joel D. Lusk at (505) 761-4525.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Chief, Surface Water Quality Bureau, New Mexico Environment Department, Santa Fe, New Mexico
Chief, Ground Water Quality Bureau, New Mexico Environment Department, Santa Fe, New Mexico
Geographic Manager, New Mexico Ecosystems, U.S. Fish and Wildlife Service, Albuquerque, New Mexico

Texaco Exploration and Production Inc P O Box 1929
Eunice NM 88231 1929

February 9,1996

Chris E. Eustice
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

RE: GROUND WATER DISCHARGE PLAN RENEWAL

Texaco Eunice South Gas Plant request renewel of the plants Ground Water Discharge Plan.The Eunice South plant has reduced its process by eliminating the fractionation train, several storage tanks, merox treating system, caustic treater and scrubber vessel, the propane water knockout and scrubber vessel and the fractionation coil shed. The discharge from the South plant has reduced to the following:

Scrubbers and separators	225 gal/day
Boilers:	15,000 to 20,000 gal/day
Cooling tower	20,000 to 25,000 gal/day

The methods of discharge at the Eunice South Plant remains the same.

If you have any questions please call me at 505-394-2516.

Sincerely,

Rodney G Bailey

Rodney G. Bailey
Eunice Complex EHS Coordinator

OIL CONSERVATION DIVISION
RECEIVED
'95 NOV 20 AM 8 52

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time	Date
	11-17-9 8:57	11-17-95

Originating Party	Other Parties
ROBERT BROWNING - TEXACO	

Subject: S. EUNICE GAS PLANT

Discussion: WILL START ON MONDAY NOV. 27 1995 DRILLING 6 MONITOR WELLS FOR GROUND WATER CONTAMINATION INVESTIGATION

Conclusions or Agreements

Distribution: CC: JERRY SEXTON BILL OLSON

Signed

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe, New Mexico 87505

November 7, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.Z-765-962-583

Mr. Rodney Bailey
Texaco USA
P. O. Box 1749
Eunice, New Mexico 88231

RE: Discharge Plan Renewal
(GW-3) Eunice South Gas Plant
Lea County, New Mexico

Dear Mr. Bailey:

On March 16, 1981, the groundwater discharge plan, GW-3, for the Texaco USA (Texaco) South Eunice Gas Plant located in the NW/4 SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was subsequently renewed on May 23, 1986 and May 24, 1991. The discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on March 16, 1996.

If the facility continues to have potential or actual effluent or leachate discharges and Texaco wishes to continue operations, Texaco must renew their discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether Texaco has made, or intends to make, any changes in the discharge system, and if so, please include these modifications in the application for renewal. **Current WQCC Regulations do not allow for an expired discharge plan to receive an extension.** Therefore Texaco should submit the renewal application in ample time before the expiration date to allow the review process to be complete prior to expiration to avoid operating out of compliance (without an approved discharge plan).

Please submit the original 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 must be submitted with the discharge plan renewal request.

The OCD mailed Texaco a renewal notice, dated March 21, 1995, with a copy of the WQCC Regulations and a copy of the OCD Guidelines for the Preperation of Groundwater Discharge Plans at Natural Gas Plants.

The discharge plan application for the Texaco South Eunice Gas Plant is subject to WQCC Regulation 3-114. Every billable facility submitting a discharge plan for renewal will be assessed a fee equal to the filing fee of $50 plus a flat fee of $1667.50 for gas processing plants. The $50 filing fee is to be submitted with the discharge plan renewal application and is non-refundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

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

If Texaco no longer has any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact Chris Eustice (505) 827-7153.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/cee

xc: OCD Hobbs Office

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 22, 1995

CERTIFIED MAIL
RETURN RECEIPT NO: P-667-242-264

Mr. C.R. Russell
Environmental Coordinator
Texaco Exploration & Production, Inc.
P.O. Box 1650
Tulsa, Oklahoma 74102

RE: TEXACO EUNICE #1 GAS PLANT
LEA COUNTY, NEW MEXICO

Dear Mr. Russell:

The New Mexico Oil Conservation Division (OCD) has been reviewing the results of ENRON Operations Corp. recent soil and ground water investigations at the Northern Natural Gas Company's (NNGC) Eunice Compressor Station which is directly adjacent to Texaco's Eunice #1 natural gas processing plant.

ENRON's investigation results have shown that ground water at the site is contaminated with hydrocarbons in excess of New Mexico Water Quality Control Commission ground water standards. The source of these contaminants is not clear. Some of these ground water contaminants appear to originate from offsite sources. In addition, documentation with the report included aerial photographs of the area taken from 1954 to 1992. These photographs show that a number of pits and disposal areas were located at Texaco's plant prior to construction of and during the operation of NNGC's Eunice Compressor Station.

Due to the accumulated information referenced above, the OCD requires that Texaco supply the following information to the OCD by July 28, 1995:

1. A map showing the location of all unlined/lined pits and any other surface or subsurface disposal areas that have been used over time at Texaco's facility.

2. Information on how the pits or disposal areas were constructed and operated.

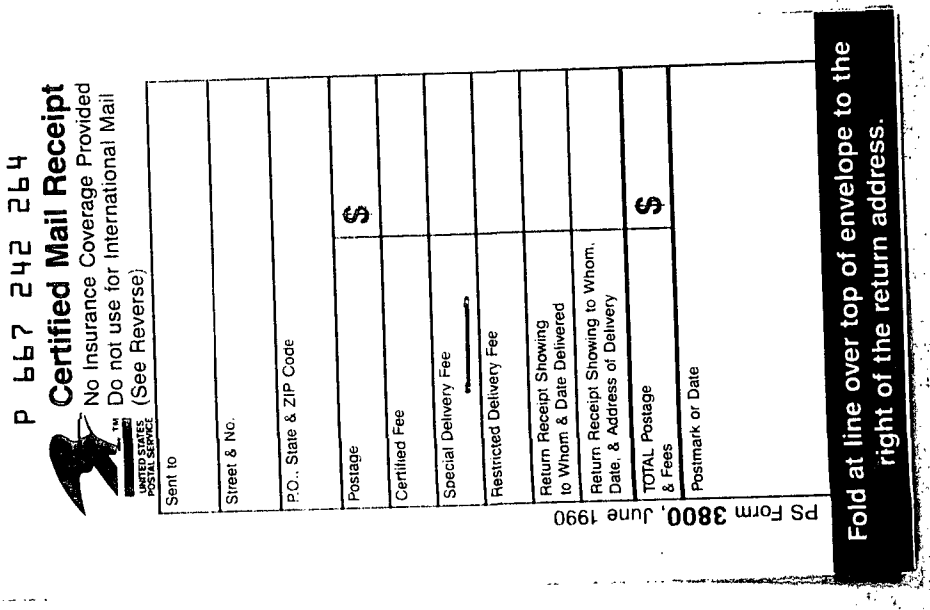
3. The types and volumes of fluids or wastes which were disposed of in each area.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

March 21, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-798

Environmental Coordinator
Texaco USA
P.O. Box 1650
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-03 Renewal
Eunice #1 Gas Processing Plant
Lea, New Mexico

Dear Sir:

On March 16, 1981, the groundwater discharge plan, GW-003, for the Eunice #1 Gas Processing Plant located in the NW/4 SW/4, Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). The plan was subsequently renewed on May 23, 1986 and May 24, 1991. This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was renewed for a period of five years. The renewal will expire on March 16,1996.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

To assist you in preparation of your application, I have enclosed an application form and a copy of the OCD's Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Plants and a copy of the WQCC regulations. 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 discharge plan renewal application for the Eunice #1 Gas Processing Plant is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat fee of $1667.50 for gas processing plants.

The (50) dollar filing fee is to be submitted with discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

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

If you no longer have any actual or potential discharges a discharge plan is not need, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Chris Eustice at (505) 827-7153.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: OCD Hobbs Office

DISCHARGE PLAN STATUS
AS OF 04/13/94

GW003 Texaco Eunice North GP

	REMARKS
06/07/83	LETTER FROM OCD CITING VIOLATIONS TO DISCHARGE PLAN
09/07/83	GETTY RESPONDS TO VIOLATIONS BY LETTER EXPLAINING REMEDIES
00/00/00	TEXACO ASSUMES OWNERSHIP OF FACILITY
08/19/85	OCD REQUIRES DP REMEWAL APPLICATION
02/20/86	OCD INSPECTS FACILITY
02/24/86	TEXACO SUBMITS RENEWAL APPLICATION
02/28/86	TEXACO SUBMITS AMMENDMENT TO DP FOR CATASTROPHIC LEAK FROM LINED PITS
03/04/86	OCD LETTER STATING INSPECTION DEFICIENCIES AND REQUESTING COMMITMENTS TO CORRECT
03/06/86	TEXACO REQUESTS EXTENSION TO DISCHARGE W/O DP
03/14/86	OCD APPROVES EXTENSION TO 5/15/86
03/31/86	LETTER FROM USDOI NOT CONTESTING RENEWAL
05/12/86	TEXACO RESPONDS TO OCD 3/4/86 LETTER
04/25/88	OCD HOBBS INSPECTS PIT LEAK DETECTION SYS
04/17/89	TEXACO SUBMITS PROPOSAL FOR CONSTRUCTION OF NEW PIT
05/15/89	OCD APPROVES CONSTRUCTION OF PIT
09/12/89	PHILLIPS RECEIVES EXEMPTION FOR NETTING
07/26/90	OCD REQUESTS DP RENEWAL APPLICATION
08/03/90	PHILLIPS REQUESTS DISPOSAL OF SLUDGE AT PARABO
08/15/90	OCD AUTHORIZES DISPOSAL AT PARABO
01/16/91	PHILLIPS SUBMITS DP RENEWAL APPLICATION
02/11/91	USFWS COMMENTS ON DP PUBLIC NOTICE
02/25/91	OCD LETTER REQUESTING ADDITIONAL INFORMATION FROM PHILLIPS FOR DP RENEWAL APPLICATION REVIEW
03/01/91	OCD RESPONDS TO USFWS COMMENTS
03/01/91	OCD REQUESTS PROPOSED ACTION TO PREVENT OIL ON PONDS
03/14/91	USFWS SUBMITS ADDITIONAL COMMENTS
03/11/91	ENV BUR RECIEVES LETTER FROM ODC HOBBS ABOUT OIL ON POND

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERV[illegible]ON DIVISION
REC[illegible]VED

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

'92 DE[illegible]14 AM 10 43

BRUCE KING
GOVERNOR

December 10, 1992

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Texaco Exploration & Production Inc.
P.O. Box 1065A
Eunice, NM 88231

Attn: Jerry Brittain

Gentlemen:

Above ground brine storage pit #1 at Texaco Plant #1 southeast of Eunice, New Mexico can be back filled and the liner buried in the pit as long as there is several feet of soil over the liner.

The closure of this pit has been discussed with Roger Anderson and he has authorized closing this pit when OCD District inspections show all salt has been removed from the pit.

Recent inspections by myself and Charlie Perrin confirm the above requirement has been met.

Please notify the Hobbs OCD office when the pit closure is set to begin.

Very truly yours,

OIL CONSERVATION DIVISION

Jerry Sexton
Supervisor, District I

JS/ed

cc: Roger Anderson
OCD Santa Fe

ENV - POLLUTION CONTROL
Solid Waste Pollution Control Permits
Eunice No. 1 Gas Processing Plant

May 2, 1991

Mr. Leonard Mohrmann, Branch Chief
Special Waste Branch
Bureau of Solid Waste Management
Texas Department of Health
1100 W. 49th Street
Austin, Texas 78756-3199

Dear Mr. Mohrmann:

On March 28, 1991, you issued a letter of authorization (copy attached) to the Mayor of Monohans, TX authorizing Texaco's Eunice Gas Processing Plants to dispose of 30 cubic yards of asbestos containing material at the Monohans Municipal Landfill. We have recently determined that the amount of asbestos containing material in several of the old boilers being renovated is much greater than originally estimated. We are, therefore, requesting that the subject letter of authorization be modified to indicate a total of 258 cubic yards of asbestos containing material for disposal at the Monohans Municipal Landfill.

All other information remains as outlined in my February 12, 1991 letter to you.

Please call me at (918) 560-7055 if additional information is required.

Sincerely,

Ray Russell/lzm

C. R. Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:ila
05/01.1

Attachment

cc: Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Mr. Herbert Quintela
Idealco
2107 Edison
Odessa, TX 79766

Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.
Commissioner

1100 West 49th Street
Austin, Texas 78756-3199
(512) 458-7111

Robert A. MacLean, M.D.
Deputy Commissioner

MAR. 29 1991

Honorable Richard J. Hoyer
Mayor of Monahans
112 W. 2nd Street
Monahans, Texas 79756

Subject: Solid Waste - Ward County
City of Monahans - Permit No. 772
Authorization to Accept Asbestos Waste

Dear Mayor Hoyer:

This letter will authorize the above cited landfill to accept approximately thirty cubic yards of asbestos insulation from Texaco USA for landfill disposal. According to C. R. Russell, Environmental Coordinator for Texaco USA, the insulation is from Texaco Production & Exploration Inc.'s Eunice #1 and Eunice #2 Gas Processing Plants near Eunice, New Mexico.

The asbestos may be accepted for landfill disposal provided:

1. the landfill complies with all federal regulations applicable to landfills accepting asbestos as outlined in the November 20, 1990 Federal Register;

2. the waste is marked as required by federal regulations (40 CFR 61); and

3. the shipment is accompanied by a manifest form (TWC Form 0311) properly prepared using the waste code number 179390 and the generator identification number 99935.

Please note that the landfill operator must report any improperly packaged shipments to EPA within one working day and must return a completed copy of the manifest to the generator within 30 days.

If you have any questions concerning this letter, you may contact Ms. Patricia Garland, C.P.C., here in Austin at telephone (512) 458-7271.

Sincerely,

L E Mohrmann

L. E. Mohrmann, Ph.D., C.P.C., Chief
Special Waste Branch
Surveillance and Enforcement Division
Bureau of Solid Waste Management

PAG:sm

cc: Region 3, TDH, El Paso
Region 3, TDH, Midland
Monahans City Manager
C. R. Russell, Texaco USA
Special Waste File

NGPLD
ENVIRONMENTAL
INDUSTRIAL HYGIENE
AND SAFETY

APR - 3 '91

DLR			MAB
LEK	4/8		RGB
GRD	4/1		RWH
CRR	4/4		BGH
GLS			JKN
ILA			OLS
LAM			
FILE	ENV-PC Solid Waste Permits Eunice #1		

CC: Eunice #2 (CRA/JEB)

ENV - POLLUTION CONTROL
Solid Waste Pollution Control Permits
Eunice No. 1 Gas Processing Plant
Minor Permit No. 8-567

May 1, 1991

Mr. Mark Henkhaus
District No. 8 Director
Railroad Commission of Texas
P.O. Box 2110
Midland, TX 79702-2110

Dear Mr. Henkhaus:

On April 15, 1991, you issued Minor Permit No. 8-567 (extended) for the transportation and disposal of 29 cubic yards of asbestos containing material originating from Texaco's Eunice Gas Processing Plants in Lea County, NM. We have since determined that the amount of asbestos in the old boilers is much greater than originally estimated.

Please revise our Minor Permit No. 8-567 to reflect an estimated 258 cubic yards of asbestos containing material for disposal at the Monohans Municipal Landfill.

Please call me at (918) 560-7055 if additional information is required.

Sincerely,

Ray Russell

C. R. Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:ila
05/01.2

cc: Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Mr. Herbert Quintela
Idealco
2107 Edison
Odessa, TX 79766

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

and numbered ..... in the

..... Court of Lea County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) consecutive weeks, beginning with the issue of

January 25, 19 91

and ending with the issue of

January 25, 19 91

And that the cost of publishing said notice is the sum of $ 43.50

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

Joyce Clemens

Subscribed and sworn to before me this 28th day of January, 19 91

Mrs. Jean Henries
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 29, 19 94

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 renewal and modification applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. 0. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-S800:

(GW-53) - Enron Gas Pipeline Operating Company, Larry Campbell Compliance Environmentalist, P. 0. Box 2018, Roswell, New Mexico 88201, has submitted a discharge plan modification application for the previously approved discharge plan for its Yates Plant located in the SW/4 Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. The modification request consists of the addition of a controlled bio-remediation landfarm area in the southeast portion of the Yates plant property. Wastes proposed to be remediated at the landfarm are nonhazardous hydrocarbon contaminated soils from field operatiom and mainline gas processing plants. The application addresses procedures to remediate contamination and prevention of possible offsite migration of contaminants. The uppermost ground water is at a depth of approximately 120 feet with a total dissolved solids concentration of approximateky 850 mg/l.

(CW-29) - Texaco USA, John H. Anderson, Operations Manager, P. Q. Box 1650, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previous)y approved discharge plan for its Buckeye Gas Processing Plant located in NE/4 NE14, Section 1, Township 18 South, Range 34 East, NMPM, Lea County, New Mexico. Approximately 6000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 1300 mg/l is disposed of at an OCD permitted offsite Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 520 mg/l. The discharge plan addresses how spi]]s, leaks and other accidental discharges to the surface will be managed.

(GW-3) - Texaco USA, John H. Anderson, Operations Manager, P. 0. Box 1650 Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Eumce #l Gas Plant located in NW/4 SW/4 Section 27, Township 22 South, Range 37 East, NMPA, Lea County, New Mexico. Approximately 70,000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7000 mg/l is discharged to a lined pond prior to final disposal in an OCD permitted Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-4) - Texaco USA, John H. Anderson, Operations Manager, P. 0. Box 1650, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Eunice #2 Gas Plant located in NE/4 SE/4, Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 17,000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7100 mg/l is disposed of at an OCD permitted offsite Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1200 to 2600 mg/l. The discharge plan addresses how spi]ls, 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. Prior to ruling on any proposed ischarge 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 wl ich comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest. If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based or nformation in the plan and information submitted at the hearing.

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 and renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-53) - Enron Gas Pipeline Operating Company, Larry Campbell, Compliance Environmentalist, P.O. Box 2018, Roswell, New Mexico 88201, has submitted a discharge plan modification application for the previously approved discharge plan for is Yates Plant located in the SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. The modification request consists of the addition of a controlled bioremediation landfarm area in the southeast portion of the Yates Plant property. Wastes proposed to be remediated at the landfarm are nonhazardous hydrocarbon contaminated soils from field operations and mainline gas processing plants. The application addressed procedures to remediate contamination and prevention of possible offsite migration of contaminants. THe uppermost ground water is at a depth of approximately 120 feet with a total dissolved solids concentration of approximately 850 mg/L

(GW-29) - Texaco USA, John H. Anderson, Operations Manager, P.O. Box 1650, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Buckeye Gas Processing Plant located in NE/4 NE/4, Section 1, Township 18 South, Range 34 East, NMPM, Lea County, New Mexico. Approximately 6000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 1300 mg/l is disposed of at an OCD permitted offsite Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 520 mg/l The discharge plan addresses how spills, leaks and other accidentaly discharges to the surface will be managed.

(GW-3) - Texaco USA, John H. Anderson, Operations Manager, P.O. Box 1650 Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Eunice #1 Gas Plant located in NW/4 SW/4, Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 70,000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7000 mg/l is discharged to a lined pond prior to final disposal in an OCD permitted Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

STATE OF NEW MEXICO
County of Bernalillo ss

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal** , and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chaper 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 23 day of Jan, 1991, and the subsequent consecutive publications on ....., 1991.

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 23 day of Jan, 1991.

AL SEAL
Annadette Duty
12-18-93

PRICE $44.54

Statement to come at end of month.

CLA-22-A (R-12/91) ACCOUNT NUMBER C81184

(GW-14) - Texaco USA, John H. Anderson, Operations Manager, P.O. Box 1650, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Eunice #2 Gas Plant located in NE/4 SE/4, Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 17,000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7100 mg/l is disposed of at an OCD permitted offsite Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1200 to 2600 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 Conversation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of January, 1991.

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

Journal: January 23, 1991

Affidavit of Publication

No. 13390

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive days weeks on the same day as follows:

First Publication January 24, 1991

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 6th day of February 1991

Barbara Ann Byrne

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1991

Copy of Publication

LEGAL NOTICE

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

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(GW-3) - Texaco USA, John H. Anderson, Operations Manager, P.O. Box 1650, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Eunice #1 Gas Plant located in NW/4 SW/4, Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 70,000 gallons per day of process wastewater with a total dissolved solids concentraiton of approximately 7000 mg/l is discharged to a lined pond prior to final disposal in an OCD permitted Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-4) - Texaco USA, John H. Anderson, Operations Manager, P.O. Box 1650, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Eunice #2 Gas Plant, located in NE/4 SE/4, Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 17,000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7100 mg/l is disposed of at an OCD permitted offsite Class II disposal well. The uppermost groundwater at the plant site is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1200 to 2600 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. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thrity (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest. If no public hearing is held the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of January, 1991. To be published on or before January 25, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY
Director

SEAL

Published in the Artesia Daily Press, Artesia, N.M. January 24, 1991.

Legal 13390

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

February 11, 1991

Cons. #2-22-91-I-075

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2008

Dear Mr. Lemay:

This responds to your public notice published on January 25, 1991, in which three injection well permit renewals and one permit modification for landfarm application were described. Our comments refer to the following permits:

(GW-53) - Enron Gas Pipeline Operating Company, Yates Processing Plant located in Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

(GW-29) - Texaco USA, Buckeye Gas Processing Plant located in Section 1, Township 18 South, Range 34 East, NMPM, Lea County, New Mexico.

(GW-3) - Texaco USA, Eunice #1 Gas Plant located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico.

(GW-4) - Texaco USA, Eunice #2 Gas Plant located in Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico.

Wetlands, riparian vegetation, and other sensitive wildlife habitat on or near the sites should be protected. Our concern with injection wells (GW-29, 3, and 4) is the potential impact to fish and wildlife through leakage and other discharges. We recommend that the evaporation pond utilized for GW-3 be covered or screened to prevent migratory bird use. If impacts cannot be avoided, a mitigation plan should be developed to compensate for fish, wildlife and habitat losses.

The landfarm application technique for remediating hydrocarbon contaminated wastes (GW-53) should specifically address the migration of contaminants into the Rio Penasco. We recommend that an alternative technique that is physically contained and involves less land area also be considered. Land application can lead to degradation of the soil through compaction and has limited use. Reusable remediation technology such as contained, rock-filtered

systems, infused with hydrocarbon metabolizing bacteria and fungi, can treat hydrocarbon contaminated soil and wastewater without the potential aquifer contamination associated with well injection, or potential soil degradation associated with landfarm application.

If you have any questions concerning our comments, please contact Thomas O'Brien or Joel Lusk at (505) 883-7877 or FTS 474-7877.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Energy, Minerals and Natural Resources Department, Forestry and Resources Conservation Division, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico

Texaco USA
PO Box 1650
Tulsa OK 74102

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ENV - POLLUTION CONTROL
Solid Waste Pollution Control Permits
Eunice #1 Gas Processing Plant
Eunice #2 Gas Processing Plant

February 12, 1991

Mr. Mark Henkhaus, District 8 Director
Railroad Commission of Texas
P. O. Box 2110
Midland, TX 79702-2110

Dear Mr. Henkhaus:

Texaco Production & Exploration Inc.'s Eunice #1 and Eunice #2 Gas Processing Plants (near Eunice, New Mexico) are planning an asbestos abatement project that will include the disposal of approximately 29 cubic yards of asbestos containing insulation at the Monahans Municipal Landfill.

The following information is relevant to the project:

Contractor

Idealco, dba A & S Insulation
2107 Edison
Odessa, TX 79766
phone: (915) 332-8586
New Mexico Construction Industries Division License #027423

Disposal Site

Monahans Municipal Landfill
City of Monahans
112 West 2nd Street
Monahans, TX 79756
phone: (915) 943-4343

Project Dates

Start: February 25, 1991
Finish: March 15, 1991

Origination Site

1. Texaco Production & Exploration Inc.
   Eunice #1 Gas Processing Plant
   P. O. Box 1137
   Eunice, NM 88231

   location: 6 miles south of Eunice, NM on State Highway #18

   amount of asbestos containing material: approximately 24 cubic yards

2. Texaco Production & Exploration Inc.
   Eunice #2 Gas Processing Plant
   P. O. Box 1137
   Eunice, NM 88231

   location: 0.1 miles north of Eunice, NM on State Highway #207

   amount of asbestos containing material: approximately 4.6 cubic yards

All asbestos material will be removed, contained, transported and disposed of in accordance with applicable state and federal regulations.

Please provide a Railroad Commission of Texas Minor Permit for the disposal of this material. The permit should be mailed to :

Ray Russell (08EIHS)
Texaco Exploration and Production Inc.
P. O. Box 1650
Tulsa, OK 74102

Should additional information be required, please call me at (918) 560-7055.

Sincerely,

C. R. Russell

C. R. Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

02CRR:lam12.3

cc: Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87504-2088

Mr. Herbert Quintela
Idealco
2107 Edison
Odessa, TX 79766

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

March 1, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-093

Mr. C. Ray Russell
Texaco USA
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-3
Eunice #1 Processing Plant
Lea County, New Mexico

Dear Mr. Russell:

During Oil Conservation Division's (OCD) field inspection of Texaco's Eunice #1 processing plant on February 8, 1991, it was noted that free oil was floating on the process water pond. Although discussion with you indicates that the oil may have been a result of equipment malfunction, you are reminded that you are subject to the requirements of Division Order R-8952 requiring protection of migratory birds. To comply with that order, ponds are required to be netted or screened unless an exception to the order has been approved. Your facility has been granted an exception based on the commitment by Texaco to visually check the pit at least twice daily for floating hydrocarbons and to remove such within four hours (copy enclosed).

Based on our discovery of hydrocarbons we request that you provide our office with information on the incident and what additional measures, if any, Texaco proposes to take to prevent reoccurrence.

I also am enclosing a copy of a letter to OCD from the US Fish and Wildlife Service recommending that we require the pond be screened or netted or that a mitigation plan be developed to compensate for losses. OCD's response is enclosed.

Please contact me at (505) 827-5812 if you have any question regarding this request.

Sincerely,

David G. Boyer, Hydrogeologist
Environmental Bureau Chief

Enclosure

DGB/sl

cc: OCD Hobbs Office

Submit 4 Copies to Appropriate District Office

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. [illegible]
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 3[illegible]
Ut. Ltr. Sec. Twp. R

Size of pit or tank: #3 Pit 243' x 243' 75,000 bbl. capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

_____ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

__X__ Operator proposes the following alternate protective measures: See attached.

SEP 15 1989

OIL CONSERVATION DIV.
SANTA FE

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

Approved by ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Title

Date SEP 12 1989

#3 PIT

This pit contains process waste water and is visually checked at least (2) times each day. The pit is located within the fenced boundaries of gas plant. The gas plant is manned 24 hours per day. Should hydrocar enter the pit, they can be removed within four (4) hours using the p vacuum truck.

Additionally, as can be seen in the attached U.S. Fish & Wildlife Serv Central Flyway diagram, there is not a waterfowl flyway located near Eunice Gas Plant.

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

February 11, 1991

Cons. #2-22-91-I-075

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2008

Dear Mr. Lemay:

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The landfarm application technique for remediating hydrocarbon contaminated wastes (GW-53) should specifically address the migration of contaminants into the Rio Penasco. We recommend that an alternative technique that is physically contained and involves less land area also be considered. Land application can lead to degradation of the soil through compaction and has limited use. Reusable remediation technology such as contained, rock-filtered

systems, infused with hydrocarbon metabolizing bacteria and fungi, can treat hydrocarbon contaminated soil and wastewater without the potential aquifer contamination associated with well injection, or potential soil degradation associated with landfarm application.

If you have any questions concerning our comments, please contact Thomas O'Brien or Joel Lusk at (505) 883-7877 or FTS 474-7877.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Energy, Minerals and Natural Resources Department, Forestry and Resources Conservation Division, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico

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

BRUCE KING
GOVERNOR

March 1, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-087

Ms. Jennifer Fowler-Propst
Field Supervisor
U. S. Fish and Wildlife Service
Suite D
3530 Pan American Highway, N.E.
Albuquerque, New Mexico 87107

Dear Ms. Fowler-Propst:

The Oil Conservation Division (OCD) has received your comments, dated February 11, 1991, concerning the renewals and/or modifications of the following discharge plans:

(GW-53) - Enron Gas Pipeline Operating Company, Yates Processing Plant located in Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

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The permitting of the Class II injection wells at the Texaco facilities (GW-3, GW-4 and GW-29) are not within the scope of the advertised discharge plan renewal applications. However, all Class II injection wells are permitted under the EPA-approved Underground Injection Control (UIC) program pursuant to Rules 701, 702, 703 and 704 of the OCD Rules and Regulations (enclosed). Any other discharges from a facility are regulated and controlled by a permit known as a "Ground Water Discharge Plan" issued pursuant to Part 3 of the New Mexico Water Quality Control Commission Regulations (enclosed). A discharge plan authorizes specific methods for disposal of wastes generated at the facility including disposal at another OCD permitted site.

Although the process water evaporation pond at Texaco's Eunice #1 Gas Plant is not screened or netted it is subject to OCD's Rule 8 (enclosed), and has been approved for exception to Division Order R-8952 requiring protection for migratory birds. A copy of the exception form and Texaco's protective measures are enclosed with this letter. OCD is evaluating whether the existing mitigation efforts are sufficiently effective.

The land farm application is a specific modification requested for a previously approved discharge plan (GW-53). As with new discharge plan applications, modification requests are reviewed very carefully to afford maximum protection to surface water, ground water and the environment. I am enclosing a copy of the modification application. In addition to the requirements committed to in the application, the OCD will not allow any fluids to be introduced to the land farm without prior approval and after complete review of proposed application techniques. This requirement will dramatically reduce the possibility of migration of contaminants by limiting any hydrostatic head available to move contaminants downward into soils or groundwater.

If you have further concerns or comments, please do not hesitate to contact me.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

Enclosures

cc: Artesia OCD Office
Hobbs OCD Office

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

OIL CONSERVATION DIVISION
RECEIVED
'91 MAR 11 AM 10 20

March 8, 1991

BRUCE KING
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Mr. William J. LeMay, Director
Oil Conservation Division
Box 2088
Santa Fe, NM 87504-2088

Dear Bill:

Recently when Roger Anderson was inspecting the Texaco Eunice Gasoline Plants, while the inspection was going on, the new plant superintendent released some oil onto a lined pit. After this, things apparently became confused and the Game and Fish Department somehow became involved. A Joel Lusk with Game and Fish stated that this pit would be required to be netted and that was the end of the situation.

This pit is well qualified for an exception to netting as it is checked daily, it is in an area which has 24-hour per day operations going on, and has not had oil on it, nor was there any evidence of dead birds.

As far as anyone knows the Game and Fish Department has not inspected the site, but apparently have taken the stance that any of the above is not relative to the operation.

If you would look into this situation and see what caused this change in the Game and Fish Department's attitude of not working with industry it would be appreciated.

To date I thought our rule had been accepted by all parties but this apparently is not the case.

Very truly yours,

OIL CONSERVATION DIVISION

Jerry Sexton
Supervisor, District I

cc: Tom Lane - Game & Fish Dept.
Roger Anderson - OCD

Encl.

Texaco

DATE: March 5, 1991

TO: Mr. Jerry Sexton
New Mexico Oil Conservation Division

FROM: Jerry Brittain
Texaco Exploration and Production Inc.
Eunice Gas Plants

SUBJECT: **MFG - PLANTS**
Pit No. 4 Inspection by OCD

February 6 three members of an inspection team from New Mexico Oil Conservation Division, led by Roger Anderson, toured Eunice No. 1 and No. 2 plants. During the inspection, I demonstrated how our oil-water skimmer sump system separates the two liquids for proper disposition. I did not realize that by operating a float switch on the water phase pump that a balance between water and oil had been disturbed to the extent that oil was sent to Pit No. 4. Normally oil is separated and recovered for storage prior to pipeline shipment.

I had personally inspected all the Eunice No. 1 pits two days earlier and all were oil free. Each day the Gas Treater Operator observes the condition of the pits during his chemical treating rounds. It is standard procedure to report oil on pit surfaces to his immediate supervisor.

During the course of each week myself, the Assistant Superintendent, and our Lab Technician will check the pits also.

The occurrence of oil on Pit No. 4 is an isolated incident very likely caused by my operating the skimmer float switch.

The oil observed was vacuumed off the water and disposed of properly the next morning.

If I can be of further assistance, please contact me.

J. E. Brittain

JEB/ps
xc: CRA
JEB
File

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

BRUCE KING
GOVERNOR

March 1, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-093

Mr. C. Ray Russell
Texaco USA
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-3
Eunice #1 Processing Plant
Lea County, New Mexico

Dear Mr. Russell:

During Oil Conservation Division's (OCD) field inspection of Texaco's Eunice #1 processing plant on February 8, 1991, it was noted that free oil was floating on the process water pond. Although discussion with you indicates that the oil may have been a result of equipment malfunction, you are reminded that you are subject to the requirements of Division Order R-8952 requiring protection of migratory birds. To comply with that order, ponds are required to be netted or screened unless an exception to the order has been approved. Your facility has been granted an exception based on the commitment by Texaco to visually check the pit at least twice daily for floating hydrocarbons and to remove such within four hours (copy enclosed).

Based on our discovery of hydrocarbons we request that you provide our office with information on the incident and what additional measures, if any, Texaco proposes to take to prevent reoccurrence.

I also am enclosing a copy of a letter to OCD from the US Fish and Wildlife Service recommending that we require the pond be screened or netted or that a mitigation plan be developed to compensate for losses. OCD's response is enclosed.

Please contact me at (505) 827-5812 if you have any question regarding this request.

Sincerely,

David G. Boyer, Hydrogeologist
Environmental Bureau Chief

Enclosure

DGB/sl

cc: OCD Hobbs Office

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

February 11, 1991

Cons. #2-22-91-I-075

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2008

Dear Mr. Lemay:

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If you have any questions concerning our comments, please contact Thomas O'Brien or Joel Lusk at (505) 883-7877 or FTS 474-7877.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Energy, Minerals and Natural Resources Department, Forestry and Resources Conservation Division, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico

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

BRUCE KING
GOVERNOR

March 1, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-087

Ms. Jennifer Fowler-Propst
Field Supervisor
U. S. Fish and Wildlife Service
Suite D
3530 Pan American Highway, N.E.
Albuquerque, New Mexico 87107

Dear Ms. Fowler-Propst:

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If you have further concerns or comments, please do not hesitate to contact me.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

Enclosures

cc: Artesia OCD Office
Hobbs OCD Office

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

BRUCE KING
GOVERNOR

February 25, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-051

Mr. C. Ray Russell
Texaco USA
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-3
Eunice #1 Processing Plant
Lea County, New Mexico

Dear Mr. Russell:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced discharge plan renewal application, dated February 8, 1991. The following comments and requests for additional information and commitments are based on review of the application and observations from the February 6, 1991, OCD site inspection:

1. All drum storage, above ground storage and pump areas susceptible to leaks must have a pad and curbing type containment. The following areas were identified that require containment:

   a) The drum storage along the north fence.

   b) The naptha saddle tank.

   c) The lube oil/slop oil saddle tanks.

   d) The cooling tower circulation pumps.

   e) The gasoline tank outside the south fence.

f) The reboiler pumps have "driptrays" that are draining to the ground. Better Containment is required at these units.

g) The disposal well pump is mounted on a pad that does not have curbing. A curbing type containment is required for this pump.

2. There was evidence of spillage around the main waste fluid sump. Submit a plan to eliminate this spillage and remediate the area.

3. The cooling towers along the south fence have evidence of overflow events. Submit a plan for limiting these events and immediate remediation if and when they occur.

4. All underground tanks or sumps that are repaired or replaced are required to be equipped with leak detection. Existing underground tanks and sumps that are not equipped with leak detection are required to be integrity tested on an annual basis. Submit a plan to accomplish this requirement.

Submission of the above information will allow review of your application to continue. If you have any questions, please do not hesitate to call me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Hobbs Office

Texaco USA
PO Box 1650
Tulsa OK 74102

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ENV - POLLUTION CONTROL
Solid Waste Pollution Control Permits
Eunice #1 Gas Processing Plant
Eunice #2 Gas Processing Plant

February 12, 1991

Ms. Debbie Brinkerhoff
Air Quality Bureau
Harold Runnel Building
1190 St. Francis Drive
Santa Fe, NM 87503

Dear Ms. Brinkerhoff:

Texaco Production & Exploration Inc.'s Eunice #1 and Eunice #2 Gas Processing Plants plan to properly remove and dispose of approximately 775 cubic feet of asbestos containing insulation.

The following information is relevant to both projects:

Contractor for Removal and Disposal

Idealco, dba A & S Insulation
2107 Edison
Odessa, TX 79766
phone: (915) 332-8586
New Mexico Construction Industries Division License #027423

Disposal Site

Monahans Municipal Landfill
City of Monahans
112 West 2nd Street
Monahans, TX 79756
phone: (915) 943-4343

Project Dates

Start: February 25, 1991
Finish: March 15, 1991

The removal and disposal will include the use of the following methods as relevant to the project:

wet method
enclosure
encapsulation
glove bag
double bag
negative air

The information submitted below is site specific as indicated. The age and use of the equipment has been specified, if known.

