GW - 5

GENERAL CORRESPONDENCE

YEAR(S):

2003-1996

Price, Wayne

From: Price, Wayne
Sent: Tuesday, October 21, 2003 3:42 PM
To: Cal Wrangham (E-mail)
Cc: Mark Larson (E-mail)
Subject: Dynegy Eunice Gas Plant GW-005

Dear Cal:

The OCD is in receipt of the Subsurface and groundwater Investigation Report Dated September 04, 2003 for the above subject site. OCD hereby approves of the report and commitments to monitor. OCD also approves of your recent verbal request to monitor for one year in order to build more accurate data. Please submit your recommendations for further delineation in the first annual report.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Price, Wayne

From: Price, Wayne
Sent: Tuesday, May 13, 2003 9:26 AM
To: 'mark@LAenvironmental.com'
Subject: Dynegy Eunice Gas Plant GW-05

Dear Mark:

OCD is in receipt of the Draft groundwater investigation Work Plan dated April 17, 2003 for the above referenced facility and hereby approves of the plan. Since this document is in draft form OCD will require dynegy to submit for approval any changes made to the plan.

Please be advised that NMOCD approval of this plan does not relieve Dynegy 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 Dynegy of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

FAX

DATE: May 12, 2003

TO: Wayne Price

WITH: New Mexico Oil Conservation Division

FAX: (505) 476-3462

FROM: Cindy Crain

WITH: Larson and Associates, Inc.

PAGES (with cover): 3

RE: **Workplan and Request for Extension for Continued Groundwater Investigation, Dynegy Midstream Services, L.P., Eunice Gas Plant (GW-005), UL B (NW/4, NE/4), Section 3, Township 22 South, Range 37 East, Lea County, New Mexico**

Larson and Associates, Inc.
507 N. Marienfeld Street
Suite 202
Midland, Texas 79701
(915) 687-0901

cindy@laenvironmental.com

Please call Cindy Crain at (915) 687-0901 if this transmittal is not legible.

Larson & Associates, Inc.
Environmental Consultants

DRAFT

April 17, 2003

VIA FACSIMILE: (505) 476-3462

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

Re: Work Plan and Request for Extension for Continued Groundwater Investigation, Dynegy Midstream Services, L.P., Eunice Gas Plant (GW-005), UL B (NW/4, NE/4), Section 3, Township 22 South, Range 37 East, Lea County, New Mexico

Dear Wayne:

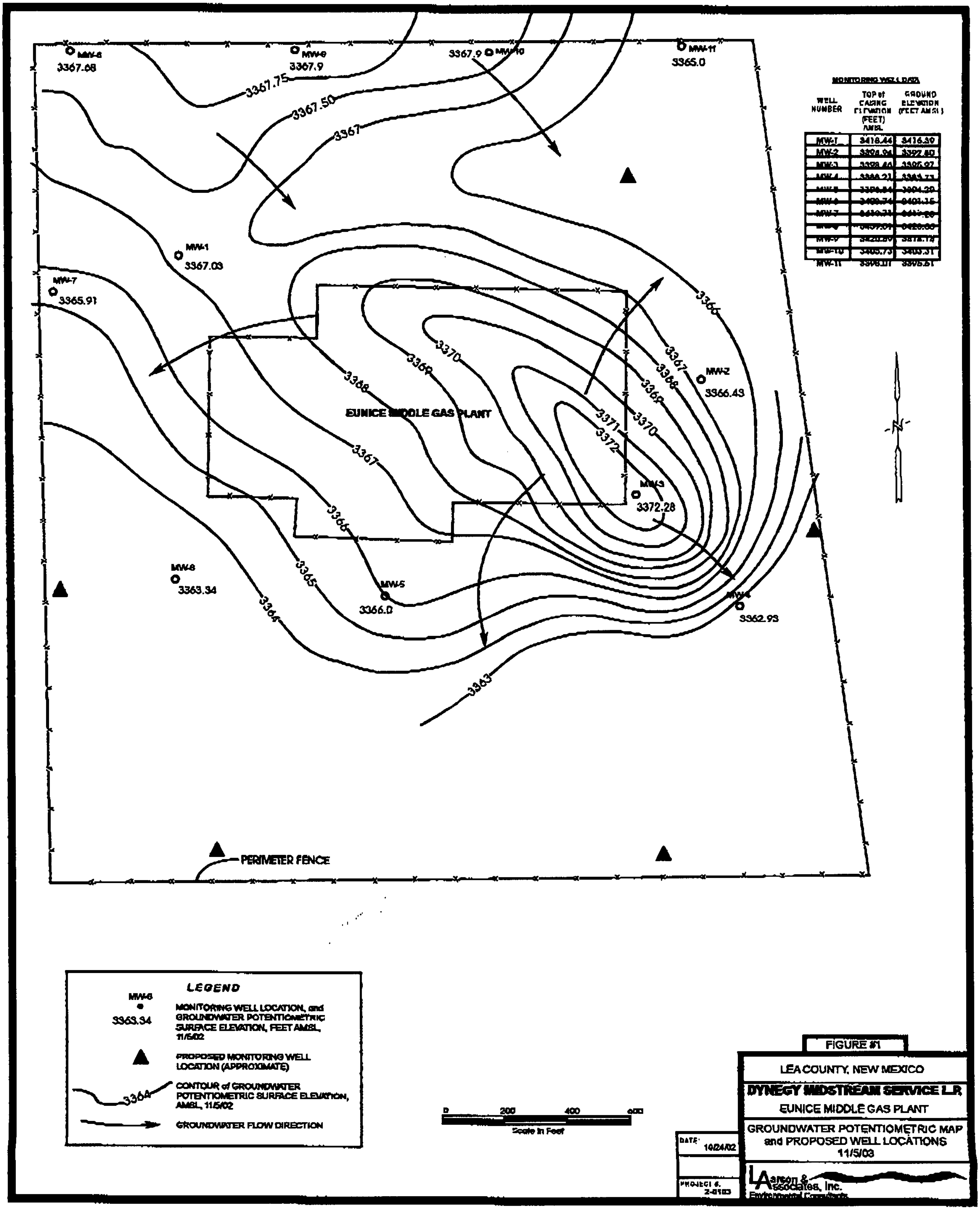
Dynegy Midstream Services, L.P. (Dynegy) has retained Larson and Associates, Inc. (LA) to prepare a work plan for continuing the groundwater investigation at the Eunice Gas Plant (Site), located in Unit Letter B (NW/4, NE/4), Section 3, Township 22 South, Range 37 East, Lea County, New Mexico. Dynegy proposes to install five (5) additional monitoring wells to satisfy a request by the New Mexico Oil Conservation Division (NMOCD) dated March 6, 2003. The five (5) additional monitoring wells will be installed at approximate locations shown on Figure 1 using procedures presented to the NMOCD in a previous report for the Site dated February 11, 2003. Groundwater samples will be collected from the new wells, as well as the existing monitoring wells for analysis of benzene, toluene, ethylbenzene, xylene (collectively referred to as BTEX), New Mexico Water Quality Control Commission (NMWQCC) metals (filtered), anions, cations and total dissolved solids (TDS). The investigation will consider the effects of density gradient. Dynegy requests an extension until July 30, 2003, to complete the investigation and submit the results to the NMOCD? Dynegy will provide the NMOCD notification (48 hours) before beginning the fieldwork. Please call Mr. Cal Wrangham at (915) 688-0542 or myself at (915) 687-0901 if you have questions. I may also be contacted by email at mark@LAenvironmental.com.

Sincerely,
Larson and Associates, Inc.

Mark J. Larson, CPG, CGWP
President

Encl.

cc: Cal Wrangham – Dynegy
James Lingnau - Dynegy
Chris Williams – NMOCD District I



MONITORING WELL DATA

WELL NUMBER	TOP of CASING ELEVATION (FEET) AMSL	GROUND ELEVATION (FEET AMSL)
MW-1	3418.44	3416.39
MW-2	[illegible]	[illegible]
MW-3	[illegible]	[illegible]
MW-4	[illegible]	[illegible]
MW-5	[illegible]	[illegible]
MW-6	[illegible]	[illegible]
MW-7	[illegible]	[illegible]
MW-8	[illegible]	[illegible]
MW-9	[illegible]	[illegible]
MW-10	[illegible]	[illegible]
MW-11	[illegible]	[illegible]

P. 01

TRANSACTION REPORT

MAY-12-2003 MON 01:22 PM

FOR:

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DATE	START	SENDER	RX TIME	PAGES	TYPE	NOTE	M#	DP
MAY-12	01:21 PM	915 687 0456	36"	3	RECEIVE	OK		

Price, Wayne

From: Price, Wayne
Sent: Thursday, March 06, 2003 3:48 PM
To: 'cwwr@dynegy.com'
Cc: Mark Larson (E-mail)
Subject: Dynegy Eunice Middle Gas Plant GW-005

Contacts: Cal Wrangham

Dear Mr. Wrangham:

The New Mexico Oil Conservation Division (OCD) is in receipt of the February 11, 2003 Subsurface Investigation submitted by Larson & Associates Inc on behalf of Dynegy Midstream Services, L.P. After reviewing the plan it appears that additional monitor wells are needed east,south and west of the plant. Please proceed with installing wells in these areas. Please properly locate, install, construct, develop, purge, sample and analyze pursuant to previously approved OCD request and EPA methods. Provide the results along with another complete round of sampling on all of the wells by May 15, 2003. Also, OCD request that Dynegy take into consideration density gradient effects of any contamination.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Larson & Associates, Inc.
Environmental Consultants

OIL CONSERVATION DIV.
02 FEB 19 PM 2:43

RECEIVED
FEB 19 2002
Environmental Bureau
Oil Conservation Division

February 15, 20002

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

Re: Storm Water Retention Berm Installation, Dynegy Midstream Services, L.P., Eunice Gas Plant (GW-005), Unit Letter C, Section 3, Township 22 South, Range 37 East, Lea County, New Mexico

Dear Mr. Price:
This letter is submitted on behalf of Dynegy Midstream Services, L.P. (Dynegy) to document that a storm water retention berm has been installed at the Eunice Gas Plant (Site). The berm was installed along the south side of the Site as a condition for renewal of the groundwater discharge plan (GW-005). The storm water retention berm was proposed to the New Mexico Oil Conservation Division (NMOCD) in response to Item 15 (Submit a storm water run-off plan for OCD by July 31, 2001 (Section 4.0) in a letter to Dynegy dated April 6, 2001. The letter specified conditions for approval of the groundwater discharge plan renewal. A response was submitted to the NMOCD on July 27, 2001. Appendix A presents photographs of the storm water retention berm.

Please contact Mr. Cal Wrangham at (915) 688-0555 or myself at (915) 687-0901 if you have questions.
Sincerely
Larson and Associates, Inc.

Mark J. Larson, CGP, CGWP
President

Encl.

cc: Cal Wrangham – Dynegy, Midland, Texas
Chris Williams – NMOCD, Hobbs District

APPENDIX A

Photographs

Dynegy Midstream Services, L. P., Eunice Gas Plant
Storm Water Retention Berm Installation Photographs

1. Storm Water Retention Berm – Southwest Corner of Facility

2. Storm Water Retention Berm – Southwest Corner of Facility

3. Storm Water Retention Berm – Southwest Corner of Facility

4. Storm Water Retention Berm – South of Facility

5. Storm Water Retention Berm – Southeast Corner of Facility

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

December 12, 2000

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

GAVE APPROVAL VIA TELEPHONE 12/19/00 Wayne Price

RE: Discharge Plan GW-005

Dear Wayne:

Dynegy Midstream Services, L. P. has received your letter dated November 28, 2000 in reference to an investigation plan near the Eunice Plant where wastewater was discharged. Your letter requested the plan be submitted by December 15, 2000. Dynegy requests this date be moved to December 31, 2000 to allow us additional time to complete a plan.

Please call with any questions or comments. (915) 688-0542.

Sincerely,

Cal Wrangham

Cal Wrangham
Permian Basin ES&H Advisor

Cc: Chris Williams- OCD Hobbs

Price, Wayne

From: Price, Wayne
Sent: Monday, March 18, 2002 1:52 PM
To: 'Mark Larson'; Price, Wayne
Cc: cwwr@dynegy.com
Subject: RE: Request for Extention, Discharge Plan GW-

APPROVED with the following conditions:

1. Monitor Wells be constructed and developed per OCD previously approved methods.

2. Notify the OCD Santa Fe office and the OCD District office at least 72 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.