Eunice #1 Gas Processing Plant

Texaco Exploration and Production Inc.
Eunice #1 Gas Processing Plant
P. O. Box 1137
Eunice, NM 88231

6 Miles South of Eunice, NM on State Highway 18

Attn: Mr. C. R. Adkison, Area Manager

Equipment to be abated:

1. 280' of 2" pipe with 2" insulation
2. 16' of 2" pipe with 1 ½" insulation
3. 85' of 4" pipe with 1 ½" insulation
4. U-tube exchanger-about 40' of 3" pipe with 1 ½' insulation
5. 60' of 1" pipe with 1" insulation
6. 48' of 6" pipe with 2" insulation
7. 39' of 8" pipe with 2" insulation

Equipment to be abated: (Continued)

8. Old steam lines
   A. 55' of 8" pipe with 3" insulation
   B. 90' of 12" pipe with 3" insulation
   C. 40' of 2" pipe with 2" insulation
   D. 150' of 8" pipe with 3" insulation
   E. 10' of 4" pipe with 2" insulation
9. Oil reclaimer vessel piping
   A. 20' of 2" pipe with 2" insulation
   B. 4' of 2" pipe with 2" insulation
10. Oil heater piping
   A. 6' of 5" pipe with 2" insulation
   B. 15' of 5" pipe with 2" insulation
11. Four Wickes Boilers. Contractor to remove boilers.
   A. #3 Boiler, Wickes, S/N 60998, 1947
   B. #4 Boiler, Wickes, S/N 62000, 1954
   C. #5 Boiler, Wickes, S/N 62023, 1954
   D. #7 Boiler, Wickes, S/N 62043, 1954
12. Four drums asbestos insulation, 21" diameter x 35" high

The estimated insulation is 450 CF for the piping and 200 CF for the boilers. The Contractor has the option of removing the pipe insulation and/or hauling off the pipe. The boilers are to be removed as units and/or sections.

Eunice #2 Gas Processing Plant

Texaco Exploration and Production Inc.
Eunice #2 Gas Processing Plant
P. O. Box 1137
Eunice, NM 88231

0.1 Miles North of Eunice, NM on State Highway 207

Attn: Mr. C. R. Adkison, Area Manager

Equipment to be abated:

1. 50' of 1" pipe with 1" insulation
2. 90' of 4" pipe with 1 ½" insulation
3. one 48' diameter by 15' vessel with 1 ½" insulation
4. one 30' diameter by 14' vessel with 1" insulation
5. one 56' diameter by 26'6" vessel with 1" insulation
6. one double 6" elbow with 1" insulation
7. 15 cf of bagged insulation

The estimated insulation is 125 CF. The Contractor has the option of removing the insulation and/or hauling off the pipe and/or vessels.

Should you have any questions or require additional information, please call me at (918) 560-7055.

Sincerely,

C. R. Russell/ler

C. R. Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

02CRR:lam12.2

cc: Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87504-2088

Mr. Herbert Quintela
Idealco
2107 Edison
Odessa, TX 79766

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

March 14, 1991

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2008

Dear Mr. Lemay:

This responds to Roger Anderson's letter dated March 1, 1991, concerning the renewal or modifications of the following discharge plans:

(GW-3) - Texaco USA, Eunice #1 Gas Plant located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico.

(GW-53) - Enron Gas Pipeline Operating Company, Yates Processing Plant located in Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

Mr. Anderson provided us copies of the New Mexico Water Quality Control Commission Regulations as amended through November 25, 1988, and the Rules and Regulations of the State of New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division (Division) dated October 16, 1989. He also included copies of the following documents.

1. The amended rules for the abandonment and plugging of wells.

2. The application for exception to Division Order R-8952 for protection of migratory birds for the Eunice #1 Gas Plant Pit #3, signed by Ray Russell, Environmental Coordinator for the operator, Texaco Producing Inc.

3. A copy of the modification permit request for the land farm application of nonhazardous contaminated soil from Enron Gas Plants (GW-53).

The information provided for GW-53 adequately addresses the U.S. Fish and Wildlife Service (Service) concerns relative to the land farm procedures.

The Service, however, finds the information contained in the application for exception to Division Order R-8952 for GW-3 to be inaccurate and strongly disagrees with the decision by the Division to grant the exception.

The requirement contained in order R-8952 to screen, net, or cover a pit or tank for the protection of migratory birds does not apply to migratory waterfowl species alone, but to all migratory bird species. Migratory birds that are not waterfowl include, but are not limited to, sparrows, hawks, blackbirds, doves, flycatchers, kingbirds, larks, swallows, thrushes, and wrens, all of which have ranges that include the area of this gas plant. Therefore, the statement that this pit is not within a migratory waterfowl management corridor within the Central Flyway is not sufficient to eliminate the potential use of water impoundments by migratory bird species. Additionally, the Eunice #1 Gas Plant Pit #3 in Lea County, New Mexico, does occur within the Central Flyway. The Central Flyway consists of Alberta, Saskatchewan; Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming; and Mexico (U.S. Department of the Interior, Fish and Wildlife Service, 1984, Flyways, Pioneering Waterfowl Management in North America).

The facility is manned 24 hours a day, and although the pit is checked two times each day and is located within the fenced boundaries of the facility, this does not lessen the accessibility of the pit to migratory birds. Human activity will not necessarily negate the use of this water impoundment by migratory birds. In addition, the removal of hydrocarbon residue within 4 hours by vacuum truck does not reduce the risk to migratory birds that contact oil and would subsequently be killed.

The Migratory Bird Treaty Act (MBTA) does not allow any exception to the take of migratory birds. If any migratory birds are killed in this pit (or any other) and documented due to granting of an exception to screening at this facility, the Service will turn the case over to the U.S. Attorney for review and possible prosecution under the MBTA. To avoid this eventuality, the Service recommends that <u>all</u> wastewater impoundments be designed and constructed to prevent access by migratory birds,

The screen, fence, net, or cover used should be of sufficient size to prevent access to the pit, tank, or impoundment. The use of unlined pits, tanks, or impoundments should also be avoided as seepage can provide migratory bird access to contaminated water. Failure to implement these measures could subject companies, and even individuals, to civil and/or criminal liabilities under the MBTA, the Endangered Species Act, and the Eagle Protection Act.

If you have any questions concerning our comments, please contact Thomas O'Brien or Joel Lusk at (505) 883-7877 or FTS 474-7877.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
District Supervisor, New Mexico Oil Conservation Division, Artesia, New Mexico
District Supervisor, New Mexico Oil Conservation Division, Aztec, New Mexico
District Supervisor, New Mexico Oil Conservation Division, Hobbs, New Mexico
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Division of Law Enforcement, Albuquerque, New Mexico
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico
Oil Pit Coordinator, U.S. Fish and Wildlife Service, Refuges and Wildlife, Albuquerque, New Mexico

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

BRUCE KING
GOVERNOR

March 1, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-087

Ms. Jennifer Fowler-Propst
Field Supervisor
U. S. Fish and Wildlife Service
Suite D
3530 Pan American Highway, N.E.
Albuquerque, New Mexico 87107

Dear Ms. Fowler-Propst:

The Oil Conservation Division (OCD) has received your comments, dated February 11, 1991, concerning the renewals and/or modifications of the following discharge plans:

(GW-53) - Enron Gas Pipeline Operating Company, Yates Processing Plant located in Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

(GW-29) - Texaco USA, Buckeye Gas Processing Plant located in Section 1, Township 18 South, Range 34 East, NMPM, Lea County, New Mexico.

(GW-3) - Texaco USA, Eunice #1 Gas Plant located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico.

(GW-4) - Texaco USA, Eunice #2 Gas Plant located in Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico.

The permitting of the Class II injection wells at the Texaco facilities (GW-3, GW-4 and GW-29) are not within the scope of the advertised discharge plan renewal applications. However, all Class II injection wells are permitted under the EPA-approved Underground Injection Control (UIC) program pursuant to Rules 701, 702, 703 and 704 of the OCD Rules and Regulations (enclosed). Any other discharges from a facility are regulated and controlled by a permit known as a "Ground Water Discharge Plan" issued pursuant to Part 3 of the New Mexico Water Quality Control Commission Regulations (enclosed). A *discharge plan authorizes specific methods for disposal of wastes generated at the facility* including disposal at another OCD permitted site.

Although the process water evaporation pond at Texaco's Eunice #1 Gas Plant is not screened or netted it is subject to OCD's Rule 8 (enclosed), and has been approved for exception to Division Order R-8952 requiring protection for migratory birds. A copy of the exception form and Texaco's protective measures are enclosed with this letter. OCD is evaluating whether the existing mitigation efforts are sufficiently effective.

The land farm application is a specific modification requested for a previously approved discharge plan (GW-53). As with new discharge plan applications, modification requests are reviewed very carefully to afford maximum protection to surface water, ground water and the environment. I am enclosing a copy of the modification application. In addition to the requirements committed to in the application, the OCD will not allow any fluids to be introduced to the land farm without prior approval and after complete review of proposed application techniques. This requirement will dramatically reduce the possibility of migration of contaminants by limiting any hydrostatic head available to move contaminants downward into soils or groundwater.

If you have further concerns or comments, please do not hesitate to contact me.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

Enclosures

cc: Artesia OCD Office
Hobbs OCD Office

Texaco Inc
PO Box 1650
Tulsa OK 74102

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ENV - POLLUTION CONTROL
Water Pollution Control Permits
Eunice #1 Gas Processing Plant
(Discharge Plan (GW-3)

May 16, 1991

Mr. Roger C. Anderson
Oil Conservation Division
P.O. Box 2008
State Land Office Building
Santa Fe, NM 87504

Dear Mr. Anderson:

Pursuant to your February 25, 1991 letter, Texaco offers the following commitments in order to correct any deficiencies that were found during your plant visit. Our responses are in the order in which they were presented in your letter.

1. a&b) The concrete slab (old office building floor) located northwest of the gas treating area will be curbed and utilized for drum storage and storage for the naptha saddle tank. This will be accomplished by September 1, 1991.

   c) A study will be conducted to determine the need for each of the lube oil/slop saddle tanks. Marginal need tanks will be eliminated. Others will be replaced and placed on pads constructed of impervious materials. A minimum of two years will be needed to completed this project.

   d) Proper shielding will be placed around the cooling tower circulation pump packing glands. Metal troughs will be placed around the pump bases to direct the flow back into the basins. The task will be completed by December 1, 1991.

   e) The gasoline tank outside the south fence will be eliminated by July 15, 1991.

f) Plugs will be placed in the drip rails around the reboiler pumps and other similar pumps. The Operators will remove any oil as it accumulates. This will be completed by August 1, 1991.

g) A curb will be installed around the disposal well pump. Additionally, a sump pump will be installed in the catch sump that will pump any liquids back to the disposal pump feed tank. A completion time of two years is planned for this project.

2. A concrete curb will be installed around the top of the main waste fluid sump (oil/water separator). The contaminated soil will be remediated or disposed of in compliance with current laws or regulations. This project will be completed by June 1, 1992.

3. Low pressure alarms will be installed to alert operators of any problems that could cause the cooling towers to overflow. This will give sufficient time for the operators to start the stand by engine. This will be completed by March 1, 1992.

4. Leak detection will be installed on all sumps upon their replacement or extensive repair. Existing sumps will be visually inspected once a year. The first annual visual inspection will be completed by June 1, 1992.

Please call me at (918) 560-7055 or Mr. J. E. Brittain at (505) 394-2566 if you need additional information.

Sincerely,

Ray Russell

C. R. Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:ila
05/15.1

Lewis E Knight
Safety and Environmental
Engineering Coordinator
Natural Gas Plants
Division

Texaco USA

PO Box 3000
Tulsa OK 74102
918 560 6331

April 17, 1989

ENV - POLLUTION CONTROL
Waste Water Disposal Petition No. 4
Eunice No. 1 Gas Plant

Mr. Roger Anderson
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

Texaco's Natural Gas Plants and Liquids Division plans to construct a new waste water disposal pit at its Eunice No. 1 gas processing plant, Lea County. The new pit (No. 4) will hold the same waste water as existing pit No. 3, prior to disposal.

Upon completion of pit No. 4, pit No. 3 will be relined and used to hold brine for our product storage operations.

Enclosed are drawings and other relevant information to aid in your review of our application. In the meantime, if you have questions or need additional information, please do not hesitate to contact me.

Very truly yours,

R. C. Knight

LEK/bam
Enclosures

4/17.2

TEXACO PRODUCING INC.

Application for Waste Disposal Pit #4

Eunice Gas Plant #1, Eunice New Mexico

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate, and complete to the best of my knowledge and belief.

L. E. Knight
Signature

4/17/89
Date

L. E. Knight
Printed Name of Person Signing

Saf. & Env. Engr. Coord.
Title

TEXACO PRODUCING INC.

Application for Waste Disposal Pit #4

Eunice Gas Plant #1, Eunice New Mexico

I. General Information

A. Owner:

Texaco Producing Inc.
P.O. Box 1137
Eunice, New Mexico 88231

Attn: Mr. C. R. Adkison, Area Manager
Telephone: (505) 394-2566

B. Name of Local Representative or Contact Person:

Mr. C. J. Shahan, Plant Superintendent
P.O. Box 1137
Eunice, New Mexico 88231
Telephone: (505) 394-2566

C. Location of Disposal Pit:

Legal Description: SW, SW, section 27, T-22-S, R-37-E of Lea County, New Mexico.

D. Type of Operation:

This facility is a natural gas processing plant. Gas is gathered, compressed, treated and dehydrated. In addition, the liquids are extracted from the gas in a cryogenic plant, then fractionated and sold as natural gas liquid products. The residue gas is transferred into a gas transmission company line for sale.

II. General Description

A. Proposed Operations

1. The waste water generated at this facility is cooling tower blowdown, boiler blowdown, natural gas liquids product treater waste water and process waste water. These waste waters are presently collected in pit #3 (see attached plot plan) prior to injecting into waste disposal wells. We propose the construction of a new waste disposal pond #4 (see attached plot plan). All process waste water will be redirected to the new pond #4 prior to being injected into permitted disposal wells. After pond #4 is placed in operation, pond #3 will be relined and converted into a brine holding pond for use in product recovery from NGL product storage wells.

2. Technical Description of Pit #4 Construction:

Effluent stored - waste waters
Volume of storage - 52,000 BBL
Area of pit (inside dimension) - 190' x 240'
Depth of pit (top to bottom of dike) - 15' (3' freeboard)
Slope of pit sides - 1:3 (inside and outside)
Pit construction - compacted earthen dam
Depth of pit below grade - approximately 7.5 feet
Liner material - high density polyethylene
Liner thickness - 60 MIL primary and 60 MIL secondary
Leak detection system -
The pit is to be double lined and a leak detection system installed to detect any fluids between liners by piping to an inspection sump outside of Pit dike.
Width of top of dike - 10 feet
Installation method -
Liners will be installed by welding the approximately 20' width sheets of polyethylene together using fusion welding machines. Vents under secondary liner and between primary and secondary lines will be installed to vent any gas that may form (see attached drawings).

B. Spill/Leak Prevention and Procedures

1. If the pit dike were to rupture, its contents would be contained in a Playa in which the pit is located.

2. Detection of leaks through primary lines will be by physical inspection of leak detection sump once per week by plant operating personnel. Records of inspections will be kept.

III. Site Characteristics

A. Hydrologic Features

1. The proposed Pit #4 is located in a Playa lake.

2. A sample of water from the nearest water wells was obtained for analysis. The well is located approximately 1/2 mile north of the plant and provides drinking water for the plant. Attached is a water analysis for the secured sample.

B. Geologic Descriptions of Pit Site

1. Soil Type - Clay, Caliche

2. Depth to the most shallow aquifer is approximately 85 to 100 feet.

TEXACO PRODUCING, INC.
NATURAL GASOLINE PLANTS LABORATORY
P. O. Box 2194
Pampa, Texas 79066

REPORT OF ANALYSIS

SAMPLE SERIAL NO. 13796 ANALYSIS NO. 1

SAMPLE OF "Able" Well Water

FROM: Eunice #1 ANALYSIS REQUESTED BY: J.W. Jacobs

SECURED BY: R. Bailey RESULTS TO: C.R. Adkison

DATE SECURED: 2-16-89 J.W. Jacobs

DATE RECEIVED: 2-17-89 C.J. Shahan

ANALYSIS COMPLETED: 2-22-89 NGP File

ANALYST: Pillon, Stinnett SS File

CHECKED BY: JWB DATE: 2-23-89

APPROVED BY: JWB DATE: 2-23-89 DATE OF REPORT: 2-28-89

ANALYSIS

PARAMETER	MG/L
Total Dissolved Solids Measured	710
Specific Conductance Umhos/cm	1100
Chromium, Total	<0.01
Zinc, Total	0.02
Chlorides	163
Sulfate	115
Hardness	290
Alkalinity	212

Texaco Inc
PO Box 1650
Tulsa OK 74102

ENV - POLLUTION CONTROL
Water Pollution Control Inspections
Eunice #1 Gas Processing Plant

March 15, 1991

Mr. David G. Boyer, Environmental Bureau Chief
New Mexico Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Dear Mr. Boyer:

I have received your March 1, 1991 letter concerning the oil found on Eunice #1 Gas Processing Plant's wastewater pit during the Oil Conservation Division's (OCD) February 6, 1991 plant inspection.

In response to your inquiry, I think the isolated incident is best described in Mr. J. E. Brittain's March 5, 1991 letter to Mr. Jerry Sexton, Hobbs OCD. I have enclosed a copy of the referenced letter for your review.

In addition, the plant will adhere to the "alternate protective measures" as outlined in our August 28, 1989 Application for Exception to Division Order R-8952. These measures include visually checking the pit for free oil at least twice daily and removing any free oil that may be found.

Please call me at (918) 560-7055 if additional information is required.

Sincerely,

Ray Russell

C. R. Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:lam
03/12.1

Attachment

Texaco

DATE: March 5, 1991

TO: Mr. Jerry Sexton
New Mexico Oil Conservation Division

FROM: Jerry Brittain
Texaco Exploration and Production Inc.
Eunice Gas Plants

SUBJECT: MWG - PLANTS
Pit No. 4 Inspection by OCD

February 6 three members of an inspection team from New Mexico Oil Conservation Division, led by Roger Anderson, toured Eunice No. 1 and No. 2 plants. During the inspection, I demonstrated how our oil-water skimmer sump system separates the two liquids for proper disposition. I did not realize that by operating a float switch on the water phase pump that a balance between water and oil had been disturbed to the extent that oil was sent to Pit No. 4. Normally oil is separated and recovered for storage prior to pipeline shipment.

I had personally inspected all the Eunice No. 1 pits two days earlier and all were oil free. Each day the Gas Treater Operator observes the condition of the pits during his chemical treating rounds. It is standard procedure to report oil on pit surfaces to his immediate supervisor.

During the course of each week myself, the Assistant Superintendent, and our Lab Technician will check the pits also.

The occurrence of oil on Pit No. 4 is an isolated incident very likely caused by my operating the skimmer float switch.

The oil observed was vacuumed off the water and disposed of properly the next morning.

If I can be of further assistance, please contact me.

J. E. Brittain

JEB/ps
xc: CRA
JEB
File

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

March 14, 1991

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2008

Dear Mr. Lemay:

This responds to Roger Anderson's letter dated March 1, 1991, concerning the renewal or modifications of the following discharge plans:

(GW-3) - Texaco USA, Eunice #1 Gas Plant located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico.

(GW-53) - Enron Gas Pipeline Operating Company, Yates Processing Plant located in Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico.

Mr. Anderson provided us copies of the New Mexico Water Quality Control Commission Regulations as amended through November 25, 1988, and the Rules and Regulations of the State of New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division (Division) dated October 16, 1989. He also included copies of the following documents.

1. The amended rules for the abandonment and plugging of wells.

2. The application for exception to Division Order R-8952 for protection of migratory birds for the Eunice #1 Gas Plant Pit #3, signed by Ray Russell, Environmental Coordinator for the operator, Texaco Producing Inc.

3. A copy of the modification permit request for the land farm application of nonhazardous contaminated soil from Enron Gas Plants (GW-53).

The information provided for GW-53 adequately addresses the U.S. Fish and Wildlife Service (Service) concerns relative to the land farm procedures.

The Service, however, finds the information contained in the application for exception to Division Order R-8952 for GW-3 to be inaccurate and strongly disagrees with the decision by the Division to grant the exception.

The requirement contained in order R-8952 to screen, net, or cover a pit or tank for the protection of migratory birds does not apply to migratory waterfowl species alone, but to all migratory bird species. Migratory birds that are not waterfowl include, but are not limited to, sparrows, hawks, blackbirds, doves, flycatchers, kingbirds, larks, swallows, thrushes, and wrens, all of which have ranges that include the area of this gas plant. Therefore, the statement that this pit is not within a migratory waterfowl management corridor within the Central Flyway is not sufficient to eliminate the potential use of water impoundments by migratory bird species. Additionally, the Eunice #1 Gas Plant Pit #3 in Lea County, New Mexico, does occur within the Central Flyway. The Central Flyway consists of Alberta, Saskatchewan; Colorado, Kansas, Montana, Nebraska, **New Mexico**, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming; and Mexico (U.S. Department of the Interior, Fish and Wildlife Service, 1984, Flyways, Pioneering Waterfowl Management in North America).

The facility is manned 24 hours a day, and although the pit is checked two times each day and is located within the fenced boundaries of the facility, this does not lessen the accessibility of the pit to migratory birds. Human activity will not necessarily negate the use of this water impoundment by migratory birds. In addition, the removal of hydrocarbon residue within 4 hours by vacuum truck does not reduce the risk to migratory birds that contact oil and would subsequently be killed.

The Migratory Bird Treaty Act (MBTA) does not allow any exception to the take of migratory birds. If any migratory birds are killed in this pit (or any other) and documented due to granting of an exception to screening at this facility, the Service will turn the case over to the U.S. Attorney for review and possible prosecution under the MBTA. To avoid this eventuality, the Service recommends that <u>all</u> wastewater impoundments be designed and constructed to prevent access by migratory birds,

The screen, fence, net, or cover used should be of sufficient size to prevent access to the pit, tank, or impoundment. The use of unlined pits, tanks, or impoundments should also be avoided as seepage can provide migratory bird access to contaminated water. Failure to implement these measures could subject companies, and even individuals, to civil and/or criminal liabilities under the MBTA, the Endangered Species Act, and the Eagle Protection Act.

If you have any questions concerning our comments, please contact Thomas O'Brien or Joel Lusk at (505) 883-7877 or FTS 474-7877.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
District Supervisor, New Mexico Oil Conservation Division, Artesia, New Mexico
District Supervisor, New Mexico Oil Conservation Division, Aztec, New Mexico
District Supervisor, New Mexico Oil Conservation Division, Hobbs, New Mexico
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Division of Law Enforcement, Albuquerque, New Mexico
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico
Oil Pit Coordinator, U.S. Fish and Wildlife Service, Refuges and Wildlife, Albuquerque, New Mexico

Texaco USA

PO Box 1650
Tulsa OK 74102

ENV - POLLUTION CONTROL
Water Pollution Control Permits
Eunice #1 Gas Processing Plant

February 8, 1991

Mr. David G. Boyer
Environmental Bureau Chief
New Mexico Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Dear Mr. Boyer:

Enclosed is Texaco Exploration and Production Inc.'s Eunice #1 Gas Processing Plant's Groundwater Discharge Plan.

Additionally, our program for berming, curbing and paving of process areas has been included in the plan.

Please feel free to call me at (918) 560-7055 if you require additional information.

Sincerely,

Ray Russell

C. Ray Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:lam
02/04.2

Attachment

GROUNDWATER DISCHARGE PLAN

TEXACO'S NATURAL GAS PLANTS & LIQUIDS DIVISION

EUNICE #1 GAS PROCESSING PLANT

LEA COUNTY, NEW MEXICO

February 8, 1991

I. GENERAL INFORMATION

A. Name of Discharger or Legally Responsible Party

Texaco Exploration and Production Inc.'s Eunice #1 Gas Processing Plant
P.O. Box 1137
Eunice, NM 88231
phone: (505) 394-2566

B. Name of Local Representative or Contact Person

Plant Superintendent: J. E. Brittain
(Same as Above)

Environmental Coordinator: C. R. Russell
Texaco Exploration and Production Inc.
P. O. Box 1650
Tulsa, OK 74102
(918) 560-7055

C. Location of Discharge

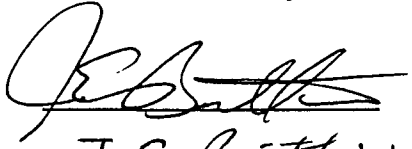
SW/4, SW/4, Section 27, Township 22 South, Range 37 East, Lea County, New Mexico.

D. Type of Natural Gas Operation

The plant is a cryogenic plant designed to process 130 million cubic feet per day. At present the plant is processing approximately 70 million cubic feet per day and producing about 350,000 gallons of natural gas liquids per day. The natural gas liquids are further processed into ethane/propane mix, propane, isobutane, normal butane and 14 pound gasoline.

E. Affirmation

"I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate and complete to the best of my knowledge and belief."

Signature:  Date: Feb 6, 1991

Printed Name: J.E. Brittain Title: Plant Supt.

II. PLANT PROCESSES

A. Sources and Quantities of Effluent and Process Fluids

1. Scrubbers and Separators: The plant utilizes the following scrubbers and separators with the indicated discharge:

a) 1st stage scrubber to turbine compressors	30 gal/day
b) 2nd stage scrubber to turbine compressors	40 gal/day
c) four interstage scrubbers on the turbine compressors	10 gal/day/scrubber
d) tank #12-14 separators	10 gal/day
e) tank #83 separator	10 gal/day
f) C_2 - C_3 caustic scrubber	20 gal/day
g) 3 product caustic scrubbers	20 gal/day
h) propane water separator	10 gal/day
i) propane well scrubber	20 gal/day
j) H_2S separator	20 gal/day
k) gas to treater scrubber	5 gal/day
l) gas treater discharge scrubber	5 gal/day
m) 2nd stage discharge scrubbers on compressors	10 gal/day
n) raw gas inlet scrubbers	15 gal/day
Total	255 gal/day

The water from the scrubbers and separators may typically be high in Total Dissolved Solids (TDS) and may contain dissolved hydrocarbons.

2. Boilers: The Eunice #1 Gas Processing Plant utilizes two Erie City boilers, two Nebraska boilers and 4 Lookout-Eclipse boilers. The combined blowdown rate varies from 20,000 gal/day to 25,000 gal/day. Additives include Calgon Conquor 3585 corrosion inhibitor and Calgon Boiler 3154. The Material Safety Data Sheets (MSDS's) are included in Appendix 1. The blowdown can be expected to be high in T.D.S.

3. Engine Cooling Water: Auxiliary engines 1-4, 5-9 and gas compressors 17-25 have their own closed loop cooling system. The cooling water is not routinely discharged but should mechanical failure occur, the water is collected in the engine room sump and is then placed in the slop oil tank at the Eunice #2 Gas Processing Plant.

The cooling water system utilizes Calgon LCS-20 corrosion inhibitor. The MSDS is included in Appendix 1.

4. Cooling Tower: The cooling tower water is continuously discharged to pit #4 through a buried 4 inch polyethylene line. The discharge rate varies from 50,000 to 54,000 gals/day. The discharged water can contain high TDS and the following additives:

Sulfuric acid for pH control
Calcium hypochlorite for algae control
Calgon H-300 biocide
Calgon H-130 biocide
Calgon pHree guard 1202 corrosion inhibitor
Calgon CL-5 corrosion inhibitor

The MSDS's are included in Appendix 1.

5. Sewage: The plants domestic sewage system consists of septic tanks and lateral lines. This system is completely separate from all other plant waste systems.

6. Others:

a. Used Engine Oil: Used engine oil from the auxiliary engines and from engines 23-25 are removed from the engine room sumps by vacuum truck and then placed in the slop oil tanks at the Eunice #2 Gas Processing Plant for recycling. The used engine oil from the remainder of the engines is pumped to tank #21. From tank #21 it is taken by vacuum truck to the Eunice #2 Gas Processing Plant slop oil tanks for recycling. There are no additives used in the engine oil.

b. Equipment Cleaning Solution: The plant uses a mixture of water and Adam Chemical Company's "Adams Special" Industrial soap. The MSDS is included in Appendix 1. The discharge averages 40 gals/day and may contain some oil and grease.

c. Water Softener Wastewater: The water softener wastewater can be expected to be high in TDS and chlorides as a result of the regeneration process. The average discharge is 806 gals/day. There are no additives in this waste stream.

B. Quality Characteristics

All plant wastewaters, except the aforementioned engine room sumps, are commingled at pit #4. (See the Wastewater Block Flow Diagram in Appendix 3.) All wastewater transfer, storage and collection units are constructed of either reinforced concrete, steel pipe or plastic pipe therefore minimizing any risk of groundwater contamination. (See Item #II-C for

additional details.)

Because of the low risk of groundwater contamination we have elected to treat all sources discharged into pit #4 as a commingled source.

Sample points will include the pit #4 discharge line and the plants freshwater well.

1. TDS, pH, Cations/Anions: See the laboratory analyses included in Appendix 2.

2. Benzene, Ethylbenzene, Toluene, Meta-Ortho-Para Xylenes: See the laboratory analyses included in Appendix 2.

3. WQCC Section 3-103 Parameters: See the laboratory analyses included in Appendix 2.

4. WQCC 1-101.uu: This facility does not manufacture herbicides, pesticides or chlorinated hydrocarbons therefore we would expect to find only those hydrocarbons that are naturally occurring such as benzene, toluene and xylene. These compounds will be quantified under item #2, above.

5. Sampling Locations, Methods and Procedures: The sampling locations include the following:

   Freshwater Well - Freshwater faucet

   Pit #4 - Discharge line to the injection well.

   All samples were unfiltered grab samples that were preserved and analyzed in accordance with EPA SW 846 and/or Standard Methods for the Examination of Water and Wastewater (17^{th} edition). The samples were then transported, on ice, to Southwestern Laboratories, Inc. in Midland, Texas for analyses.

6. Variability in Flow Rates and Concentration: During normal operations we anticipate no significant fluctuations in flow rate or concentration in the plant effluents. However, if there is a mechanical malfunction at off-site gas gathering locations, there is a possibility of increased volumes of produced water and oil flowing to the plant. We would not anticipate a significant increase in concentration of the parameters of concern.

C. Transfer and Storage of Process Fluids and Effluents

1. Water and Wastewater Flow Schematics: See Wastewater Block Flow Diagram in Appendix 3.

2&3. Description of Equipment Associated with Wastewater Production and Handling

a. Raw Gas Inlet Scrubbers - The scrubbers are pressurized vessels which discharge by pump into tank #21. The discharge lines are constructed with a solid connection to the drains and are fabricated with 4 inch schedule 40 carbon steel pipe. The drain lines and a section of the dump lines are buried.

b. Tank #21 - This vessel operates at atmospheric pressure and is used to provide storage for slop oil and water from the engine sumps and inlet scrubbers. Slop oil and water mixture is trucked from tank #21 to the Eunice #2 Gas Processing Plant for recovery of the oil. This tank is a standard welded tank with a capacity of 20,000 gallons and well thickness of .3125 inches. The tank is 40 feet in diameter and 10 feet tall.

c. Engine Sumps - The engine sumps are constructed of reinforced concrete. The sumps for engines #17-22 are pumped to tank #21 through a 4 inch schedule 40 carbon steel pipe. All connections are of solid construction. In addition to used engine oil and any escaping coolant, the sumps also collect any soap and wash water that is used in the engine room.

The sump liquids from the auxiliary engines and engines #23-25 are removed by vacuum truck and taken directly to the Eunice #2 Gas Processing Plant for oil recovery.

d. 2nd Stage Discharge Scrubbers on Compressors - These scrubbers are pressurized vessels which separate gas and liquids by gravity. The liquids are discharged to tank #21 through a 2 inch schedule 40 carbon steel line that is constructed with solid connections. With the exception of the last 50 feet, these lines are installed above ground.

e. Gas to Amine Treater/Scrubber - The scrubbers are pressurized vessels which separate gas and liquids by gravity. The liquids are discharged to tank #21 through a 2 inch schedule 40 carbon steel line that is constructed with solid connections. With the exception of the last 50 feet, these lines are installed above ground.

f. Gas Treater Gas Discharge Scrubber - This is a pressurized vessel which separates gas and monoethanalamine (MEA) by gravity. The MEA liquid discharges back to the MEA surge tank through a 2 inch carbon steel line. This line is constructed with solid connections and is above ground.

g. MEA Filter - This is a pressurized vessel that discharges liquids to the drain system once every six months when the filters are changed. Discharge is through a 4 inch carbon steel line that is of solid construction and is installed above ground. The 4 inch line is then discharged into an underground 6 inch schedule 40 carbon steel line that is discharged to the plant skimmer tank.

h. MEA Reclaimer - This pressurized vessel discharges liquid every 3 months upon cleaning of the reclaimer. The liquid is discharged through 4 inch carbon steel line into a bell riser that is connected to a buried 6 inch drain line. The 6 inch line discharges to the plant skimmer tank.

i. MEA Surge Tank - This pressurized vessel discharges to the 4 inch drain line (described in (g) above) only in the event of an emergency.

j. Zeolite Treaters - Both of the zeolite treaters discharge high TDS water into a buried 4 inch carbon steel line which in turn discharges into a buried 4 inch polyethylene line. The 4 inch polyethylene line discharges into pit #4.

k. Boilers - The plant utilizes 2 Nebraska boilers, 2 Erie City boilers and 4 Lookout-Eclipse boilers. Each of the Nebraska boilers is rated at 30,000 lbs/hr. The Erie City boilers are rated at 58,000 lbs/hr and each Lookout-Eclipse boilers are rated at 6,000 lbs/hr. The continuous and manual blowdown from all 9 boilers is discharged to a 25 foot length of buried 4 inch carbon steel line. The 4 inch line then discharges to a buried 4 inch polyethylene line. The polyethylene line then discharges to pit #4.

l. H_2S Flare Sump - This is a pressurized vessel used to separate gas and liquid. The liquid is pumped from the sump to pit #4 through a buried 2 inch carbon steel line. All connections are of solid construction.

m. Saltwater Tank Overflow - This tank is for the storage of salt water that is used in the regeneration cycle of the zeolite treaters. The overflow line is constructed of buried 2 inch

carbon steel with solid connections to within 15 feet of pit #4. The last 15 feet is above ground 2 inch polyethylene line. The salt water is discharged into pit #4.

n. Vapor Line Blowdown at #4 C_2C_3 Well- This line consists of 2 inch carbon steel line and is used to blow vapors and saltwater from the C_2C_3 well prior to pumping product. The line is constructed with solid connections with all but 8 feet of the line buried. The saltwater is discharged to pit #4.

o. IC_4, NC_4 & C_3 Storage Tanks - These are pressurized tanks that have a capacity of 22,000 gallons/vessel. These vessels sometimes collect small amounts of water or caustic that must be removed. Each tank has a separate 1 inch drain line that extends into a 4 inch riser. The four inch riser is connected to a buried 4 inch carbon steel line that gravity discharges to the plant skimmer tank.

p. C_3 Water Knock-outs - These pressurized vessels are used to separate water and liquid propane. The blowdown lines are buried 1 inch carbon steel lines that gravity flow to the plant skimmer tank. The lines are constructed with solid connections.

q. C_3 Well Scrubber - This pressurized vessel is used to separate saltwater from the liquid propane as it is removed from the propane storage well. The drain line is a buried 2 inch carbon steel line that dumps into a pot that is connected to a buried 4 inch carbon steel line. The 4 inch line discharges to the plant skimmer tank. All connections, except where the 2 inch line discharges to the pot, are of solid construction.

r. Cooling Tower Blowdown - The blowdown originates at the discharge of the coil shed circulation pumps. The water is discharged into a 4 inch polyethylene line that is buried and of solid construction which, in turn, discharges to pit #4.

s. Skimmer Tank - This is a 6 foot diameter by 19 foot 8 inch deep underground process tank that is constructed of 7/16 inch welded steel. This tank receives wastewater from several sources (see Wastewater Block Flow Diagram in Appendix 3). After the reclaimable hydrocarbons are removed, the effluent is pumped to pit #4 through a buried 4 inch polyethylene line.

t. Product Caustic Scrubber - These pressurized vessels separate liquid product and caustic before the product enters the storage tanks. The blowdown lines are constructed of

aboveground 2 inch carbon steel line that discharges to tank # 83 which in turn discharges to the plant skimmer tank.

u. C_2 - C_3 Caustic Treater - This pressurized vessel is used to treat an ethane-propane mix before going to storage. The caustic removes any mercaptans left in the C_2-C_3 stream. The drain line from the vessel is a solid and buried 2 inch carbon steel line that discharges to the skimmer tank via tank #83.

v. C_2 - C_3 Caustic Scrubber - This is a pressurized vessel that separates caustic from the ethane-propane stream. The blowdown line is a solid 2 inch carbon steel line that discharges to tank #83.

w. C_3 Water Wash - This pressurized vessel is used as a final wash before the propane enters the dryers. The drain line is a buried, solid 2 inch carbon steel line that discharges to the skimmer tank.

x. Caustic Settling Tank - This pressurized vessel contains caustic that is circulated over the merox treater beds once/day. The drain is used only when the caustic is spent. The drain is a solid, buried 2 inch carbon steel line for about 15 feet where it enters a solid, buried 4 inch carbon steel line that is discharged to the skimmer tank.

y. Caustic Wash - This pressurized vessel holds caustic through which 14 lb. gasoline is passed for final treating. The drain line consists of a 2 inch carbon steel line for approximately 6 feet before entering a 6 inch carbon steel riser line that then discharges to the skimmer tank.

z. Merox Treaters - These pressurized vessels are used to treat 14 lb. gasoline. The drain lines consists of a 6 foot long 2 inch carbon steel line that then discharges into a 6 inch carbon steel riser line that then discharges into the skimmer tank.

aa. Sump - The sump pit is constructed of reinforced concrete and measures 4'8" x 4'8" x 7' deep. This sump receives waste water from the waste heat boilers, interstage scrubbers, 1st and 2nd stage scrubbers and the drains from tanks 12-14. The sump is gravity drained to the skimmer tank through a solid, buried 6 inch, schedule 40, carbon steel line.

bb. Tanks 12-14 - These pressurized vessels are used for NGL storage for rerun purposes. The drains for tanks #13 and 14

are 2 inch carbon steel that connect to a 4 inch carbon steel line. The drain for tank #12 is a 2 inch carbon steel line that discharges into a 4 inch carbon steel riser. The 4 inch line for both drains is routed into a 4 inch polyethylene line that discharges to the sump.

cc. Regenerator Gas Separator - This pressurized vessel is used to separate gas and liquid from the regeneration beds. The drain line is a solid, buried 2 inch carbon steel line. The separator is equipped with a level control that automatically drains this vessel to tank #12.

dd. Water Knockout on Glycol Reboiler Overhead - This vessel is used to separate gas and liquid. The liquid is pumped through a solid, buried, 2 inch carbon steel line that is discharged to tank #12.

ee. Interstage Scrubbers - These pressurized vessels are used to separate the gas from the liquid as the gas travels from the 1st stage to the 2nd stage on the turbine compressors. The liquid is automatically drained to a solid, buried, 2 inch carbon steel line that discharges into a solid, buried, 6 inch carbon steel line. The 6 inch line is then discharged to the sump.

ff. 2nd Stage Scrubber - This pressurized vessel is used to separate liquid from the raw gas prior to the turbine compressors. The drain line consists of a 2 inch carbon steel line that is connected to a 6 inch schedule 40 carbon steel line. Approximately 15 feet of the line is above ground while the remaining 5 feet is buried. The vessel is automatically discharged to the drain which is then discharges to the sump.

gg. 1st Stage Scrubbers - This pressurized vessel is used to separate the liquid from the raw gas prior to the 2nd stage turbine compressors. The vessel drains automatically to an above ground, solid 4 inch carbon steel line that, in turn discharges to a buried 6 inch schedule 40 carbon steel line that discharges to the sump.

hh. Flare Water Knockout - Condensed water from the flare gravity flows into an underground process tank. The tank is pumped by vacuum truck once/week. The fluid is then discharged to pit #4.

D. Spill/Leak Prevention and Housekeeping Procedures

1. Containment and Cleanup of Spills: Texaco's Eunice #1 Gas Processing Plant is manned 24 hours per day, 7 days per week. After hours, from 3:30 pm until 7:00 AM, there are four operators at the plant site.

In the event of a spill that cannot be handled with personnel and equipment on site, the Plant Superintendent, Assistant Superintendent or his designated representative will call a trained and experienced local contractor who can provide the equipment necessary to contain and remove the spill. The contractor's equipment may include, but is not limited to, vacuum trucks, dump trucks, backhoes, hand tools and absorbent material.

The Eunice #1 Gas Processing Plant has in effect a plan for prevention of significant spills that could lead to groundwater contamination. This plan calls for the installation of curbing, diking and/or other acceptable containment measures around all ground level storage vessels. The plant has made a commitment to have this work completed within two years of this date.

This plan also provides that any future ground level storage tanks will be installed on curbed pads constructed of concrete or other impervious material that will facilitate the detection of leaks.

Any spill contaminated materials will be disposed of in a manner that is consistent with all applicable local, state and federal regulations.

In the event of a reportable spill, leak or release, notification will be provided in accordance with New Mexico Oil Conservation Division Rule 116 and any other applicable rules or regulations.

2. Housekeeping Procedures: Empty chemical drums are rinsed until clean and then stored for return to the providing vendor or for proper disposal. The rinsate is returned to process. Where practical the plant utilizes bulk storage tanks in lieu of drums.

Oily rags are accumulated in drums placed at strategic locations throughout the plant. The oily rags are then returned to the vendor for cleaning and reuse.

Trash is stored in a dumpster for removal by Waste Management of Southeast New Mexico and disposal at the Hobbs Landfill.

The plant has a spill program in effect that calls for the installation of drip/leak collection pads or vats around or under all sources that have a history of leaking or have a high potential to leak. The sources that will be controlled will include certain pumps, valves,

flanges, chemical pots, and blowdown lines.

The plant has initiated installation of drip vats under the chemical drum racks. The vats or container are emptied on an as-needed basis. The material removed from the vats or container is returned to process.

Should a spill or leak occur any contaminated soil is removed and disposed of in accordance with applicable local, state and federal regulations.

The plant's spill program is scheduled to be completed within two years from this date.

3. Leak Detection: The plant operators conduct hourly walk-through inspections of the entire facility. If a leak is discovered the plant operator will initiate corrective action. In the event of a serious or catastrophic leak the plant operator may initiate emergency procedures as outlines in Item II.D.1.

   Any problems encountered are noted in the operators log book and/or the remarks section of the daily work sheets.

   Additionally, the plant plans to leak test all buried wastewater lines within 2 years from this date. All pressurized lines will be hydrostatically tested at 1.5 times their operating pressure. Open-end lines will be tested by pneumatic or other acceptable non-destructive testing techniques. Records of the leak testing will be maintained in the plant files.

4. Injection Wells - Alternate Disposal: Should the on-site injection well become unserviceable, the plant's wastewater will be stored in pit #4. (Pit #4 has a storage volume of approximately 52,000 bbls.) Should the storage capacity of pit #4 be exceeded, the plant wastewater will be transported by truck to any of a number of permitted locally available commercial disposal wells.

III. EFFLUENT DISPOSAL

A. Existing Operations

1. On-site Facilities:

a. Description

(1) Surface Impoundments: The Eunice #1 Gas Processing Plant does not utilize any surface impoundments for disposal, however, pit #4 is used for wastewater storage pending disposal in the plants injection well. The following information is relevant to pit #4:

- Date of use: Constructed in 1989. The pit is still being utilized as of this date.
- Type and volume of effluents stored: All liquid plant waste as described in previous sections are stored in pit #4 prior to disposal. The volume of liquid wastes averages approximately 1.98 million gallons per month.
- Area (inside dimensions): 190' x 240'
- Volume: 52,000 bbls.
- Depth (top of dike to bottom of pit): 15'
- Slope: 1:3 (inside and outside)
- Sub-grade description: Sand directly beneath secondary liner followed by compacted earth.
- Liner type: High density polyethylene
- Liner thickness: 60 Mil primary and secondary
- Compatibility of liner and effluents: See the chemical resistance information provided in Appendix 6.
- Installation method: The liners were installed by welding the approximate 20' width sheets of polyethylene together using fusion welding machines. Vents were installed under the secondary liner and between the primary and secondary liner to vent any gas that may form.
- Leak detection methods: A network of 4 1/2 inch O.D. perforated polyethylene pipe wrapped in Geotextile that empties into a 4 inch collector pipe which in turn empties into a 30 inch concrete sump. The perforated pipe is situated

between the primary and secondary liner. Each perforated pipe has been graveled in with clean pea gravel. (See drawings in Appendix 7)

- Freeboard: 3'
- Run-on/run-off protection: Run-on and run-off is prevented by the compacted earthen dikes that extend approximately 7 1/2' above grade.

(2) Leach Fields: Not applicable.

(3) Injection Wells:

- Effluent injected: All liquid plant wastes as described in previous sections.
- Volume: Approximately 1.98 million gallons/month.
- Depth: 4550'
- Formation: San Andres
- OCD order number: SWD-29
- Approval date: November 25, 1961

The injected wastes are not classified as hazardous wastes. The majority of the plant liquid wastes are covered under EPA's Exploration, Production, Gas Processing and Geothermal exemptions for RCRA hazardous wastes.

(4) Drying Beds: Not applicable.

(5) Other On-site Disposal: Not applicable.

b. Protection from Groundwater Contamination

(1) See item III.A.1.a.(1) above (Surface Impoundments).

(2) Samples of pit #4 may be acquired from the pit discharge line. Any leaks occurring through the primary liner will be collected in the leak detection sump located adjacent to the pit.

A flow meter does not currently exist on the pit #4 discharge line, however, a meter may be installed if required.

(3) The monitoring system is described in item III.A.1.a.(1) above (Surface Impoundments).

(4) The pit #4 sump is visually checked for liquids once per month. The results are noted in a log book. Should liquid be found, a representative sample will be secured for laboratory analyses of screening parameters.

(5) Should a leak be detected, the Oil Conservation Division (OCD) District Office will be provided written notice within 10 working days. Additionally, any needed corrective action will be coordinated through the OCD District Office.

(6) Discontinuance of Facility Operations: Not applicable.

2. Off-site Disposal: There are no industrial wastes that are routinely disposed of off-site. However, sludges from the wastewater pit or various plant processes may be disposed of on an as-needed basis. Should the need for off-site disposal arise, the Oil Conservation Division, and all other applicable regulatory agencies, will be notified prior to disposal. Additionally, any required testing and/or permits will be secured prior to disposal.

The Eunice #1 Gas Processing Plant transports its' used lube oil and certain slop oils to the Eunice #2 Gas Processing Plant for reclamation and reintroduction into the Texas-New Mexico Crude Oil Pipeline. The used oil is transported by vacuum truck.

B. Proposed Modifications: Not applicable.

IV. SITE CHARACTERISTICS

A. Hydrological Features

1. There are no known bodies of water, streams or other water courses within a one mile radius of the plant. There are two known water wells within a one mile radius of the plant:

a. The John Able water well is located 3/4 mile north of the plant on the west side of State Highway #207. The surface

property at the well location is owned by Texaco. Texaco also leases the water rights for domestic and industrial use.

b. Texaco's water well #17 is located in the SW/4, SW/4, SW/4 of Section 17, Township 22 South, Range 37 East, Lea County, New Mexico. This well is used exclusively for industrial use.

2. The depth to the first usable groundwater averages 85-100 feet. On January 28, 1991, the plant's freshwater well (the Able Well) was sampled for water quality analyses. The results indicated 402 mg/l TDS. The analyses are included in Appendix 2.

3. The groundwater flow direction is not known.

B. Geological Description of Discharge Site

1. Soil Types: According to local well logs, the soils in the area of the plant are typically:

surface to 45'	Caliche
45' - 130'	sand, shale and, occasionally, Redbeds
130' - 430'	Triassic Redbeds

2. Name of Aquifer: According to groundwater maps of the area, the groundwater is on the extreme south/southwestern fringe of the Ogallala aquifer.

3. Composition of Aquifer Material: The composition of the aquifer material is an alluvium composed of various sands, shale and occasionally Redbed clays.

4. Depth to Rock at Base of Alluvium: The Triassic Redbeds are encountered at approximately 130'. The Triassic Redbeds and various sands are present from 130' to 1196' where anhydrite is encountered.

C. Flood Protection

1. Flooding Potential: According to plant employees there have been no known flooding events within the last 50 years. Additionally, the average single-event rainfall averages .3' to .5'.

2. Flood Protection Measures: Not applicable.

CRR:lam
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Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Inc.	**Report No.**	70255
Delivered by	Rodney Bailey	**Report Date**	2-1-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, No. 4 Waste Pit, Sampled 1-28-91 by R. Bailey

REPORT OF ORGANICS ANALYSIS

Date of Analysis 1-29-91 **Method** SW846, 5030/8240
Technique Purge and Trap GC/MS **Analyst** W. Kucera

Compound	ug/kg
Chloromethane	15
Bromomethane	*10
Vinyl Chloride	*10
Chloroethane	*10
Methylene Chloride	* 5
1,1-Dichloroethene	* 5
1,1-Dichloroethane	* 5
trans-1,2-Dichloroethene	* 5
Chloroform	* 5
1,2-Dichloroethane	97
1,1,1-Trichloroethane	* 5
Carbon Tetrachloride	* 5
Bromodichloromethane	* 5
1,2-Dichloropropane	* 5
trans-1,3-Dichloropropene	* 5
Trichloroethene	* 5
Dibromochloromethane	* 5
1,1,2-Trichloroethane	* 5
cis-1,3-Dichloropropene	* 5
2-Chloroethylvinylether	*10
Bromoform	* 5
Tetrachloroethene	* 5
1,1,2,2-Tetrachloroethane	* 5
Chlorobenzene	* 5
1,3-Dichlorobenzene	* 5
1,4-Dichlorobenzene	* 5
1,2-Dichlorobenzene	* 5

*Denotes "less than"

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2cc - Tulsa, OK, Attn: Ray Russell

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Report of tests on	Water	File No.	6838500
Client	Texaco Exploration & Production Inc.	Report No.	70255
Delivered by	Rodney Bailey	Report Date	2-1-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, No. 4 Waste Pit
Sampled 1-28-91 by R. Bailey

REPORT OF CHEMICAL ANALYSIS

Parameters	Results mg/L	Date Performed	Analyst	Standard Methods, 17th Edition
Calcium	26	1-29-91	W. Jaycox	3500-Ca,D
Magnesium	0	1-29-91	W. Jaycox	3500-Mg,E
Sodium	2243	1-31-91	A. Johnston	3500-Na,D
Potassium	100	1-31-91	A. Johnston	3500-K,D
Hydroxide	52	1-29-91	W. Jaycox	2320-B
Carbonate	110	1-29-91	W. Jaycox	2320-B
Bicarbonate	0	1-29-91	W. Jaycox	2320-B
Sulfate	753	1-30-91	W. Jaycox	4500-SO_4,C
Chloride	2794	1-29-91	W. Jaycox	4500-Cl,B
Total Dissolved Solids, @ 180°C	5140	1-30-91	W. Jaycox	2540-C
Total Hardness as CaCO3	64	1-29-91	W. Jaycox	2340-C
pH 10.99		1-29-91	W. Jaycox	4500-H
Fluoride	2.61	2-1-91	W. Jaycox	4500-F, C
Nitrate-N	2.6	1-29-91	A. Johnston	4500-NO_3,F
Phenol	0.1	1-28-91	A. Johnston	SW846/9066
Cyanide	*0.1	2-1-91	A. Johnston	SW846/9012

*Denotes "less than"

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2cc - Tulsa, OK, Attn: Ray Russell

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Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Inc.	**Report No.**	70255
Delivered by	Rodney Bailey	**Report Date**	2-1-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, No. 4 Waste Pit, Sampled 1-28-91 by R. Bailey

REPORT OF ORGANICS ANALYSIS

Date of Analysis 1-30-91
Analyst J. Barnett

Method: SW846,5030/8020

Compound	mg/L
Benzene	9.94
Toluene	12.33
Ethyl Benzene	2.03
Total Xylenes	3.98

*Denotes "less than"

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Reviewed by

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SwL SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services
1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Company	**Report No.**	70255
Delivered by	Rodney Bailey	**Report Date**	2-1-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, No. 4 Waste Pit
Sampled 1-28-91 by R. Bailey

REPORT OF PCB ANALYSIS

Date of Analysis 1-31-91 **Method:** SW846, 3550/8080
Analyst M. Dave

Compound	mg/L
PCB-1016	*0.01
PCB-1221	*0.01
PCB-1232	*0.01
PCB-1242	*0.01
PCB-1248	*0.01
PCB-1254	*0.01
PCB-1260	*0.01

*Denotes "less than"

Copies: Texaco Exploration & Production, Inc. - Eunice, NM, Attn: J. E. Brittain
2cc - Tulsa, OK, Attn: Ray Russell

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1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Inc .	**Report No.**	70255
Delivered by	Rodney Bailey	**Report Date**	2-4-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, No. 4 Waste Pit, Sampled 1-28-91 by R. Bailey

REPORT OF TOTAL METALS

Parameters	Results mg/L	Date Performed	Analyst	Test Method
Arsenic	*0.01	2-2-91	A. Johnston	SW846, 7061
Barium	*1	2-1-91	A. Johnston	SW846, 7080
Cadmium	0.01	1-31-91	A. Johnston	SW846, 7130
Chromium	*0.05	1-31-91	A. Johnston	SW846, 7190
Copper	*0.05	2-1-91	A. Johnston	SW846, 7210
Iron	*0.1	2-1-91	A. Johnston	SW846, 7380
Lead	*0.01	2-3-91	A. Johnston	SW846, 7421
Manganese	*0.05	2-1-91	A. Johnston	SW846, 7460
Mercury	*0.002	2-2-91	A. Johnston	SW846, 7470
Selenium	*0.01	2-2-91	A. Johnston	SW846, 7741
Silver	*0.05	1-31-91	A. Johnston	SW846, 7760
Zinc	0.09	2-1-91	A. Johnston	SW846, 7950

*Denotes "less than"

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2cc: Tulsa, Oklahoma - Attn: Ray Russell

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1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Inc.	**Report No.**	70256
Delivered by	Rodney Bailey	**Report Date**	2-1-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, Able Fresh Water Well
Sampled 1-28-91 by R. Bailey

REPORT OF ORGANICS ANALYSIS

Date of Analysis 1-29-91 **Method** SW846, 5030/8240
Technique Purge and Trap GC/MS **Analyst** W. Kucera

Compound	ug/kg
Chloromethane	*10
Bromomethane	*10
Vinyl Chloride	*10
Chloroethane	*10
Methylene Chloride	* 5
1,1-Dichloroethene	* 5
1,1-Dichloroethane	* 5
trans-1,2-Dichloroethene	* 5
Chloroform	* 5
1,2-Dichloroethane	* 5
1,1,1-Trichloroethane	* 5
Carbon Tetrachloride	* 5
Bromodichloromethane	* 5
1,2-Dichloropropane	* 5
trans-1,3-Dichloropropene	* 5
Trichloroethene	* 5
Dibromochloromethane	* 5
1,1,2-Trichloroethane	* 5
cis-1,3-Dichloropropene	* 5
2-Chloroethylvinylether	*10
Bromoform	* 5
Tetrachloroethene	* 5
1,1,2,2-Tetrachloroethane	* 5
Chlorobenzene	* 5
1,3-Dichlorobenzene	* 5
1,4-Dichlorobenzene	* 5
1,2-Dichlorobenzene	* 5

*Denotes "less than"

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2cc - Tulsa, OK, Attn: Ray Russell

SOUTHWESTERN LABORATORIES

ABT
Reviewed by

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1703 West Industrial Avenue • P.O. Box 2150 • Midland, Texas 79702

Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Inc.	**Report No.**	70256
Delivered by	Rodney Bailey	**Report Date**	2-1-91
		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, Able Fresh Water Well
Sampled 1-28-91 by R. Bailey

REPORT OF ORGANICS ANALYSIS

Date of Analysis 1-30-91 **Method:** SW846,5030/8020
Analyst J. Barnett

Compound	mg/L
Benzene	*0.005
Toluene	*0.005
Ethyl Benzene	*0.005
Total Xylenes	*0.005

*Denotes "less than"

Copies: Texaco Exploration & Production Inc. - Eunice, NM, Attn: J. E. Brittain
2cc - Tulsa, OK, Attn: Ray Russell

Reviewed by

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Sampled 1-28-91 by R. Bailey

REPORT OF PCB ANALYSIS

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Analyst M. Dave

Compound	mg/L
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PCB-1232	*0.01
PCB-1242	*0.01
PCB-1248	*0.01
PCB-1254	*0.01
PCB-1260	*0.01

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Reviewed by

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		Date Received	1-28-91

Identification Texaco Eunice No. 1 Gas Plant, Able Fresh Water Well
Sampled 1-28-91 by R. Bailey

REPORT OF CHEMICAL ANALYSIS

Parameters	Results mg/L	Date Performed	Analyst	Standard Methods, 17th Edition
Calcium	67	1-29-91	W. Jaycox	3500-Ca,D
Magnesium	35	1-29-91	W. Jaycox	3500-Mg,E
Sodium	143	1-31-91	A. Johnston	3500-Na,D
Potassium	8	1-31-91	A. Johnston	3500-K,D
Carbonate	0	1-29-91	W. Jaycox	2320-B
Bicarbonate	262	1-29-91	W. Jaycox	2320-B
Sulfate	128	1-30-91	W. Jaycox	4500-SO_4,C
Chloride	213	1-29-91	W. Jaycox	4500-Cl^-,B
Total Dissolved Solids, @ 180°C	850	1-30-91	W. Jaycox	2540-C
Total Hardness as CaCO3	312	1-29-91	W. Jaycox	2340-C
pH 7.67		1-29-91	W. Jaycox	4500-H
Fluoride	3.27	2-1-91	W. Jaycox	4500-F, C
Nitrate-N	1.5	1-29-91	A. Johnston	4500-NO_3,F
Phenol	*0.1	1-28-91	A. Johnston	SW846/9066
Cyanide	*0.1	2-1-91	A. Johnston	SW846/9012

*Denotes "less than"

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Report of tests on	Water	**File No.**	6838500
Client	Texaco Exploration & Production Inc.	**Report No.**	70256
Delivered by	Rodney Bailey	**Report Date**	2-4-91
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Chromium	*0.05	1-31-91	A. Johnston	SW846, 7190
Copper	*0.05	2-1-91	A. Johnston	SW846, 7210
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Manganese	*0.05	2-1-91	A. Johnston	SW846, 7460
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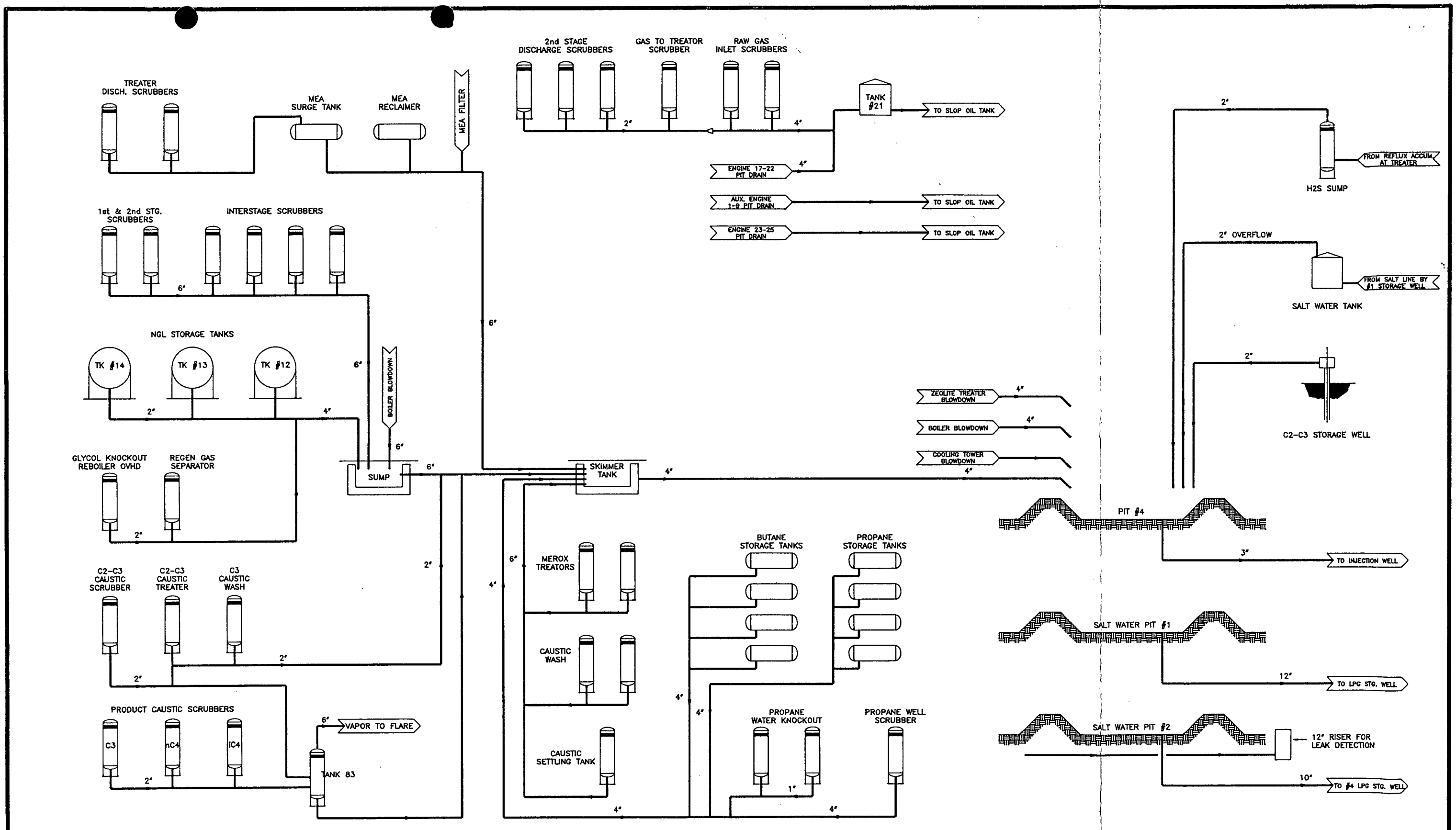


GENERAL NOTES:

REVISIONS

MK.	DESCRIPTION	BY	CHK
P	ISSUE FOR N.M. OCD PERMIT	JH	

REFERENCE DRAWINGS

DRAWING NO.	TITLE	DRAWING NO.	TITLE

NOTICE

TEXACO | NATURAL GAS PLANTS AND LIQUIDS DIVISION

APPROVED:	DATE	TITLE: WASTE WATER SYSTEM BLOCK FLOW DIAGRAM EUNICE #1 GAS PLANT LEA COUNTY NEW MEXICO
CHECKED:		
DESIGNED:		
DRAWN: HARBOUR	1-91	EST. NO: OCD · SCALE: NONE · DWG. NO.: D-0010-20-5003 · REV.: P

THE REPRODUCTION OF

THE

FOLLOWING

DOCUMENT (S)

CANNOT BE IMPROVED

DUE TO

THE CONDITION OF

THE ORIGINAL

POLY-FLEX
THYLENE GEOMEMBRANES

APPENDIX A

Chemical Resistance Information

Poly-Flex and Dura-Flex polyethylenes are primarily inert and stable, and contain no plasticizers. Since chemical resistance data for Dura-Flex is limited, the following chart (compiled by Nalgene), which documents such data for Low Density Polyethylene (LDPE) and High Density Polyethylene (HDPE), is included. The chemical resistance qualities for LDPE can be used only as a guideline for Dura-Flex material. It is important to note that chemical mixtures do not necessarily affect plastics in the same way that the component chemicals of the same mixture will individually. Chemical attack is influenced by temperature, length of contact with material, chemical concentration, and chemical composition. It is therefore recommended that immersion tests be conducted during the design stage of a project, to confirm the stability of the selected membrane type.

- **E** — 30 days of constant exposure cause no damage. Plastic may even tolerate for years.
- **G** — Little or no damage after 30 days of constant exposure to the reagent.
- **F** — Some effect after 7 days of constant exposure to the reagent. Depending on the plastic, the effect may be crazing, cracking, loss of strength, or discoloration. Solvents may cause softening, swelling and permeation losses with LDPE and HDPE. The solvent effects on these resins are normally reversible; the part will ususally return to its normal condition after evaporation.
- **N** — Not recommended for continuous use. Immediate damage may occur. Depending on the plastic, the effect will be a more severe crazing, cracking, loss of strength, discoloration, deformation, dissolution or permeation loss.

The first letter of each pair applies to conditions at 20° C (68° F); the second to those at 50° C (122° F).

CHEMICAL	LDPE	HDPE
Acetaldehyde	GN	GF
Acetamide, Sat.	EE	EE
Acetic Acid, 5%	EE	EE
Acetic Acid, 50%	EE	EE
Acetic Anhydride	NN	FF
Acetone	EE	EE
Acetonitrile	EE	EE
Acrylonitrile	EE	EE
Adipic Acid	EG	EE
Alanine	EE	EE
Allyl Alcohol	EE	EE
Aluminum Hydroxide	EC	EE
Aluminum Salts	EE	EE
Amino Acids	EE	EE
Ammonia	EE	EE
Ammonium Acetate, Sat.	EE	EE
Ammonium Glycolate	EG	EE
Ammonium Hydroxide, 5%	EE	EE
Ammonium Hydroxide, 30%	EG	EE
Ammonium Oxalate	EG	EE
Ammonium Salts	EE	EE
n-Amyl Acetate	GF	EG
Amyl Chloride	NN	FN
Aniline	EG	EG
Aqua Regia	NN	NN

CHEMICAL	LDPE	HDPE
Benzaldehyde	EG	EE
Benzene	FN	GG
Benzoic Acid, Sat.	EE	EE
Benzyl Acetal	EG	EE
Benzyl Alcohol	NN	FN
Bromine	NN	FN
Bromobenzene	NN	FN
Bromoform	NN	NN
Butadiene	NN	FN
Butyl Chloride	NN	NN
n-Butyl Acetate	GF	EG
n-Butyl Alcohol	EE	EE
sec-Butyl Alcohol	EG	EE
tert-Butyl Alcohol	EG	EE
Butyric Acid	NN	FN
Calcium Hydroxide, Conc.	EE	EE
Calcium Hypochlorite, Sat.	EE	EE
Carbazole	EE	EE
Carbon Disulfide	NN	NN
Carbon Tetrachloride	FN	GF
Cedarwood Oil	NN	FN
Cellosolve Acetate	EG	EE
Chlorobenzene	NN	FN
Chlorine, 10% in Air	GN	EF
Chlorine, 10% (Moist)	GN	GF

APPENDIX A

POLY-FLEX

Chemical Resistance Information (Cont'd.)

CHEMICAL	LDPE	HDPE	CHEMICAL	LDPE	HDPE
Chloroacetic Acid	EE	EE	Ethyl Lactate	EE	EE
p-Chloroacetophenone	EE	EE	Ethylene Chloride	GN	GF
Chloroform	FN	GF	Ethylene Glycol	EE	EE
Chromic Acid, 10%	EE	EE	Ethylene Glycol Methyl Ether	EE	EE
Chromic Acid, 50%	EE	EE	Ethylene Oxide	FF	GF
Cinnamon Oil	NN	FN	Fatty Acids	EG	EE
Citric Acid, 10%	EE	EE	Fluorides	EE	EE
Cresol	NN	FN	Fluorine	FN	GN
Cyclohexane	FN	FN	Formaldehyde, 10%	EE	EE
Cyclohexanone	NN	FN	Formaldehyde, 40%	EG	EE
Cyclopentane	NN	FN	Formic Acid, 3%	EG	EE
DeCalin	GF	EG	Formic Acid, 50%	EG	EE
n-Decane	FN	FN	Formic Acid, 98-100%	EG	EE
Diacetone Alcohol	FN	EE	Freon TF	EG	EG
o-Dichlorobenzene	FN	FF	Fuel Oil	FN	GF
p-Dichlorobenzene	FN	GF	Gasoline	FN	GG
1,2-Dichloroethane	NN	NN	Glacial Acetic Acid	EG	EE
2,4-Dichlorophenol	NN	NN	Glutaraldehyde (Disinfectant)	EG	EE
Diethyl Benzene	NN	FN	Glycerine	EE	EE
Diethyl Ether	NN	FN	n-Heptane	FN	GF
Diethyl Ketone	GF	GG	Hexane	NN	GF
Diethyl Malonate	EE	EE	Hydrazine	NN	NN
Diethylamine	NN	FN	Hydrochloric Acid, 1-5%	EE	EE
Diethylene Glycol	EE	EE	Hydrochloric Acid, 20%	EE	EE
Diethylene Glycol Ethyl Ether	EE	EE	Hydrochloric Acid, 37%	EE	EE
Dimethyl Acetamide	FN	EE	Hydrofluoric Acid, 4%	EG	EE
Dimethyl Formamide	EE	EE	Hydrofluoric Acid, 48%	EE	EE
Dimethylsulfoxide	EE	EE	Hydrogen Peroxide, 3%	EE	EE
1,4-Dioxane	GF	GG	Hydrogen Peroxide, 30%	EG	EE
Dipropylene Glycol	EE	EE	Hydrogen Peroxide, 90%	EG	EE
Ether	NN	FN	Iodine Crystals	NN	NN
Ethyl Acetate	EE	EE	Isobutyl Alcohol	EE	EE
Ethyl Alcohol (Absolute)	EG	EE	Isopropyl Acetate	GF	EG
Ethyl Alcohol, 40%	EG	EE	Isopropyl Alcohol	EE	EE
Ethyl Benzene	FN	GF	Isopropyl Benzene	FN	GF
Ethyl Benzoate	FF	GG	Isopropyl Ether	NN	NN
Ethyl Butyrate	GN	GF	Jet Fuel	FN	FN
Ethyl Chloride, Liquid	FN	FF	Kerosene	FN	GG
Ethyl Cyanoacetate	EE	EE	Lacquer Thinner	NN	FN

POLYFLEX
POLYETHYLENE GEOMEMBRANES

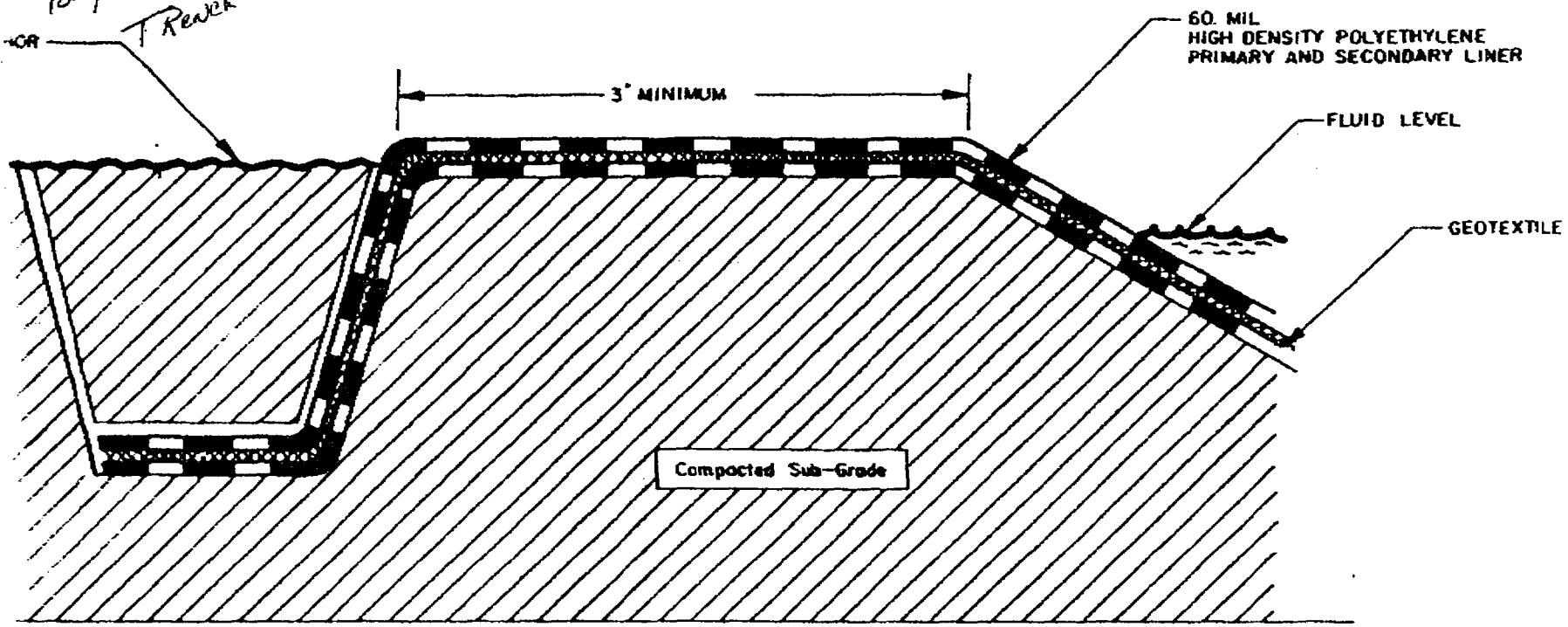
APPENDIX A

Chemical Resistance Information (Cont'd.)