Please be advised that NMOCD approval of this plan does not relieve Dynegy 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 Dynegy of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Mark Larson [mailto:mark@laenvironmental.com]
Sent: Monday, March 18, 2002 12:48 PM
To: Price, Wayne
Cc: cwwr@dynegy.com
Subject: Re: Request for Extention, Discharge Plan GW-005

Dear Mr. Price:
Dynegy has given Larson and Associates, Inc. authorization to proceed with the investigation at the Dynegy - Eunice Gas Plant. Your December 26, 2001 correspondence to Dynegy stated a reporting date of April 15, 2002. Field work is currently scheduled for the last week in March or first week in April 2002. An extension is requested until May 30, 2002 for submittal of the report.

Larson & Associates, Inc.
Environmental Consultants

OIL CONSERVATION DIV.
01 AUG 20 PM 3:31

August 14, 2001

VIA FACSIMILE: (505) 476-3462

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

Re: Addendum to Groundwater Discharge Plan Renewal, Dynegy Midstream Services, L.P., Eunice Gas Plant (GW-005), NW/4, NE/4, Section 3, Township 22 South, Range 37 East, Lea County, New Mexico

Dear Mr. Price:
This letter is an addendum to a letter prepared by Larson & Associates, Inc. (LA), on behalf of Dynegy Midstream Services, L.P. (Dynegy), responding to items identified by the New Mexico Oil Conservation Division (NMOCD) during its inspection of the Eunice Gas Plant (Facility) on November 21, 2000. The inspection was performed in conjunction with renewal of the Facility's groundwater discharge plan (GW–005). The Facility is located in the northwest quarter (NW/4) of the northeast quarter (NE/4), Section 3, Township 22 South, Range 37 East, Lea County, New Mexico.

On April 6, 2001, the NMOCD issued Dynegy a letter specifying conditions for approval of the groundwater discharge plan renewal. LA was requested to prepare responses to Item 14 C and Item 15 for submittal to the NMOCD by July 31, 2001. Item 14B was accidentally missed, and a response to this item follows. Item 14B reads:

> Item 14 B The following process areas were notede to have discharges to the surface:
> 1. Pipeline pump area (see pic#2 in inspection report).
> 2. Engine # 13A (see pic#3 in inspection report).
> 3. Engine Room # 20 (see pic#4 in inspection report).
> 4. Class II SWD disposal well area filter screen drain sump (see pic#5 in inspection report).
>
> Dynegy shall submit an action plan for OCD approval by July 31, 2001 addressing the above deficiencies.

1.0 ACTION PLAN

1.1 Introduction

The NMOCD identified four areas that showed staining likely from spills or drips near the pipeline pump, Engine #13, Engine Room # 20 and Class II SWD well. (pictures # 2 through # 5).

1.2 Proposed Cleanup Plan

Dynegy proposes to treat the affected areas by adding amendments to the soil to promote biological degradation of hydrocarbons that may be present. A nitrogen-based fertilizer and organic mulch (i.e., manure and hay) will be mixed into the soil to stimulate microbes to metabolize the organic compounds. The soil will be periodically tilled and watered. Soil samples will be collected and analyzed for TPH to assess remediation progress. Dynegy will submit a summary report to the NMOCD following completion of the project.

Please contact Mr. Cal Wrangham at (915) 688-0555 or myself at (915) 687-0901 if you have questions.

Sincerely

Larson and Associates, Inc.

Mark J. Larson, CGP, CGWP
President

Encl.

cc: Cal Wrangham – Dynegy, Midland, Texas
James Lingnau – Dynegy, Eunice, New Mexico
Chris Williams – NMOCD, District 1, Hobbs, New Mexico

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Carol Leach
Acting Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

January 30, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 5357 7294

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, Texas 79705

RE: Discharge Plan GW-005
Dynegy Midstream Services, L.P.
Eunice-Middle Gas Plant
Lea County, New Mexico

Dear Mr. Wrangham:

The New Mexico Oil Conservation Division (OCD) is in receipt of your response letter dated January 07, 2002 concerning OCD's request that Dynegy modify the current discharge plan by installing a groundwater and vadose zone monitoring system pursuant to NMAC 20.6.2.3107.

Due to past plant operations, in which wastewater fluids have been documented to have been discharged to the ground and OCD's experience in this matter at other nearby facilities indicates there is a high probability that ground water may have been impacted. Therefore, your are hereby required to modify the current discharge plan as requested.

If you have any questions please do not hesitate to contact me at 505-476-3487 or E-mail WPRICE@state.nm.us.

Sincerely,

Wayne Price- Engineer

cc: OCD Hobbs Office

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WP
GW-605

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION
1220 SO. ST. FRANCIS
SANTA FE, NM 87505

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

DYNEGY

January 7, 2002

VIA CERTIFIED MAIL

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

Re: Response to Report of Investigation for Alleged Chromium Impact, Dynegy Midstream Services, L.P., Eunice Middle Gas Plant, NE/4, NE/4, Section 3, Township 22 South, Range 37 East, Lea County, New Mexico, April 26, 2001

Dear Mr. Price:
This letter is written in response to your correspondence dated December 26, 2001, requesting additional investigation at he Dynegy Midstream Services, L.P., Eunice Gas Plant. In November 2000 the Oil Conservation Division (OCD) requested Dynegy to prepare a work plan to address a citizen complaint submitted to the OCD alleging chromium impact to soil in an area east of Dynegy's Eunice Gas Plant where cooling tower water was once discharged. A work plan was submitted on December 18, 2000, and Larson and Associates, Inc. (LA) was requested to perform the investigation on April 4, 2001. Soil samples were collected at five (5) locations and analyzed for chromium. The laboratory reported a maximum chromium concentration from the former discharge area of 14.31 milligrams per kilogram (mg/kg), and background concentration of 34.84 mg/kg. The chromium levels were well below the soil screening level (SSL) of 100,000 mg/kg (chromium III) and 230 mg/kg (chromium VI) established for residential soils by the New Mexico Environment Department (NMED). A contaminant is not a concern if the concentration is below the SSL.

On December 26, 2001, the OCD issued a letter requiring Dynegy to install a groundwater and vadose zone monitoring system, including a groundwater monitoring well in the area where the plant wastewater was discharged, a monitoring well up gradient to the plant, and a monitoring well down gradient to the plant. No justification is provided for the additional investigation, and it is Dynegy's position that the investigations are not warranted since chromium levels reported in soil are well below the SSL. Dynegy requests another evaluation of the report, and justification for additional investigation. Please call me at (915) 688-0542 if you have questions.

Sincerely,

Cal Wrangham
Region Advisor

cc: Roger Anderson

Price, Wayne

[redacted]

From: LARSONANDASSOCIATES[SMTP:LARSONANDASSOCIATES@PRODIGY.NE

Sent: Tuesday, April 03, 2001 4:29 PM

To: Price, Wayne

Subject: Re: Dynegy Eunice Middle Plant Possible chrome contamination

Wayne:

Per our telephone conversation on March 28, 2001, an extension was requested and granted until April 30, 2001. I will be at the plant tomorrow (April 4, 2001) to collect the samples, and anticipate receiving result shortly. I will call you with a verbal update when the data is received.

Mark

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

From: Price, Wayne <WPrice@state.nm.us>

To: <larsonandassociates@prodigy.net>

Sent: Tuesday, April 03, 2001 12:26 PM

Subject: Dynegy Eunice Middle Plant Possible chrome contamination

> Mark what is the status of this project!

Price, Wayne

From: Cal.Wrangham@dynegy.com[SMTP:Cal.Wrangham@dynegy.com]
Sent: Wednesday, April 04, 2001 8:35 AM
To: Price, Wayne
Subject: storage wells

There are 2 underground storage wells at Eunice (old Warren Plant) S3 T22S R37E.
Mark LPG #1 Closed and plugged 1983
Mark LPG #2 Closed and plugged 1983

I have not heard back from Robert Patterson on the discharge plan issue. I will go down to their office this afternoon.

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

DYNEGY

September 17, 2001

Mr. Wayne Price
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division
1220 S St. Francis
Santa Fe, NM 87505

RE: Discharge Plan GW-005, Approval Condition 9 Notification

Dear Wayne:

Dynegy Midstream Services, L. P. (DMS) is notifying OCD that underground drain testing will begin September 24th at the Eunice Plant. This notification is required as part of condition 9 in the approval conditions. DMS will demonstrate line integrity by pressure testing the lines utilizing compressed air.

Please call with any questions or comments. (915) 688-0542.

Sincerely,

Cal Wrangham
Permian Basin ES&H Advisor

Cc: Chris Williams- OCD Hobbs

A TRASMITTAL FROM THE OFFICE OF:

LEO V. Sims II
814 W. Marland
HOBBS NM 88240
(505) 393-3024

TO: Rodger Anderson

DATE: 8-20-01

DOCUMENTS ENCLOSED: Dynegy mid Plant Envir, NM
Project Location is on the Paper due with G.P.S.

2 *PAGES INCLUDING COVER SHEET*

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR

ATTN:

FAX TO:

Receiving Date: 09/13/00
Reporting Date: 09/19/00
Project Number:
Project Name: LEA COUNTY
Project Location: 32, 25, 30.44/103, 08, 38.88

Sampling Date: 09/13/00
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: AH

RCRA METALS

LAB NUMBER	SAMPLE ID	Arsenic As ppm	Silver Ag ppm	Barium Ba ppm	Cadmium Cd ppm	Chromium Cr ppm	Lead Pb ppm	Mercury Hg ppm	Selenium Se ppm
ANALYSIS DATE:		09/18/00	09/18/00	09/18/00	09/18/00	09/18/00	09/18/00	09/19/00	09/19/00
H5171-1	9913008LV	4.65	16.70	63.45	4.56	53.15	61.60	0.585	1.22
Quality Control		0.053	4.884	23.70	1.028	5.298	4.636	0.0089	0.174
True Value QC		0.050	5.000	25.00	1.000	5.000	5.000	0.0100	0.200
% Recovery		106	97.7	94.8	103	106	92.7	89.0	87.0
Relative Percent Difference		0.6	0.1	1.4	0.7	0.5	0.2	1.1	4.0

METHODS: EPA 600/4-79-020	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2
METHODS: SW-846	7060A	7760A	7080A	7130	7190	7420	7470A	7740

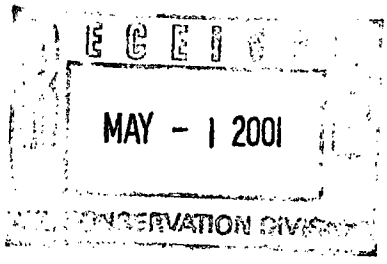
Chemist

09/19/2000
Date

H5171M.XLS

Larson & Associates, Inc.
Environmental Consultants

April 26, 2001



VIA FACSIMILE: (505) 476-3462

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

Re: Report of Investigation for Alleged Chromium Impact, Dynegy Midstream Services, L.P., Eunice Middle Gas Plant, NE/4, NE/4, Section 3, Township 22 South, Range 37 East, Lea County, New Mexico

Dear Mr. Price:
Dynegy Midstream Services, L.P. (Dynegy) has retained Larson & Associates, Inc. (LA) to investigate potential impacts to soil by chromium at a former discharge area located east of Dynegy's Eunice Middle Gas Plant (Site), located near Eunice, New Mexico. The legal description for the Site is the northeast quarter (NE/4) of the northeast quarter (NE/4), Section 3, Township 22 South, Range 37 East, Lea County, New Mexico. Figure 1 presents a Site location and topographic map.

Background
In November 2000 the New Mexico Oil Conservation Division (NMOCD) received a public complaint alleging that chromium was present at possible hazardous levels in soil east of the Site where water from the cooling tower was discharged on the ground over a short interval of time approximately thirty years ago. Dynegy employees removed piping previously associated with the discharge area. Figure 2 presents a Site drawing showing the discharge area measuring approximately 50 x 50 feet. On November 28, 2000, the NMOCD submitted a letter to Dynegy requesting a work plan to address the complaint. A work plan, prepared by LA, was submitted to the NMOCD by Dynegy on December 18, 2000, and approved by the NMOCD on February 7, 2001. The work plan proposed collecting soil samples from 0 to 1 foot below ground surface (BGS) and 3 to 4 feet BGS from four (4) hand-auger borings installed in the discharge area, and a background location.

Investigation and Findings
Fieldwork was performed on April 4, 2001, and soil samples were collected from 4 borings (HA-1 through HA-4) installed in the discharge area using a stainless steel hand auger. The borings terminated between 1 and 2 feet BGS due to caliche. Soil samples were collected from 0 to 1 feet BGS, and 1 to 2 feet BGS. Samples were also collected from a background location (HA–5) approximately 280 feet north of the discharge area. The soil samples were collected in clean glass sample containers, labeled, chilled in an ice chest, delivered under chain-of-custody control to Environmental Lab of Texas, Inc., and analyzed for total chromium. The laboratory analyses are summarized on Table 1. Appendix A presents the laboratory report. Figure 2 presents the hand-auger boring locations.