CHEMICAL	LDPE	HDPE
Lactic Acid, 3%	EG	EE
Lactic Acid, 85%	EE	EE
Mercury	EE	EE
2-Methoxyethanol	EG	EE
Methoxyethyl Oleate	EG	EE
Methyl Acetate	FN	FF
Methyl Alcohol	EE	EE
Methyl Ethyl Ketone	EG	EE
Methyl Isobutyl Ketone	GF	EG
Methyl Propyl Ketone	GF	EG
Methyl-t-butyl Ether	NN	FN
Methylene Chloride	FN	GF
Mineral Oil	GN	EE
Mineral Spirits	FN	FN
Nitric Acid, 1-10%	EE	EE
Nitric Acid, 50%	GG	GN
Nitric Acid, 70%	FN	GN
Nitrobenzene	NN	FN
Nitromethane	NN	FN
n-Octane	EE	EE
Orange Oil	FN	GF
Ozone	EG	EE
Perchloric Acid	GN	GN
Perchloroethylene	NN	NN
Phenol, Crystals	GN	GF
Phenol, Liquid	NN	NN
Phosphoric Acid, 1-5%	EE	EE
Phosphoric Acid, 85%	EE	EE
Picric Acid	NN	NN
Pine Oil	GN	EG
Potassium Hydroxide, 1%	EE	EE
Potassium Hydroxide, Conc.	EE	EE
Propane Gas	NN	FN
Proplonic Acid	FN	EF
Propylene Glycol	EE	EE
Propylene Oxide	EG	EE
Resorcinol, Sat.	EE	EE
Resorcinol, 5%	EE	EE
Salicylaldehyde	EG	EE

CHEMICAL	LDPE	HDPE
Salicylic Acid, Powder	EE	EE
Salicylic Acid, Sat.	EE	EE
Salt Solutions, Metallic	EE	EE
Silicone Oil	EG	EE
Silver Acetate	EE	EE
Silver Nitrate	EG	EE
Skydrol LD4	GF	EG
Sodium Acetate, Sat.	EE	EE
Sodium Hydroxide, 1%	EE	EE
Sodium Hydroxide, 50% to Sat.	GG	EE
Sodium Hypochlorite, 15%	EE	EE
Stearic Acid, Crystals	EE	EE
Sulfuric Acid, 1-6%	EE	EE
Sulfuric Acid, 20%	EE	EE
Sulfuric Acid, 60%	EG	EE
Sulfuric Acid, 98%	GG	GG
Sulfur Dioxide, Liq., 46 psig	NN	FN
Sulfur Dioxide, Wet of Dry	EE	EE
Sulfur Salts	FN	GF
Tartaric Acid	EE	EE
Tetrahydrofuran	FN	GF
Thionyl Chloride	NN	NN
Toluene	FN	GG
Tributyl Citrate	GF	EG
Trichloroacetic Acid	FN	FF
1,2,4-Trichlorobenzene	NN	NN
Trichloroethane	NN	FN
Trichloroethylene	NN	FN
Triethylene Glycol	EE	EE
2,2,4-Trimethylpentane	FN	FN
Tripropylene Glycol	EE	EE
Tris Buffer, Solution	EG	EG
Turpentine	FN	GG
Undecyl Alcohol	EF	EG
Urea	EE	EE
Vinylidene Chloride	NN	FN
Xylene	GN	GF
Zinc Stearate	EE	EE

12" x 18" Anchor
T Reach



#4 Pit

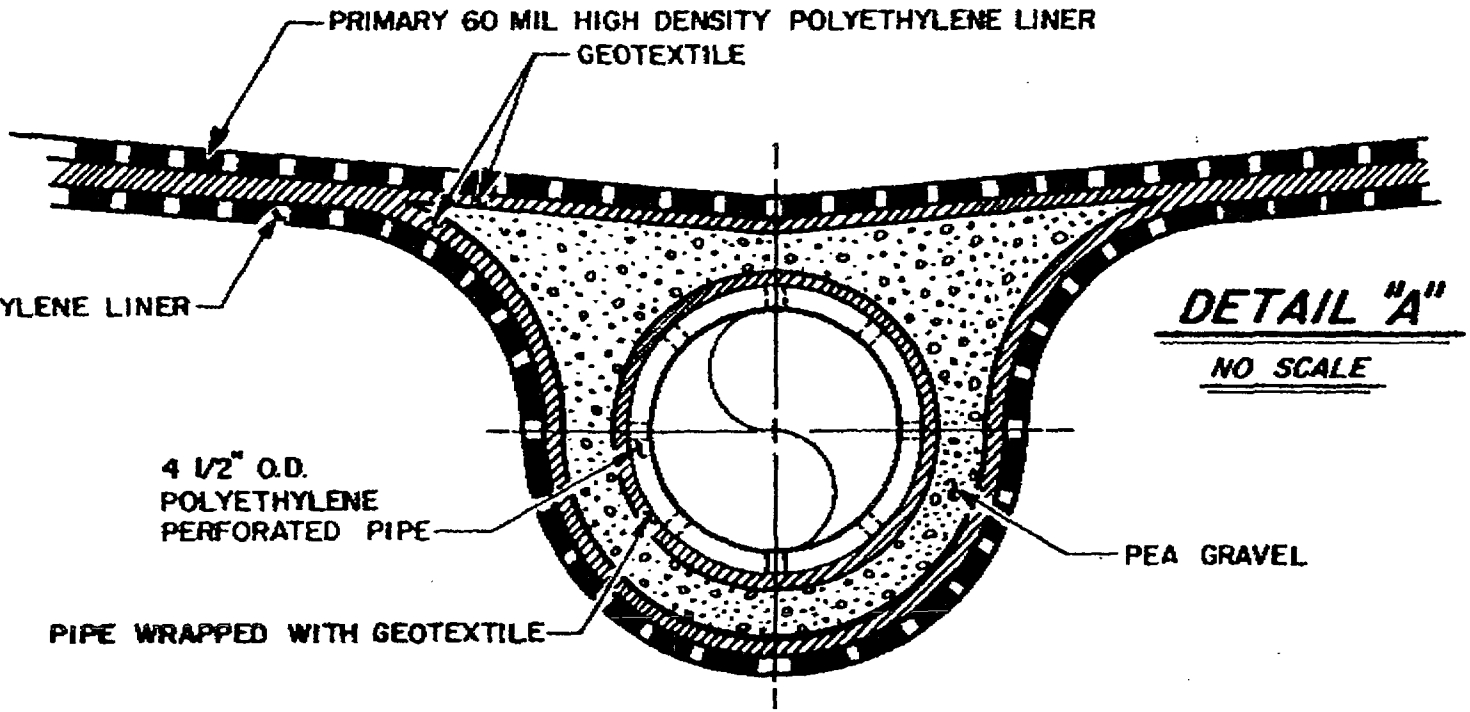
REVISIONS		NUMBER	REFERENCE DRAWINGS	NOTICE			
FOR APPROVAL				TEXACO USA	DWN	RAC	3/92
FOR BIDS					CHKD		
					PIPE		
					INSTR		
					ELECT		
					STR		
					APP		
					CODE		

ANCHOR TRENCH DETAIL

TEXACO USA
NATURAL GAS PLANTS DIVISION

SECTION "A-A"

NO SCALE



DETAIL "A"

NO SCALE

S:

be installed atop, and evenly rolled, 1-1/2" to 2" thick layer of acted to a 95% Proctor Density. No sharp-edged exposed stones ts will be allowed.

shall be made w/stone aggregate and shall develop a compressive 3000 PSI in 28 days.

nstruction shall be in accordance w/ACI-318, latest edition.

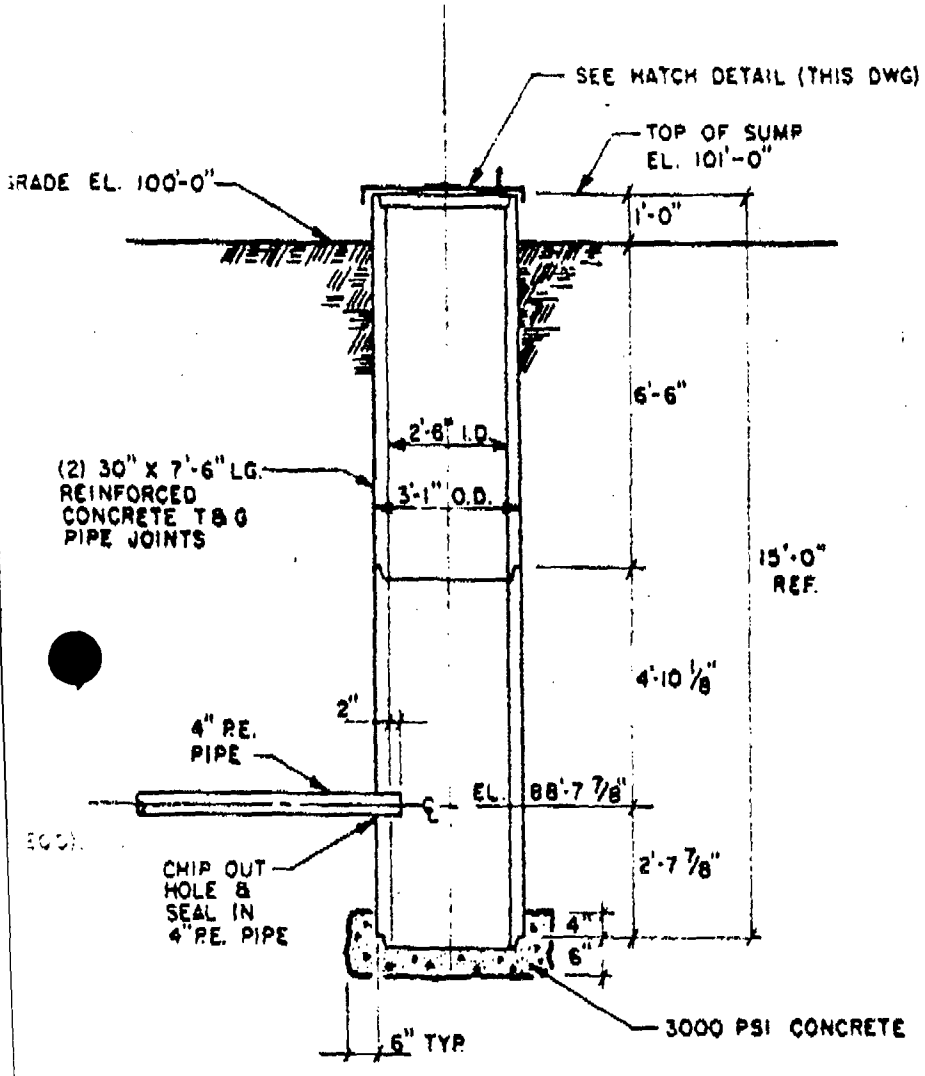
ng bar shall be ASTM A-615 Gr. 60, and is dimensioned out to out.

shall rest on undisturbed soil or compacted sand returned to a 95% ity.

l overlap 12" or 24 bar diameters, whichever is greater.

REVISIONS

MK	DESCRIPTION	DATE	BY	CHK
A	Issue for approval	3-89	RAC	
B	Issue for bids	3-89	RAC	
	#4 Pit			



#4 pit

SUMP DETAIL

SCALE: 1" = 4'

Texaco USA
PO Box 3000
Tulsa OK 74102

David P

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 23, 1990

ENV - POLLUTION CONTROL
Solid Waste Control Permits
Eunice #1 Gas Plant

Ms. Debbie Brinkerhoff
Air Quality Bureau
1190 St. Francis Drive
Santa Fe, NM 87503

Dear Ms. Brinkerhoff:

Texaco Producing Inc. plans to properly remove and dispose of approximately 390.5 cubic feet of asbestos insulation at its Eunice #1 Gas Plant. The plant is located 6 miles south of Eunice, N.M. on State Highway #18. The plant's mailing address is:

Texaco Producing Inc.
Eunice #1 Gas Plant
P.O. Box 1137
Eunice, NM 88231
Attn: Mr. C. R. Adkison

The contractor selected to remove and dispose of the asbestos is:

AOI - Alpha Omega Icon
P.O. Box 12887
8044 W. County Road
Odessa, TX 79768
New Mexico Construction Industry Division
License #27634

The properly bagged insulation material will be disposed of at:

Monahans Municipal Landfill
Monahans, Texas
(915) 943-4343

The method of removal and disposal will include the use of the following:

wet method
enclosures
encapsulation
glove bag
double bag
negative air
transporting in enclosed trailer

The age of the units are unknown. The size and use are as stated below:

#7 Wickes Boiler, 250HP, 200 #WP, S/N 62043-3
#5 Wickes Boiler, 250HP, 200 #WP, S/N 62023
#4 Wickes Boiler, 250HP, 200 #WP, S/N 62000
#3 Wickes Boiler, 250HP, 200 #WP, S/N 60998

118′ 12-3/4" OD 200# Steam Pipe, about 2" insulation, 300# flanges
128′ 4-1/2" OD 200# Steam Pipe, about 1-1/2" insulation, 300# flanges
108′ 2-3/8" OD 200# Condensate Pipe, about 1" insulation, 300# flanges
91′ 6-5/8" OD 200# Steam Pipe, about 1-1/2" insulation, 300# flanges
29′ 1.315" OD 200# Steam Pipe, about 1" insulation, 300# flanges

The removal operation is scheduled to begin during the first week of February, 1990 and should be completed by the second week of March, 1990.

Should you have any questions or require additional information, please call me at (918) 560-7055.

Sincerely,

Ray Russell

C. R. RUSSELL
Environmental Coordinator
Natural Gas Plants & Liquids Division

crr:ila
01/23.02

cc: Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Mr. Jerry L. Holloway
AOI - Alpha Omega Icon
P.O. Box 12887
Odessa, TX 79768

Texaco USA
PO Box 1650
Tulsa OK 74102

ENV - POLLUTION CONTROL
Water Pollution Control Permits
Groundwater Discharge Plans
Eunice #1 Gas Processing Plant (GW-3)
Eunice #2 Gas Processing Plant (GW-4)

January 16, 1991

Mr. Roger Anderson
New Mexico Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

We are requesting renewal of the previously approved Groundwater Discharge Plans (GW-3 and GW-4 respectively) for Texaco's Eunice #1 and Eunice #2 Gas Processing Plants.

The details of any amendments or process charges at the plants will be provided to you by February 8, 1991.

The additional information you requested is provided on the attached Table 1.

Please call me at (918) 560-7055 if additional information is required.

Sincerely,

Ray Russell

C. Ray Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:lam
01/16.2

Attachment

TABLE 1

	Eunice #1	Eunice #2
Approximate plant discharge volume	70,266 gal/day	16,982 gal/day
Discharge TDS	9000 μmhos/cm	5850 μmhos/cm
Depth to groundwater	80' - 90'	80' - 90'
Groundwater TDS	1210 μmhos/cm	2800 μmhos/cm
Final disposition of discharge	Injection Well SWD #1-L Sec. 27, T22S, R37E	Aqua Systems Injection Well Operated by Rice Engineering Inc.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

August 15, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-343

Mr. C. Ray Russell
Texaco USA
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: Solid Disposal - #3 Wastewater Pond - Eunice #1 Gas Plant

Dear Mr. Russell:

The Oil Conservation Division (OCD) has received your request for authorization to dispose of approximately 2000 cubic yards of solids from the above referenced waste water pond. The solids will be transported to the Parabo Disposal facility for disposal.

Based on the information provided in your request, the solids are RCRA nonhazardous and your request is approved.

If you have any questions, please contact me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Hobbs Office

Texaco USA
PO Box 1650
Tulsa OK 74102

August 3, 1990

ENV - POLLUTION CONTROL
Solid Waste Pollution Control Permits
Eunice #1 Gas Plant

Mr. David G. Boyer
State of New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87504-2088

Dear Mr. Boyer:

Texaco's Eunice #1 Gas Plant, located in Lea County, has been negotiating with Unichem International's Parabo disposal facility at Hobbs for the disposal of approximately 2000 cubic yards of solids from Eunice's #3 wastewater pit. According to our plant management, about 95% of the solids originate from brine water operations and spent caustic from gas sweetening operations. The balance originates from produced water solids. It is our belief that these wastes are RCRA exempt wastes. In addition, a sample of the material was collected on August 31, 1989 for hazardous waste characterization. The results of the analysis (copy attached) indicate that the waste does not characterize as hazardous.

Unichem International has requested that we acquire written consent from your agency for the disposal of the sludge at the Parabo facility.

Please call me at (918) 560-7055 if you have any questions or need additional information.

Sincerely,

Ray Russell

C. Ray Russell
Environmental Coordinator
NATURAL GAS PLANTS AND LIQUIDS DIVISION

CRR:lam
08/06.1

SOUTHWEST LABORATORY OF OKLAHOMA, INC.

1700 W. Albany • Suite "C" • Broken Arrow, Oklahoma 74012 • 918-251-2858

CLIENT: TEXACO, U.S.A.
POST OFFICE BOX 1650
TULSA, OKLAHOMA 74102
ATTN: RAY RUSSELL

REPORT: G1957

DATE: 09-18-89

SAMPLE MATRIX: SLUDGE
SWLO # 30842
DATE SUBMITTED: 08-31-89
PROJECT: EUNICE #1
SAMPLE ID: TEXACO PIT #3 08-30-89 8:15 A.M.

PARAMETER	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
EP TOXICITY METALS					
ARSENIC	0.035	mg/L	ND	09-13-89	SW 6010
BARIUM	0.03	mg/L	0.29	09-13-89	SW 6010
CADMIUM	0.005	mg/L	ND	09-13-89	SW 6010
CHROMIUM	0.005	mg/L	0.025	09-13-89	SW 6010
LEAD	0.02	mg/L	ND	09-13-89	SW 6010
MERCURY	0.05	mg/L	ND	09-13-89	SW 6010
SELENIUM	0.03	mg/L	0.049	09-13-89	SW 6010
SILVER	0.01	mg/L	ND	09-13-89	SW 6010
REACTIVITY					
CYANIDE	1.0	mg/Kg	ND	09-12-89	SW 9010
SULFIDE * 500 mg/Kg regulatory waste for sulfides	1.0	mg/Kg	131	09-14-89	SW 9030
IGNITABILITY					
FLASH POINT	NA	°F	>139*	09-18-89	SW 1010
CORROSIVITY					
pH (@ 25° C)	NA	S.U.	8.02	09-06-89	SW 9040

* EXTINGUISHED FLAME @139

ND = NONE DETECTED
SW = EPA METHOD REFERENCES, "SW846"

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

July 26, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-301

Mr. J. H. Anderson
Manager of Operations
Texaco, Inc.
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-3
Eunice #1 Gas Processing Plant
Lea County, New Mexico

Dear Mr. Anderson:

On May 23, 1986, the ground water discharge plan, GW-3 for the Texaco Eunice #1 Gas Processing Plant located in the NW/4 SW/4, Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on March 16, 1991.

If your facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application.

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

Please note that all gas plants, refineries and compressor stations in excess of 25 years of age will be required to submit plans for, or the results of, an underground drainline testing program as a requirement for discharge plan renewal.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5884.

Sincerely,

David G. Boyer, Hydrogeologist
Environmental Bureau Chief

DGB/sl

Enclosure

cc: OCD Hobbs Office
Ray Russell, Environmental Coordinator, Texaco, Tulsa

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 9:30	Date 5/9/90

Originating Party	Other Parties
Ray Russell, (918) 560-7055 Texaco Inc	D. Boyer OCD

Subject: Texaco Eunice #1 Plant -

Discussion: Texaco is planning to convert Pit #3 to brine storage from wastewater disposal Pit has non-~~hazardous~~ EP Toxic waste (but no benzene test). Wanted guidance on disposal. I told him he could bury on site and cover. I suggested (since he already had a pit) that he line it with plastic before depositing solids to isolate solids from soil beneath in case they need to dig up. Site would need to be protected from run-on - mounded. He also wanted to explore

Conclusions or Agreements: leaving salts in pond but covering with sand and liner for the brine water. I told him was possibility, but OCD would require positive assurance of leak detection. Told him OCD rule 8 required plans and specs be submitted

Distribution

Texaco Eunice #1 File
Roger Anderson

Signed WJLB

Santa Fe

Submit 4 Copies
to Appropriate
District Office

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. H-21
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(I)

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37E
(Ut. Ltr. Sec. Twp. Rge)

Size of pit or tank: #1 Brine Pit 243' x 243' 75,000 bbl. capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

X The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

Contains only brine water.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Removal by vacuum truck. Time required: 4 hours. The pit is located on plant property and is checked daily. The plant is manned 24 hours per day.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

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OIL CONSERVATION DIV.
SANTA FE

____ Operator proposes the following alternate protective measures:

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

Approved by ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Title

Date SEP 12 1989

8F

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State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. H-22
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37
Ut. Ltr. Sec. Twp. Rg

Size of pit or tank: #2 Brine Pit 243' x 243' 75,000 bbl. capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

X The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

Contains only brine water.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Removal by vacuum truck. Time required: 4 hours. The pit is located on plant property and is checked daily. The plant is manned 24 hours per day.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

____ Operator proposes the following alternate protective measures:

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SANTA FE

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

Approved by ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Title

Date SEP 12 1989

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State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. H-23
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37E
(Ut. Ltr. Sec. Twp. Rg)

Size of pit or tank: #3 Pit 243' x 243' 75,000 bbl. capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

_____ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

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SANTA FE

__X__ Operator proposes the following alternate protective measures: See attached.

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

Approved by ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Title

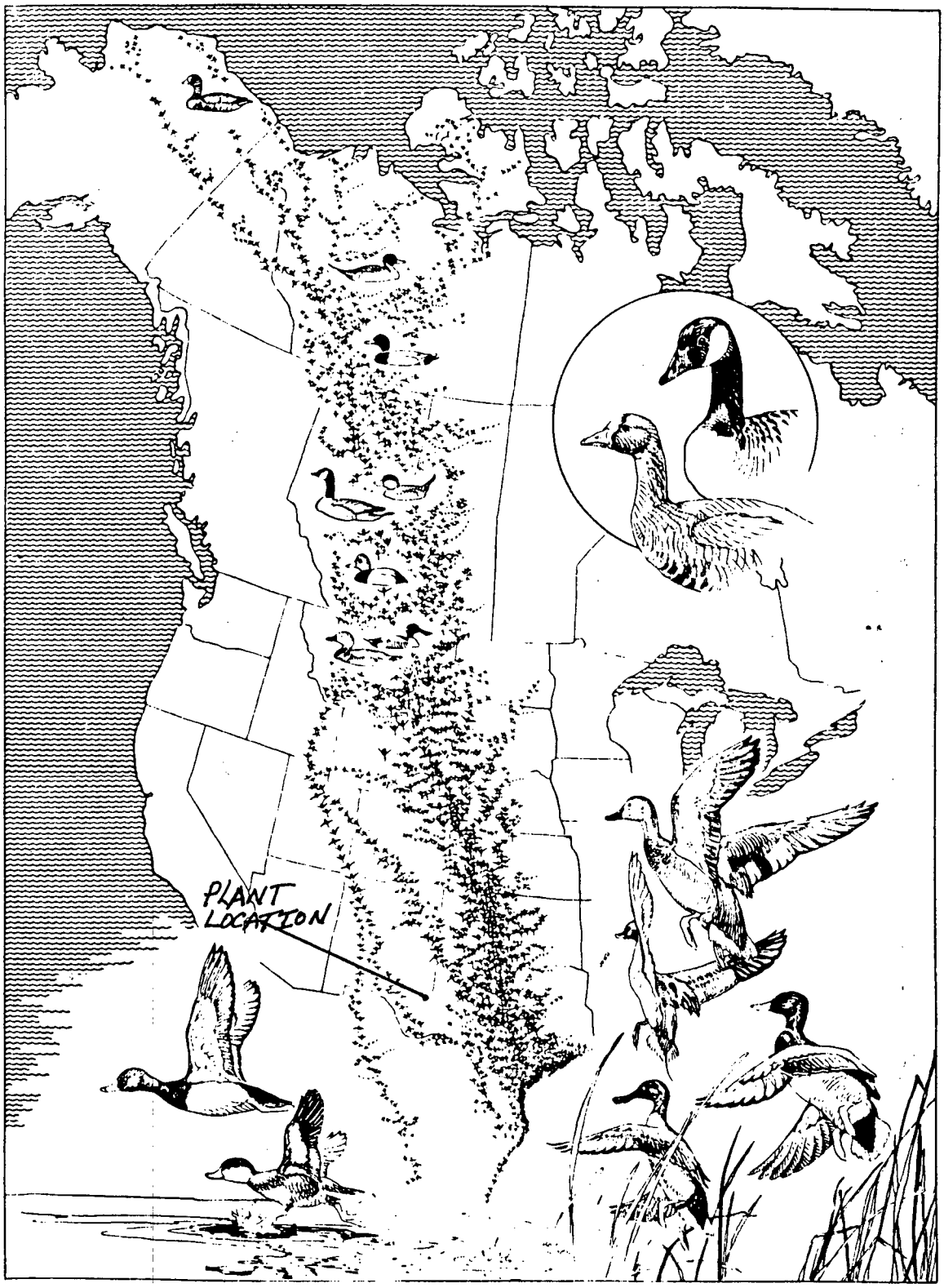
Date SEP 12 1989

#3 PIT

This pit contains process waste water and is visually checked at least two (2) times each day. The pit is located within the fenced boundaries of the gas plant. The gas plant is manned 24 hours per day. Should hydrocarbons enter the pit, they can be removed within four (4) hours using the plant vacuum truck.

Additionally, as can be seen in the attached U.S. Fish & Wildlife Services Central Flyway diagram, there is not a waterfowl flyway located near the Eunice Gas Plant.

CENTRAL FLYWAY



UNITED STATES DEPARTMENT OF THE INTERIOR • FISH AND WILDLIFE SERVICE

INT: 4038-73

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State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. 1424
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37E
(Ut. Ltr. Sec. Twp. Rg)

Size of pit or tank: #4 Brine Pit 190' x 240' . 52,000 bbl. capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

X The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

Contains only brine water

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Removal by vacuum truck. Time required: 4 hours. The pit is located on plant property and is checked daily. The plant is manned 24 hours per day.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

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SEP 15 1989
OIL CONSERVATION DIV
SANTA FE

____ Operator proposes the following alternate protective measures:

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

Approved by ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Title

Date SEP 12 1989

AF

Submit 4 Copies to Appropriate District Office

SEP 15 1989

OIL CONSERVATION DIV. SANTA FE

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State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. 1425
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37
Ut. Ltr. Sec. Twp. Rg

Size of pit or tank: Treated Water Tank 29' 9" diameter 3,000 bbl capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

__X__ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

This tank contains only softened well water.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

NA

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

_____ Operator proposes the following alternate protective measures:

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected

Inspected by

Approved by ORIGINAL SIGNED BY JERRY SEXTON DISTRICT I SUPERVISOR

Title

Date SEP 12 1989

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Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. H-26
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37E
Ut. Ltr. Sec. Twp. Rg

Size of pit or tank: Jacket Water Tank 29' 9" diameter, 3,000 bbl capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

__X__ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

See attached

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

_____ Operator proposes the following alternate protective measures:

SEP 15 1989
OIL CONSERVATION DIV.
SANTA FE

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Approved by

Title

Date SEP 12 1989

JACKET WATER TANK

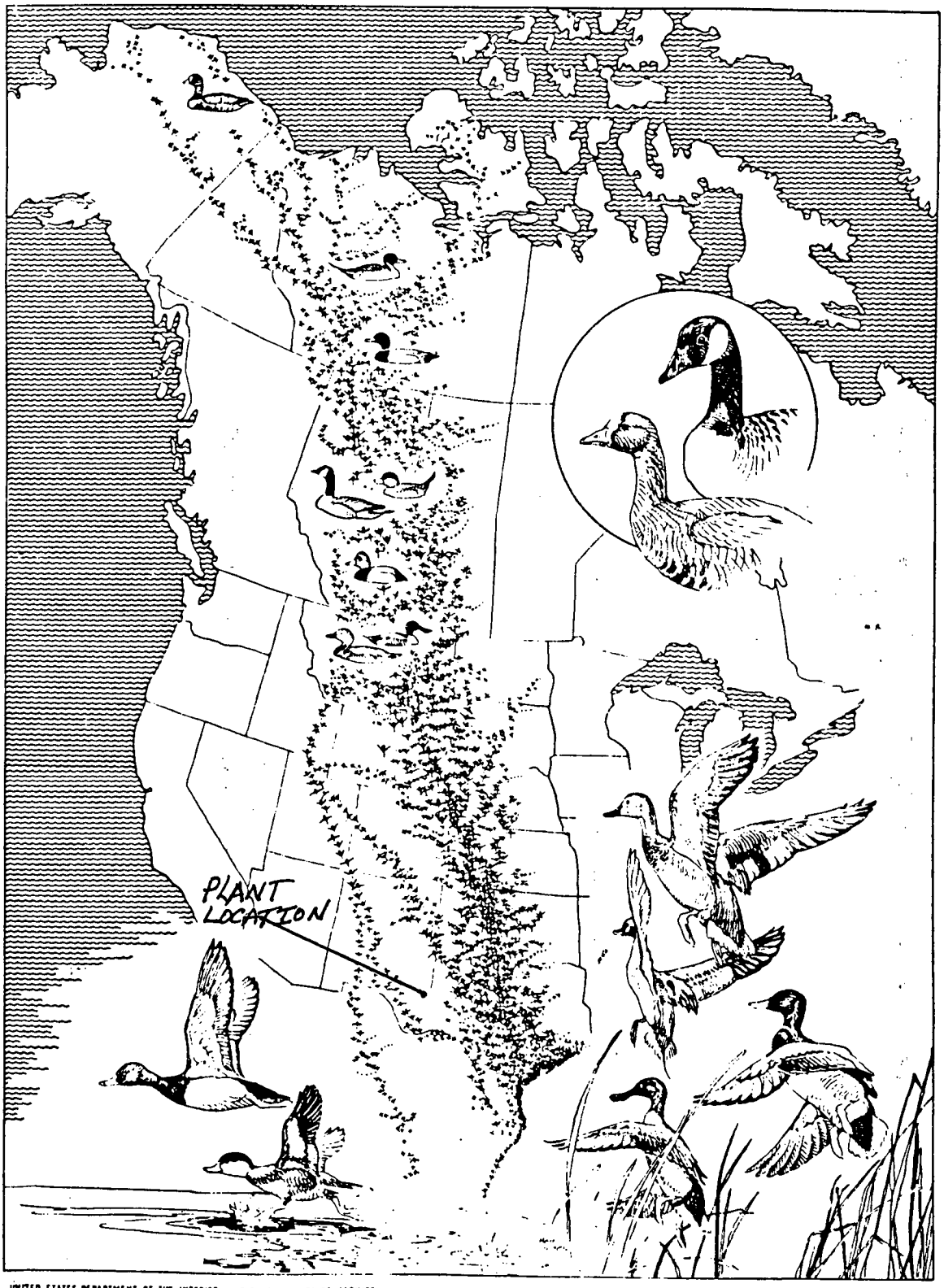
This tank contains water, Calgon LCSA-20 and Calgon H-300.

Calgon LCS-20 is a sodium nitrite solution that is used for corrosion control and is maintained at 2400 ppm. The sodium nitrite is converted to nitrates upon mixing with water and, according to Calgon, equates to the nitrates that might be found in a tank or pond adjacent to a farmers fertilized field.

Calgon H-300 contains glutaraldehyde and is mixed with the water at about 79 ppm. Toxicity information from Calgon indicates that H-300's 8 day oral LC-50 for ducks is in excess of 10,000 ppm. According to Calgon neither of the chemicals pose a threat to waterfowl at the above indicated concentrations.

Additionally, as can be seen in the attached U.S. Fish & Wildlife Services Central Flyway diagram, there is not a waterfowl flyway located near the Eunice Gas Plant

CENTRAL FLYWAY



UNITED STATES DEPARTMENT OF THE INTERIOR • FISH AND WILDLIFE SERVICE

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1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Form C-134
Aug. 1, 1989

Permit No. 14-27
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(

Operator Name: Texaco Producing Inc.

Operator Address: Post Office Box 1650 Tulsa, Oklahoma 74102

Lease or Facility Name Eunice #1 Gas Plant Location SW/4 27 22S 37
Ut. Ltr. Sec. Twp. Rg

Size of pit or tank: Ring Water Tank - 95 13/16' dia. x 8' high 10,000 bbl capacity

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

X The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

Contains only fresh well water

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

N.A.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

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SEP 15 1989

OIL CONSERVATION DIV.
SANTA FE

____ Operator proposes the following alternate protective measures:

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Ray Russell Title Environmental Coordinator Date 8/28/89

Printed Name Ray Russell Telephone No. (918) 560-7055

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 9-8-89

Inspected by Eddie W. Seay
Oil & Gas Inspector

Approved by ORIGINAL SIGNED BY JERRY SEXTON
DISTRICT I SUPERVISOR

Title

Date SEP 12 1989

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

May 15, 1989

GARREY CARRUTHERS
GOVERNOR

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

CERTIFIED MAIL - RETURN
RECEIPT NO. P-106 675 053

Mr. Lewis E. Knight
Texaco USA
Natural Gas Plants Division
P. O. Box 3000
Tulsa, Oklahoma 74102

Re: Waste Water Disposal Pit
Eunice No. 1 Gas Plant
Lea County, New Mexico

Dear Mr. Knight:

The Oil Conservation Division (OCD) has received your application, dated April 17, 1989, for the construction of a double-lined evaporation pit with leak detection. The new pit will receive the waste water previously disposed of in pit No. 3. Pit No. 3 will be re-lined and used to store brine water for the product storage operation.

The design and specifications submitted are adequate for the protection of the environment and are approved with the following conditions:

1) A minimum 3-foot freeboard will be maintained at all times to prevent over-topping of the side walls.

2) If fluids are detected in the leak detection sump during your weekly inspection, notification will be made to this office, samples taken and analyzed and prompt repairs made on the liner, if required.

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of the environment which may be actionable under other laws and/or regulations.

If you have any questions, please do not hesitate to call me at (505) 827-5884.

Sincerely,

Roger C. Anderson

ROGER C. ANDERSON,
Environmental Engineer

RCA/dr

cc: Oil Conservation Division - Hobbs

P-106 675 053

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Lewis Knight/Texaco USA	
Street and No. Box 3000	
P.O., State and ZIP Code Tulsa, Ok. 74102	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, June 1985

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

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

MEMO TO: Dave Boyer

FROM: Jerry Sexton

SUBJECT: Pit leak detection device

DATE: April 26, 1988

The inspections that have been made concerning the reliability of the lined pit leak detection systems indicates they are working effectively.

The system monitoring the pits at the Warren Plant at Monument indicated a leak in the lining of the south pit, and the Plant Superintendent advised us that the pit will be corrected and will not be used until the repairs are completed. All other pits checked were in good shape.

I wanted you to have this information for your records. If there is other information that we can give you, feel free to contact me.

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

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

MEMORANDUM TO: Jerry Sexton
FROM: Eddie W. Seay
DATE: April 26, 1988

SUBJECT: Leak Detection Pit Inspection

On April 21 and 25, inspections were made by me on pits at Phillips - Buckeye, Enron - West Hobbs, Warren Petroleum - Monument, and Texaco - South Eunice.

The inspections were to check leak detection systems on lined pits at these facilities.

Enron and Phillips' inspection holes were dry. Texaco had one which was dry and one that had a small amount of water in it. Per my conversation with Mr. Charlie Adkison, Supt. of Texaco Plants, Texaco had approved budget to repair and build new pits; correspondence with Charlie and Dave Boyer are forthcoming.

The two pits at Warren Petroleum - Monument Plant were both constructed and monitored by OCD with leak detection systems in them. The north pit's detection system was dry. The south pit's detection system had pit water in it, liner in pit appears to be leaking. I was informed by Plant Supt. that corrections to liner would be made and use of pit has been stopped until corrected. A letter from Warren Petroleum on proposed work is in process.

It appears that the pits which the OCD monitored construction on with leak detection systems works!

Bill Lemay
To: David B

090793

Lewis E Knight
Safety and Environmental
Engineering Coordinator
Natural Gas Plants
Division

Texaco USA

PO Box 3000
Tulsa OK 74102
918 560 6331

RECEIVED
OFFICE OF THE GOVERNOR
SEP 22 2 10 PM '87

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 15, 1987

GOV - FEDERAL GOVERNMENT
EPA - Superfund Amendments & Reauthorization Act
Emergency Planning & Community Right-to-Know
Texaco - Natural Gas Plants Division
Notification - Facility Coordinators and Alternates

The Honorable Garrey Carruthers
Governor of the State of New Mexico
State Capitol Building
Santa Fe, NM 87503

The Honorable Garrey Carruthers:

Texaco, Natural Gas Plants Division, made a May 11, 1987 notification that its Eunice No. 1 and Eunice No. 2 Natural Gas Processing Plants were subject to SARA Title III requirements. Accordingly, this is to notify you that Mr. C. R. Adkison is hereby designated as the Facility Coordinator to serve on the Local Emergency Planning Committee. In his absence, Mr. C. J. Shahan has been designated Mr. Adkison's alternate. Either or both individuals may be reached at the following address/telephone number.

Mr. C. R. Adkison
Texaco Producing Inc.
Eunice Gas Plants
P. O. Box 1137
Eunice, NM 88231
505/394-2566

Mr. C. J. Shahan
Texaco Producing Inc.
Eunice Gas Plants
P. O. Box 1137
Eunice, NM 88231
505/394-2566

Should you have questions or require additional information, please do not hesitate to contact Mr. Adkison, Mr. Shahan, or me at any time.

Very truly yours,

Lewis E. Knight

LEK:wsh

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501-2088
(505) 827-5800

May 23, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. H. Anderson
Mgr., Tulsa District
Natural Gas Plant Division
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: DISCHARGE PLAN GW-3
TEXACO PRODUCING INC.
EUNICE NO. 1 GAS PROCESSING PLANT

Dear Mr. Anderson:

The ground water discharge plan renewal (GW-3) for the Texaco Eunice No. 1 Gas Processing Plant located in the NW/4 of the SW/4 of Section 27, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico, is hereby approved with the following provisions as committed to in your May 12, 1986 correspondence:

1. The cooling tower will be repaired by January, 1987, so as to prevent any future leaks or windblown cooling tower water to pool on the adjacent ground.

2. Periodic inspection of the brine pit liners, with timely repair if necessary.

The original discharge plan was approved on March 16, 1981 and expired March 16, 1986. The renewal application consists of the plan dated November 18, 1980 and supplements dated December 29, 1980, September 7, 1983, February 24, 1986, February 28, 1986, and May 12, 1986.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

There will be no routine monitoring or reporting requirements.