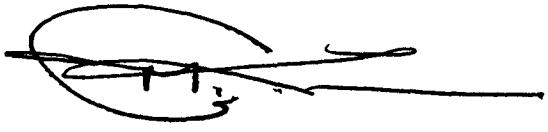
The hand auger was thoroughly washed between sample events using potable water and laboratory-grade detergent, rinsed with distilled water, rinsed with hexane, and air-dried.

Referring to Table 1, samples approximately 0 to 1 foot BGS) reported total chromium concentrations from 4.166 milligrams per kilogram (mg/kg) in the sample from location HA-4 to 14.31 mg/kg in the sample from location HA-2. Total chromium concentrations in the samples from approximately 1 to 2 feet BGS ranged from 4.029 mg/kg in the sample from location HA-1 to 4.709 mg/kg in the sample from location HA-3. The total chromium concentrations in background samples were 16.23 mg/kg (0 to 1 foot BGS) and 34.84 mg/kg (1 to 2 feet BGS). A sample from 1 to 2 feet BGS was not possible at location HA-2 due to caliche at approximately 1 foot BGS.

In December 2000, the New Mexico Environment Department (NMED), Hazardous Waste Bureau and Groundwater Quality Bureau issued generic soil screening levels (SSLs) for residential and non-residential land uses for chemicals commonly found at contaminated sites, including chromium III and chromium VI. The generic SSLs are based on conservative default values for various exposure pathways and receptors. The generic SSLs do not represent cleanup levels but concentrations below that are not generally of concern. The generic SSLs for chromium III and chromium VI for residential soil are 100,000 mg/kg and 230 mg/kg, respectively. The generic SSLs for chromium III and chromium VI for industrial soils are 100,000 mg/kg and 660 mg/kg, respectively. The maximum concentration of total chromium reported in the soil samples from the discharge area was 14.31 mg/kg in the sample from HA-2, 0 to 1 foot BGS. The maximum total chromium concentration observed in the background soil was 34.84 mg/kg in the sample from 1 to 2 feet BGS. The total chromium concentrations reported in Site soil are well below the generic SSLs for residential and industrial soil, and would not require further action.

Dynegy feels that it has satisfied the complaint, and requests closure regarding this issue. Please call Mr. Cal Wrangham at (915) 688-0555 or myself at (915) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.



Mark J. Larson, CPG, CGWP
President

Encl.

cc: Cal Wrangham – Dynegy
Ronnie Baucom – Dynegy
Chris Williams – NMOCD District I

TABLES

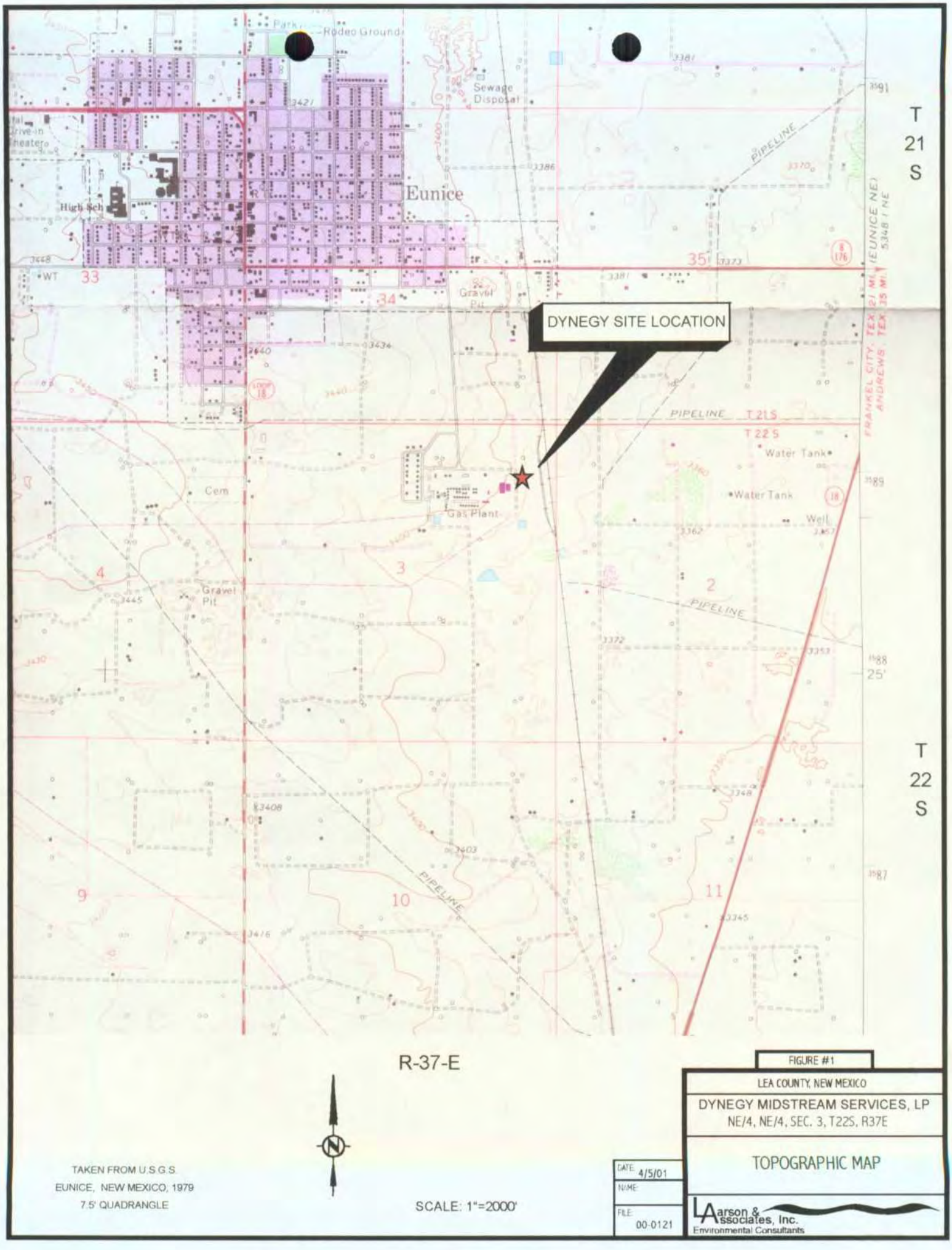
Table 1: **Summary of Total Chromium Analyses of Soil Samples**
Dynegy Midstream Services L.P., Eunice Middle Gas Plant
NE/4, NE/4, Section 3, Township 22 South, Range 37 East
Lea County, New Mexico

Sample Date	Boring Number	Sample Depth (Feet BGS)	Chromium (mg/kg)
04-April-01	HA - 1	0 - 1	7.244
04-April-01	HA - 1	1 - 2	4.029
04-April-01	HA - 2	0 - 1	14.31
04-April-01	HA - 3	0 - 1	4.727
04-April-01	HA - 3	1 - 2	4.709
04-April-01	HA - 4	0 - 1	4.166
04-April-01	HA - 4	1 - 2	4.272
04-April-01	HA - 5	0 - 1	16.23
04-April-01	HA - 5	1 - 2	34.84

Notes: Analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas

1. BGS: Depth in feet below ground surface
2. mg/kg: Milligrams per kilogram

FIGURES



TAKEN FROM U.S.G.S.
EUNICE, NEW MEXICO, 1979
7.5' QUADRANGLE

SCALE: 1"=2000'

FIGURE #1

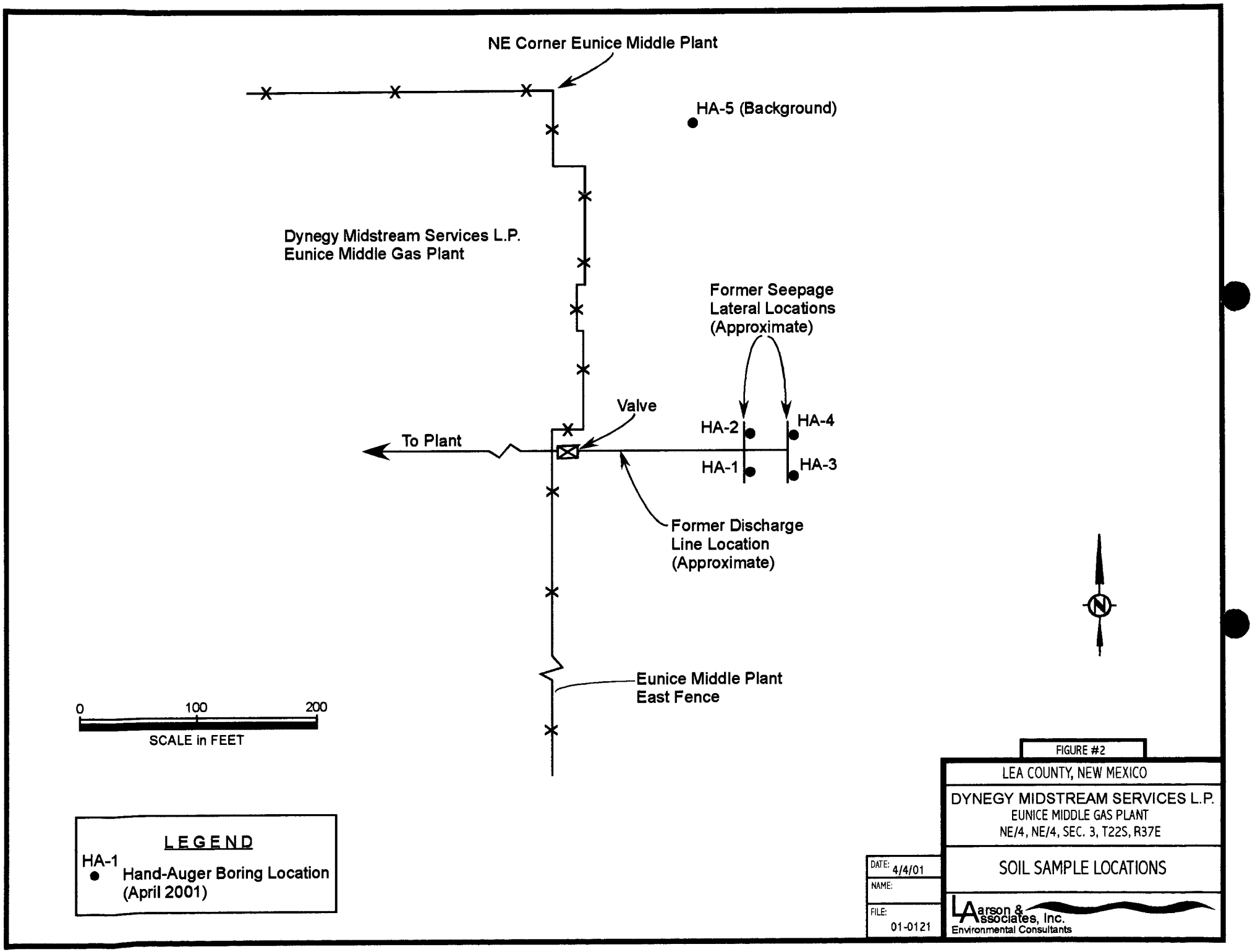
LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES, LP
NE/4, NE/4, SEC. 3, T22S, R37E

TOPOGRAPHIC MAP

DATE: 4/5/01
NAME:
FILE: 00-0121

Larson & Associates, Inc.
Environmental Consultants


NE Corner Eunice Middle Plant
HA-5 (Background)
Dynegy Midstream Services L.P.
Eunice Middle Gas Plant
Former Seepage
Lateral Locations
(Approximate)
Valve
To Plant
HA-2
HA-4
HA-1
HA-3
Former Discharge
Line Location
(Approximate)
Eunice Middle Plant
East Fence
N
0
100
200
SCALE in FEET
LEGEND
HA-1
Hand-Auger Boring Location
(April 2001)
FIGURE #2
LEA COUNTY, NEW MEXICO
DYNEGY MIDSTREAM SERVICES L.P.
EUNICE MIDDLE GAS PLANT
NE/4, NE/4, SEC. 3, T22S, R37E
SOIL SAMPLE LOCATIONS
DATE: 4/4/01
NAME:
FILE: 01-0121
Larson & Associates, Inc.
Environmental Consultants

APPENDIX A

Environmental Lab of Texas, Inc. Report

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

LARSON AND ASSOCIATES, INC.
ATTN: MR. MARK LARSON
P.O. BOX 50685
MIDLAND, TEXAS 79710-0685
FAX: 687-0456

Sample Type: Soil
Sample Condition: Intact/ Iced/ 2.0 deg. C
Project #: 00-0121
Project Location: Dynegy Midstream Services/ Eunice Middle Plant
Project Location: Lea County, N.M.

Sampling Date: 04/04/01
Receiving Date: 04/05/01
Analysis Date: 04/09/01

ELT#	FIELD CODE	Total Chromium mg/kg
38795	HA-1, 0-1'	7.244
38796	HA-1, 1-2'	4.029
38797	HA-2, 0-1'	14.31
38798	HA-3, 0-1'	4.727
38799	HA-3, 1-2'	4.709
38800	HA-4, 0-1'	4.166
38801	HA-4, 1-2'	4.272
38802	HA-5, 0-1'	16.23
38803	HA-5, 1-2'	34.84
	% IA	102
	% EA	93
	BLANK	<0.100

Methods: SW 846-3050, 6010B

Raland K. Tuttle

4-10-01
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763
Phone: 915-563-1800
Fax: 915-563-1713

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Mark Larson
Company Name: Larson and Associates, Inc.
Company Address: P.O. Box 50685
City/State/Zip: Midland, Texas 79710-0685
Telephone No: (915) 687-0901 Fax No: (915) 687-0456
Sampler Signature:

Project Name: Dynegy Midstream Services Eunice Middle Plant
Project #: 00-0121
Project Loc: Lea County, NM
PO #:

528-2178

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative: Ice	HNO3	HCl	NaOH	H2SO4	None	Other (Specify)	Matrix: Water	Sludge	Soil	Other (specify):	Analyze For: TDS / CL / SAR / EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030	RUSH TAT (Pre-Schedule)	Standard TAT
38795	HA-1, 0-1'	4/4/01	1105	1	✓								✓						✓	(Cr)					
38796	HA-1, 1-2'		1115	1	✓								✓						✓						
38797	HA-2, 0-1'		1125	1	✓								✓						✓						
38798	HA-3, 0-1'		1130	1	✓								✓						✓						
38799	HA-3, 1-2'		1135	1	✓								✓						✓						
38800	HA-4, 0-1'		1140	1	✓								✓						✓						
38801	HA-4, 1-2'		1145	1	✓								✓						✓						
38802	HA-5, 0-1'		1150	1	✓								✓						✓						
38803	HA-5, 1-2'		1155	1	✓								✓						✓						

Special Instructions:

Sample Containers Intact? (Y) N
Temperature Upon Receipt:
Laboratory Comments: Rec 2.0°C

Relinquished by:	Date	Time	Received by:	Date	Time
	4/5/01	0700			
Relinquished by:	Date	Time	Received by ELOT:	Date	Time
			Jamie McMurry	4-5-01	0800

Price, Wayne

From: Price, Wayne

Sent: Wednesday, February 07, 2001 9:56 AM

To: 'cwwr@dynegy.com'

Cc: 'arsonandassociates@prodigy.net'

Subject: GW-005 Soil Investigation plan area east of plant

Dear Mr. Wrangham:

The NMOCD is in receipt of your letter dated 12/18/2000 and investigation work plan dated 12/12/2000 for the Eunice Gas Plant area located east of the plant where wastewater was discharged. The NMOCD hereby approves of the plan and requires Dynegy to submit the findings of the investigation by March 30, 2001.

Please be advised that NMOCD approval of this plan does not relieve Dynegy Midstream Services, LP of responsibility should their activities 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 Dynegy Midstream Services, LP of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Price, Wayne

From: Price, Wayne

Sent: Wednesday, February 07, 2001 9:56 AM

To: 'cwwr@dynegy.com'

Cc: 'arsonandassociates@prodigy.net'

Subject: GW-005 Soil Investigation plan area east of plant

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Please be advised that NMOCD approval of this plan does not relieve Dynegy Midstream Services, LP of responsibility should their activities 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 Dynegy Midstream Services, LP of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

December 18, 2000

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

RE: Discharge Plan GW-005

Dear Wayne:

Dynegy Midstream Services, L. P. (DMS) has received your letter dated November 28, 2000 in reference to investigating the possibility of contaminated soil in an area near the Eunice Plant where wastewater was discharged. DMS has hired Mr. Mark Larson of Larson & Associates, Inc. to facilitate this investigation. Please find the investigation plan attached for your approval..

Please call with any questions or comments. (915) 688-0542.

Sincerely,

Cal Wrangham
Permian Basin ES&H Advisor

Cc: Chris Williams- OCD Hobbs

Larson & Associates, Inc.
Environmental Consultants

December 12, 2000

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive, Suite 3300
Midland, Texas 79705

Re: Proposed Investigation Plan for Alleged Chromium Impact, Dynegy Midstream Services, L.P., Eunice Middle Gas Plant, Lea County, New Mexico

Dear Mr. Wrangham:

Per your request, Larson & Associates, Inc. (LA) has prepared this plan to investigate a discharge area located on the east side of the Dynegy Midstream Services, L.P. (Dynegy), Middle Eunice Gas Plant (Site), located near Eunice, New Mexico. On November 28, 2000, Dynegy received a letter from the New Mexico Oil Conservation Division (NMOCD) requesting a plan to investigate an area of the Site where a complaint alleged that chromium was present in soil possible hazardous levels. The area is the location of an area where wastewater from plant operations was discharged for a short period of time approximately thirty years ago. Dynegy recently removed piping from the area measuring approximately 50 x 50 feet.

Soil samples will be collected from four locations in the discharge area using a stainless steel hand auger. The samples will be collected from approximately 0 to 1 and 3 to 4 feet below ground surface (BGS). Samples will also be collected at 0 to 1 and 3 to 4 feet BGS from an undisturbed area for background purposes. The samples will be placed in clean glass sample containers, labeled, chilled in an ice chest, and submitted under chain-of-custody control to Trace Analysis, Inc., located in Lubbock, Texas. The samples will be analyzed for total chromium in accordance with EPA approved methods.

A report will be submitted to Dynegy following receipt of the laboratory analyses. Please call me at (915) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.

Mark J. Larson, CPG, CGWP
President

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

November 28, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 4829

Mr. Cal Wrangham
Dynegy Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, Texas 79705

RE: Discharge Plan Renewal GW-005
Dynegy Midstream Services, L.P.
Eunice Middle Gas Plant
Lea County, New Mexico

Dear Mr. Wrangham:

The New Mexico Oil Conservation Division (OCD) recently received a complaint that past plant operations discharged plant wastewater to the ground in an area located east of the plant between the plant east side fence and the railroad tracks. The complainant was concerned that chrome was present in the soil at possible hazardous levels. On November 21, 2000 the OCD conducted a discharge plan renewal inspection of the Eunice Middle Gas Plant presently covered under discharge plan GW-005. The inspection revealed that Dynegy has recently removed portions of the old piping system in the area of question.

The OCD is hereby requesting that Dynegy Midstream Services, L.P. submit an investigation plan for the area where the plant wastewater was discharged. Please submit the plan for OCD approval by December 15, 2000.

If you have any questions please call me at 505-827-7155.

Sincerely;

Wayne Price-Pet. Engr. Spec.

Cc: OCD Hobbs Office

Attachments-

UNITED STATES POSTAL SERVICE

MIDLAND/ODESSA TX 797

MIDLAND/ODESSA TX
PM
01 DEC
2000

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

wp
GW-005

Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 182161 ACCOUNT: 56689
LEGAL NO: 68436 P.O.#: 00199000278
183 LINES 1 time(s) at $ 80.67
AFFIDAVITS: 5.25
TAX: 5.37
TOTAL: 91.29

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, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-005) - Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Eunice Gas Plant located in the NE/4 of Section 3, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 600 barrels per day of waste water will be disposed of in an OCD permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 90 feet with an estimated total dissolved solids concentration ranging from 400 to 2000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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 Conservation Commission at Santa Fe, New Mexico, this 15th day of November, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY,
Director

Legal #68436
Pub. November 22, 2000

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, B Reynes being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #68436 a copy of which is hereto attached was published in said newspaper 1 day(s) between 11/22/2000 and 11/22/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 22 day of November, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Reynes
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 21 day of November A.D., 2000

Notary Janet L. Montoya

Commission Expires 12/30/03

NOV 27 2000

OFFICIAL SEAL
Janet L. Montoya
NOTARY PUBLIC - STATE OF NEW MEXICO
MY COMMISSION EXPIRES 12/30/03

Approved JW

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 15th Day of November, 2000.

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION
LORI WROTENBERY,
Director

SEAL

Published in the Lovington Daily Leader November 21, 2000.

Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertisting 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

Legal Notice

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, for one (1) day, beginning with the issue of November 21, 2000 and ending with the issue of November 21, 2000.

And that the cost of publishing said notice is the sum of $ 55.00 which sum has been (Paid) as Court Costs.

Joyce Clemens

Subscribed and sworn to before me this 21st day of November 2000

Debbie Schilling

Debbie Schilling
Notary Public, Lea County, New Mexico
My Commission Expires June 22, 2002

NOTICE OF PUBLICATION

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

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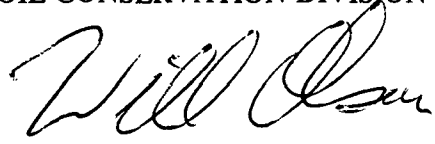
GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 15 th. Day of November, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



SEAL

for LORI WROTENBERY, Director

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/12/00,

or cash received on ______________ in the amount of $ 50.00

from DYNEGY MIDSTREAM SERVICES

for EUNICE GAS PLANT (MIDDLE) GW-005.

(Facility Name) (DP No.)

Submitted by: WAYNE PRICE Date: 11/15/00

Submitted to ASD by: [signature] Date: 11/15/00

Received in ASD by: ______________ Date: ______

Filing Fee ✓ New Facility ____ Renewal ____

Modification ____ Other ______________

(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. ARTIFICIAL WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW.

DYNEGY MIDSTREAM SERVICES,
LIMITED PARTNERSHIP
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(713) 507-3988

BANK ONE, NA
CHICAGO, IL 60670

PAY Fifty and NO/100 Dollars

CHECK NO.	CHECK DATE	PAY EXACTLY
[redacted]	10 / 12 / 00	$*********50.00

Void After 90 Days

TO THE ORDER OF
Water Quality Management Fund
c/o Oil Conservation Division
2040 South Pacheco
Santa Fe NM 87508

DYNEGY MIDSTREAM SERVICES,

[signature]

VICE PRESIDENT - TREASURER
AUTHORIZED SIGNATURE

[redacted]

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
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Eunice Gas Processing Plant
2. Operator: Dynegy Midstream Services, L. P.

   Address: PO Box 1909 Eunice, NM 88231

   Contact Person: Cal Wrangham Phone: (915) 688-0542

3. Location: NE /4 /4 Section 3 Township 22 South Range 37 East
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site. **See in attached Discharge Plan**
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. **See in attached Discharge Plan**
6. Attach a description of all materials stored or used at the facility. **See in attached Discharge Plan**
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. **See in attached Discharge Plan**
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **See in attached Discharge Plan**
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **See in attached Discharge Plan**
10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See in attached Discharge Plan**
11. Attach a contingency plan for reporting and clean-up of spills or releases. **See in attached Discharge Plan**
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. **See in attached Discharge Plan**
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See in attached Discharge Plan**

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

Name: Cal Wrangham Title: Permian Basin Region ES&H Advisor

Signature: Cal Wrangham Date: 11/7/2000

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

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

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 16, 1998

CERTIFIED MAIL
RECEIPT NUMBER Z-357-869-910

Mr. Bill E. Hobbs
Plant Superintendent
Warren Petroleum Company, Limited Partnership
P. O. Box 1840
Lovington, New Mexico 88260

RE: EUNICE GAS PLANT, GW-005, LEA COUNTY, NEW MEXICO

Dear Mr. Hobbs:

OCD is in receipt of your letter, dated August 4, 1997, and attached laboratory report for soil samples taken from impacted area south of the plant fence at the above referenced site. Based upon laboratory results of the collected and composited soil samples OCD **approves the closure** of the remediation project and **approves the re-seeding** with native grasses common to the area as indicated in your letter.

Note that OCD approval does not relieve Warren Petroleum Company of liability should Warren Petroleum Company's operations result in contamination of surface waters, ground waters or the environment.

If you have any questions please feel free to call Jack Ford at (505) 827-7156.

Sincerely,.