Please note that Section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and

conditions of the plan." Pursuant to Section 3-107.C., you are 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 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire March 16, 1991, and you should submit an application for renewal in ample time before that date. Testing of all underground pipes will be required before renewal of the discharge plan can be considered.

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,

R. L. STAMETS
Director

RLS:RCA:dp

cc: OCD, Hobbs
L. E. Knight, Texaco USA, Tulsa, Oklahoma
C. R. Adkison, Texaco, Eunice

John H Anderson
Manager Tulsa District
Natural Gas Plants Division

Texaco USA

P O Box 1650
Tulsa OK 74102
918 560 6705

May 12, 1986

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
Energy and Minerals Dept.
P. O. Box 2088 - State Land Bldg.
Santa Fe, New Mexico 87501

Re: ENV - Pollution Control
Water Pollution Control Permits
Eunice No. 1 - Discharge Plan GWR-3

Dear Mr. Anderson:

In reference to your telephone conversation with Mr. L. E. Knight this date, regarding the Eunice No. 1 Discharge Plan GWR-3, we offer the following information.

1. Leaks from the cooling tower circulating pumps have been repaired. We are in the process of obtaining quotes for repair/replacement of the old louvers. After all quotes are in, evaluated, and the job awarded, the work should be completed by the third or fourth quarter of this year. Also, it should be noted that cooling tower water is no longer pooling on the ground.

2. The No. 1 brine pit liner has been repaired. We have also set up an annual liner integrity inspection schedule for this pit.

Should you have questions or need additional information, please do not hesitate to contact us.

Very truly yours,

J. H. Anderson

JHA/LEK:mm

FJKjr
WEI
CRA
GDW

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Field Supervisor
Ecological Services, USFWS
Post Office Box 4487
Albuquerque, New Mexico 87196

March 31, 1986

Mr. R. L. Stamets, Director
Oil Conseration Division
State of New Mexico
State Land Office Building
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Stamets:

This letter responds to the public notice dated March 31, 1986 for proposed discharge plans submitted to your division. We have reviewed the following plans and have not identified any resource issues of concern to our agency. Renewal of these plans should not have a significant impact upon plants, fish, shellfish or wildlife resources of New Mexico.

(GW-2) Phillips 66 Natural Gas Co. Buckeye Plant, Lea County, New Mexico
(GW-3) Texaco Producing Inc. Eunice No. 1, Lea County, New Mexico
(GW-4) Texaco Producing Inc. Eunice No. 2, Lea County, New Mexico
(GW-5) Warren Petroleum Company, Eunice Gas Processing Plant, Lea County, New Mexico
(GW-32) Giant Refinery Company; Ciniza Refinery, Gallup, McKinley County, New Mexico

These comments represent the views of the Fish and Wildlife Service. Thank you for the opportunity to review and comment on the proposed plans. If you have any questions concrning our comments please contact Tom O'Brien at (505) 766-3966 or FTS 474-3966.

Sincerely yours,

John C. Peterson
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Health and Environment Department, Environmental Improvement Division, Santa Fe, New Mexico
Regional Administrator, Environmental Protection Agency, Dallas, Texas
Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico

NOTICE ...
STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plan has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505)827-5800.

(GW-32) Giant Refining Company, Carl D. Shook, Refinery Manager, Route 3, Box 7, Gallup, New Mexico ...301, has submitted a discharge application for the Ciniza Refin... ...ated 17 miles east of Gallup, ...on U.S. Highway 40. The ...d associated waste... ...cilities are located in ... 28 and the N¾ of ...nship 15 North, ...PM), McKinley ... The refinery ...mestic-use ...mpleted ...forma... ...tely ...ss

STATE OF NEW MEXICO } ss.
County of Bernalillo

APR 4 1986

...ISION

THOMAS J. SMITHSON .... being duly sworn declares and

says that he is NAT'L ADV. MGR. of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for ....1.... times, the first publication being on the ....3.... day

of ....April...., 198..6.., and the subsequent consecutive

publications on .... 198.....

........Thomas J Smithson........

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this ..3.. day of ....April...., 198....

PRICE ....67.63....

Statement to come at end of month.

ACCOUNT NUMBER ....C80932....

OFFICIAL SEAL
Signature: Vickie J Blasi
VICKIE J. BLASI
NOTARY PUBLIC-NEW MEXICO
Notary Bond Filed with Secretary of State
My Commission Expires: 5-31-89

EDJ-15 (R-2/86)

...formerly Getty ... Processing Plant (Eunice No. 2), J. Anderson, Manager, Natural Gas Plants Division, P.O. Box 1650, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 24,300 gallons per day of process, boiler, and cooling tower water with a total dissolved content of approximately 7100 mg/l will be discharged to a pipeline operated by Aqua Incorporated for ... via OCD...

AFFIDAVIT OF PUBLICATION

State of New Mexico,

County of Lea.

I, _____

Robert L. Summers

of the Hobbs Daily News-Sun, a daily 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 in a supplement thereof for a period

of _____

One weeks.

Beginning with the issue dated

March 31, 1986

and ending with the issue dated

March 31, 1986

Robert L Summers

Publisher.

Sworn and subscribed to before me this 31 day of March, 1986

Vera Murphy

Notary Public.

My Commission expires

Nov. 14, 1988

(Seal)

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

180

LEGAL NOTICE
March 31, 1986

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-2) Phillips 66 Natural Gas Company, Lee (Buckeye) Plant, J.E. Jennings, Agent, 4001 Penbrook, Odessa, Texas 79762, proposes to renew the previously approved discharge plan at its facility located in the SW/4SE/4 of Section 30, Township 17 South, Range 35 East (NMPM), Lea County, New Mexico. Approximately 57,000 gallons per day of process, boiler and cooling tower waste water with a total dissolved solids content of approximately 5300 mg/l will be discharged to holding tanks. The discharge water will then be pumped to Rice Engineering for final disposal via OCD-approved deep well injection. Ground water most likely to be affected by any discharge at the surface is at a depth of about 85 feet and has a total dissolved solid concentration of approximately 600 mg/l.

(GW-3) Texaco Producing Inc., Eunice No. 1 Gas Processing Plant (formerly Getty Eunice No. 1), J. Anderson, Manager, Natural Gas Plants Division, P.O. Box 1650, Tulsa, Oklahoma, 74102, proposes to renew the previously approved discharge plan at its facility located in the NW/4SW/4 of Section 27, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 91,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved solids content of approximately 7000 mg/l will be discharged to a lined pond for storage prior to final disposal via OCD-approved deep well injection at site. Other lined pits hold brine water for LPG storage well use. The ground water most likely to be affected from any discharge at the surface is at a depth of about 65 feet and has a total dissolved solids concentration of approximately 1700 mg/l.

(GW-4) Texaco Producing Inc., Eunice No. 2 Gas Processing Plant (formerly Getty Eunice No. 2), J. Anderson, Manager, Natural Gas Plants Division, P.O. Box 1650, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4SE/4 of Section 28, Township 21 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 24,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved content of approximately 7100 mg/l will be discharged to a pipeline operated by Aqua Incorporated for final disposal via OCD-approved deep well injection. The ground water most likely to be affected from any discharge at the surface is at a depth of about 70 feet and has a total dissolved solids concentration ranging from 1200 to 2600 mg/l.

(GW-5) Warren Petroleum Company, Eunice Gas Processing Plant, L.T. Reed, Director, Environmental Affairs, P.O. Box 1589, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4 of Section 3, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 45,000 gallons per day of process, boiler, and cooling tower water, with a total dissolved solids content of approximately 3600 mg/l will be discharged to metal holding tanks for storage prior to final disposal via OCD-approved deep well injection at the sites. The ground water most likely to be affected from any discharge at the surface is at a depth of about 90 feet and has a total dissolved solids concentration ranging from about 400 to 2000 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. 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 an interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of March, 1986.

To be published on or before March 31, 1986.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
R.L. STAMETS
Director
(SEAL)

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

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(GW-4) Texaco Producing Inc., Eunice No. 2 Gas Processing Plant (formerly Getty Eunice No. 2), J. Anderson, Manager, Natural Gas Plants Division, P. O. Box 1650, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 24,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved content of approximately 7100 mg/l will be discharged to a pipeline operated by Aqua Incorporated for final disposal via OCD-approved deep well injection. The ground water most likely to be affected from any discharge at the surface is at a depth of about 70 feet and has a total dissolved solids con-

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

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of March, 1986. To be published on or before March 31, 1986.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

R. L. STAMETS
Director

S E A L

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

50 YEARS
1935 - 1985

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

March 14, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. H. Anderson
Mgr., Tulsa District
Natural Gas Plants Division
P. O. Box 1650
Tulsa, Oklahoma 74102

Re: Discharge Plans GRW-3 and GRW-4
Texaco Producing Inc.
Eunice Nos. 1 and 2 Gas Processing Plants

Dear Mr. Anderson:

We have received your letter dated March 6, 1986, requesting a 60-day extension to May 15, 1986, for the completion of the above-referenced discharge plan renewals. Renewal applications are dated February 24, 1986 for Eunice No. 1, and March 6, 1986 for Eunice No. 2.

Pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations and for good cause shown, Texaco is hereby granted an extension and approval until May 16, 1986, or until discharge plan approval, whichever is earlier, to discharge without an approved discharge plan. This extension is granted to allow completion of discharge plan review by the OCD, exchange of comments, and submittal of clarifying information, if needed. Also, public notice will be issued, and if a public hearing is needed on the proposed discharge plan, an additional extension will be granted consistent with the time frame of any public hearing.

If you have any questions or comments, please feel free to contact Dave Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5885.

Sincerely,

R. L. STAMETS
Director

RLS:RCA:dp

cc: Dave Boyer
OCD - Hobbs

Discharge plan approval for Eunice No. 1 expires March 16, 1986, and discharges beyond that date are unauthorized unless an extension of time has been requested and authorized by the Division. The OCD is presently reviewing discharge plan renewals carefully. Texaco's commitment to correct the above items with a reasonable timetable for completion can expedite this system so that review can be completed during the extension time frame.

If you have any questions, please do not hesitate to contact David Boyer or myself at (505) 827-5885.

Sincerely,

Roger C Anderson

ROGER C. ANDERSON
Environmental Engineer

RCA:dp

cc: R.L. Stamets
Dave Boyer
OCD - Hobbs

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

RECEIVED JUN - 2 1986 OIL CONSERVATION DIVISION SANTA FE

Heavy Metal ~~GENERAL WATER CHEMISTRY and NITROGEN~~ ANALYSIS

DATE RECEIVED 3 | 5 | 86 LAB NO. HM466 USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE 86|02|20
Collection TIME 1250
SITE INFORMATION ► OC8
Sample location: Brine Pond - Texaco Getty #1
Collected by — Person/Agency: Boyer / Anderson
Collection site description: Center of west side of pond

SEND FINAL REPORT TO ►
ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501
Attn: David Boyer

Station/ well code
Owner

SAMPLING CONDITIONS

☐ Bailed ☐ Pump ☒ Dipped ☐ Tap	Water level —	Discharge —	Sample type Grab
pH (00400)	Conductivity (Uncorrected) Sat. Salt µmho	Water Temp. (00010) °C	Conductivity at 25°C (00094) µmho

Field comments

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted 1 ☐ NF: Whole sample (Non-filtered) ☒ F: Filtered in field with 0.45 µmembrane filter ☒ A: ~~2 ml H_2SO_4/L~~ added 4 ml conc HNO_3

☐ NA: No acid added ☐ Other-*specify:*

ANALYTICAL RESULTS from SAMPLES

~~NF,~~ NA		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: ICAP			
☒ Other: As			
☒ Other: Hg			

F, NA		Units	Date analyzed
☐ Calcium (00915)		mg/l	
☐ Magnesium (00925)		mg/l	
☐ Sodium (00930)		mg/l	
☐ Potassium (00935)		mg/l	
☐ Bicarbonate (00440)		mg/l	
☐ Chloride (00940)		mg/l	
☐ Sulfate (00945)		mg/l	
☐ Total filterable residue (dissolved) (70300)		mg/l	
☐ Other:			

NF, A-H_2SO_4		Units	Date analyzed
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, A-H_2SO_4		Units	Date analyzed
☐ Nitrate-N +, Nitrate-N dissolved (00631)		mg/l	
☐ Ammonia-N dissolved (00608)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Other:			

Analyst	Date Reported	Reviewed by
	5 | 27 | 86	Jim Ashley

Laboratory remarks: Sample Digested.

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED: 3 | 5 | 86 — LAB NO. WC 980 — USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE: 03/02/20 — Collection TIME: 1155 — Collected by — Person/Agency: Boyer Anderson OCD

SITE INFORMATION ►

Sample location: Texaco-Getty Eunice #1 Cooling Tower

Collection site description: Center of Cooling Tower

SEND FINAL REPORT TO ►

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501

Attn: David Boyer

APR 3-0 1986
OIL CONSERVATION DIVISION
SANTA FE

Station/well code:

Owner:

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level: —	Discharge: —	Sample type: Grab
pH (00400): 7	Conductivity (Uncorrected): 7200 µmho	Water Temp. (00010): 23 °C	Conductivity at 25°C (00094): µmho

Field comments:

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1

☒ Whole sample (Non-filtered) ☒ **F:** Filtered in field with 0.45 µmembrane filter ☐ **A:** 2 ml H_2SO_4/L added

☒ **NA:** No acid added ☐ Other-*specify:*

ANALYTICAL RESULTS from SAMPLES

NF, NA		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☐ Other:			
☐ Other:			
☐ Other:			

F, NA		Units	Date analyzed
☒ Calcium (00915)	360	mg/l	3-6
☒ Magnesium (00925)	107	mg/l	"
☒ Sodium (00930)	906	mg/l	"
☒ Potassium (00935)	20.7	mg/l	"
☒ Bicarbonate (00440)	61.5	mg/l	3/13
☒ Chloride (00940)	2442	mg/l	3/19
☒ Sulfate (00945)	1407	mg/l	3/27
☒ Total filterable residue (dissolved) (70300)	6735	mg/l	4/8
☒ Other: CO_3	0.0		3/13

NF, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N dissolved (00631)		mg/l	
☐ Ammonia-N dissolved (00608)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Other:			

Analyst: | Date Reported: 4 | 14 | 86 | Reviewed by:

Laboratory remarks:

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED 3 5 86	LAB NO. WC969	USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235	
Collection DATE 2 26 20	SITE INFORM-ATION	Sample location: Texaco-Getty Eunice #1 Cooling Tower	
Collection TIME 1155		Collection site description: Cooling Tower	
Collected by — Person/Agency: Boyer Henderson Oil			

SEND FINAL REPORT TO ►

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501

Attn: David Boyer

Station/ well code

Owner

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level —	Discharge —	Sample type Grab
pH (00400) 7	Conductivity (Uncorrected) 7000 µmho	Water Temp. (00010) 23 °C	Conductivity at 25°C (00094) µmho

Field comments

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted 1 | ☐ NF: Whole sample (Non-filtered) | ☒ F: Filtered in field with 0.45 µmembrane filter | ☒ A: 2 ml H_2SO_4/L added

☐ NA: No acid added ☐ Other-*specify:*

ANALYTICAL RESULTS from SAMPLES

NF, NA		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☐ Other:			
☐ Other:			
☐ Other:			

F, NA		Units	Date analyzed
☐ Calcium (00915)		mg/l	
☐ Magnesium (00925)		mg/l	
☐ Sodium (00930)		mg/l	
☐ Potassium (00935)		mg/l	
☐ Bicarbonate (00440)		mg/l	
☐ Chloride (00940)		mg/l	
☐ Sulfate (00945)		mg/l	
☐ Total filterable residue (dissolved) (70300)		mg/l	
☐ Other:			

NF, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, A-H_2SO_4			
☒ Nitrate-N +, Nitrate-N dissolved (00631)	14.28	mg/l	4/3
☒ Ammonia-N dissolved (00608)	0.10	mg/l	4/2
☒ Total Kjeldahl-N ( )	0.33	mg/l	3/17
☐ Other:			

Analyst	Date Reported	Reviewed by
	4 7 86	

Laboratory remarks

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

Heavy Metal
~~GENERAL WATER CHEMISTRY and NITROGEN~~ ANALYSIS

DATE RECEIVED 3 5 86	LAB NO. HM465	USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235	
Collection DATE 3/02/20	SITE INFORMATION ►	Sample location Texaco-Gotty Eunice #1 Cooling Tower	
Collection TIME 1155		Collection site description Center of Cooling tower	
Collected by — Person/Agency Bruce Henderson OCD			

SEND FINAL REPORT TO ►
ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501
Attn: David Boyer

MAR 31 1986
OIL CONSERVATION DIVISION
SANTA FE

Station/ well code
Owner

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level —	Discharge —	Sample type Grab
pH (00400) 7	Conductivity (Uncorrected) 7000 µmho	Water Temp. (00010) 23 °C	Conductivity at 25°C (00094) µmho

Field comments

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted 1 | ☐ NF: Whole sample (Non-filtered) | ☒ F: Filtered in field with 0.45 µmembrane filter | ☒ A: ~~2 ml H_2SO_4/L~~ added 4 ml conc HNO_3

☐ NA: No acid added ☐ Other-*specify:*

ANALYTICAL RESULTS from SAMPLES

~~NF, NA~~ F, A-HNO_3		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: ICAP SCAN			3/26/86
☐ Other:			
☐ Other:			

F, NA		Units	Date analyzed
☐ Calcium (00915)		mg/l	
☐ Magnesium (00925)		mg/l	
☐ Sodium (00930)		mg/l	
☐ Potassium (00935)		mg/l	
☐ Bicarbonate (00440)		mg/l	
☐ Chloride (00940)		mg/l	
☐ Sulfate (00945)		mg/l	
☐ Total filterable residue (dissolved) (70300)		mg/l	
☐ Other:			

NF, A-H_2SO_4

☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, A-H_2SO_4

☐ Nitrate-N +, Nitrate-N dissolved (00631)		mg/l	
☐ Ammonia-N dissolved (00608)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Other:			

Analyst	Date Reported	Reviewed by
	4 18 86	

Laboratory remarks
Sample digested.

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

86-0232-C

STATE OF NEW MEXICO
ENVIRONMENT

SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 841-2570

REPORT TO: DAVID G. BOYER
PLEASE PRINT
NEW MEXICO OIL CONSERVATION DIV.
P.O. BOX 2088
SANTA FE, NM 87504-2088
PHONE(S): 827-5812

S.L.D. No.: OR- 232 A,B
DATE REC. : 3/4/86
SLD PRIORITY #: 3

USER CODE: 8|2|2|3|5

SUBMITTER: DAVID BOYER
SUBMITTER CODE:

SAMPLE TYPE: WATER [X], SOIL [ ], OTHER
SAMPLE TYPE CODE:

COLLECTED: 86/02/20 (DATE) - 11:55 (TIME) BY AYR (INITIALS)
CODE: Y Y M M D D H H M M I I I

SOURCE: Cooling Tower, Texaco Colby
CODE: AQUIFER DEPTH

NEAREST CITY: Eunice Eunice #1
CODE:

LOCATION:
CODE: TOWNSHIP RANGE SECTION TRACTS

pH= 7 ; Conductivity= 2000 umho/cm at 23 °C; Chlorine Residual=
Dissolved Oxygen= mg/l; Alkalinity= ; Flow Rate=
Sampling Location, Methods and Remarks (i.e. odors, etc.)
Sample from center of cooling tower

I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. David G Boyer
Method of shipment to the Laboratory Hand carried
This form accompanies 2 Septum Vials, Glass Jugs,
Containers are marked as follows to indicate preservation:
[ ] NP: No preservation; sample stored at room temperature.
[X] P-Ice Sample stored in an ice bath (not frozen).
[ ] P-$Na_2S_2O_3$; Sample preserved with $Na_2S_2O_3$ to remove chlorine residual.

I (we) certify that this sample was transferred from
to at (location) on
__/__/__ - __:__ (DATE AND TIME) and that the statements in this block are correct.
Evidentiary Seals: Not Sealed [ ] Seals Intact: Yes [ ] No [ ]
Signatures

(we) certify that this sample was transferred from
to at (location) on
__/__/__ - __:__ (DATE AND TIME) and that the statements in this block are correct.
Evidentiary Seals: Not Sealed [ ] Seals Intact: Yes [ ] No [ ]
Signatures

ANALYSES REQUESTED

LAB. NO.: ORG- 232

PLEASE CHECK THE APPROPRIATE BOXES BELOW TO INDICATE THE TYPE OF ANALYTICAL SCREENS REQUIRED. WHENEVER POSSIBLE LIST SPECIFIC COMPOUNDS SUSPECTED OR REQUIRED.

QUALITATIVE	QUANTITATIVE	PURGEABLE SCREENS	QUALITATIVE	QUANTITATIVE	EXTRACTABLE SCREENS
		ALIPHATIC HYDROCARBON SCREEN			ALIPHATIC HYDROCARBONS
X	X	AROMATIC HYDROCARBON SCREEN			CHLORINATED HYDROCARBON PESTICIDES
X	X	HALOGENATED HYDROCARBON SCREEN			CHLOROPHENOXY ACID HERBICIDES
		GAS CHROMATOGRAPH/MASS SPECTROMETER			HYDROCARBON FUEL SCREEN
					ORGANOPHOSPHATE PESTICIDES
					POLYCHLORINATED BIPHENYLS (PCB's)
					POLYNUCLEAR AROMATIC HYDROCARBONS
					TRIAZINE HERBICIDES
		SPECIFIC COMPOUNDS			SPECIFIC COMPOUNDS

REMARKS:

ANALYTICAL RESULTS

COMPOUND	[PPB]	COMPOUND	[PPB]
aromatic hydrocarbons	*none detected		
halogenated hydrocarbons	**none detected		
		* Detection Limit	1
		* DETECTION LIMIT	1

REMARKS:

CERTIFICATE OF ANALYTICAL PERSONNEL

Seal(s) Intact: Yes___ NO___. Seal(s) broken by:_____ date:_____

I certify that I followed standard laboratory procedures on handling and analysis of this sample unless otherwise noted and that the statements in this block and the analytical data on this page accurately reflect the analytical results for this sample.

Date(s) of analysis: 3/6/86. Analyst's signature: Mary C. Ellen

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block. Reviewers signature: L Meyerhen

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED: 3 | 5 | 86 — LAB NO. WC 983 — USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE: 03/02/86 — Collection TIME: 1232 — SITE INFORMATION ►

Sample location: Final Effluent - Texaco Getty #1

Collected by — Person/Agency: Boyer/Anderson CES

Collection site description: Sample from disposal pond at injection pump spigot

SEND FINAL REPORT TO ►

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501

Attn: David Boyer

RECEIVED APR 2 8 1986 OIL CONSERVATION DIVISION SANTA FE

Station/ well code:

Owner:

SAMPLING CONDITIONS

☐ Bailed ~~☐ Dipped~~ ☐ Pump ☒ Tap	Water level:	Discharge:	Sample type: Grab
pH (00400): 10	Conductivity (Uncorrected): 13190 µmho	Water Temp. (00010): 22.5 °C	Conductivity at 25°C (00094): µmho

Field comments:

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1

☐ **NF:** Whole sample (Non-filtered) ☒ **F:** Filtered in field with 0.45 µmembrane filter ☐ **A:** 2 ml H_2SO_4/L added

☒ **NA:** No acid added ☐ Other-*specify:*

ANALYTICAL RESULTS from SAMPLES

NF, NA		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☐ Other:			
☐ Other:			
☐ Other:			

F, NA		Units	Date analyzed
☒ Calcium (00915)	160	mg/l	3-6
☒ Magnesium (00925)	46.4	mg/l	"
☒ Sodium (00930)	3310	mg/l	"
☒ Potassium (00935)	131	mg/l	"
☒ Bicarbonate (00440)	44.7	mg/l	3/13
☒ Chloride (00940)	5142	mg/l	3/19
☒ Sulfate (00945)	836	mg/l	3/27
☒ Total filterable residue (dissolved) (70300)	9335	mg/l	4/9
☒ Other: CO_3	62.6		3/13

NF, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N dissolved (00631)		mg/l	
☐ Ammonia-N dissolved (00608)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Other:			

Analyst: | Date Reported: 4 | 14 | 86 | Reviewed by: CJ

Laboratory remarks:

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

Lab Number: [redacted]471

Sample [redacted]e: Final Eff. Getty #1

Date Submitted: 3/5/86

Date Analyzed: 3/20/86

By: Boyer

Reviewed By: Jim Ashley

Date Reported: 5/2/86

Element	ICAP VALUE(MG/L)	AA VALUE(MG/L)
Aluminum	<0.1	
Barium	<0.1	
Berylium	<0.1	
Boron	0.8	
Cadmium	<0.1	
Calcium	150.	
Chromium	<0.1	
Cobalt	<0.1	
Copper	<0.1	
Iron	<0.1	
Lead	<0.1	
Magnesium	25.	
Manganese	<0.05	
Molybdenum	<0.1	
Nickel	<0.1	
Silicon	1.7	
Silver	<0.1	
Strontium	4.3	
Tin	<0.1	
Vanadium	<0.1	
Zinc	<0.1	
Arsenic		0.63
Selenium		
Mercury		<0.0005

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

Heavy Metal ~~GENERAL WATER CHEMISTRY and NITROGEN~~ ANALYSIS

DATE RECEIVED 3 / 5 / 86	LAB NO. HM 471
USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235	
Collection DATE 860217-D	SITE INFORMATION ► Sample location: Final Effluent - Texaco Getty #1
Collection TIME 1232	Collection site description: Sample from disposal pond (injection pump spigot)
Collected by — Person/Agency: Boyer / Anderson OCD	

SEND FINAL REPORT TO ►

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501

Attn: David Boyer

MAY 8 1986

Station/ well code:

Owner:

SAMPLING CONDITIONS

☐ Bailed ☐ Pump ~~Dipped~~ ☒ Tap	Water level —	Discharge —	Sample type Grab
pH (00400) 10	Conductivity (Uncorrected) 13100 µmho	Water Temp. (00010) 22.5 °C	Conductivity at 25°C (00094) µmho

Field comments

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted 1	☐ NF: Whole sample (Non-filtered)	☒ F: Filtered in field with 0.45 µmembrane filter	☒ A: ~~2 ml H_2SO_4/L~~ added 4 ml conc HNO_3

☐ NA: No acid added ☐ Other-*specify*:

ANALYTICAL RESULTS from SAMPLES

~~NF, NA~~		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☒ Other: ICAP SCAN			
☒ Other: As			
☒ Other: Hg			

NF, A-H_2SO_4		Units	Date analyzed
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, NA		Units	Date analyzed
☐ Calcium (00915)		mg/l	
☐ Magnesium (00925)		mg/l	
☐ Sodium (00930)		mg/l	
☐ Potassium (00935)		mg/l	
☐ Bicarbonate (00440)		mg/l	
☐ Chloride (00940)		mg/l	
☐ Sulfate (00945)		mg/l	
☐ Total filterable residue (dissolved) (70300)		mg/l	
☐ Other:			

F, A-H_2SO_4		Units	Date analyzed
☐ Nitrate-N +, Nitrate-N dissolved (00631)		mg/l	
☐ Ammonia-N dissolved (00608)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Other:			

Analyst	Date Reported	Reviewed by
	5 / 2 / 86	Jim Ashley

Laboratory remarks

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

STATE OF NEW MEXICO
ENVIRONMENT

86-0239-C

SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 841-2570

REPORT TO: DAVID G. BOYER (PLEASE PRINT)
NEW MEXICO OIL CONSERVATION DIV.
P.O. BOX 2088
SANTA FE, NM 87504-2088
PHONE(S): 827-5812

S.L.D. No.: OR-239-A,B
DATE REC.: 3/5/86
SLD PRIORITY #: 3

USER CODE: 8 2 2 3 5
SUBMITTER: DAVID BOYER
SUBMITTER CODE:
SAMPLE TYPE: WATER [X], SOIL [ ], OTHER
SAMPLE TYPE CODE:
COLLECTED: 86/02/20 (DATE) - 12:32 (TIME) BY DGB (INITIALS)
CODE: Y Y M M D D H H M M I I I
SOURCE: Getty-Eunice #1, Disposal Well
CODE: AQUIFER + DEPTH +
NEAREST CITY: Eunice
CODE:
LOCATION:
CODE: TOWNSHIP RANGE SECTION TRACTS

pH= 10 ; Conductivity= 13,000 umho/cm at 25.5 °C; Chlorine Residual=
Dissolved Oxygen= mg/l; Alkalinity= ; Flow Rate=
Sampling Location, Methods and Remarks (i.e. odors, etc.)
Sample of injection fluid from disposal holding pond at injection pump spigot

I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. David G. Boyer
Method of shipment to the Laboratory Hand carried
This form accompanies 2 Septum Vials, Glass Jugs,
Containers are marked as follows to indicate preservation:
[ ] NP: No preservation; sample stored at room temperature.
[X] P-Ice Sample stored in an ice bath (not frozen).
[ ] P-$Na_2S_2O_3$; Sample preserved with $Na_2S_2O_3$ to remove chlorine residual.

I (we) certify that this sample was transferred from
to at (location) on
/ / - : (DATE AND TIME) and that the statements in this block are correct.
Evidentiary Seals: Not Sealed [ ] Seals Intact: Yes [ ] No [ ]
Signatures

(we) certify that this sample was transferred from
to at (location) on
/ / - : (DATE AND TIME) and that the statements in this block are correct.
Evidentiary Seals: Not Sealed [ ] Seals Intact: Yes [ ] No [ ]
Signatures

ANALYSES REQUESTED

LAB. No.: ORG- 239

PLEASE CHECK THE APPROPRIATE BOXES BELOW TO INDICATE THE TYPE OF ANALYTICAL SCREENS REQUIRED. WHENEVER POSSIBLE LIST SPECIFIC COMPOUNDS SUSPECTED OR REQUIRED.

QUALITATIVE	QUANTITATIVE	PURGEABLE SCREENS	QUALITATIVE	QUANTITATIVE	EXTRACTABLE SCREENS
		ALIPHATIC HYDROCARBON SCREEN			ALIPHATIC HYDROCARBONS
☒	☒	AROMATIC HYDROCARBON SCREEN			CHLORINATED HYDROCARBON PESTICIDES
☒	☒	HALOGENATED HYDROCARBON SCREEN			CHLOROPHENOXY ACID HERBICIDES
		GAS CHROMATOGRAPH/MASS SPECTROMETER			HYDROCARBON FUEL SCREEN
					ORGANOPHOSPHATE PESTICIDES
					POLYCHLORINATED BIPHENYLS (PCB's)
					POLYNUCLEAR AROMATIC HYDROCARBONS
					TRIAZINE HERBICIDES
		SPECIFIC COMPOUNDS			SPECIFIC COMPOUNDS

REMARKS:

ANALYTICAL RESULTS

COMPOUND	[PPB]	COMPOUND	[PPB]
~~Base~~ Aromatic hydrocarbons**		halogenated hydrocarbons * none detected	
Benzene	2900		
Toluene	4000		
m-~~Dibrom~~ xylene	750		
		** Detection Limit	1
		* DETECTION LIMIT	1

REMARKS: other peaks detected but not identified

CERTIFICATE OF ANALYTICAL PERSONNEL

Seal(s) Intact: Yes___ NO ✓. Seal(s) broken by: not sealed date:

I certify that I followed standard laboratory procedures on handling and analysis of this sample unless otherwise noted and that the statements in this block and the analytical data on this page accurately reflect the analytical results for this sample.

Date(s) of analysis: 3/6/86. Analyst's signature: Gary C. Ellen

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block. Reviewers signature: L Meyerhoe

New Mexico Health and Environment Department
SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 — (505) 841-2555

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED: 3 | 5 | 86 — LAB NO. WC979 — USER CODE ☐ 59300 ☐ 59600 ☒ OTHER: 82235

Collection DATE: 86 02 20 — Collection TIME: 1250 — SITE INFORMATION ► OCD

Collected by — Person/Agency: Boyer / Anderson

Sample location: North Brine Pond - Texaco Cotty #1

Collection site description: Center of west side of pond

SEND FINAL REPORT TO ►

ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
State Land Office Bldg, PO Box 2088
Santa Fe, NM 87501

Attn: David Boyer

APR 8 1986
OIL CONSERVATION DIVISION
SANTA FE

Station/well code:

Owner:

SAMPLING CONDITIONS

☐ Bailed ☒ Dipped ☐ Pump ☐ Tap	Water level: —	Discharge: —	Sample type: Grab
pH (00400)	Conductivity (Uncorrected): Sat. Salt µmho	Water Temp. (00010) °C	Conductivity at 25°C (00094) µmho

Field comments:

SAMPLE FIELD TREATMENT — *Check proper boxes*

No. of samples submitted: 1

☐ **NF:** Whole sample (Non-filtered) ☒ **F:** Filtered in field with 0.45 µmembrane filter ☐ **A:** 2 ml H_2SO_4/L added

☒ **NA:** No acid added ☐ Other-*specify:*

ANALYTICAL RESULTS from SAMPLES

NF, NA		Units	Date analyzed
☐ Conductivity (Corrected) 25°C (00095)		µmho	
☐ Total non-filterable residue (suspended) (00530)		mg/l	
☐ Other:			
☐ Other:			
☐ Other:			

F, NA		Units	Date analyzed
☒ Calcium (00915)	1040.0	mg/l	3-6
☒ Magnesium (00925)	296.4	mg/l	"
☒ Sodium (00930)	24840.0	mg/l	"
☒ Potassium (00935)	10,400	mg/l	"
☒ Bicarbonate (00440)	235	mg/l	3/13
☒ Chloride (00940)	180250	mg/l	3/19
☒ Sulfate (00945)	15216	mg/l	3/27
☒ Total filterable residue (dissolved) (70300)	333,360	mg/l	4/8
☒ Other: CO_3	0.0		3/13

NF, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N total (00630)		mg/l	
☐ Ammonia-N total (00610)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Chemical oxygen demand (00340)		mg/l	
☐ Total organic carbon ( )		mg/l	
☐ Other:			
☐ Other:			

F, A-H_2SO_4			
☐ Nitrate-N +, Nitrate-N dissolved (00631)		mg/l	
☐ Ammonia-N dissolved (00608)		mg/l	
☐ Total Kjeldahl-N ( )		mg/l	
☐ Other:			

Analyst: | Date Reported: 4 | 14 | 86 | Reviewed by:

Laboratory remarks: interferences on flame photometer

SLD 726 (12/84) *DISTRIBUTION:* **WHITE** — EID, GW&HW Bureau **CANARY** — WS System **PINK** — EID Local Office **GOLDENROD** — SLD

STATE OF NEW MEXICO
ENVIRONMENT

86- 0241-C

SCIENTIFIC LABORATORY DIVISION
700 Camino de Salud NE
Albuquerque, NM 87106 841-2570

REPORT TO: DAVID G. BOYER
PLEASE PRINT
NEW MEXICO OIL CONSERVATION DIV.
P.O. BOX 2088
SANTA FE, NM 87504-2088
PHONE(S): 827-5812

S.L.D. No.: OR- 241-A,B
DATE REC. : 3/6/86
SLD PRIORITY #: 3

USER CODE: 8 2 2 3 5

SUBMITTER: David G Boyer
SUBMITTER CODE:

SAMPLE TYPE: WATER [X], SOIL [ ], OTHER
SAMPLE TYPE CODE:

COLLECTED: 86/02/20 (DATE) - 12:50 (TIME) BY DGB (INITIALS)
CODE: Y Y M M D D H H M M I I I

SOURCE: North Brine Pond - Texaco
CODE: AQUIFER + DEPTH

NEAREST CITY: Eunice (Getty #1)
CODE:

LOCATION:
CODE: TOWNSHIP RANGE SECTION TRACTS

pH=_____; Conductivity=0§ scale umho/cm at _____ °C; Chlorine Residual=_____

Dissolved Oxygen=_____ mg/l; Alkalinity=_____; Flow Rate=_____

Sampling Location, Methods and Remarks (i.e. odors, etc.)

Sample from center, west side. Pond had rips & tears

I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. David G Boyer

Method of shipment to the Laboratory Hand carried

This form accompanies 2 Septum Vials, ___ Glass Jugs, ___ _____

Containers are marked as follows to indicate preservation:

- [ ] NP: No preservation; sample stored at room temperature.
- [X] P-Ice Sample stored in an ice bath (not frozen).
- [ ] P-$Na_2S_2O_3$; Sample preserved with $Na_2S_2O_3$ to remove chlorine residual.

I (we) certify that this sample was transferred from _____

to _____ at (location) _____ on

___/___/___ - ___:___ (DATE AND TIME) and that the statements in this block are correct.

Evidentiary Seals: Not Sealed [ ] Seals Intact: Yes [ ] No [ ]

Signatures _____ _____

_____

(we) certify that this sample was transferred from _____

to _____ at (location) _____ on

___/___/___ - ___:___ (DATE AND TIME) and that the statements in this block are correct.

Evidentiary Seals: Not Sealed [ ] Seals Intact: Yes [ ] No [ ]

Signatures _____ _____

ANALYSES REQUESTED

LAB. No.: ORG- 241

PLEASE CHECK THE APPROPRIATE BOXES BELOW TO INDICATE THE TYPE OF ANALYTICAL SCREENS REQUIRED. WHENEVER POSSIBLE LIST SPECIFIC COMPOUNDS SUSPECTED OR REQUIRED.