Roger C. Anderson
Environmental Bureau Chief

cc: Hobbs OCD District Office

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

WARREN PETROLEUM COMPANY,
Limited Partnership
An NGC Company

AUG 0 1 1997

August 4, 1997

Mr. P. W. Sanchez
Petroleum Engineer
Oil Conservation Division

Mr. Wayne Price
Environmental Engineer
Oil Conservation Engineer

RE: Renewal Inspection
Discharge Plan GW-005
Eunice Gas Plant

Dear Sirs:
Warren Petroleum would like to update you on our progress toward compliance with the concerns stated in your response letter, regarding the Eunice Plant's Discharge Plan Renewal Inspection.

As stated in our memo to you dated Oct. 25, 1996, Safety & Environmental Solutions, Inc. conducted a composite sample of the soil in the bio-remediation plot south of the plant fence. The analysis indicated the TPH was 11,100 PPM. The Eunice Plant employees continued to bio-remediate the area, using commercial fertilizers, until July 23, 1997. On that date Warren Petroleum enlisted the services of Mr. Gayle A. Potter of Cardinal Laboratories, Hobbs, NM 393-2326 to conduct a composite sample from the bio area. This sampling was witnessed by Mr. Glen Jenkins; Operations Supervisor-Eunice Plant, and Mr. Cal Wrangham; ES&H Coordinator- NM Asset, 396-4600. The analytical results of this sample are attached indicating the TPH level at 117 mg/Kg. Warren Petroleum would like to finalize this closure by seeding the area with native grasses.

This was the final item to be addressed; the Eunice Plant is in compliance with all the items discussed concerning the renewal inspection.

Thank you for your guidance during this process, and if you have any questions please contact Cal Wrangham or me.

Bill E. Hobbs

Mr. Bill E. Hobbs
Eunice Plant Superintendent
(505) 394-2534

BEH:cww
Cc: Eunice Discharge Plan

New Mexico Asset Office
P. O. Box 1840
Lovington, NM 88260
Tel 505.396.4600
Fax 505.396.2907

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page ___ of

Company Name: Warren Petroleum	BILL TO — PO #:
Project Manager:	Company: same
Address: PO Box 1909	Attn:
City: Eunice State NM Zip: 88231	Address:
Phone #: 505 394-2534	City:
Fax #:	State: Zip:
Project #:	Phone #:
Project Name: Bio-remediation Plot	Fax #:
Project Location:	

LAB I.D. #	Sample I.D.	COMP(C) OR GRAB(G)	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERVATION: ACID:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME
H30760-1						X							7/23	

ANALYSIS REQUEST: 418.1

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

Sampler Relinquished:	Date:	Received By:	Phone Result ☐ Yes ☐ No Additional Fax #:
	Time:		Fax Results: ☐ Yes ☐ No
Relinquished By:	Date: 7-23-97	Received By: (Lab Staff)	REMARKS:
	Time: 2:00 pm		
Delivered By: (Circle One) UPS - Fed Ex - Bus - Other:		Sample Condition: Cool ☒ Yes ☐ No; Intact ☒ Yes ☐ No	CHECKED BY: (Initials)

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
WARREN PETROLEUM
ATTN: CAL WRANGHAM
P.O. BOX 1909
EUNICE, NM 88231
FAX TO:

Receiving Date: 07/23/97
Reporting Date: 07/25/97
Project Number: NOT GIVEN
Project Name: BIO-REMEDIATION PLOT
Project Location: EUNICE, NM

Analysis Date: 07/24/97
Sampling Date: 07/23/97
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)
H3076-1	BIO-REMEDIATION PLOT	117
Quality Control		204
True Value QC		200
% Recovery		102
Relative Percent Difference		2.8

METHOD: EPA 418.1, 3510, 3540, or 3550; Infrared Spectroscopy

Chemist

7/25/97
Date

WARREN PETROLEUM COMPANY,
Limited Partnership
An NGC Company

April 30, 1997

Mr. P. W. Sanchez
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico

MAY - 2 [illegible]

Dear Mr. Sanchez:

Warren Petroleum Company, L.P., Eunice Gas Plant would like to amend the facility DISCHARGE PLAN GW-005, SECTION IX, WASTE MANAGEMENT PLAN. The proposed amendment is to change the disposal method for molecular sieve from plant landfill, to disposal by Waste Management of Southeast New Mexico, 2608 Lovington Highway, Hobbs, New Mexico 88240 at their Hobbs landfill. Molecular sieve disposal is at infrequent time intervals, with up to 35 cubic yards of material, if all three beds are renewed.

Attached is Waste Management's approval for disposal, and the waste profile sheet.

If you have any questions or concerns please contact me at (505) 394-2534, or Mr. Cal Wrangham, New Mexico Asset ES&H Coordinator at (505) 393-2823.

B. S. Hobbs

Mr. Bill Hobbs
Eunice Plant Superintendent

RECEIVED
MAY - 2 1997
Environmental Bureau
Oil Conservation Division

xc: Mr. Wayne Price w/ attachments
State of New Mexico
Oil Conservation Division
PO Box 1980
Hobbs, NM 88240

P.O. Box 1909
Eunice, New Mexico 88231-1909
Tel 505.394.2534
Fax 505.394.2714

Date 4/29/97
Time 15:19:17

WASTE MANAGEMENT DECISION

Location of Original WESTERN REGION LAB

I. Generator and Facility Information

Decision Site Hobbs Landfill
Proposed Management Facility Hobbs Landfill

*** This Decision is APPROVED

Tracking #: 4897596 Priority : MB
Profile # : A01520 Date Received: 04/28/97
Effective Date: 04/29/97
Generator : WARREN PETROLEUM CO
Waste Category Code:
Description : MOLECULAR SIEVE ZEOLITE

II. Decision to Deny Approval for Management of Waste

Reason for Denying Approval

Final Approval _____ Name (print) _____ Date _____

III. Decision to Approve

Approved

a) Approved Management Methods
DIRECT LANDFILL

b) Precaution Conditions or Limitations on Approval

(1) Site Conditions
POTENTIAL "DUSTY" LOAD, NOTIFY OPERATIONS MANAGER.

(2) Contracting Conditions

(3) Site and Contracting Conditions
NO RCRA HAZARDOUS WASTE MAY BE SHIPPED ON THIS PROFILE.
NO FREE LIQUIDS.
THE PROFILE SHEET NUMBER MUST BE PRINTED ON THE SHIPPING PAPERS.
HOBBS LANDFILL RESERVES THE RIGHT TO REJECT ANY SHIPMENT OF WASTE THAT FAILS TO CONFORM WITH PROFILE SHEET INFORMATION/DOCUMENTATION.
CONTACT HOBBS LANDFILL TO SCHEDULE WASTE FOR DISPOSAL AT LEAST 24 HOURS PRIOR TO SHIPPING.
(505) 392-6571

c) Analytical Requirements for Each Load
Visual Inspection

d) Decision Expiration Date 04/29/98

IV. Final Decision

State any Additional Precautions, Conditions, or Limitations

Date 4/29/97
Time 15:19:17

WASTE MANAGEMENT DECISION

Location of Original WESTERN REGION LAB

I. Generator and Facility Information

Decision Site Hobbs Landfill
Proposed Management Facility Hobbs Landfill

*** This Decision is APPROVED

Tracking #: 4897596 Priority : HB
Profile # : A01520 Date Received: 04/28/97
Effective Date: 04/29/97
Generator : WARREN PETROLEUM CO
Waste Category Code:
Description : MOLECULAR SIEVE ZEOLITE

IV. Continuation.....

Final Approval _____ Name (print) RAYMOND RUTKOWSKI Date 04/29/97

16F X

Waste Management, Inc.

Date Printed 04/29/97

GENERATOR'S WASTE PROFILE SHEET

Profile # NOB A01520

(_) Check here if this is a Recertification LOCATION OF ORIGINAL Hobbs Landfill

GENERAL INFORMATION

1. Generator Name: WARREN PETROLEUM CO Generator USEPA ID: NMD008001307
2. Generator Address: 1 MI SE OF EUNICE Billing Address: (_) Same
   PO BOX 1197
   EUNICE NM 88231-1197
3. Technical Contact/Phone: BILL HOBBS 505/394-2534
4. Alternate Contact/Phone: Billing Contact/Phone:

PROPERTIES AND COMPOSITION

5. Process Generating Waste: GAS DEHYDRATION
6. Waste Name: MOLECULAR SIEVE ZEOLITE
7A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (_) No (X)
B. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U):
   State Waste Codes:
8. Physical State @ 70F: A. Solid(X) Liquid(_) Both(_) Gas(_) B. Single Layer (X) Multilayer (_) C. Free liq. range 0 to 0%
9A. pH: Range or Not applicable (X) B. Strong Odor (_);describe
10. Liquid Flash Point: < 73F (_) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (_) N.A. (X) Closed Cup (X) Open Cup (_)
11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

Constituents	Range	Unit Description
ZEOLITE	to 100	%
MSDS ATTACHED	to	
	to	
	to	
	to	
	to	
TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):	100.000000	

12. OTHER: PCBs if yes, concentration _____ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_) Radioactive (_) Benzene if yes, concentration _____ ppm. NESHAP (_) Shock Sensitive (_) Oxidizer (_) Carcinogen (_) Infectious (_) Other
13. If waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.

SHIPPING INFORMATION

14. PACKAGING: Bulk Solid (X) Bulk Liquid (_) Drum (_) Type/Size: ROLLOFF Other
15. ANTICIPATED ANNUAL VOLUME: 35 Units: CUBIC YARDS Shipping Frequency: ONE TIME

SAMPLING INFORMATION

Sample Tracking Number: 6897596

16a. Sample source (drum, lagoon, pond, tank, vat, etc.):
Date Sampled: Sampler's Name/Company:
16b. Generator's Agent Supervising Sampling: 17. (_) No sample required (See instructions.)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification.

Signature CARL WRANGHAM ENV SAF & HEALTH COORD. 4/24/97
Name and Title Date

ZEOCHEM
Chemie Uetikon
and United Catalysts Inc.
Joint Venture

P.O. Box 35940
Louisville, KY 40232 USA
Telephone: 502-634-7600
Telex: 204190, 204239
Fax: 502-634-2133

R-7

Post-it® Fax Note 7671	Date 4-22-97	# of pages ▶ 6
To CAL WRANGHAM	From RONNIE WADE	
Co./Dept. WARREN	Co. WARREN	
Phone # 1-505-393-2823	Phone # 394-2534	
Fax # 1-505-393-4780	Fax # 1-505-394-2714	

MATERIAL SAF

I. PRODUCT

PRODUCT Z3-01, 02, 03, 04, 05; Z4-01, 02, 03, 04, 05; Z5-01, 02; Z10-01, 02, 03, 04, 05, 06

FORMULA $Mx/n[AlO_2)x(SiO_2)y]+wH_2O$

CHEMICAL NAME Synthetic Sodium Potassium or Calcium Aluminosilicate

CHEMICAL FAMILY Molecular Sieve Zeolite

II.(A) INGREDIENTS

COMPONENT	CAS No.	Zeolite Type
Zeolite, NaA	1344-00-9	4A
Zeolite, KA	12736-96-8	3A
Zeolite, CaA	1344-01-0	5A
Zeolite, NaX	1344-00-9	13X
Mg Aluminosilicate	1327-43-1	Clay

II. (B) PRODUCT ANALYSES & EXPOSURE LIMITS

COMPONENT	CAS NO.	%	OSHA/PEL	ACGIH/TLV
Zeolite	See above	75-85	10mg/m^3	10mg/m^3
Mg Aluminosilicate	1327-43-1	23-15	10mg/m^3	10mg/m^3
Quartz	14808-60-7	<.5	0.1mg/m^3	0.1mg/m^3

III. PHYSICAL DATA

MELTING POINT °F >2900

MELTING POINT °C >1600

BULK DENSITY 0.68 g/cc

PERCENT VOLATILES BY WEIGHT <5%

DATE OF ISSUE: January 1, 1986
DATE OF REVISION: March 7, 1994

Bill Al

PRODUCT	Z3-01, 02, 03, 04, 05; Z4-01, 02, 03, 04, 05; Z5-01, 02; Z10-01, 02, 03, 04, 05, 06
APPEARANCE AND ODOR	Product may appear as light tan bead, cake or powder.

IV. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT	Nonflammable	FIREFIGHTING MEDIA	Dry chemical, water spray or foam.

FIRE AND EXPLOSION HAZARD - Negligible fire and explosion hazard when exposed to heat or flame by reaction with incompatible substances.

FIREFIGHTING - Nonflammable solids, liquids or gases: Cool containers that are exposed to flames with water from the side until well after fire is out. For massive fire in enclosed area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or discoloration of the tank due to fire.

V. HEALTH HAZARD DATA

Health hazards may arise from ingestion, inhalation and contact with the skin and eyes. Ingestion may result in damage to throat, esophagus, and/or gastro-intestinal tract. Inhalation may cause burning of the upper respiratory tract and/or temporary or permanent lung damage. Prolonged or repeated contact with the skin, in the absence of proper hygiene, may cause dryness, irritation, and/or dermatitis. Contact with eye tissue may result in irritation, burns or conjunctivitis. This product contains a small amount of crystalline silica which may cause delayed respiratory disease if inhaled over a prolonged period of time. IARC Monographs on the evaluation of the Carcinogenic Risk of Chemicals to Humans (volume 42, 1987) concludes that there is "limited evidence" of the carcinogenicity of crystalline silica to humans. IARC classification 2A.

First Aid (Inhalation) - Remove to fresh air immediately. If breathing has stopped, give artificial respiration. Keep affected person warm and at rest. Get medical attention immediately.

First Aid (Ingestion) - If large amounts have been ingested, give emetics to cause vomiting. Stomach siphon may be applied as well. Milk and fatty acids should be avoided. Get medical attention immediately.

PRODUCT Z3-01, 02, 03, 04, 05; Z4-01, 02, 03, 04, 05; Z5-01, 02; Z10-01, 02, 03, 04, 05, 06

First Aid (Eyes) - Wash affected areas immediately and carefully for 15 to 20 minutes with running water. Get prompt medical attention.

First Aid (Skin) - Wash with soap and water.

NOTE TO PHYSICIAN - This product is a desiccant and generates heat as it absorbs water. The used product can contain material of hazardous nature. Identify that material and treat accordingly.

VI. REACTIVITY DATA

Reactivity - Is stable under normal temperatures and pressures in sealed containers. Hazardous polymerization will not occur. Moisture can cause rise in temperature which may result in burn. Avoid sudden contact with high concentrations of chemicals having high heats of adsorption such as olefins, HCl, etc.

VII. SPILLS OR LEAK PROCEDURES

Notify safety personnel of spills or leaks. Cleanup personnel need protection against inhalation of dusts or fumes. Eye protection is required. Vacuuming or wet methods of cleanup are preferred. Place in appropriate containers for disposal keeping airborne particulate at a minimum.

Disposal Method - In selecting the method of disposal, applicable local, state and federal regulations should be consulted.

VIII. SPECIAL PROTECTION INFORMATION

Respiratory Protection - Provide a NIOSH/MSHA jointly approved respirator in the absence of proper environmental control or where TLV for crystalline silica may be exceeded. Contact your safety equipment supplier for proper mask type.

Ventilation - Provide general and/or local exhaust ventilation to keep exposures below the threshold limit value. Ventilation used must be designed to prevent spots of dust accumulation or recycling of dusts.

Protective Clothing - Wear protective clothing, including gloves, to prevent repeated or prolonged skin contact.

PRODUCT Z3-01, 02, 03, 04, 05; Z4-01, 02, 03, 04, 05; Z5-01, 02; Z10-01, 02, 03, 04, 05, 06

Eye Protection - Chemical splash goggles designed in compliance with OSHA regulations are recommended. Consult your safety equipment supplier.

IX. REGULATORY INFORMATION

The information presented herein is believed to be accurate but is not warranted. Recipients are advised to confirm in advance that the information is current and applicable to meet their circumstances.

This product contains substances which appear on lists of the indicated act or agency.

XX American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substance in the Work Environment

XX California Proposition 65

___ Clean Air Act 40 CFR 61

___ Clean Water Act 40 CFR 116

___ Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) 40 CFR 302

XX International Agency for Research on Cancer (IARC) Monographs on the Evaluation of Carcinogenic Risks to Humans Volumes 1-42

___ NTP Annual Report on Carcinogens

XX Occupational Safety and Health Administration (OSHA) 29 CFR 1910

___ Resource Conservation and Recovery Act (RCRA) 40 CFR 261 Subpart C

___ Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III Section 313 40 CFR 372

XX Toxic Substances Control Act (TSCA) 40 CFR 700

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 24, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-760

Mr. Cal Wrangham
ES&H Coordinator
Warren Petroleum Co. L.P.
P.O. Box 67
Monument, NM 88265

RE: "Septic System Sampling and Analytical Results"
From Warren Petroleum Co. L.P., dated February 17, 1997
Discharge Plan GW-005
Eunice Gas Plant

Dear Mr. Wrangham:

The New Mexico Oil Conservation Division (OCD) has completed its review of the **"Septic System Sampling and Analytical Results"** dated February 17, 1997 by Warren Petroleum Co., L.P.(WPCLP) Eunice gas plant GW-005. These results were submitted by WPCLP as part of the permit renewal commitments for discharge plan GW-005, which was renewed by the OCD on May 6, 1996, and a subsequent letter of approval from OCD dated December 11, 1996.

- Based upon the results of the work plan the OCD shall allow WPCLP to continue to use the septic system for "Domestic Liquid Waste" only.

Please note, OCD approval does not relieve WPCLP from liability should it be found that contamination exists due to the use of this septic system. Further OCD approval does not relieve WPCLP from compliance/reporting requirements with regards to other federal, state, and local rules and regulations that may apply.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau-OCD
(505)-827-7156

c: Mr. Wayne Price - Environmental Engineer, OCD Hobbs District.

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

43

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☐ Telephone ☒ Personal	Time 9:45 AM	Date 2-3-97

Originating Party	Other Parties
Pat Sanchez - OCD	Bill Olsen, Roger Anderson OCD

Subject 1,4 dichlorobenzene in septic wastewater (Class V) at Warren Eunice Gas Plant GW-005

Discussion 1,4 dichlorobenzene present at 38 ppb (Federal standard MCL = 75 ppb) WQCC Toxic Pollutant Criteria is 1 in 100,000 for additional cancer risk. They indicated that since it was below MCL (Based on 1 in 1,000,000) and that the pollutant was < than (i.e. 38 ppb < 75 ppb (mcl)) that no further action is required regarding this constituent.

Conclusions or Agreements

Therefore no further action in terms of WQCC is required since 38 ppb is lower than the "Toxic pollutant" criteria of 1 in 100,000. (i.e. MCL = 75 ppb for 1 in 1,000,000)

Distribution File, Wayne Price.

Signed Patricia A. Sanchez

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

Mr. P. Sanchez
Petroleum Engineer
OCD Santa Fe, NM

Mr. W. Price
Environmental Engineer
OCD Hobbs, NM

December 5, 1996

Please find inclosed a work plan to address the sampling of materials in the class V well located at the Warren Plant in Eunice, NM. Warren Petroleum will hire Safety & Environmental Solutions of Hobbs to perform the sampling.

If there are any concerns or questions please call me.

Cal Wrangham
Warren Petroleum LP
ES&H Coordinator
393-2823 or mobile 505 369- 8614

Work Plan
Warren Petroleum Company L.P.
Class V Well Investigation

Purpose

The purpose of this work plan is to sample the material, liquid and sludge, in the septic tank located at Warren Petroleum Co. Eunice Gas Plant in order to make a hazardous waste determination and compare liquid effluent to WQCC Groundwater Standards.

Background

The Oil Conservation Division (OCD) performed an inspection of the Eunice Gas Plant as required as part of the renewal process for discharge plan GW-005 in April 1996. The report of the inspection was dated April 22, 1996 and addressed the Class V well located at the plant. The lab sink had been connected to the septic system in the past. The lab has connection has be terminated and Safety & Environmental Solutions, Inc. was engaged to perform an investigation of the septic system as required in the report of April 22, 1996. The report dated October 22, 1996 which was submitted to the OCD on behalf of Warren Petroleum did not completely address the hazardous nature of the material in the septic system. Only a Toxic Leaching Characteristic Procedure (TCLP) for metals was performed instead of the full TCLP. In a letter dated November 21, 1996 the OCD requested a new work plan which will fully characterize the material in the septic system and the zone underneath the system as necessary.

Standard Operating Procedures

Standard operating procedures (SOPs) were obtained from the Environmental Protection Agency, 1984, Characterization of Hazardous Waste Sites - A Methods Manual:Vol II. Available sampling methods. EPA/600/4-84-076.

Liquid and sludge samples will be taken using a polyethylene Composite Liquid Waste Sampler (COLIWASA). The COLIWASA will allow a representative sample to be composited from all depths of the tank being investigated. The liquid samples will be placed in 1 x 4 amber glass bottles and the sludge will be placed in an 8 oz. wide-mouth Teflon-lined glass jar. All samples will be preserved on ice and transported immediately under a chain of custody to Cardinal Laboratories in Hobbs, New Mexico.

TCLP volatiles and semi-volatiles will be run on the sludge samples. TCLP metals and Reactivity, Corrosivity, and Ignitability were run on the sludge and liquid samples of September 23, 1996 with results below regulatory limits. The waste entering the septic system has not changed since the September 23, 1996 sampling and WPC has no knowledge of any other type of waste entering the system. The liquid will be analyzed for WQCC water standards as listed in Subpart III - Permitting and Ground Water Standards (20 NMAC 6.2.3103).

In the event that the above referenced analyses indicate that the material in the septic system does

not meet regulatory standards, a bore hole will be drilled into the soil three (3) feet below the leech line or beside the tank if there is no leech line to the same depth. TCLP metals, volatiles and semi-volatiles will be performed on the soil sample obtained from the bottom of the bore hole. Split spoon sampler will be used to take soil samples below the system. The samples will be place in an 8 oz. wide-mouthed Teflon-lined glass jar, preserved on ice and transported under chain of custody to Cardinal Laboratories in Hobbs, New Mexico for analysis.

Site Safety

There are a number of health and safety concerns that may be associated with sampling programs. Compliance with the following OSHA standards will be maintained as required at this site:

- Trenching and Shoring - 29 CFR 1926.650 - 653
- Hazwoper/Atmospheric Testing - 29 CFR 1910.120
- Respiratory Protection - 29 CFR 1910.134
- Personal Protective Equipment - 29 CFR 1910.132 - 140

Conclusion

The Oil Conservation Division will be furnished with a report detailing the activities and results of this investigation. The report will include analytical data and future plans regarding the septic system.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

November 21, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-700

Mr. Cal Wrangham
ES&H Coordinator
Warren Petroleum Co. L.P.
P.O. Box 1909
Eunice, NM 88231

RE: October 23, 1996 Report
From Safety & Environmental Solutions, Inc.
On Behalf of Warren Petroleum Co. L.P.
Discharge Plan GW-005
Eunice Gas Plant

Dear Mr. Wrangham:

The New Mexico Oil Conservation Division (OCD) has completed its review of the report submitted October 25, 1996 by Warren Petroleum Co. L.P.(WPCLP) Eunice gas plant GW-005. This report was submitted by WPCLP as part of the permit renewal commitments for discharge plan GW-005, which was renewed by the OCD on May 6, 1996. The progress thus far seems to be sufficient with the exception of the Class V well investigation as it was stated in the inspection report for OCD dated April 22, 1996:

From the April 22, 1996 inspection report to Mr. Donnie Wallis with Warren Petroleum Company, Page 2.

- *A work plan to address the Class V well at the facility that was connected to the lab sink needs to be proposed by Warren Petroleum Company - The plan shall address the nature of the sludge in the septic as well as the leech line drainage area, and vertical extent of possible contamination so that WQCC Groundwater Standards will not be exceeded. Lab waste can no longer be disposed of in the septic - and Warren needs to identify an alternate disposal method.* ***Note:*** *If the sludge and leech line drainage area test Hazardous per TCLP and RIC , or contain listed Hazardous Waste - Warren Petroleum Company will contact the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau at (505)- 827-1558 for guidance.*

The work plan as implemented by Safety and Environmental Solutions, Inc. did not address 20 NMAC 6.2. 3103 parameters (WQCC Groundwater standards) in the liquid effluent contained in the septic/leach system. The work plan also did not address TCLP semi-volatile and volatile constituents in the sludge or provide a regulatory statement with regards to listed hazardous waste or process knowledge as defined in 40 CFR Part 261. The work plan also did not appear to address the leach field area in terms of vertical and horizontal extent with regards to 20 NMAC 6.2 3103 parameters.

Warren Petroleum Co. L.P. will submit a work plan for approval before implementation that will address the deficiencies outlined above to the OCD Santa Fe Division Office for approval, with a copy sent to the attention of Mr. Wayne Price at the OCD Hobbs District I Office within 60 days of receipt of this letter.