QUALITATIVE	QUANTITATIVE	PURGEABLE SCREENS	QUALITATIVE	QUANTITATIVE	EXTRACTABLE SCREENS
		ALIPHATIC HYDROCARBON SCREEN			ALIPHATIC HYDROCARBONS
X	X	AROMATIC HYDROCARBON SCREEN			CHLORINATED HYDROCARBON PESTICIDES
X	X	HALOGENATED HYDROCARBON SCREEN			CHLOROPHENOXY ACID HERBICIDES
		GAS CHROMATOGRAPH/MASS SPECTROMETER			HYDROCARBON FUEL SCREEN
					ORGANOPHOSPHATE PESTICIDES
					POLYCHLORINATED BIPHENYLS (PCB's)
					POLYNUCLEAR AROMATIC HYDROCARBONS
					TRIAZINE HERBICIDES
		SPECIFIC COMPOUNDS			SPECIFIC COMPOUNDS

REMARKS:

ANALYTICAL RESULTS

COMPOUND	[PPB]	COMPOUND	[PPB]
aromatic hydrocarbons *			
toluene	13		
halogenated hydrocarbons**	none detected		
		** Detection Limit	1
		* DETECTION LIMIT	1

REMARKS:

CERTIFICATE OF ANALYTICAL PERSONNEL

Seal(s) Intact: Yes ___ NO ___. Seal(s) broken by: _____ date: _____

I certify that I followed standard laboratory procedures on handling and analysis of this sample unless otherwise noted and that the statements in this block and the analytical data on this page accurately reflect the analytical results for this sample.

Date(s) of analysis: 3/6/86. Analyst's signature: Mary C. Elam

I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block. Reviewers signature: L Meyerhen

Lab Number: [redacted] 465

Sample [redacted]de: Texaco - Getty Eunice #1

Date Submitted: 3/5/86

Date Analyzed: 3/20/86

By: Boyer

Reviewed By: Jim Ashby

Date Reported: 4/18/86

Element	ICAP VALUE(MG/L)	AA VALUE(MG/L)
Aluminum	<0.1	
Barium	0.1	
Berylium	<0.1	
Boron	1.4	
Cadmium	<0.1	
Calcium	580.	
Chromium	<0.1	
Cobalt	<0.1	
Copper	<0.1	
Iron	<0.1	
Lead	<0.1	
Magnesium	180.	
Manganese	<0.05	
Molybdenum	<0.1	
Nickel	<0.1	
Silicon	0.4	
Silver	<0.1	
Strontium	9.6	
Tin	<0.1	
Vanadium	0.2	
Zinc	<0.1	
Arsenic		
Selenium		
Mercury		

Lab Number: NM 466 Sample Code: North Brine Pond

Date Submitted: 3/5/86 Date Analyzed: 3/20/86

By: Boyer Reviewed By: Jim Ashby

Date Reported: 5/27/86

	Element	ICAP VALUE(MG/L)	AA VALUE(MG/L)
	Aluminum	<0.1	
	Barium	<0.1	
	Berylium	<0.1	
.75	Boron	90.	
	Cadmium	<0.1	
	Calcium	440.	
	Chromium	<0.1	
	Cobalt	<0.1	
	Copper	<0.1	
	Iron	<0.1	
	Lead	<0.1	
	Magnesium	3470.	
.2	Manganese	0.52	
	Molybdenum	<0.1	
	Nickel	<0.1	
	Silicon	2.5	
	Silver	<0.1	
	Strontium	12.	
	Tin	<0.1	
	Vanadium	<0.1	
	Zinc	<0.1	
.1	Arsenic		0.68
	Selenium		
	Mercury		<0.0005

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

1935 - 1985

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

March 4, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. H. Anderson
Mgr., Tulsa District
Natural Gas Plants Division
P. O. Box 1650
Tulsa, Oklahoma 74102

RE: Discharge Plan GWR-3
Texaco Producing Inc.
Eunice No. 1 Gas Processing Plant

Dear Mr. Anderson:

The OCD has received your application for renewal of the above-referenced discharge plan and is currently reviewing it. A plant inspection was conducted on February 20, 1986 by David Boyer, OCD Environmental Bureau Chief, and myself. As a result of this inspection, two areas of concern were viewed and a commitment from Texaco Inc. with a completion timetable to correct or eliminate these concerns is required to continue the review process. The areas requiring correction are listed below:

1) The ground area around the cooling towers has water pooling on it. This water is originating from leaks in the circulating pumps and/or leaks through cracks in the cooling tower base. The conductivity of the cooling tower water was measured at 7000 μmhos and contains anti-scaling chemicals. The water can and does at times flow through a series of unlined ditches to the old lime pit. A method of containing or eliminating this water pooling on the ground surface should be planned and implemented.

2) The No. 1 Brine pit liner had numerous tears and what appeared to be small sections cut out of it. Since this pit is not equipped with leak detection, the entire liner should be inspected for integrity on a regular schedule.

John H Anderson
Manager Tulsa District
Natural Gas Plants Division

Texaco USA

P O Box 1650
Tulsa OK 74102
918 560 6705

March 6, 1986

Mr. R. L. Stamets, Director
Energy and Minerals Division
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

RE: MFG - PLANTS
Discharge Plans GWR-3 and GWR-4
Texaco Producing Inc.
Eunice Nos. 1 and 2 Gas Processing Plants

Dear Mr. Stamets:

As per recent telephone conversation between Mr. L. E. Knight and Mr. Roger Anderson of your office, we respectfully request an extension of 60 days days, from March 4, 1986 to May 4, 1986, for the completion of the above referenced Discharge Plans.

Your cooperation in granting this extension is most appreciated.

Very truly yours,

JHA/LEK:lt

CRA
WEI
FJK,Jr.
GDW

John H Anderson
Manager Tulsa District
Natural Gas Plants Division

Texaco USA

P O Box 1650
Tulsa OK 74102
918 560 6705

February 28, 1986

State of New Mexico
Oil Conservation Division
Energy and Minerals Department
P.O. Box 2088
State Land Building
Santa Fe, New Mexico 87501

Attn: Mr. Dave Boyer

Re: Discharge Plan GWR-3
Texaco Producing Inc.
Eunice No. 1 Gas Processing Plant

Dear Mr. Boyer:

As an addendum to my February 24, 1986, letter requesting renewal of subject discharge plan, please be aware that in the event of a catastrophic leak in any of the three (3) lined storage pits, immediate action would be taken to empty the pit and initiate repairs up to and including liner replacement if necessary. Also, all notification of appropriate OCD personnel would be made as per Division regulations.

Very truly yours,

John H. Anderson/ubs

JHA/LEK:bes

cc: FJK, Jr.
WEI
GDW
CRA

John H Anderson
Manager Tulsa District
Natural Gas Plants Division

Texaco USA

P O Box 1650
Tulsa OK 74102
918 560 6705

February 24, 1986

Mr. Dave Boyer
State of New Mexico
Oil Conservation Division
Energy and Minerals Department
P. O. Box 2088
State Land Building
Santa Fe, New Mexico 87501

RE: DISCHARGE PLAN GWR-3
TEXACO PRODUCING INC.
EUNICE NO. 1 GAS PROCESSING PLANT

Dear Mr. Boyer:

This is to inform you of our efforts to continue to operate the Eunice No. 1 Gas Processing Plant in accordance with the above referenced Discharge Plan, and request that the Plan be renewed as per State regulations.

Attached for your reference is a copy of the original approved Plan and supplementary information previously submitted to the Oil Conservation Division.

Should you have any questions or need additional information, please do not hesitate to contact Mr. C. R. Adkison (505/394-2516) or Mr. L. E. Knight (918/560-6331).

Very truly yours,

JHA/LEK:lt

Attachment

xc: CRA
WEI
FJK,Jr.
GDW

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

50 YEARS
1935 - 1985

TONEY ANAYA
GOVERNOR

August 19, 1985

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Mr. J. H. Anderson,
Mgr. Tulsa District
Texaco USA
P. O. Box 3000
Tulsa, Ok. 74102

Re: Discharge Plan GWR-3

Dear Mr. Anderson:

On March 16, 1981, the ground water discharge plan, GWR-3, for the Eunice No. 1 Gas Plant located in Lea County was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission Regulations and it was approved for a period of five years or less. The approval will expire on March 16, 1986.

If your facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines will be used in review of your renewal application.

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

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

Sincerely,

David R Boyer

DAVID BOYER
Environmental Bureau Chief

DB/dr

cc: R. L. Stamets
OCD - Hobbs
L. E. Knight - Texaco USA, Tulsa, Ok.

P 505 905 956

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. J. H. Anderson	
Street and No. Mgr. Tulsa District	
P.O., State and ZIP Code P.O. Box 3000, Tulsa, OK. 74102	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, Feb. 1982

Texaco USA
PO Box 2194
Pampa TX 79066-2194

November 26, 1984

Mr. Phillip Baca
State of New Mexico
Oil Conservation Division
Environmental Bureau
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: Discharge Plan
Eunice #2 Gas Processing Plant

Dear Phil:

Per our telephone conversation today, attached is a copy of a March 16, 1981 letter to Mr. C. R. York from Mr. Joe D. Ramey approving the discharge plan for our Eunice #2 gas processing Plant.

Should you have any questions or need additional information, please feel free to contact me at 806-665-3775, or Mr. C. R. Adkison, Plant Superintendent of the Eunice Plants at 505-394-2566 anytime.

Very truly yours,

Lewis E. Knight

Lewis E. Knight
Environmental Engineer
Pampa, Texas

Tulsa Office
(918) 560-6331

kcc
Attachment
cc: J. H. Anderson
C. R. Adkison
File

Getty Oil Company | P.O. Box 1137, Eunice, NM 88231 • Telephone: (505) 394-2566

Eunice Gasoline Plants

November 15, 1983

Mr. Jerry Sexton
New Mexico Oil Conservation Division
P. O. Box 1980
Hobbs, New Mexico 88240

Re: Remedial work performed and Step Rate Test on
Getty Oil Company, Eunice Gas Plant No. 1, Salt
Water Disposal Well

Dear Sir:

Please find attached a description of work performed on the subject Disposal Well during the week of October 3, 1983, and subsequent Step Rate Test completed October 11, 1983, by B & D Well Testers.

Yours Truly,

C. R. Adkison

Attachments
xc: Mr. Joe D. Ramey - New Mexico OCD - Santa Fe
J. H. Anderson
L. E. Knight
File

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT

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OPERATOR		

OIL CONSERVATION DIVISION

P. O. BOX 2088
SANTA FE, NEW MEXICO 87501

Form C-103
Revised 10-1-78

5a. Indicate Type of Lease: State ☐ Fee ☐

5. State Oil & Gas Lease No.

SUNDRY NOTICES AND REPORTS ON WELLS

(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT —" (FORM C-101) FOR SUCH PROPOSALS.)

1. OIL WELL ☐ GAS WELL ☐ OTHER- Disposal Well

7. Unit Agreement Name

2. Name of Operator: Getty Oil

8. Farm or Lease Name: Getty Gas Plant #1

3. Address of Operator: Box 1137 Eunice, New Mexico 88231

9. Well No.: Disposal well

4. Location of Well
UNIT LETTER L, ____ FEET FROM THE ____ LINE AND ____ FEET FROM THE ____ LINE, SECTION 27 TOWNSHIP 22 S RANGE 37 E NMPM.

10. Field and Pool, or Wildcat

15. Elevation (Show whether DF, RT, GR, etc.)

12. County: Lea

16.

Check Appropriate Box To Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:				SUBSEQUENT REPORT OF:			
PERFORM REMEDIAL WORK	X	PLUG AND ABANDON	☐	REMEDIAL WORK	☐	ALTERING CASING	☐
TEMPORARILY ABANDON	☐			COMMENCE DRILLING OPNS.	☐	PLUG AND ABANDONMENT	☐
PULL OR ALTER CASING	☐	CHANGE PLANS	☐	CASING TEST AND CEMENT JOB	☐		
OTHER	☐			OTHER	☐		

17. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

See Attached Sheet

18. I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNED David Bumpf TITLE Consultant DATE 11-13-83

APPROVED BY ____ TITLE ____ DATE ____

CONDITIONS OF APPROVAL, IF ANY:

Getty Oil
Eunice Gas Plant #1
Salt Water Disposal Well

10-3-83	Rig up pulling unit, BOP, reverse unit and tanks. Pull Halliburton R4 packer and 3½ plastic lined tubing. Run 3½ work string with casing scraper and bit. Pull scraper, run bit through casing to fill Start clean out. Pull bit into casing. Shut in.
10-4-83	Clean well to 4450. Pull bit into casing. Shut in.
10-5-83	Clean out to 4550 ft. Spot 800 gal. 15% HCL at 4545. Flush tubing with 34 bbls. H20. Pull 25 joints. Shut in.
10-6-83	Pull 3½ work string. Return 3½ plastic coated injection string with Halliburton model R4 packer set at 3855 ft. Flush and load annulus with Unichem packer fluid. Set packer in tension. Test packer to 400 psi. Run 5 stage 15,000 gal. matrix acid job with an additional 5500 gal. to remove thick scale deposit on tubing. Resume plant injection for 3 days.
10-10-83	Run step rate injection test. Resume plant injection.

Work done by B & D Well Testers
David Bump

B & D Well Testers
(505) 393-0119

STEP RATE TEST

HOBBS, NEW MEXICO

FIELD DATA SHEET

Type Test: ☐ Initial ☐ Annual ☐ Special — Test Date: 10-11-83 — Lease No. or Serial No.:

Company: Getty Oil — Allottee:

Field: — Reservoir: — Location: — Unit:

Completion Date: — Total Depth: — Plug Back TD: — Elevation: — Farm or Lease Name: Eunice Gas Plant #1

Csg. Size: 7" — Wt.: 20# — d: — Set At: 4010 — Perforations: From: Open hole — To: 4010 — 4550 — Well No.: Salt Water Disposal

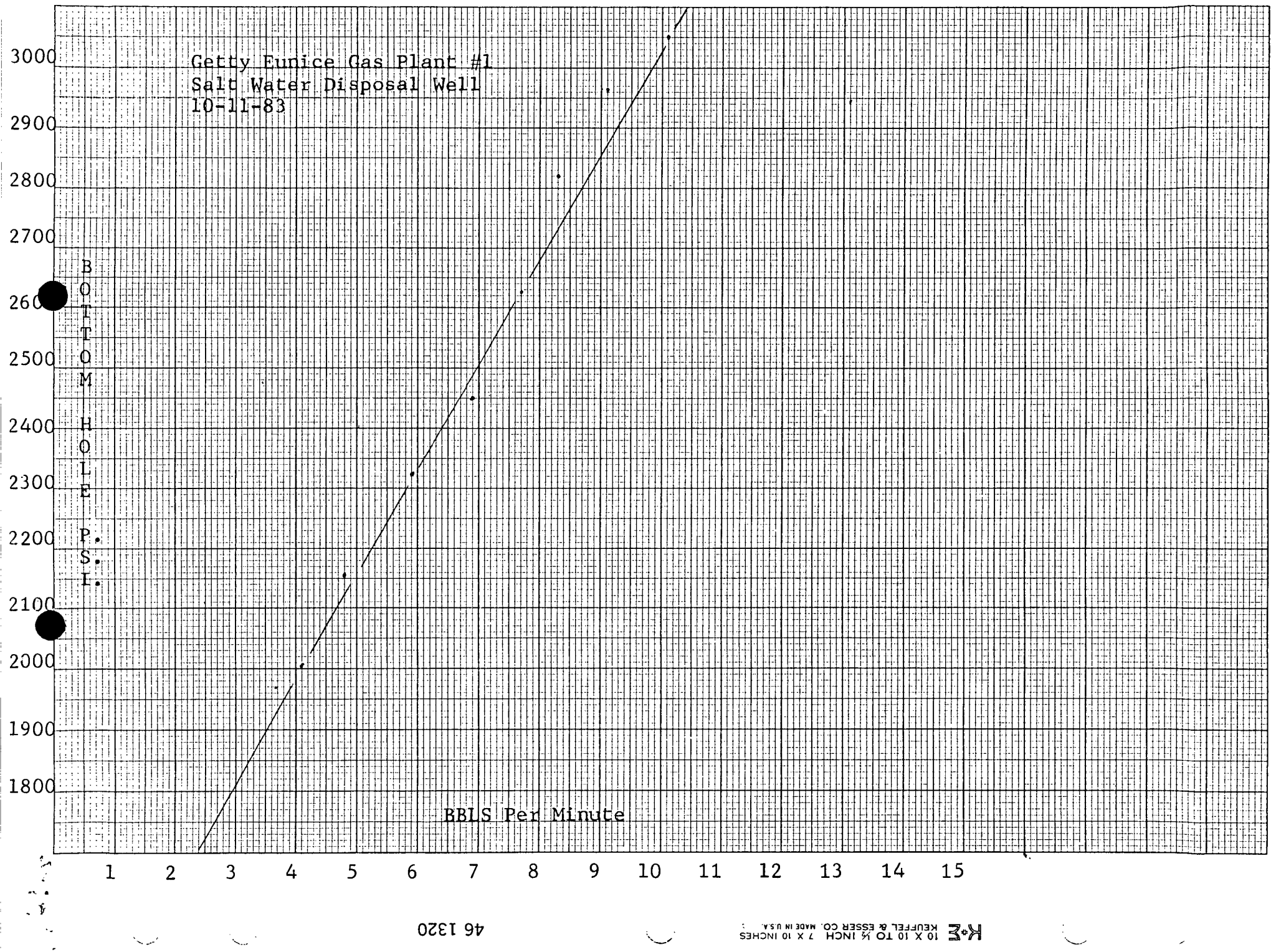
Tbg. Size: 3½ — Wt.: 9.30 — d: — Set At: — Perforations: From: — To: — Sec. — Twp — Blk — Rge —

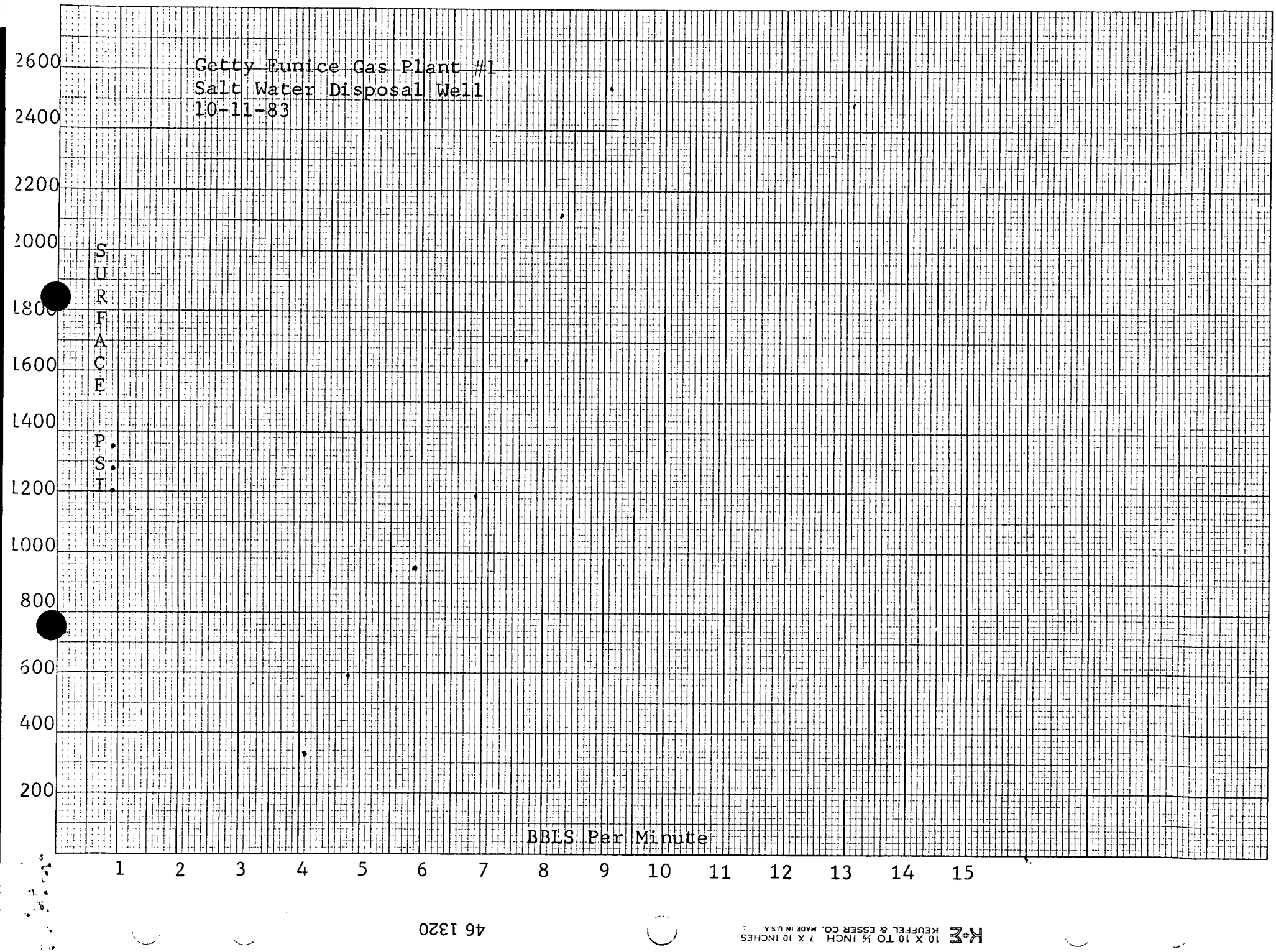
Type Completion (Describe): — Packer Set At: 3855 — County or Parish:

Producing Thru: — Reservoir Temp. F: — Mean Ground Temp. F: — Baro. Press. – P_a: — State:

CO. REPRESENTATIVE

DATE Time of Reading	ELAP. TIME Hrs.	well information Rate BPM	Surf. Psig	B.H.P.	surf. psi.cor friction	remarks (Include liquid production data: Type – API Gravity – Amount)
9:40			Vacuum	1707		
9:43						Open well to vacuum taking 1 BBL per min.
9:45	start	3.9		1919		
9:50		4.0	280			Run test with Halliburton frac pump with
9:55		4.0	280			4½ inch plunger, acid pump with 4½ plunger
10:00	15	4.1	330	2006		and frac van
10:05		4.9	630			
10:10		4.8	590			
10:15	30	4.8	590	2155		
10:20		6.0	960			
10:25		5.9	950			
10:30	45	5.9	950	2326		
10:35		6.6	1220			
10:40		6.5	1200			
10:45	1	6.9	1190	2450		
10:50		7.6	1650			
10:55		7.6	1640			
11:00	15	7.7	1640	2627		
11:05		8.4	2070			
11:10		8.4	2100			
11:15	30	8.3	2120	2820		
11:20		9.0	2460			
11:25		9.0	2500			
11:30	45	9.1	2540	2966		
11:35		10.1	3020			
11:40		10.1	3040			
11:43	2		3050	3050		ISIP 800 PSI





Getty

Getty Oil Company | P.O. Box 2194, Pampa, Texas 79065 • Telephone (806) 665-3775

Lewis E. Knight, Environmental Engineer, Natural Gas Plants Department

September 7, 1983

Mr. Joe D. Ramey, Director
Oil Conservation Division
State of New Mexico
P. O. Box 2088
Santa Fe, New Mexico 87501

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Re: Getty Oil Company
Eunice Plant No. 1

Dear Mr. Ramey:

At our July 5, 1983 meeting in your office, we discussed each of the items in your June 7, 1983 letter and promised you a written update of each. Listed below is that update in the same order as we discussed them.

I. Your Letter - Item 1:

Caustic wash was being dumped into an unlined pond on the south side of the plant. Chemical analysis of the substance indicated that it was a high concentration of sodium hydroxide with a pH of 14 and contained a variety of organic substances such as benzene and toulene.

Getty Action - Item 1:

All sources of liquids draining into subject pond have been diverted into lined disposal pit "C" (see approved Discharge Plan GWR-3). All traces of liquid remaining have evaporated and the pond closed. (See attached photograph no. 1). No liquids/solids were removed from the pond.

II. Your Letter - Item 2:

Brine water coming from the zeolite treater is not being collected and stored properly and as a result is flowing out onto the ground surface.

Getty Action - Item 2:

As we discussed, the water that was leaking from our water softeners and collecting around the brine tanks was well water, not brine used for regeneration. The well water leaks have been repaired and the wetted area around the brine tanks landscaped and recovered with gravel.

III. Your Letter - Item 3:

Treatment chemicals and cleaning solvents throughout the plant are being spilled onto the ground surface. Improper storage and containment facilities and improper mixing methods and facilities thereof are creating the problem.

Getty Action - Item 3:

"Drip" type collection facilities have been installed on bulk chemical storage containers throughout the plant. The "drip" collectors not only keep any chemical from being spilled onto the ground but also reduces chemical losses. (See attached photograph no. 2).

IV. Your Letter - Item 4:

The wastewater effluent holding pond and south brine storage pond are leaking.

Getty Action - Item 4:

Both ponds referred to do indicate some leakage. The south brine pond has been emptied, the liner inspected, and a four-inch wide seam rip found and repaired. Also any areas that showed any signs of wear were patched over.

After the south brine pond is fully back in service, the wastewater effluent pond will be emptied for inspection.

V. Your Letter Item 5:

The closed cooling system which contains chromate has numerous locations where the fluid from this system is exposed to the atmosphere. At these locations leakage and spillage is occurring, allowing the closed cooling fluid to escape and flow onto the ground surface.

Getty Action - Item 5:

The engine jacket water cooling system, which contains a sodium chromate corrosion inhibitor, had an open sample point where the water could be blown onto the ground by a sudden gust of wind. This has been corrected.

VI. Your Letter - Item 6:

Surface runoff and/or possible plant effluent is being allowed to drain and collect into a pond that once was used to hold plant effluent and sludge. The hydraulic head from the fluid in the pond has the potential for leaching substances from the sludge, which could affect ground water. Surface water needs to be diverted and not be allowed to collect in this area. Also, the fluid in the pond needs to be drained immediately and kept dry at all times.

Getty Action - Item 6:

Berms have been constructed around old unlined ponds to keep all rainfall runoff from entering them and no plant effluent is drained to them. In Discharge Plan GWR-3, the unlined pond designated as "Pit B" is in the process of being closed. At present "Pit B" is in its drying cycle, which when complete will allow equipment in to finish the closing.

VII. Your Letter - Item 7:

A. The plant collection and drain system needs to be expanded to accomodate or collect all plant effluent or discharges. There are many drains that are plugged or broken and some of the drains are not aligned properly to capture effluent.

B. Buildings without drain systems and concrete slabs need to have curbing to contain effluent or discharges. Presently effluent and/or various kinds of substances are drained out onto the ground surface.

C. The injection pump is leaking which allows effluent to escape onto the ground surface.

Getty Action - Item 7:

A. Much work has been done and is continuing throughout the plant on this item. Some drain systems have been upgraded/replaced while in other areas, new systems have been installed.

B. At this time, installation of curbing around engine rooms, etc., is not planned. Any oil/water resulting from mopping/washing down of the floors is picked up and disposed of into the appropriate drain system.

C. The waste water injection pump does leak on occasion; however, any leakage is captured in a buried 500 gallon tank which is emptied as necessary into the appropriate system.

VIII. Your Letter - Item 8:

The injection well does not have a meter to measure the volume of effluent being disposed of or have a pressure gauge to measure the injection pressure.

Getty Action - Item 8:

An orifice meter and pressure gauge have been installed on wastewater injection system. Information on the orifice meter is attached.

IX. Your Letter - Item 9:

The north brine pond does not have a leak detection or monitoring system.

Getty Action - Item 9:

Inspection of the north brine storage pond has been delayed to permit inspection and repair of the south storage pond. We are now in the process of lowering the level in this pond for inspection purposes. As we discussed, because the liner was installed prior to regulatory requirements and because we feel the liner is in good shape, Getty has no immediate plans to install a leak detection system on this pond until the existing liner needs replacement.

As you requested, a step rate test was run on the Eunice No. 1 disposal well on July 25, 1983 (see Mr. C. R. Adkison's 8-10-83 letter to you).

Thank you again for the time you and Dick Stamets spent with us. We want to assure you that Getty will continue to keep you abreast of our progress and looks forward to working with the Oil Conservation Division in the future.

Very truly yours,

Lewis E. Knight

Lewis E. Knight

kcc
Attachments
cc: C. R. Adkison
J. H. Anderson
C. F. Gee
R. L. Morgan

PHOTOGRAPH NO. 1

Unlined caustic wash pond in final stages drying prior to closing and covering.

PHOTOGRAPH NO. 2

"Drip" type collectors on bulk chemical storage tanks.

Getty

Getty Oil Company | P.O. Box 1137, Eunice, NM 88231 • Telephone: (505) 394-2566

Eunice Gasoline Plants

August 10, 1983

State of New Mexico
Energy and Materials Division
Oil Conservation Division
Mr. Joe D. Ramey, Division Director
P. O. Box 2088
Santa Fe Land Office Building
Santa Fe, N. M. 87501

Dear Sir:

Please find attached a copy of step rate test performed July 25, 1983, on the Getty Eunice No. 1 Disposal Well. The step rate test was supervised by David Bump with B & D Well Testers.

Upon being informed by Mr. Bump on July 26, 1983, that the formation appeared to fracture at 1385 psig surface pressure, all Getty operating personnel were informed to limit the disposal well pressure to 1250 psig.

At the present time, arrangements are being made with B & D testers to pull the tubing from the disposal well, clean all "fill" from the open hole, acidize and perform another step rate test. It is anticipated this work will commence August 22, 1983. After completion, a copy of the step rate test will be forwarded to you.

Yours Truly,

C. R. Adkison

CRA/add
xc: J. H. Anderson
L. E. Knight
Mr. Jerry Sexton
OCD - Hobbs, N.M.

B. & D. Well Testers
(505) 393-0119

HOBBS, NEW MEXICO

STEP RATE TEST

FIELD DATA SHEET

Type Test: ☐ Initial ☐ Annual ☐ Special — Test Date: 7-25-83 — Lease No. or Serial No.

Company: Getty Oil — Allottee

Field — Reservoir — Location — Unit

Completion Date — Total Depth — Plug Back TD: 4148 — Elevation — Farm or Lease Name: Eunice Getty Plant

Csg. Size: 7" — Wt. — d — Set At: 4010 — Perforations: From — To: Open hole — Well No.: Disposal well

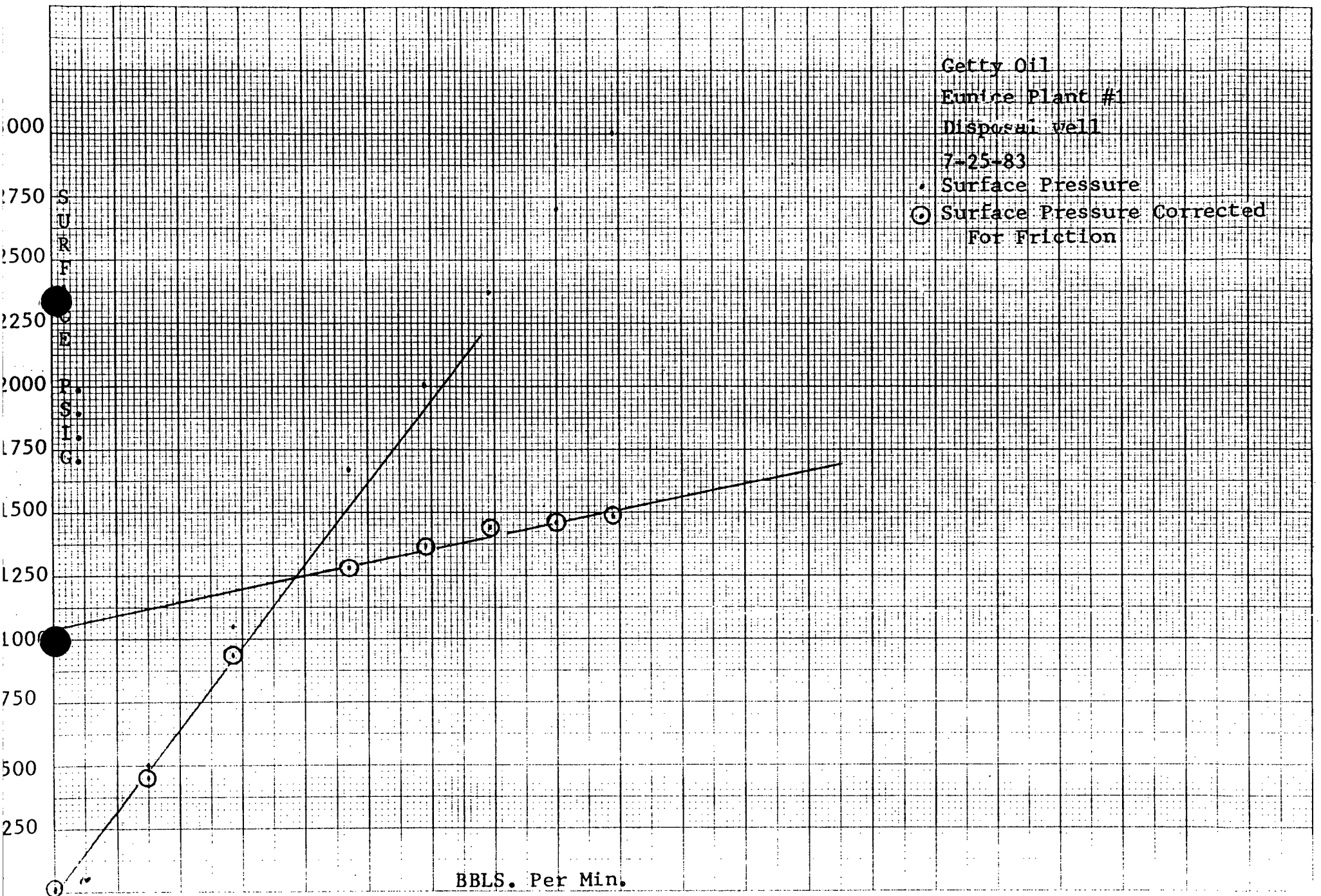
Tbg. Size: 3" — Wt. — d — Set At — Perforations: From — To — Sec. — Twp - Unit — Rge.

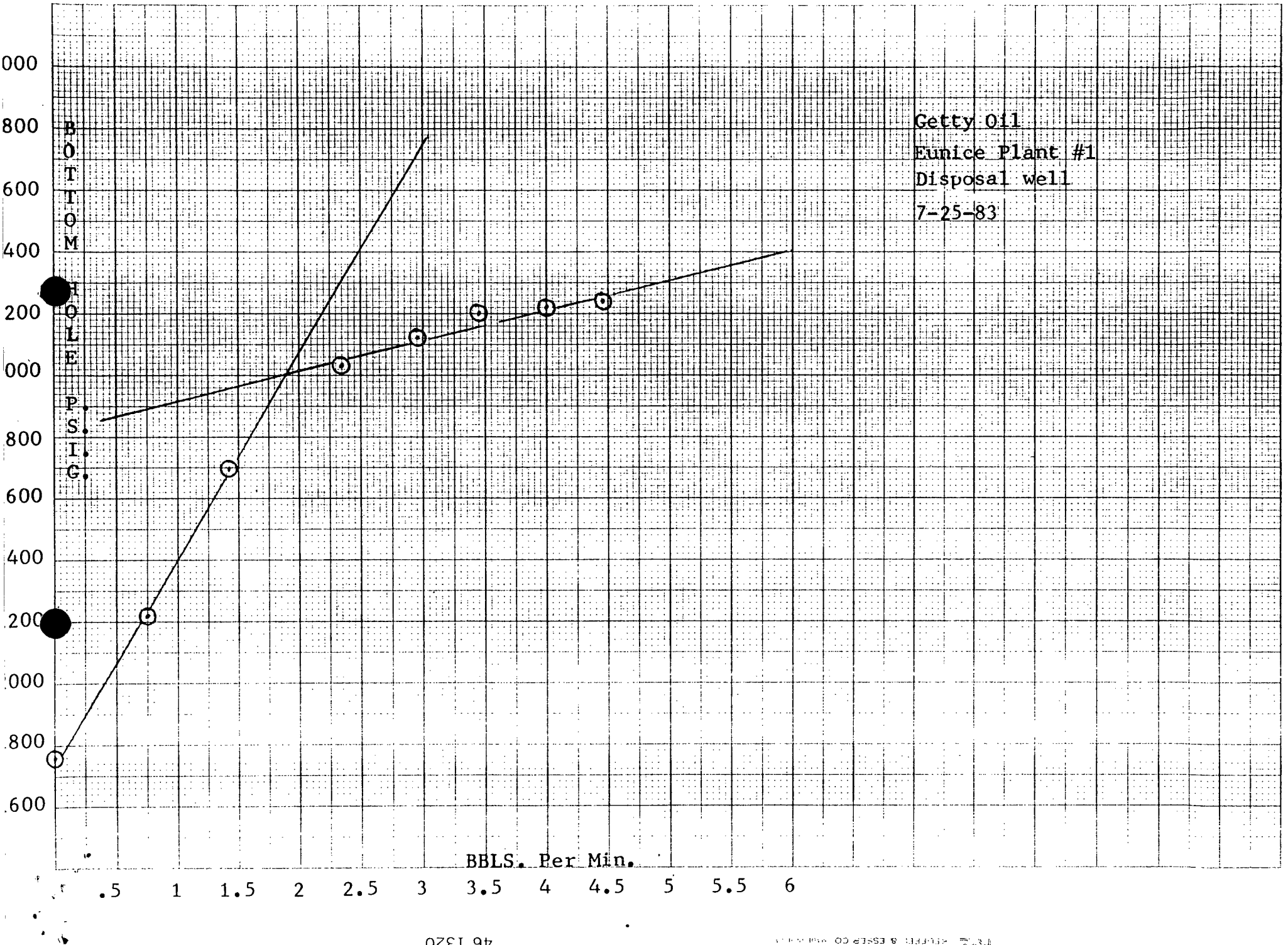
Type Completion (Describe) — Packer Set At: 3935 — County or Parish: Lea

Producing Thru — Reservoir Temp. F: @ — Mean Ground Temp. F — Baro. Press. - P — State: New Mexico

CO. REPRESENTATIVE Charles Atkinson

DATE Time of Reading	ELAP. TIME Hrs.	Well Information: Rate BPMin.	Surf. Psig	B.H.P.	surf. psi.cor friction	remarks (Include liquid production data: Type - API Gravity - Amount)
10:40			Vacuum			Bombs set @ 4041 on bottom 10:43
10:45		Load tubing				139 bbls loading tubing
10:50	start	.75	3	1765		column wt. 1762
11:05	15	.75	500	2217	455	628 gallons pumped total
11:20	30	1.42	1050	2696	934	1525
11:35	45	2.35	1675	3034	1272	3000
11:50	1	2.96	2000	3124	1362	4870
12:05	15	3.46	2380	3199	1437	7050
12:20	30	4	2700	3221	1459	9570
12:35	45	4.46	3000	3242	1480	12380 End test
						1300 Instant shut in P.S.I.
						Jarrel Equipment
						Top bomb serial #24513 x 6250 PSI x 12 hr
						Bottom bomb serial #36825 x 8000 PSI x 12
						Halliburton Equipment
						Pump plunger 4½ x 8
						Turbine meter 2"
						Electronic measurement
						.2 BBL per min. increment
						200 P.S.I. increment
						H2O gravity 1.010




Getty Oil
Eunice Plant #1
Disposal well
7-25-83
BOTTOM HOLE P.S.I.G.
000
800
600
400
200
000
800
600
400
200
000
800
600
BBLS. Per Min.
.5
1
1.5
2
2.5
3
3.5
4
4.5
5
5.5
6

JARREL SERVICES, INC.