Note: For your convenience a copy of 20 NMAC 6.2.3103 is enclosed.

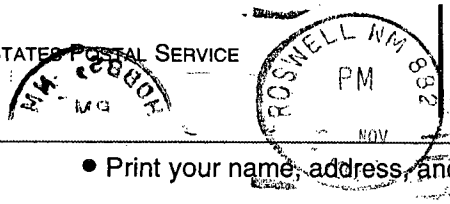
Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau-OCD
(505)-827-7156

enclosure

xc: Mr. Wayne Price - OCD Hobbs w/o enclosure.

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

96 DE 7 PM 8 52

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

October 25, 1996

P. W. Sanchez
Petroleum Engineer
Oil Conservation Division

Wayne Price
Environmental Engineer
Oil Conservation Engineer

RE: Renewal Inspection
Discharge Plan GW-005
Eunice Gas Plant

Dear Sirs:

Warren Petroleum would like to update you on our progress toward compliance with the concerns stated in your response letter, regarding the Eunice Plant's Discharge Plan Renewal Inspection.

- An impermeable barrier of concrete has been poured under the boiler feed chemical tanks, and sealed to the existing concrete berm walls.
- Warren Petroleum enlisted the services of Safety & Environmental Solutions, Inc. to provide consulting and sampling services for the liquid and sludge contained in the septic system, which the lab utilized. As per attached analysis report the samples were non-hazardous per characteristic, and the TCLP metals were below detectable limits in all categories on both the liquid and sludge.
- Safety & Environmental Solutions, Inc. also conducted a composite sample of the soil in the bio-remediation plot south of the plant fence. As per attached analysis the TPH was 11,100 ppm. Warren will continue to bio-remediate this area until the TPH levels are acceptable, and at that time submit an analysis to you.
- The testing of the underground drain system by sections is nearly complete, and will be complete by year's end, as reported to you in a response letter dated June 11, 1996.

Please contact me with any questions.

Cal Wrangham
Warren Petroleum Co. L.P.
New Mexico Asset
ES&H Coordinator
(505) 393-2823
Mobile (505) 369-8614

Safety & Environmental Solutions, Inc.

October 22, 1996

Attention: Cal Wrangham
Warren Petroleum Company
P.O. Box 1909
Eunice, NM 88231

On September 23, 1996, Warren Petroleum Company enlisted the services of Safety & Environmental Solutions, Inc. to provide consulting and sampling services for the Eunice plant. The sampling technician for SES, Inc. was Dyke A. Browning, who was accompanied by Mr. Cal Wrangham, compliance coordinator for Warren.

A polyethylene coliwasa was utilized to sample the septic tank east of the office in the plant yard. A composite sample was taken of both:

(1) The fluid present in the top 1/3 of the septic tank
(2) The sludge settled at the bottom of the septic tank

Decontamination of the sampling apparatus was not necessary, as both samples came from the same vessel and cross-contamination can be assumed to have already occurred. One liter samples of both the fluid and the sludge were collected, (each sample consisting of numerous grabs with the coliwasa to obtain the necessary zero headspace one-liter container of sample), sealed, placed on ice for transport to the laboratory, and the necessary chain of custody paperwork was completed. The sample was transported to a third pary laboratory within two (2) hours. Third party laboratory tests were requested for :

(1) RCRA characteristic hazards
(2) TCLP metals

As can be seen from the attached analysis, the samples were non-hazardous per characteristic, and the TCLP metals were **below detectable limits in all categories on both samples**. This data should provide information necessary to any regulatory agency regarding the degree of environmental threat posed by this septic system.

In addition to the septic system sampling, a composite sample consisting of 10 grabs was taken from the bio-remediation area south of the plant fence. (See attached sampling diagram). This sample was also refrigerated, and the appropriate chain of custody paperwork was completed. The sample was transported to a third party laboratory within two (2) hours. Third party analyticals were requested for TPH (Total Petroleum Hydrocarbons) and BTEX. Test results are included with this report.

If there are any questions as to sampling techniques, chain of custody integrity, transport of samples, preservation of samples, or any other relevant concern, please contact Safety & Environmental Solutions, Inc.

Thank you for the opportunity to serve your environmental and compliance needs.

Sincerely,

Dyke A. Browning CEI, REM
Vice President
SES

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401
PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON, SUITE 103
HOBBS, NM 88240
FAX TO: 505-393-4388

Receiving Date: 09/23/96
Reporting Date: 09/25/96
Project Number: WARREN PETROLEUM
Project Name: ~~SEPTIC TANK~~ BIO-AREA
Project Location: EUNICE, NM 88240

Sampling Date: 09/23/96
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (ppm)	BENZENE (ppb)	TOLUENE (ppb)	ETHYL BENZENE (ppb)	TOTAL XYLENES (ppb)
ANALYSIS DATE:		9/25/96	9/24/96	9/24/96	9/24/96	9/24/96
H2655-3	SOIL FROM BIO AREA	11100	<1	<1	<1	<1
Quality Control		203	82.6	76.8	73.4	223
True Value QC		200	88.2	85.8	83.4	254
% Accuracy		101	93.6	89.6	88.0	87.8
Relative Percent Difference		1.5	4.6	3.4	3.4	3.6

METHODS: TRPHC - EPA 600/7-79-020, 418.1; BTEX - EPA SW-846-8020

Burgess J. A. Cooke, Ph. D.

9/25/96
Date

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401
PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON, SUITE 103
HOBBS, NM 88240
FAX TO: 505-393-4388

Receiving Date: 09/23/96
Reporting Date: 10/02/96
Project Number: WARREN PETROLEUM
Project Name: SEPTIC TANK
Project Location: EUNICE, NM

Sampling Date: 09/23/96
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: WL

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		9/27/96	9/25/96	9/26/96	9/26/96	9/25/96	9/25/96	9/25/96	9/27/96
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H2655-1	SLUDGE	<0.1	<0.1	<5	<0.1	<0.5	<1	<0.002	<0.1
H2655-2	WATER	<0.1	<0.1	<5	<0.1	<0.5	<1	<0.002	<0.1
Quality Control		9.3	0.504	4.77	0.54	2.125	0.99	102.1	44.3
True Value QC		10.0	0.500	5.00	0.50	2.000	1.00	100.0	50.0
% Accuracy		93	100.8	95.4	108	106.3	99	102.1	88.6
Relative Percent Difference		5.4	0.7	3.4	0.1	0.7	1.0	7.7	3.8
METHODS: EPA 1311, 600/4-91/		200.7	200.7	200.7	200.7	200.7	200.7	245.1	200.7

Wei Li
Wei Li, Chemist

10-2-96
Date

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401
PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR
SAFETY & ENVIRONMENTAL SOLUTIONS, INC.
ATTN: DYKE BROWNING
703 E. CLINTON, SUITE 103
HOBBS, NM 88240
FAX TO: 505-393-4388

Receiving Date: 09/23/96
Reporting Date: 10/07/96
Project Number: WARREN PETROLEUM
Project Name: SEPTIC TANK
Project Location: EUNICE, NM 88240

Sampling Date: 09/23/96
Sample Type: LIQUID
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By:

LAB NUMBER	SAMPLE ID	REACTIVITY Sulfide (ppm)	REACTIVITY Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:		9/26/96	9/26/96	10/4/96	10/4/96
H2655-1	SLUDGE	<50	<50	7.52	>140
H2655-2	WATER	<50	<50	7.45	>140
Quality Control		NR	NR		NR
True Value QC		NR	NR		NR
% Accuracy		NR	NR		NR
Relative Percent Difference		NR	NR		NR

METHOD: EPA SW 846-7.3, 7.2, 1010

Chemist

10/7/96
Date

Safety & Environmental Solutions, Inc.

703 E. Clinton, Suite 103, Hobbs, New Mexico 88240
(505)397-0510

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: DYKE BROWNING
Phone #: 397-0510
FAX #: 393-4388

Company Name & Address: Safety & Environmental Solutions Inc.

Project #: Warren Petroleum –
Project Name: Septic Tank

Project Location: Eunice, NM
Sampler Signature:

H2655

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE	TIME	BTEX 8021B/5030	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
1	Sludge	1	1qt				X				X			9/23	1:10			X					X
2	Water	1	1qt	X							X			9/23	1:10			X					X
3	Soil from BioArea	1	1qt		X						X			9/23	1:10	X	X						

Relinquished by:	Date:	Time:	Received by:	REMARKS
	9/23/96	1:13		
Relinquished by:	Date:	Time:	Received by:	
Relinquished by:	Date:	Time:	Received by Laboratory:	

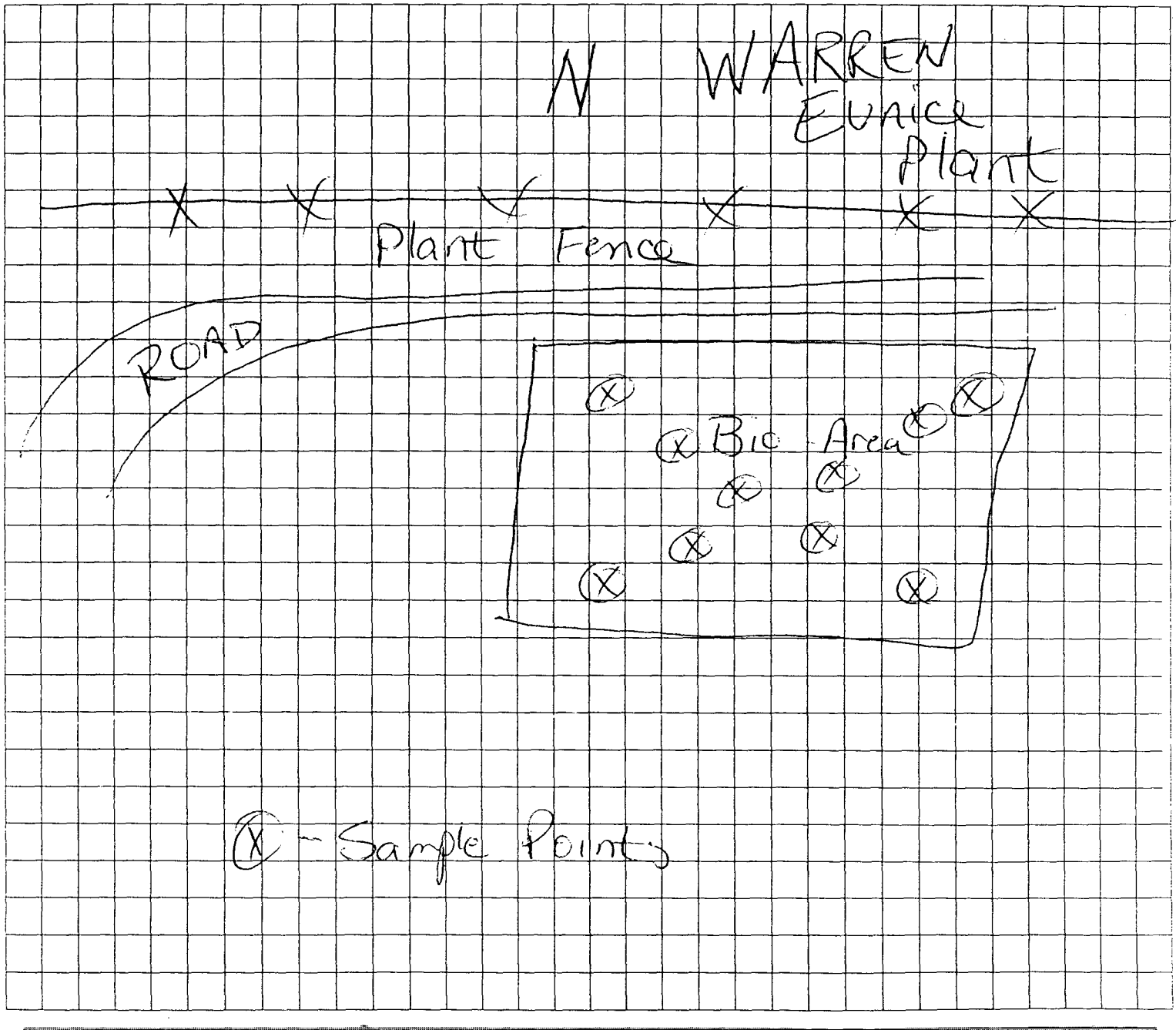
Safety & Environmental Solutions, Inc.