POST OFFICE BOX 1654 PHONES 505 393-5396 — 393-8274

HOBBS, NEW MEXICO 88240

COMPANY: Getty Oil Company

WELL: Disposal Well, No. 1 FIELD:

CHRONOLOGICAL PRESSURE DATA

DATE	STATUS OF WELL	TIME	ELASPED TIME HRS.	ELASPED TIME MIN.	SURFACE PRESSURE TBG	SURFACE PRESSURE CSG	BHP @ ( ) 4041'PSIG
1983							
7/25	Open. Run Tandem Bombs & hung Bombs @ 4041'	10:43 AM					1639
	Loaded Tubing	10:45	0	02	-	-	1849
	Started 1st Rate	10:50	0	05	-	-	1765
	Finished 1st Rate & Started 2nd Rate	11:05	0	15	-	-	2217
	Finished 2nd Rate & Started 3rd Rate	11:20	0	15	-	-	2696
	Finished 3rd Rate & Started 4th Rate	11:35	0	15	-	-	3034
	Finished 4th Rate & Started 5th Rate	11:50	0	15	-	-	3124
	Finished 5th Rate & Started 6th Rate	12:05	0	15	-	-	3199
	Finished 6th Rate & Started 7th Rate	12:20	0	15			3221
	Finished 7th Rate & Stopped Pumping	12:35	0	15			3242
	Shut in	12:40	0	05	-	-	2901
	"	12:45	0	10	-	-	2817
	Pulled Bombs	12:50	0	15	-	-	2714

STATE OF NEW MEXICO

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

June 9, 1983

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Environmental Improvement
Division
Hazardous Waste Section
P.O. Box 968
Santa Fe, New Mexico 87504-0968

Attention: Raymond R. Sisneros
Program Manager PEM Section

Re: OCD Inspection of
Getty Oil Company's
Eunice Plant No. 1
Section 27, Township
22 South, Range 37
East, NMPM, Lea County,
New Mexico.

Dear Sir:

On Wednesday, May 4, 1983, I inspected Getty Oil Company's gas processing plant, Eunice Plant No. 1 located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico.

The reason for the inspection was to determine if plant effluent discharges and disposal practices thereof were being performed in accordance with their discharge plan GWR-3.

The inspection revealed several violations of the Water Quality Control Commission Regulations. Refer to the attached June 7, 1983, letter from Mr. Joe D. Ramey to Mr. Charles Adkinson of Getty Oil Company. Samples were collected and analyzed for some of the violations. Refer to the attached lab results from Ana Cor Laboratories dated May 26, 1983.

The correlation between the lab results and the inspection letter is as follows:

A) Sample Number 4 from the lab report is a sample of the caustic wash pond that is

described in Item No. 1 of the June 7, 1983, letter to Getty.

B) Sample Number 6 from the lab report is a sample of the fluid from the chemical drum (55 gal. drum) that contains chromate. This substance is used in their closed cooling system. Refer to Item Nos. 3 and 5 of the June 7th letter.

C) Sample No. 5 from the lab report is a sample of Getty's closed cooling system that contains chromate. This sample correlates to Item No. 5 of the June 7th letter.

D) Sample No. 1 from the lab report is a sample from the leak detection sump of the lined waste water holding pond. The waste water holding pond is leaking allowing effluent to percolate into the ground. Refer to Item No. 4 of the report.

E) Sample Number 3 from the lab report is from fluid in a surface disposal pond which supposedly has not been used for some time. Refer to Item No. 6 of the June 7th letter.

F) Sample No. 2 is a sample from the leak detection sump of the south lined brine storage pond. Refer to Item No. 4 of the June 7th letter.

Caustic wash at the Getty plant is used to remove certain unwanted mercaptans from the unprocessed gas stream. The use of the caustic wash is very common throughout the gas processing industry. According to plant personnel, dumping of caustic wash into an unlined pond on the south side of the plant has been occurring for several years. Previous OCD inspections date the pond's existence at least back to December of 1981.

The lab results and certain plant practices may be in violation of certain hazardous waste regulations. I am forwarding this information to you for your review.

If you have any questions concerning this matter or if you need pictures of this inspection or past inspections, please contact me at (505) 827-5822.

Sincerely,

Oscar A. Simpson III

OSCAR A. SIMPSON, III
Water Resource Specialist

OAS/dp

cc: Joe D. Ramey, Director

AnaCor Laboratories
7300 Jefferson St., N.E.
Albuquerque, NM 87109
(505)345-8964

Joint Venture of AnaChem, Inc. and Assaigai Analytical Laboratories

To: Oil Conservation District
P.O. Box 2008
Santa Fe, New Mexico 87501

Date: May 26, 1983
JV-441

Attention: Oscar Simpson

Analyte	Sample Indentification				
	#1	#2	#3	#4	#5
As	8.57 ppm		0.28 ppm	46.57 ppm	
Cd	<0.01 ppm		<0.01 ppm	<0.01 ppm	
Cr	<0.05 ppm		<0.05 ppm	0.18 ppm	Cr +3 60.0 ppm Cr +6 105.0 ppm
Pb	<0.05 ppm		<0.05 ppm	<0.05 ppm	
Hg	0.24 ppm		<0.002 ppm	1.01 ppm	
Se	<0.01 ppm		<0.01 ppm	3.38 ppm	
Ba	1.06 ppm		0.10 ppm	<0.1 ppm	
Fe	66.19 ppm		0.50 ppm	1.40 ppm	
Cu	<0.02 ppm		<0.02 ppm	<0.02 ppm	
Mn	0.61 ppm		0.05 ppm	0.01 ppm	
Mg	37.0 ppm		37.0 ppm	<0.01 ppm	
Zn	1.60 ppm		<0.1 ppm	2.59 ppm	
Al	0.67 ppm		7.71 ppm	<0.01 ppm	
B	5.89 ppm		3.58 ppm	2.74 ppm	
Co	19.47 ppm		<0.003 ppm	0.30 ppm	
Mo	<0.01 ppm		<0.01 ppm	1.72 ppm	

To: Oil Conservation District

Date: May 26, 1983
JV-441
Page 2

Analyte	Sample Indentification				
	#1	#2	#3	#4	#5
Ni	<0.01 ppm		<0.01 ppm	<0.01 ppm	
CN	8.15 ppm	9.01 ppm	0.355 ppm	1100 ppm	
F	8.36 ppm	2.31 ppm	16.4 ppm	0.99 ppm	
NO_3 as N	65 ppm		3.55 ppm	450 ppm	
Cl	1700 ppm		710 ppm	10,600 ppm	
SO_4	320 ppm	16,500 ppm	1800.0 ppm	5,300 ppm	
pH	8.57	7.02	8.44	>14.0	1.10 ← ACIDIFIED IN FIELD NOT TRUE PH
TDS	2210 ppm	54,900 mg/l	14,498 ppm	104,048.0 ppm	1090 ppm
COD	1232.0 mg/l		504 mg/l	24,200.0 mg/l	
Benzene	4.67 ppm			0.019 ppm	
Toluene	3.3 ppm			0.523 ppm	

To: Oil Conservation District

Date: May 26, 1983
JV- 441

Analyte	Sample Indentification
	#6
Cr +3	0.062%
Cr +6	18.8%

An invoice for services is enclosed. Thank you for your consideration in contacting AnaCor Laboratories.

Sincerely,

Jennifer V. Smith

Jennifer V. Smith, Ph.D.
Laboratory Director

Enclosure

To: Oil Conservation District

Date: May 26,1983
JV- 441

	Normal Detection Limit
Al	0.01 mg/l
As	0.002 mg/l
Ba	0.1 mg/l
B	0.004 mg/l
Cd	0.01 mg/l
Co	0.003 mg/l
Cr	0.05 mg/l
Cu	0.02 mg/l
Fe	0.05 mg/l
Hg	0.002 mg/l
Mg	0.01 mg/l
Mn	0.005 mg/l
Mo	0.01 mg/l
Ni	0.01 mg/l
pH	0.05 mg/l
Se	0.01 mg/l
Zn	0.1 mg/l
CN	0.01 ppm
F	0.01 ppm
NO_3	0.1 ppm
Cl	0.1 ppm
SO_4	1.0 ppm
pH	0.1
TDS	1.0 ppm
COD	1.0 mg/l
Benzene	0.001 ppm
Toluene	0.01 ppm

Reference: "Standard Methods for the Examination of Water and Wastewater", 15th Edition, APHA, NY., 1980.

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

June 7, 1983

Getty Oil Company
P.O. Box 1137
Eunice, New Mexico 88231

Attention: Charles Adkinson

Re: Inspection of Getty Plant No. 1, Lea County, New Mexico, for Compliance of Discharge Plan GWR-3

Dear Sir:

On Wednesday, May 4, 1983, the Oil Conservation Division (OCD) staff inspected Getty Oil Company's Eunice Plant No. 1 to determine if plant effluent discharges and disposal practices thereof were being performed in accordance with your discharge plan GWR-3.

Inspection of Getty's Eunice Plant No. 1 revealed there were several violations of the discharge plan as follows:

1. Caustic wash was being dumped into an unlined pond on the south side of the plant. Chemical analysis of the substance indicated that it was a high concentration of sodium hydroxide with a ph of 14 and contained a variety of organic substances such as benzene and toluene.

2. Brine water coming from the zeolite treater is not being collected and stored properly and as a result is flowing out onto the ground surface.

3. Treatment chemicals and cleaning solvents throughout the plant are being spilled onto the ground surface. Improper storage and containment facilities and improper mixing methods and facilities thereof are creating the problem.

4. The wastewater effluent holding pond and south brine storage pond are leaking.

5. The closed cooling system which contains chromate has numerous locations where the fluid from this system is exposed to the atmosphere. At these locations leakage and spillage is occurring, allowing the closed cooling fluid to escape and flow onto the ground surface.

6. Surface runoff and/or possible plant effluent is being allowed to drain and collect into a pond that once was used to hold plant effluent and sludge. The hydraulic head from the fluid in the pond has the potential for leaching substances from the sludge, which could affect ground water. Surface water needs to be diverted and not be allowed to collect in this area. Also, the fluid in the pond needs to be drained immediately and kept dry at all times.

7. The plant collection and drain system needs to be expanded to accomodate or collect all plant effluent or discharges. There are many drains that are plugged or broken and some of the drains are not aligned properly to capture effluent.

   Buildings without drain systems and concrete slabs need to have curbing to contain effluent or discharges. Presently effluent and/or various kinds of substances are drained out onto the ground surface.

   The injection pump is leaking which allows effluent to escape onto the ground surface.

8. The injection well does not have a meter to measure the volume of effluent being disposed of or have a pressure gauge to measure the injection pressure.

9. The north brine pond does not have a leak detection or monitoring system.

Your discharge plan was approved on March 16, 1981. OCD staff inspected Eunice Plant No. 1 in December, 1981. That inspection

revealed that no construction or initiative had been taken to collect and dispose of effluent as described in GWR-3. OCD staff verbally informed the then plant superintendent, T. L. Trainor, to collect and dispose of all plant effluent as described in GWR-3 as soon as possible.

In May, 1982, the OCD again inspected Eunice Plant No. 1. The inspection revealed that significant progress had been made but many serious violations of the discharge plan still remained. Mr. T. L. Trainor was again verbally informed by the OCD staff of the infractions and that if these infractions were not corrected in the shortest possible time, legal action against Getty might be taken.

Getty Oil Company has been adequately warned of the problem areas at Getty's Eunice Plant No. 1. Therefore, the OCD will request that Getty correct the listed violations in the time table set by this letter or face legal action.

Item No. 1. Getty will stop disposing of its caustic waste in the unlined pond within ten days of receipt of this letter. The unlined pond receiving the caustic waste will be drained within 20 days of receipt of this letter. The fluid from this unlined pond may be considered hazardous waste by EPA. You may want to contact them about proper disposal. The OCD will require you to accurately document the amount of fluid you obtain from this pond and where disposed.

Items Nos. 2, 3, 6, 8. Getty is required to correct these items within 30 days from the date of this letter.

Items Nos. 4 and 5. Getty will fix the leaks in the plant effluent pond and south brine pond within 45 days of the date of this letter. Brine water or plant effluent will not be allowed to be drained out onto the ground surface to repair the lined ponds.

Item No. 7. Getty is required to fix and expand its effluent collection and drainage system as needed to effectively collect all plant effluent and/or discharges, sludge included, whether such discharges are sporadic or constant in nature, within 90 days from the date of this letter.

Item No. 9. Getty is required to submit engineering construction plans to the OCD for a leak detection or monitoring

system for the north brine pond within 45 days from receipt of this letter.

The OCD has made a survey of salt water disposal wells injecting into the San Andres formation in the proximity of the Getty injection well (Eunice GP No. 1, Section 27, T-23S, R-37E). It was found that other injection wells were operating at substantially lower injection pressures ranging from vacuum to 700 psi. The volumes of fluid being injected by each well is also much less than the Getty well.

Step rate tests from San Andres injection wells in the area indicate the formation parting pressure ranges from 680 to 1400 psi.

Due to the toxic nature of Getty's plant effluent being injected and past occurrences in this area of injection fluids escaping into upper formations, the OCD requests that Getty perform a step rate test on the Eunice GP Well No. 1-L, Section 27, Township 23 South, Range 37 East, injection well within 90 days from receipt of this letter.

Because of the May 4, 1983 inspection and results of analysis of plant effluent, the OCD feels that additional detailed information is needed to supplement your discharge plan GWR-3. In the near future, the OCD will require Getty to submit such information and may require additional monitoring as per Section 3-107 (A) Monitoring, Reporting, and Other Requirements of the Water Quality Control Commission Regulations, WQCC 82-1, pages 25 and 26. A copy is enclosed for your convenience.

If you have any questions concerning this matter, please contact me at (505) 827-5803 or Oscar Simpson at 827-5822.

Sincerely,

JOE D. RAMEY
Director

JDR/OS/dp

cc: Hobbs District Office

AnaCor Laboratories
7300 Jefferson St., N.E.
Albuquerque, NM 87109
(505)345-8964

Joint Venture of AnaChem, Inc. and Assaigai Analytical Laboratories

To: Oil Conservation District
P.O. Box 2008
Santa Fe, New Mexico 87501

Date: May 26, 1983
JV-441

Attention: Oscar Simpson

Analyte	Sample Indentification				
	#1	#2	#3	#4	#5
As	8.57 ppm		0.28 ppm	46.57 ppm	
Cd	<0.01 ppm		<0.01 ppm	<0.01 ppm	
Cr	<0.05 ppm		<0.05 ppm	0.18 ppm	Cr +3 60.0 ppm Cr +6 105.0 ppm
Pb	<0.05 ppm		<0.05 ppm	<0.05 ppm	
Hg	0.24 ppm		<0.002 ppm	1.01 ppm	
Se	<0.01 ppm		<0.01 ppm	3.38 ppm	
Ba	1.06 ppm		0.10 ppm	<0.1 ppm	
Fe	66.19 ppm		0.50 ppm	1.40 ppm	
Cu	<0.02 ppm		<0.02 ppm	<0.02 ppm	
Mn	0.61 ppm		0.05 ppm	0.01 ppm	
Mg	37.0 ppm		37.0 ppm	<0.01 ppm	
Zn	1.60 ppm		<0.1 ppm	2.59 ppm	
Al	0.67 ppm		7.71 ppm	<0.01 ppm	
B	5.89 ppm		3.58 ppm	2.74 ppm	
Co	19.47 ppm		<0.003 ppm	0.30 ppm	
Mo	<0.01 ppm		<0.01 ppm	1.72 ppm	

To: Oil Conservation District

Date: May 26, 1983
JV-441
Page 2

Analyte	Sample Indentification				
	#1	#2	#3	#4	#5
Ni	<0.01 ppm		<0.01 ppm	<0.01 ppm	
CN	8.15 ppm	9.01 ppm	0.355 ppm	1100 ppm	
F	8.36 ppm	2.31 ppm	16.4 ppm	0.99 ppm	
NO_3 as N	65 ppm		3.55 ppm	450 ppm	
Cl	1700 ppm		710 ppm	10,600 ppm	
SO_4	320 ppm	16,500 ppm	1800.0 ppm	5,300 ppm	
pH	8.57	7.02	8.44	>14.0	1.10
TDS	2210 ppm	54,900 mg/l	14,498 ppm	104,048.0 ppm	1090 ppm
COD	1232.0 mg/l		504 mg/l	24,200.0 mg/l	
Benzene	4.67 ppm			0.019 ppm	
Toluene	3.3 ppm			0.523 ppm	

DOES NOT REPRESENT FIELD CONDITIONS WAS ACIDIFIED

To: Oil Conservation District

Date: May 26, 1983
JV- 441

Analyte	Sample Indentification
	#6
Cr +3	0.062%
Cr +6	18.8%

An invoice for services is enclosed. Thank you for your consideration in contacting AnaCor Laboratories.

Sincerely,

Jennifer V. Smith

Jennifer V. Smith, Ph.D.
Laboratory Director

Enclosure

To: Oil Conservation District

Date: May 26,1983
JV- 441
Page 4

	Normal Detection Limit
Al	0.01 mg/l
As	0.002 mg/l
Ba	0.1 mg/l
B	0.004 mg/l
Cd	0.01 mg/l
Co	0.003 mg/l
Cr	0.05 mg/l
Cu	0.02 mg/l
Fe	0.05 mg/l
Hg	0.002 mg/l
Mg	0.01 mg/l
Mn	0.005 mg/l
Mo	0.01 mg/l
Ni	0.01 mg/l
pH	0.05 mg/l
Se	0.01 mg/l
Zn	0.1 mg/l
CN	0.01 ppm
F	0.01 ppm
NO_3	0.1 ppm
Cl	0.1 ppm
SO_4	1.0 ppm
pH	0.1
TDS	1.0 ppm
COD	1.0 mg/l
Benzene	0.001 ppm
Toluene	0.01 ppm

Reference: "Standard Methods for the Examination of Water and Wastewater", 15th Edition, APHA, NY., 1980.

Invoice No. 448

AnaCor Laboratories
7300 Jefferson Street, N.E.
Albuquerque, NM 87109
(505) 345-8964

Joint Venture of AnaChem, Inc. and Assaigai Analytical Laboratories

Sold To: Oil Conservation District
P.O. Box 2008
Santa Fe, NM 87501

JV- 441

Invoice Date
May 26, 1983

Your Order No.

Date Shipped
May 26, 1983

Ship Via

Quantity	Description	Price	per	Amount
3	As	10.00	ea	30.00
3	Cd	8.00	ea	24.00
5	Cr	8.00	ea	40.00
3	Pb	8.00	ea	24.00
3	Hg	15.00	ea	45.00
3	Se	8.00	ea	24.00
3	Ba	8.00	ea	24.00
3	Fe	8.00	ea	24.00
3	Cu	8.00	ea	24.00
3	Mn	8.00	ea	24.00
3	Mg	8.00	ea	24.00
3	Zn	8.00	ea	24.00
3	Al	8.00	ea	24.00
3	B	8.00	ea	24.00
3	Co	8.00	ea	24.00
3	Mo	8.00	ea	24.00
3	Ni	8.00	ea	24.00
4	CN	10.00	ea	40.00
4	F	10.00	ea	40.00
3	NO_3 as N	8.00	ea	24.00
3	Cl	8.00	ea	24.00
4	SO_4	8.00	ea	32.00
5	pH	2.00	ea	10.00
5	TDS	7.00	ea	35.00
3	COD	12.50	ea	37.50
2	Benzene	15.00	ea	30.00
2	Toluene	15.00	ea	30.00

Invoice No. 448

AnaCor Laboratories
7300 Jefferson Street, N.E.
Albuquerque, NM 87109
(505) 345-8964

Joint Venture of AnaChem, Inc. and Assaigai Analytical Laboratories

Sold To: Oil Conservation District
P.O. Box 2008
Santa Fe, NM 87501

JV- 441
Page 2

Invoice Date	Your Order No.
May 26, 1983	
Date Shipped	**Ship Via**
May 26, 1983	

Quantity	Description	Price	per	Amount
		Sub Total		753.50
		Tax		32.02
		Total		785.52
		Thank You		

Net 15 Days

Sample #1 5-4-83 EFFLUENT POND SUMP

2-40ML glass VIALS WITH TEFLON SEALS NOT PRESERVED
1-QT, cubs container NF-NA
1-QT, CC, NF-A-5ML H_2SO_4
1-QT, CC, NF-A, 5ML HNO_3

ANALYSES REQUEST

U	Total Sediable Solids
Ag	TOX
As ✓	TOC
Cd ✓	COD ✓
Cr ✓	Ra226
Pb ✓	Ra228
Hg, Total ✓	PCB
Se ✓	Phenols ✓
Ba ✓	Halogenated Volatile Organics
Fe ✓	Benzene
Cu ✓	Toluene
Mn ✓	Carbon tet
Mg ✓	Serene
Zn ✓	
Al ✓	Non halogenated Volatile Organics
B ✓	
Co ✓	
Mo ✓	
Ni ✓	
CN^- ✓	EP Toxicity
F^- ✓	
NO_3^- as N ✓	
Cl^- ✓	
SO_4^- ✓	
pH	Elutriate or Leachate Test
TDS ✓	
TSS	

Sample #2 1qt cc NAENA

ANALYSES REQUEST

U	Total Sediable Solids
Ag	TOX
As	TOC
Cd	COD
Cr	Ra226
Pb	Ra228
Hg, Total	PCB
Se	Phenols
Ba	Halogenated Volatile Organics
Fe	
Cu	
Mn	
Mg	
Zn	
Al	Non halogenated Volatile Organics
B	
Co	
Mo	
Ni	
CN^-	EP Toxicity
F^-	
NO_3^- as N	
Cl^- ✓	
SO_4^- ✓	
pH	Elutriate or Leachate Test
TDS ✓	
TSS	

Sample #3

ANALYSES REQUEST

U	Total Sediable Solids
Ag	TOX
As ✓	TOC
Cd ✓	COD
Cr ✓	Ra226
Pb ✓	Ra228
Hg, Total ✓	PCB
Se ✓	Phenols
Ba ✓	Halogenated Volatile Organics
Fe ✓	
Cu ✓	
Mn ✓	
Mg ✓	
Zn ✓	
Al ✓	Non halogenated Volatile Organics
B ✓	
Co ✓	
Mo ✓	
Ni ✓	
CN^- ✓	EP Toxicity
F^- ✓	
NO_3^- as N ✓	
Cl^- ✓	
SO_4^- ✓	
pH	Elutriate or Leachate Test
TDS ✓	
TSS	

Sample # Caustic 4

ANALYSES REQUEST

U	Total Sediable Solids
Ag	TOX
As ✓	TOC ?
Cd ✓	COD ?
Cr ✓	Ra226
Pb ✓	Ra228
Hg, Total ✓	PCB
Se ✓	Phenols
Ba ✓	Halogenated Volatile Organics
Fe ✓	Organic screen
Cu ✓	
Mn ✓	
Mg ✓	
Zn ✓	
Al ✓	Non halogenated Volatile Organics
B ✓	
Co ✓	
Mo ✓	
Ni ✓	
CN^- ✓	EP Toxicity
F^- ✓	
NO_3^- as N ✓	
Cl^- ✓	
SO_4^- ✓	
pH ✓	Elutriate or Leachate Test
TDS ✓	
TSS	

Sample #5

ANALYSES REQUEST

U	Total Sediable Solids
Ag	TOX
As	TOC
Cd	COD
Cr ✓ diff bet +6 +3	Ra226
Pb	Ra228
Hg, Total	PCB
Se	Phenols
Ba	Halogenated Volatile Organics
Fe	
Cu	
Mn	
Mg	
Zn	
Al	Non halogenated Volatile Organics
B	
Co	
Mo	
Ni	
CN^-	EP Toxicity
F^-	
NO_3^- as N	
Cl^-	
SO_4^-	
pH	Elutriate or Leachate Test
TDS ✓	
TSS	

6

ANALYSES REQUEST

U	Total Sediable Solids
Ag	TOX
As	TOC
Cd	COD
Cr total nrat + 6 + 13	Ra226
Pb	Ra228
Hg, Total	PCB
Se	Phenols
Ba	Halogenated Volatile Organics
Fe	
Cu	
Mn	
Mg	
Zn	
Al	Non halogenated Volatile Organics
B	
Co	
Mo	
Ni	
CN^-	EP Toxicity
F^-	
NO_3^- as N	
Cl^-	
SO_4^-	
pH	Elutriate or Leachate Test
TDS	
TSS	

Getty Oil Company | P.O. Box 2194, Pampa, Texas 79065 • Telephone (806) 665-3775

Lewis E. Knight, Environmental Engineer, Natural Gas Plants Department

May 18, 1981

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Attention: Mr. Joe D. Ramey, Director

RE: Water Discharge Plan
Getty Oil Company
Eunice No. 2 Gas Plant

Dear Mr. Ramey:

Confirming our telephone conversation of May 14, 1981, and pursuant to our letter of December 29, 1980, "Agua" will not be able to procure all necessary Rights-of-Way from our Eunice No. 2 Gas Plant to their disposal system. Therefore, Getty Oil Company will obtain Rights-of-Way as follows, and will maintain and inspect the line at appropriate intervals to ensure a safe, efficient, and leak free operation.

Section 28; T-21S; R-37E (3967.8 feet)
Section 29; T-21S; R-37E (2678.2 feet)

Thank you for your cooperation and help in this matter.

Very truly yours,

Lewis E. Knight

Lewis E. Knight

ojo

cc: J. H. Anderson
W. A. Smith
T. L. Trainor

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

March 16, 1981

Getty Oil Company
P. O. Box 3000
Tulsa, Oklahoma 74102

Attention: Mr. Charles R. York

Re: GWR-3

Gentlemen:

The discharge plan submitted for the discharge of boiler and cooling tower waters from your Eunice No. 1 Gas Plant located in Section 27, Township 22 South, Range 37 East, Lea County, New Mexico, is hereby approved.

The discharge plan was submitted pursuant to section 3-106 of the Water Quality Control Commission regulations. It is approved pursuant to section 109. Please note subsections 3-109.E and 3-109.F which provide for possible future amendment of the plan. Please also be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

Charlie Odbinson new Engr

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

SANTA FE, NEW MEXICO

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501, telephone (505) 827-3260.

PHILLIPS PETROLEUM COMPANY, Lee (Buckeye) Plant, West Star Route, Lovington, New Mexico 88260, also Bartlesville, Oklahoma 74004, proposes to discharge 29,400 gallons per day of boiler and cooling tower water into holding tanks located in the SW/4 SE/4 of Section 30, Township 17 South, Range 35 East. The discharge water will then be pumped to the injection well system for the approved East Vacuum Grayburg San Andres Unit Waterflood in the SW/4 SW/4 of Section 29, Township 17 South, Range 35 East, Lea County, New Mexico, for injection into an oil reservoir. Total dissolved solids of the discharge water is 9,000 mg/l. The applicant states that no ground water will be affected.

Notice Dates
11/14/81 (ALB)
11/16/81 (HOBBS)

GETTY OIL COMPANY, Eunice No. 1 Gas Plant, P. O. Box 1137, Eunice, New Mexico 88231, also P. O. Box 3000, Tulsa, Oklahoma 74102, proposes to discharge 91,266 gallons per day of process, boiler and cooling tower water into lined pits located in the SW/4 SW/4 of Section 27, Township 22 South, Range 37 East, Lea County, New Mexico. The discharge water will be pumped from the lined pits into an injection well located in same above section. Total dissolved solids of the discharge water is about 7,000 mg/l.

GETTY OIL COMPANY, Eunice No. 2 Gas Plant, P. O. Box 1137, Eunice, New Mexico 88231, also P. O. Box 3000, Tulsa, Oklahoma 74102, proposes to discharge 24,318 gallons per day of process, boiler and cooling tower water produced in the SE/4 SE/4 of Section 28, Township 21 South, Range 37 East, Lea County, New Mexico. The discharge water will then be piped via 3 inch PVC pipeline into the Agua Incorporated salt water disposal system, which is 7,300 feet from plant where it will be injected in Agua disposal wells. Total dissolved solids of the discharge water is about 7,065 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. 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 there is significant public interest.

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

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1981.

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

JOE D. RAMEY

Director

S E A L

Getty

Getty Oil Company | P.O. Box 3000, Tulsa, Oklahoma 74102 • Telephone: (918) 560-6380

Natural Gas Plants Department

December 29, 1980

State of New Mexico
Energy and Minerals Department
Water Quality Control Commission
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey
Director

Re: Amendments to Eunice No. 1 and No. 2 Gas Plants
Water Discharge Plan

Dear Mr. Ramey:

Eunice No. 1 Gas Plant:

The three lined pits shown on the attached plat plan are numbered 1, 2 and 3. The number 1 pit was constructed in April, 1966 prior to New Mexico State Permit requirements, effective May, 1967. The number 1 pit having no leak detection system is emptied semi-annually and visually inspected for leaks. It is inspected each month for indications of unusual fluid loss in excess of evaporation. Should its liner fail, it is a Getty policy to install leak detection systems under all pit liners that are replaced. This will be the policy for the number 1 pit as well.

Lined pits numbers 2 and 3 were constructed under the authority of New Mexico State Permit No. LP-101 (copy attached).

Pits numbers 2 and 3 have leak detection systems and the inspection boxes are checked each month for signs of leaks.

The number 3 pit or pit "C" is the pit that is proposed as the process water holding pit for delivery into the permitted disposal well.

Eunice No. 2 Gas Plant:

Upon completion of the 7,300', 3" PVC pipeline running from the Eunice No. 2 Gas Plant to the "Agua" water disposal system, the line will be deeded over to "Agua". Besides their ownership of the new line segment, "Agua" takes possession

of the water at the plant fence. "Agua" indemnifies and holds Getty Oil Company harmless from any and all liability due to line loss or damages resulting after they take possession of the water as per our proposed contract with "Agua".

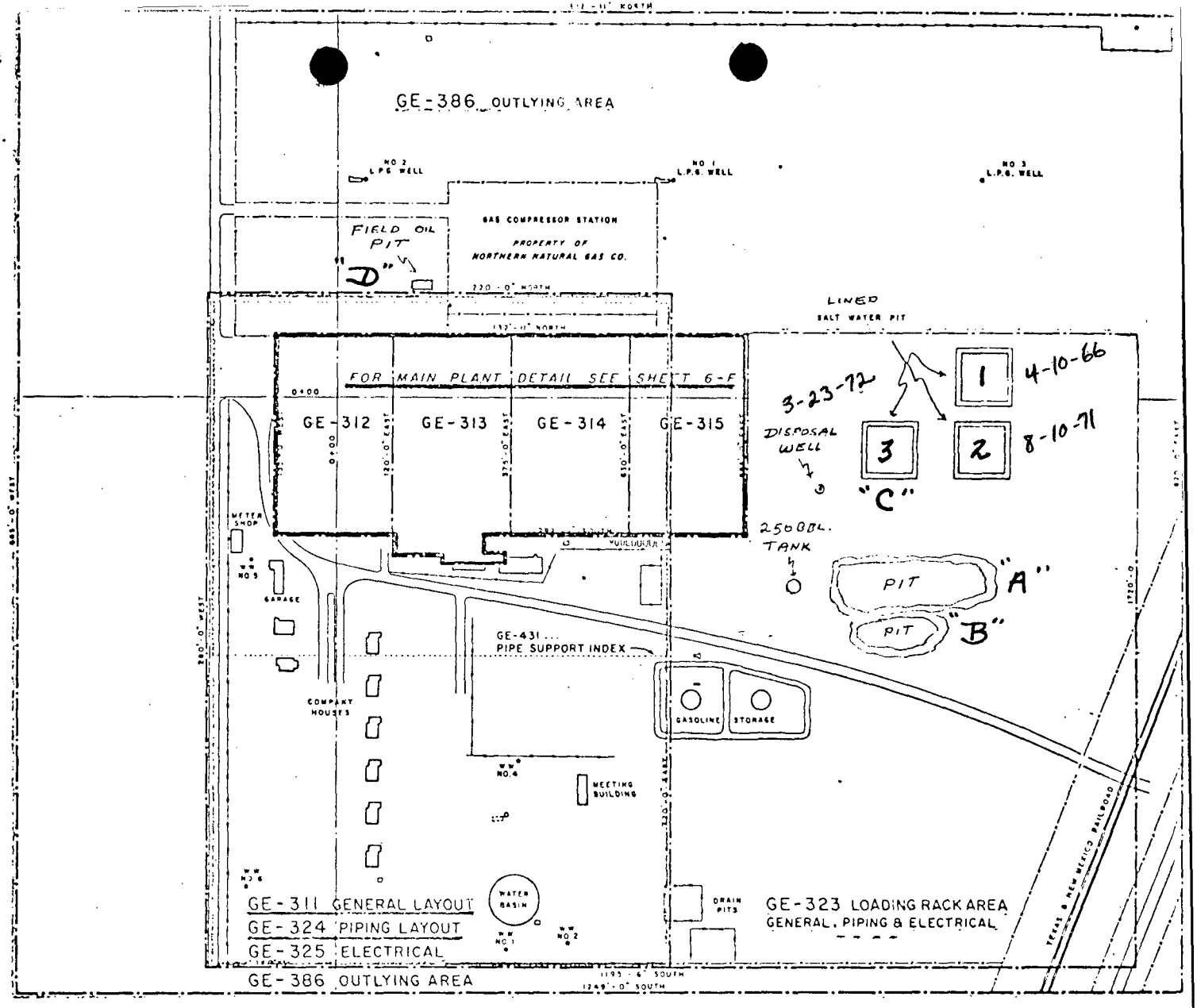
Respectfully,
GETTY OIL COMPANY

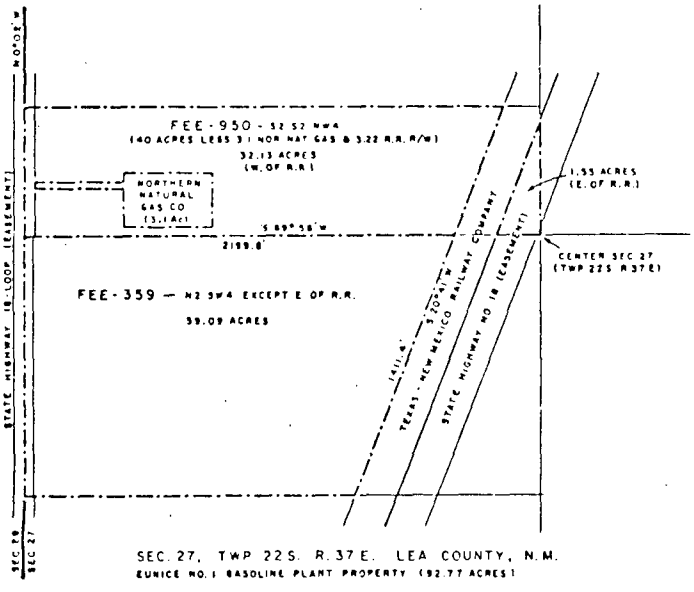
Charles R. York

CHARLES R. YORK
ENVIRONMENTAL COORDINATOR

CRY:sd
Attachments
CERTIFIED MAIL:RRR

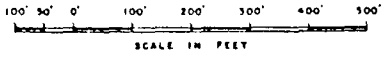
cc: Messrs. J. H. Anderson)w/attach.
C. F. Gee)w/attach.
T. L. Trainor)w/attach.
File - 1





SEC. 27, TWP 22 S. R. 37 E. LEA COUNTY, N.M.
EUNICE NO. 1 GASOLINE PLANT PROPERTY (92.77 ACRES)

EUNICE NO. 1 GASOLINE PLANT PIPING MAP INDEX



RECEIVED

SEP 22 1971

OIL CONSERVATION COMM.
HOBBS, N. M.

RECEIVED
SEP 20 1971
New Mexico Oil Conservation Commission

APPLICATION FOR PERMIT TO UTILIZE A LINED EVAPORATION PIT

PERMIT NO. LP-101

Name of Operator Skelly Oil Company

Address P. O. Box 1650, Tulsa, Oklahoma 74102

* Name of lease upon which evaporation pit will be located Eunice Gasoline Plant #1 - Eunice, New Mexico

* Location of evaporation pit: Unit Letter F Section 27 Township 22S Range 37E

Lease(s) which will be producing into pit Not applicable (N.A.)

Pool(s) which will be producing into pit Not applicable (N.A.)

Analysis of ~~disposed~~ stored water: Chlorides 136,000 ppm. Total dissolved solids 220,000 ppm.
(If more than one pool will be producing into pit, give water analysis for each pool.)

Quantity of water to be ~~disposed of into~~ stored in this pit 75,000 barrels ~~per days~~

Water production from these same wells six months ago N,A. bpd. Three months ago N.A bpd
(If more than one pool will be producing into pit, give water production data for each)

Method of hydrocarbon entrapment to be employed: Settling tank N.A. Header pit N.A.

If settling tank is to be used, give size and number of barrels N.A.

If header pit is to be used, give dimensions and depth N.A.

Header pit lining material N.A. Thickness N.A.

* Dimensions of Evaporation Pit ("A" and "B" on diagram) 243' x 243'

Number of square feet contained in above 59,049

Depth (Top of levee to floor of pit--"D" on diagram) 15'

Material to be used as liner Nylon Reinforced Butyl Thickness 45 Mills

Does manufacturer recommend protection of material from direct sunlight? Yes ____ No No

If yes, what means will be provided to so protect the material? ____

Is material resistant to hydrocarbons? Yes ____ No No

Is material resistant to acids and alkalis? Yes Yes ____ No ____

Is material resistant to salts? Yes Yes ____ No ____

Is material resistant to fungus? Yes Yes ____ No ____

Is material rot-resistant? Yes Yes ____ No ____

Will joints in material be fabricated in the field? Yes Yes ____ No ____

If yes, describe method to be used in joining material Adhesive - 2" seam

Attach manufacturer's brochure describing the qualities of the lining material.

Describe the leakage detection system to be used Consists of one foot square gravel-filled trench rimming the floor of the pit and connected with 4" plastic pipe to an inspection box outside the dike.

I hereby certify that the information contained herein is true and complete to the best of
* my knowledge and belief, and further, that the subject evaporation pit and appurtenances, when installed, will be kept in good repair, and that all due diligence will be exercised in keeping the surface of the water free of oil and other debris.

Name Charles C. Chastain Title Attorney Date 9-17-71

Approved by [signature] Title CHIEF ENGINEER Date 9/21/71

Exhibit "A" Order No. R-3221-C

* The words "LPG Brine Storage Pit" should be substituted for the words "Evaporation Pit" throughout.

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

November 26, 1980

Mr. Charles R. York
Environmental Coordinator
Natural Gas Plants Department
Getty Oil Company
P. O. Box 3000
Tulsa, Oklahoma 74102

Re: Eunice No. 2 Discharge Plan

Dear Mr. York:

We have reviewed your discharge plan of November 18, 1980.

Getty needs to submit further information about the three (3) inch diameter P.V.C. pipe line running to the Agua Incorporated water disposal system. Have you scheduled a daily inspection of the entire length of this pipe line for the purpose of detecting leaks?

The Oil Conservation Division must have this information before a discharge plan can be approved.

Your sample analysis Serial No. 5708 has an error in it. New Mexico standards for ground water for Total Dissolved Solids should be 1000.0 mg/l or 1538.5 mhos/cm.

Yours very truly,

JOE D. RAMEY
Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs

Getty Oil Company | P.O. Box 3000, Tulsa, Oklahoma 74102 • Telephone: (918) 560-6380

Natural Gas Plants Department

November 18, 1980

State of New Mexico
Energy and Minerals Department
Water Quality Control Commission
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey
Director

Re: Water Discharge Plan
Getty Oil Company
Eunice No. 1 and No. 2 Gas Plants

Dear Mr. Ramey:

Eunice No. 1 Gas Plant:

Location: SW, SW, Section 27, T-22-S, R-37-E of Lea County, New Mexico.

Waste Water Streams	BBLS/Day
Process	51
Cooling (Non-Contact)	1,300
Boiler Blowdown	822
TOTAL TO DISPOSAL WELL	2,173

1. Waste water will be redirected from unlined pits "A" and "B" to lined pit "C" prior to injecting into disposal well along with salt water.

2. Unlined pits "A" and "B" will be closed.

3. Field oil pit "D" has already been closed.

Eunice No. 2 Gas Plant:

Location: SE, SE, Section 28, T-21-S, R-37-E of Lea County, New Mexico.

Waste Water Streams	BBLS/Day
Process	20
Cooling (Non-Contact)	544
Boiler Blowdown	15
TOTAL TO AGUA, INC.	579

1. All of the Eunice No. 2 Gas Plant's waste water consisting of the above streams will be piped via a 3" diameter PVC pipeline into the New Mexico State approved AGUA Incorporated water disposal system, which is 7,300 feet from the plant, and then into the State approved disposal wells which AGUA operates.

2. Unlined pit "E" will be closed.

All the pits referred to in this letter can be located on one of the two plats included.

Respectfully,
GETTY OIL COMPANY

Charles R. York

CHARLES R. YORK
ENVIRONMENTAL COORDINATOR

CRY:sd
CERTIFIED MAIL:RRR
Attachments
cc: Messrs. J. H. Anderson)w/attach.
C. F. Gee)w/attach.
T. L. Trainor)w/attach.
File - 1)w/attach.

Pampa, Texas 79065

REPORT OF ANALYSIS

SAMPLE SERIAL NO. 5708 ANALYSIS NO. _____

SAMPLE OF Process, Boiler Blowdown and Cooling Tower Blowdown

FROM: Eunice G.P. #2 ANALYSIS REQUESTED BY: C. R. York

SECURED BY: Boehmisch & York RESULTS TO: J. H. Anderson

DATE SECURED: 7-15-80 W. A. Smith

DATE RECEIVED: 7-16-80 C. R. York

ANALYSIS COMPLETED: 7-22-80 SS File

ANALYST: Gortmaker-Burgess NGPL File

CHECKED BY: JWB DATE: 7-22-80

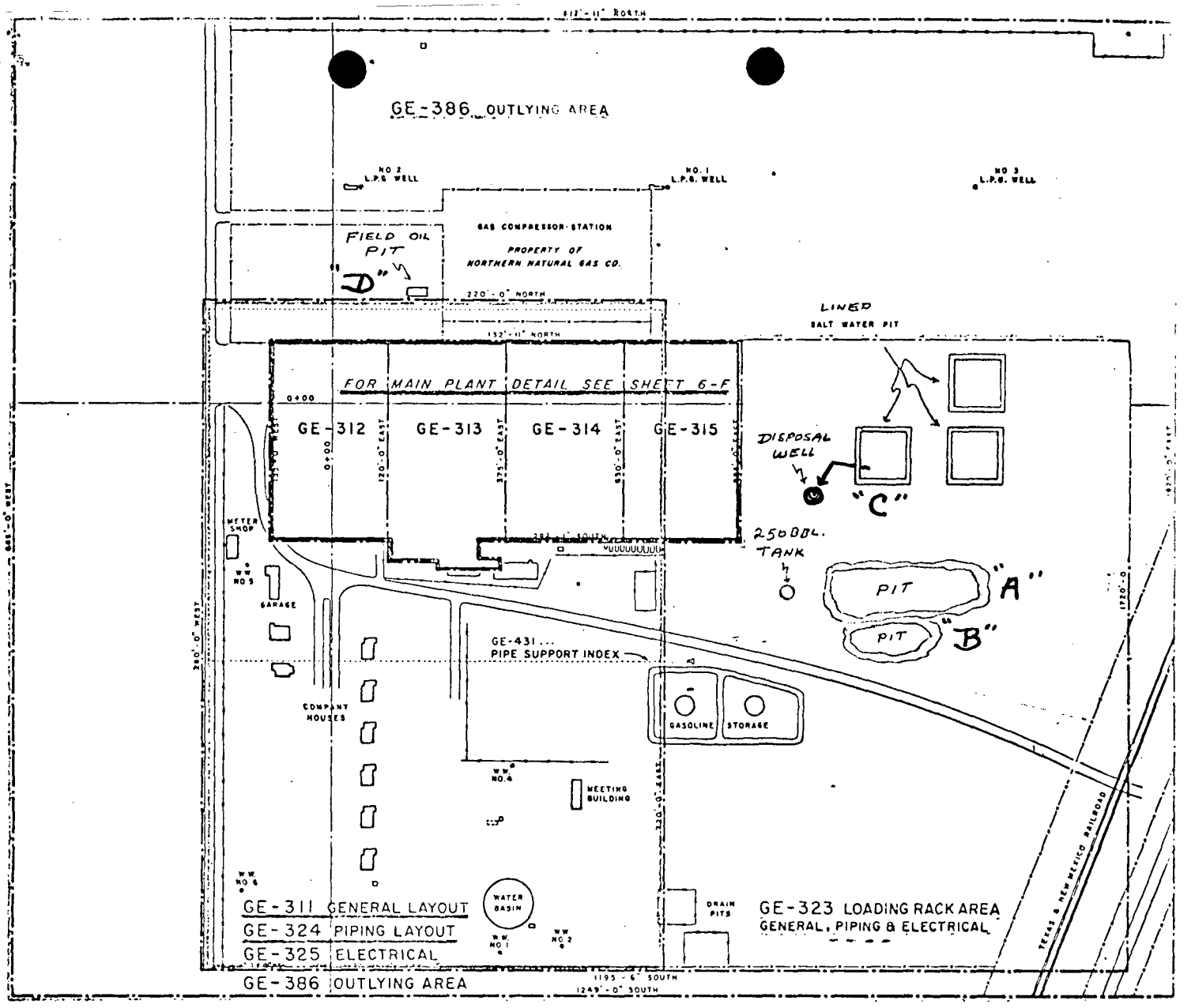
APPROVED BY: JWB DATE: 7-22-80 DATE OF REPORT: 7-23-80

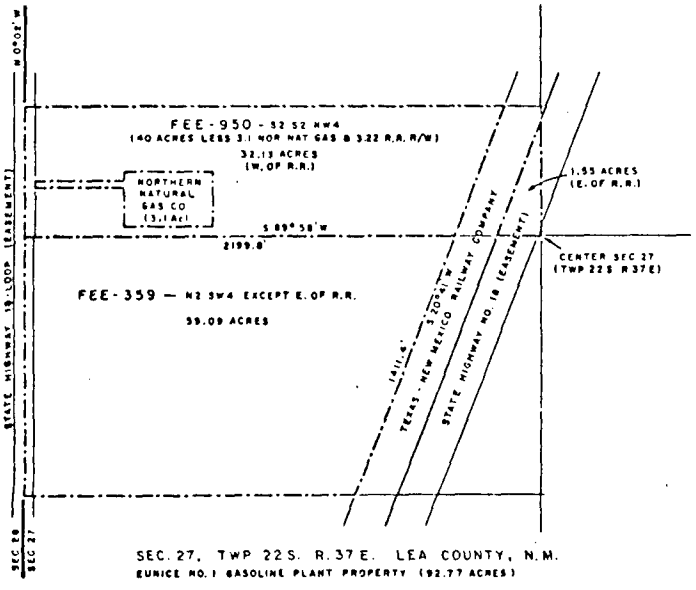
CORRECTED COPY

ANALYSIS

Effluent Characteristics	Process Water & Boiler Blowdown	Cooling Tower Blowdown	New Mexico Limits*
pH	9.35	6.30	6.0 - 9.0
BOD_5 mg/l	125.00	1.35	< 30
COD mg/l	560.00	96.50	< 125
Oil & grease mg/l	33.50	.30	---
Chromium mg/l	15.20	15.90	.05
Cadmium mg/l	.07	.04	.01
Silver mg/l	.02	.04	.05
Lead mg/l	.20	.25	.05
Chloride mg/l	3612.00	1318.00	250
Copper mg/l	.09	.09	1.00
Iron mg/l	.57	.30	1.00
Zinc mg/l	1.45	.72	10.00
Nickel mg/l	.12	.10	.20
T.D.S. µmhos/cm	10870.00	5850.00	10000.00

* The New Mexico limits will depend on which Water Quality Control regulations apply.

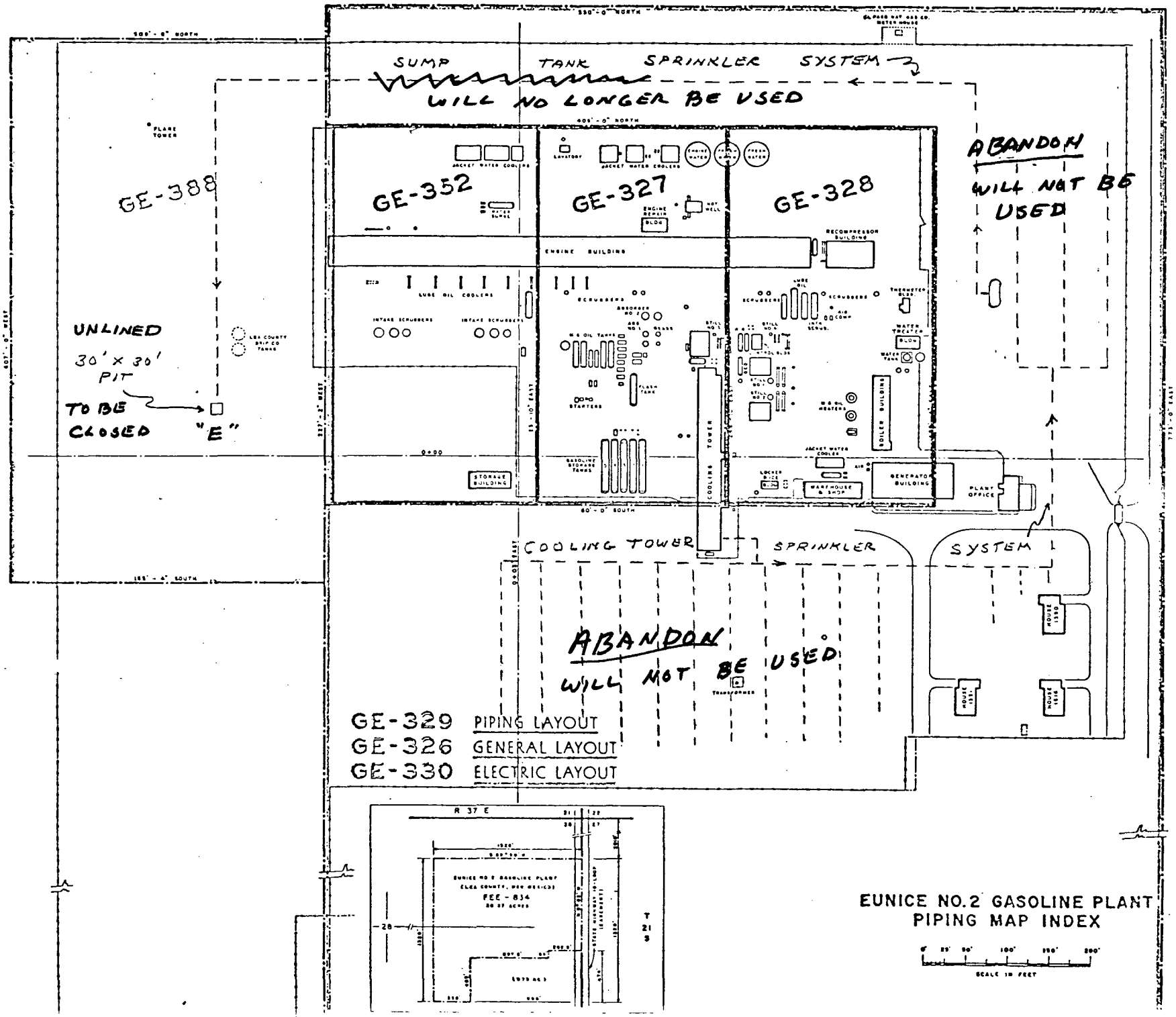




SEC. 27, TWP 22 S. R. 37 E. LEA COUNTY, N.M.
EUNICE NO. 1 GASOLINE PLANT PROPERTY (92.77 ACRES)

EUNICE NO. 1 GASOLINE PLANT PIPING MAP INDEX

100' 50' 0' 100' 200' 300' 400' 500'
SCALE IN FEET


SUMP TANK SPRINKLER SYSTEM
WILL NO LONGER BE USED
ABANDON
WILL NOT BE USED
GE-388
GE-352
GE-327
GE-328
UNLINED
30' X 30'
PIT
TO BE
CLOSED
"E"
COOLING TOWER SPRINKLER SYSTEM
ABANDON
WILL NOT BE USED
GE-329 PIPING LAYOUT
GE-326 GENERAL LAYOUT
GE-330 ELECTRIC LAYOUT
EUNICE NO. 2 GASOLINE PLANT
PIPING MAP INDEX
SCALE IN FEET

Form 18-829-477
Printed In U.S.A.

[illegible] Company
NATURAL GASOLINE [illegible] ANTS LABORATORY
P. O. Box 2194
Pampa, Texas 79065

RECEIVED
SEP 0 4 1980
N. G. P.

REPORT OF ANALYSIS

SAMPLE SERIAL NO. 0 ANALYSIS NO.

SAMPLE OF Water Well Analyses

FROM: Eunice #2 G.P. ANALYSIS REQUESTED BY:
SECURED BY: Rodney Bailey RESULTS TO: C. R. York
DATE SECURED: 8-1-80
DATE RECEIVED: 8-1-80
ANALYSIS COMPLETED: 8-1-80
ANALYST: Bailey
CHECKED BY: DATE: 8-28-80
APPROVED BY: DATE: 8-28-80 DATE OF REPORT: 8-28-80

ANALYSIS

Well #	Chlorides ppm	Hardness ppm	TDS umhos/cm	pH
1	454	456	2100	7.2
2	334	348	1750	7.3
3	227	340	1250	7.3
12	206	342	1550	7.3
15	398	412	1900	7.4
17	149	242	1200	7.3
18	206	350	1600	7.3
19	291	436	1900	7.4
21	256	316	1500	7.4
23	241	286	1500	7.4

Form 18-829-477
Printed in U.S.A.

NATURAL GASOLINE PLANTS LABORATORY
P. O. Box 2194
Pampa, Texas 79065

SEP 04 1980

N. G. P.

REPORT OF ANALYSIS

SAMPLE SERIAL NO. 0 ANALYSIS NO.

SAMPLE OF Plant Water Tests

FROM: Eunice #2 G.P. ANALYSIS REQUESTED BY: Weekly Water Tests

SECURED BY: Rodney Bailey RESULTS TO: C. R. York ✓

DATE SECURED: 8-27-80 File

DATE RECEIVED: 8-27-80

ANALYSIS COMPLETED: 8-27-80

ANALYST: Bailey

CHECKED BY: DATE: 8-28-80

APPROVED BY: DATE: 8-28-80 DATE OF REPORT: 8-28-80

ANALYSIS

Parameter I.D.	Raw Water	Treater Water	Cooling Tower	Boiler Feed	Boiler #1 Blowdown	Boiler #2 Blowdown
Chloride mg/l	262	63	1256	71	234	262
Hardness mg/l	380	0	1810	0	0	0
TDS umhos/cm	1550	690	6500	1000	2600	3000
Alkalinity mg/l	152	210	44	210		
pH	7.2	7.4	6.8	8.6	11.4	11.5
Chromate mg/l			30			
Phosphate mg/l					35	45
Sulfite mg/l					76	114

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

September 18, 1980

Getty Oil Company
Box 3000
Tulsa, Oklahoma 74102

Attention: Mr. Charles R. York

Gentlemen:

As requested in your letter of September 12, 1980, you are granted until December 10, 1980, to submit Discharge Plans for your Eunice No. 1 and No. 2 Gasoline Plants.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

cc: Tom Parkhill

Getty Oil Company | P.O. Box 3000, Tulsa, Oklahoma 74102 • Telephone: (918) 560-6380

Natural Gas Plants Department

September 12, 1980

State of New Mexico
Energy and Minerals Department
Water Quality Control Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey
Director

Re: Water Discharge Plan
Getty Oil Company
Eunice No. 1 and No. 2 Gas Plants

Dear Mr. Ramey:

The Getty Oil Company respectfully requests a 90-day extension period, ending December 10, 1980, for submission of the Water Discharge Plan for Getty's Eunice No. 1 and No. 2 Gas Plants.

We need the extra time to engineer and assimilate a plan we feel will be satisfactory to the State of New Mexico and the public.

Very truly yours,
GETTY OIL COMPANY

Charles R. York
Environmental Coordinator

CRY:sd

cc: Messrs. J. H. Anderson
C. F. Gee
J. R. McKinley
T. L. Trainor, Eunice
L. J. Wilde

Received OCD
11-18-80

Getty Oil Company | P.O. Box 3000, Tulsa, Oklahoma 74102 • Telephone: (918) 560-6380

Natural Gas Plants Department

September 3, 1980

Not official.
Discussion copy only.

State of New Mexico
Energy and Minerals Department
Water Quality Control Commission
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey
Director

Re: Water Discharge Plan
Getty Oil Company
Eunice No. 1 and No. 2 Gas Plants

Dear Mr. Ramey:

Eunice No. 1 Gas Plant:

1. Redirect process and waste water from unlined pits "A & B" to lined pit "C" before injecting into disposal well along with salt water.

2. Close pits "A" & "B".

3. Field oil pit "D" has already been closed.

Eunice No. 2 Gas Plant:

1. The process water and boiler blow down discharge will be routed to a new lined pit. The flow is estimated to be 500 GPD without steam tracing condensate. If during the period that steam tracing is required and the flow exceeds evaporation rates, the process water will be hauled to the Eunice No. 1 plant for injection into the disposal well. Unlined pit "E" will be closed. None of the above water is to be used to sprinkle grass.

2. (a) Cooling tower water blow down treatment will be changed from Chromate to Phosphates.

   (b) A variance is requested from present Water Quality Control Commission concentration limits to five (5) times the fresh water concentrations on total dissolved solids and chlorides for water that is used to sprinkle grass.

The fresh water supply runs from 255 to 300 mg/l and the total dissolved solids average about 1,800 mg/l.

The above variance would conserve the use of the Lea County ground water supply yet be an improvement over previous discharges at the Eunice No. 2 Gas Plant.

The cooling tower make-up during the summer at the No. 2 plant averages 800,000 gallons of water per week. Ninety-five percent of this water is supplied from Getty water wells with the remainder from City water supply. A variance of only two (2) concentrations would increase the water demand to 2,000,000 gallons per week.

The maximum output from the Eunice No. 2 Gas Plant water wells is 100 gpm or 1,008,000 gallons per week. A rate of 80 gpm would be maximum for extended periods of time.

Very truly yours,
GETTY OIL COMPANY

Charles R. York

CHARLES R. YORK
ENVIRONMENTAL COORDINATOR

CRY:sd

cc: Mr. J. H. Anderson)w/attach.
Mr. C. F. Gee)w/attach.
Mr. T. L. Trainor)w/attach.

Pampa, Texas 79065

REPORT OF ANALYSIS

SAMPLE SERIAL NO. 5708 ANALYSIS NO.

SAMPLE OF Process, Boiler Blowdown and Cooling Tower Blowdown

FROM: Eunice G.P. #2 ANALYSIS REQUESTED BY: C. R. York

SECURED BY: Boehmisch & York RESULTS TO: J. H. Anderson

DATE SECURED: 7-15-80 W. A. Smith

DATE RECEIVED: 7-16-80 C. R. York

ANALYSIS COMPLETED: 7-22-80 SS File

ANALYST: Gortmaker-Burgess NGPL File

CHECKED BY: JWB DATE: 7-22-80

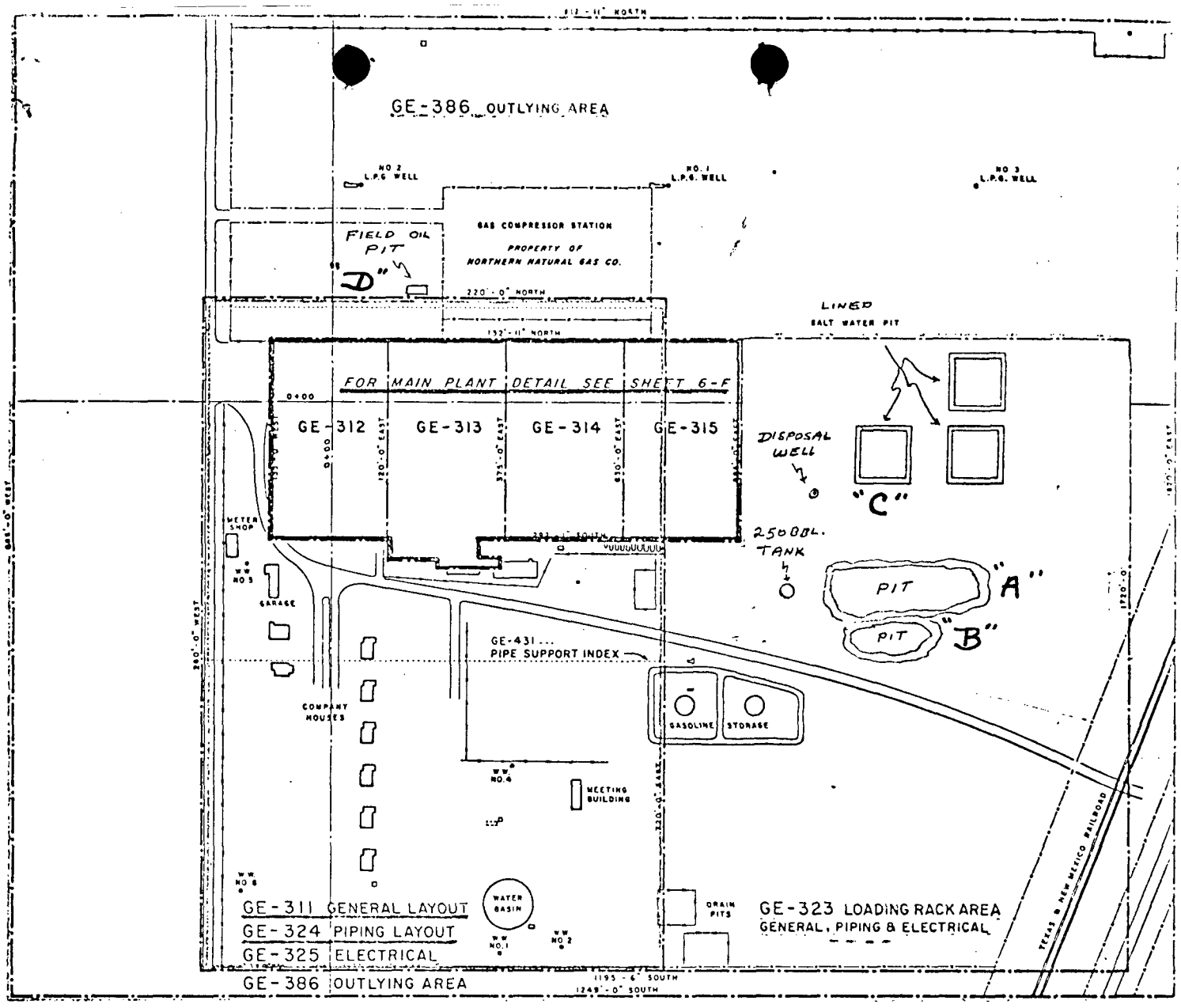
APPROVED BY: JWB DATE: 7-22-80 DATE OF REPORT: 7-23-80

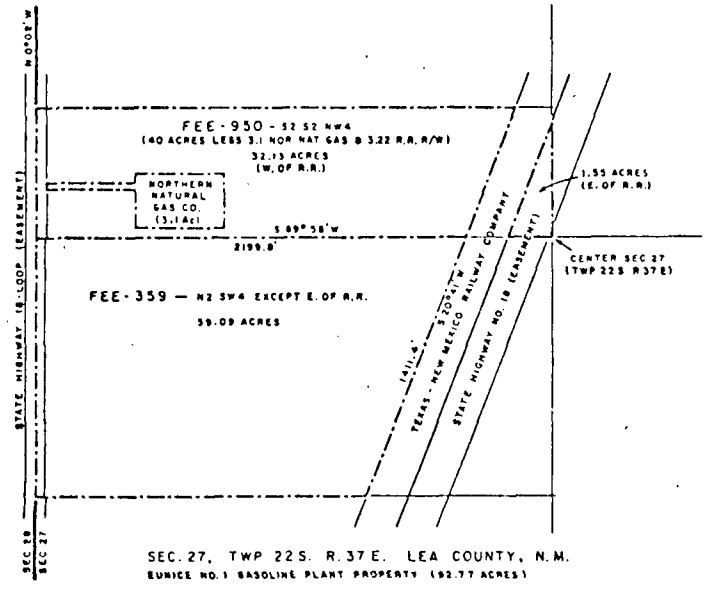
CORRECTED COPY

ANALYSIS

Effluent Characteristics	Process Water & Boiler Blowdown	Cooling Tower Blowdown	New Mexico Limits*
pH	9.35	6.30	6.0 - 9.0
BOD_5 mg/l	125.00	1.35	< 30
COD mg/l	560.00	96.50	< 125
Oil & grease mg/l	33.50	.30	---
Chromium mg/l	15.20	15.90	.05
Cadmium mg/l	.07	.04	.01
Silver mg/l	.02	.04	.05
Lead mg/l	.20	.25	.05
Chloride mg/l	3612.00	1318.00	250
Copper mg/l	.09	.09	1.00
Iron mg/l	.57	.30	1.00
Zinc mg/l	1.45	.72	10.00
Nickel mg/l	.12	.10	.20
T.D.S. µmhos/cm	10870.00	5850.00	10000.00

* The New Mexico limits will depend on which Water Quality Control regulations apply.





SEC. 27, TWP 22 S. R. 37 E. LEA COUNTY, N.M.
EUNICE NO. 1 GASOLINE PLANT PROPERTY (92.77 ACRES)

EUNICE NO. 1 GASOLINE PLANT PIPING MAP INDEX

100' 50' 0' 100' 200' 300' 400' 500'
SCALE IN FEET

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

April 29, 1980

Getty Oil Company
Box 3000
Tulsa, Oklahoma 74102

Re: Request for Discharge Plans

Gentlemen:

Under provisions of the regulations of the Water Quality Control Commission I am hereby requesting the filing of discharge plans for Getty's Eunice Gasoline Plants No. 1 and No. 2.

These plans should cover all discharges of effluent at the plant sites or adjacent to the plant sites. Section 3-106 A. of the regulations requires submittal of the discharge plans within 120 days of receipt of this notice unless an extension of this time period is sought and approved.

The discharge plans should be prepared in accordance with Part 3 of the Regulations, a copy of which is forwarded herewith. Due to a recent court decision references to "toxic pollutants" may be ignored.

If there are any questions on this matter, please do not hesitate to call me or Thomas Parkhill at 827-3260. Mr. Parkhill has been assigned responsibility for review of all discharge plans.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd
enc.

cc: OCD Hobbs District Office
Getty Oil Company
P. O. Box 1137
Eunice, New Mexico 88231

Getty Oil Company | P.O. Box 1137, Eunice, New Mexico 88231 • Telephone: (505) 394-2566

December 28, 1978

Posted
1-11-79

Mr. Eddie Seay
State of New Mexico
Oil Conservation Division
P. O. Box 1980
Hobbs, New Mexico 88240

Re: Brine Pits at Getty Oil Co.
Eunice Gasoline Plant #1

Dear Sir:

Getty Oil Company's Eunice Gasoline Plant #1 has three rubber lined pits of 75,000 barrel capacity each, which are used for 1.2 specific gravity brine water storage. The brine water in these pits is used to recover LPG products which is stored in underground storage cavities. No surface run-off water is impounded by these pits and no brine water is ever released to the surrounding land surface. An average of 2,000,000 barrels of brine is pumped out and returned to these pits each year.

Sketches are enclosed showing the size and location of these three pits in relation to the plant location.

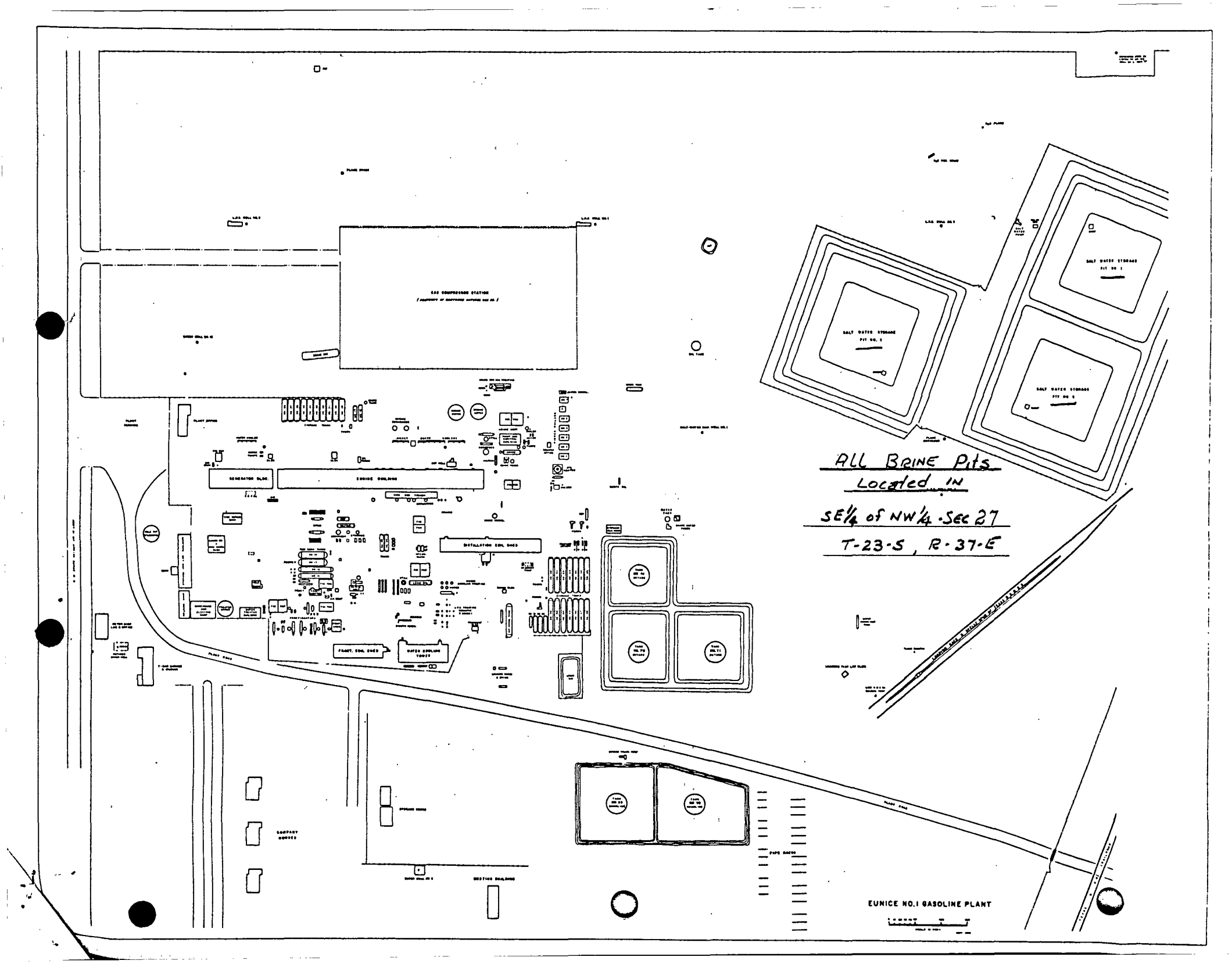
Sincerely,

Jack Brown
Jack C. Brown
Process Engineer

JCB:wpo

Attachment

cc: File


ALL BRINE Pits
Located IN
SE¼ of NW¼ · Sec 27
T-23-S, R-37-E
EUNICE NO.1 GASOLINE PLANT

FORM 13-392-865 OR OTHER UNIT AFFECTED

Eunice No. 1 Gasoline Plant

DRAWING NUMBERS AFFECTED 45-386 3 GL-323

SALT WATER STORAGE PIT No. 3, No. 2 & No. 1 (ALL same Dimensions)

(240' x 240' Top Dimensions by 15' Deep - 3/1 Slope)

45 Mil THICK Butyl Rubber Liners

75,000 BBl Capacity