Sampling Site Map

Date: 9/23/96

Location: Bio-Area

Purpose: Determine TPH, BTEX on Bio-Area South of Eunice Plant



Sample Description: 10 point composite grab

Remarks: Carl Wrangham witnessed sampling

Technician: Dyke Browning

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 10:00 Am	Date 9-16-96
Originating Party		**Other Parties**
Cal Wrangham - Warren Petroleum 393-2823 - Monument G.P.		Pat Sanchez - OCD

Subject: Warren Eunice Gas Plant - class V investigation

Discussion: Mr. Wrangham informed me that after further research the lab waste actually went to a sesspool and Not the septic leech system. I told him they would have to access the "sesspool" as a class V well and sample the sludge / wastewater. (1) sludge - TCLP, RIC (2) wastewater - WQCC 3103 (3) Put together a list of lab chemicals used. - Make regulatory determination on (1) & (3) to determine if Haz. or Non-Haz., look at wastewater for WQCC to determine potential GW. upon submittal will determine

Conclusions or Agreements: if a boring is needed to address potential vertical extent. ✱ I let Mr. Wrangham know I would contact Wayne Price - and that he could also discuss w/ Wayne to determine options / Sampling methods.

Distribution: File, WaynePrice

Signed: Patricia W. Sanchez

Chevron

Warren

Warren Petroleum Company
P.O. 1909
Eunice, NM 88231

P. W. Sanchez
Petroleum Engineer
Oil Conservation Division - Santa Fe

Wayne Price
Environmental Engineer
Oil Conservation Division - Hobbs

July 30, 1996

As per the Warren Petroleum Eunice Plant Discharge Plan (GW-5), this is a notification that the Eunice Plant disposed of 444 pounds, or approximately 1 cubic yard of pipe insulation which contained asbestos. Keer Environmental Inc., which is located 15 miles south of Mountainair, N. M., was utilized as the disposal site. The insulation was properly packaged, transported, and disposed of in an approved cell.

If you have any questions please contact D. L. Ishmael , Facility Manager at (505) 394-2534

DLI / CWW
File with Dis. Plan and VII.B.3.d.(A)

D. L. Ishmael

Chevron **Warren**

Warren Petroleum Company
P.O. 1909
Eunice, NM 88231

Mr. Patricio W. Sanchez
Petroleum Engineering Specialist
State of New Mexico
Oil Conservation Division
Energy and Minerals Department
2040 S. Pacheco
Santa Fe, New Mexico 87505

RE: Renewal Inspection
Discharge Plan GW-005
Eunice Gas Plant

June 11, 1996

Dear Mr. Sanchez:

Warren Petroleum Company has received your inspection report dated April 22, 1996 and has set time lines for compliance of the items listed as you requested. Please consider this action plan for OCD compliance.

- We are currently pressure testing the underground drain system by sections, and will complete testing and repairs if needed by December 31, 1996.
- An analysis of the Class V septic tank sludge, and leech line drainage area will be completed during the third quarter of 1996. We will submit the testing results and corrective actions if required to you at that time. We have contracted the Safety Kleen Company for collection an proper disposal of our lab wastes. We no longer put any lab materials into the Class V well.
- We have discontinued use of the bio-remediation plot and will follow OCD guidelines for closure. We will bio-remediate any oil contaminated soil using the in-situ method.
- An impermeable barrier will be placed under the boiler feed chemical tanks during the third quarter of 1996.
- All floor drains in the old turbine warehouse have been capped.
- As per process knowledge will know all the streams that are injected into the Class II disposal well are exempt from RCRA Subtitle C regulations.

We will submit letters of documentation to you on the items listed as they are completed. Please contact me with any questions regarding this proposal.

D. L. Ishmael
Facility Manager
Eunice Plant, Warren Petroleum
(505) 394-2534

DLI / CWW
xc: L. T. Reed
K. A. Peterson
File: with Discharge Plan and VII.B.3.d.(A)

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 5/21/96

or cash received on _____ in the amount of $ 1667.50

from Warren Pet

for Eunice G.P. (Facility Name) GW-005 (OCD No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R Chavez Date: 5/31/96

Received in ASD by: Lorna Salazar Date: 5/31/96

Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

Chevron **Warren**

Warren Petroleum Company
P.O. Box 1589
Tulsa, OK 74102-1589

No. [redacted]

5/21/96

Pay to order of

NMED - Water Quality Management
c/o Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Amount $**1,667.50**

Two signatures required if $1,500.00 or more

Norwest Bank Montana, N.A.
175 North 27th Street, Billings, MT 59101

[redacted]

CK-287
WP-82

Warren Petroleum Company, P.O. Box 1589, Tulsa, Oklahoma 74102 [redacted]

Description	Amount
Discharge Plan Renewal Fee	1,667.50

SAP Document Number

Dr. Cr.	Account	Amount	Cost Center	Order	Product	Product	UOM
Allocation							
Text							

Chevron **Warren**

May 17, 1996

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102
1350 South Boulder
Tulsa, OK 74119

Manufacturing Department
Health, Environment and
Loss Prevention
Phone 918 560 4138
Fax 918 560 4544

Mr. William J. LeMay, Director
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

DISCHARGE PLAN FEE
EUNICE GAS PROCESSING PLANT-GW 005

Gentlemen:

I have attached a check in the amount of $1,667.50 for payment of the subject fee.

If you find that you have any questions, or need further information, please contact me at (918) 560-4138.

Very truly yours,

L. L. Johnson, Environmental Specialist
Environmental Protection

xc: K. A. Peterson, Tulsa
D. L. Ishmael, Eunice
D. E. Wallis, Monument
Plant File: IX.B.
Tulsa File: NM Fees Paid in 1996

s:\envr\llj\nmfeeocd.doc

Chevron **Warren**

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

D. D. Dunlap
Vice President,
Operations
Phone 918 560 4050
Fax 918 560 4304

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 22, 1996

USEPA Region VI Office
1445 Ross Avenue
Dallas, Texas 75202-2733

Attn.: Mr. Fred Woods
Enforcement Division

Re: TRANSFER OF EPA GENERATOR NUMBERS
WARREN PETROLEUM COMPANY

Dear Ladies and Gentlemen:

This is to advise you that on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

Warren Petroleum Company, a Division of Chevron USA Inc., had been issued EPA Generator Numbers over the years. Those Generator Numbers that were assigned to assets that will be transferred into Warren LP are listed in the Attachment. Most of these numbers were obtained in 1980 and were protective filings. We have since determined that most of our sites are non-handlers of hazardous waste.

United States Environmental Protection Agency
Attn.: Mr. Fred Woods
August 22, 1996

The new address for the home office will change on September 1, 1996 to:

NGC Corporation
Warren Petroleum Company, Limited Partnership
13430 Northwest Freeway
Suite 1200
Houston, TX 77040
Attn.: J. Dee Morris
Environmental Manager

If you have any questions, please call Bob Langley at 918-560-4471 or J. Dee Morris at 918-560-4114.

Very truly yours,

For

D. D. Dunlap

xc: Texas Natural Resource Conservation Commission
PO Box 13087
Austin, TX 7871111-3087

Texas Railroad Commission
PO Box 12967 - Capitol Station
Austin, TX 78711-2967
Attn.: Jerry Mullican

New Mexico Environmental Department
Water and Waste Management Division
2048 Galisteo
Santa Fe, NM 87505

New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn.: Roger C. Anderson

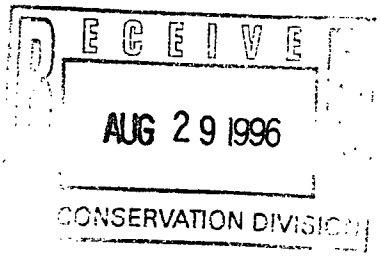
Oklahoma Department of Environmental Quality
4545 N. Lincoln Blvd., Suite 250
Oklahoma City, OK 73105-3483
Attn.: Al Colter

Louisiana Department of Environmental Quality
Office of Solid and Hazardous Waste
7290 Bluebonnet Road
Baton Rouge, LA 70810

ATTACHMENT
Warren Petroleum Company
(a division of Chevron USA Inc.)
EPA Generator Numbers/State Registration Numbers

Bluitt Plant	EPA Generator # NMD000719385	
Breckenridge Plant	EPA Generator # TXD026092395	TNRCC # 35978
Canadian Plant	EPA Generator # TX0087499539	TNRCC # 35979
Eunice Plant	EPA Generator # NMD008001307	
Fashing Plant	EPA Generator # TXD008130031	TNRCC # 35984
Kingfisher Plant	EPA Generator # OKD000729137	
Leedey Plant	EPA Generator # OKD000729145	
McLean Plant	EPA Generator # TXD071669816	TNRCC # 35987
Monahans Plant	EPA Generator # TXD026858373	TNRCC # 36000
Mont Belvieu Plant	EPA Generator # TXD980625974	TNRCC # 31048
Mont Belvieu Terminal	EPA Generator # TXD070886205	
Monument Plant	EPA Generator # NMD000709303	
Moores Orchard Plant	EPA Generator # TXD073899627	
Sand Hills Plant	EPA Generator # TXD000835090	TNRCC # 36003
Saunders Plant	EPA Generator # NMD000804138	
Shackelford Plant	EPA Generator # TXD000835280	
Tonkawa Plant	EPA Generator # TXT490010865	TNRCC # 35999
Vada Plant	EPA Generator # NMD000709287	
Venice Plant	EPA Generator # LAD041514811	LDEQ # GD-075-1635
Waddell Compressors	EPA Generator # TXD060169448	TNRCC # 35996
Warrengas Terminal	EPA Generator # TXD000835082	TNRCC # 35997
Worsham Plant	EPA Generator # TXD000835298	TNRCC # 36002

Warren



Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

D. D. Dunlap
Vice President,
Operations
Phone 918 560 4050
Fax 918 560 4304

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 23, 1996

United States Environmental Protection Agency
Stormwater Notice of Intent/Termination
401 M Street, SW
Washington, DC 20460

Attn.: Mr. Jon D. Klaff

Re: SUPPLEMENTAL FILING TO AUTOMATIC TRANSFER OF NPDES PERMITS DATED JULY 29, 1996

Dear Ladies and Gentlemen:

Warren Petroleum Company filed for Automatic Transfer of NPDES Permits on July 29, 1996 since on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

In response to our July 29 letter, we received information on August 14, 1996 from Jon D. Klaff of the Storm Water Notice of Intent Processing Center that further information is required so that the permits may be transferred. Mr. Klaff starred 38 items on our list of transferring NPDES Permits that needed more informatin. Please note that this list has been updated and the 38 starred items have been carried over on the new Attachment for ease of identification. Three additional Notices of Termination are also included for recently completed projects, bringing the total to 41 items.

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
August 23, 1996

If you have any questions, please contact Bob Langley at 918-560-4471 or J. Dee Morris at 918-560-4114.

Very truly yours,

R. L. Langley for

D. D. Dunlap

Attachment
cc without forms:

Jane Saginaw, Reginal Administrator
United States Environmental Protection Agency
Region VI Office
1445 Ross Avenue
Dallas, Texas 75202-2733

Mr. Dale Givens, Secretary
Louisiana Dept. of Environmental Quality
Office of Water Resources
PO Box 82215
Baton Rouge, LA 70884-2215

Mr. Jerry W. Mullican, Director of UIC
Texas Railroad Commission
Oil & Gas Division
PO Box 12967
Austin, TX 78711-2967

Mr. Roger Anderson, Environmental Bureau Chief
New Mexico Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504

Warren

Tulsa, OK
August 2, 1995

MEMO TO FILE
LETTER OF AUTHORIZATION

To Whom It May Concern:

Please be advised that effective July 1, 1992, R. L. Langley was appointed Manager -Health, Environment and Loss Prevention for Warren Petroleum Company. In my absence, the incumbent in this position is Warren's duly authorized representative to verify by signature any appropriate permit required reporting or to provide agency required information.

If you have any questions or comments regarding this, please contact L.L. Johnson, Environmental Specialist, Warren's Health, Environment and Loss Prevention.

D. D. Dunlap, Vice President
Operations

DDD/LLJ/lj

xc: L. L. Johnson
C. A. McCartney
File: VII.A.4.b.(4)

s:\envr\llj\aauthltr.doc

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
August 23, 1996

ATTACHMENT
Warren Petroleum Company
(a division of Chevron USA Inc.)
NPDES Permits

ABILENE LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00F771 (9/16/94)*(NOT attached)(NOI attached)(1)
BLUITT PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A117 (8/13/93)*(NOT filed 12/7/95)(2)
BRIDGEPORT LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00F773 (9/16/94)*(NOT attached)(NOI attached)(3)
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MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No.TXR10M935, Sand Hills to Monahans (PIPELINE) (01/17/95)*(NOT attached)(18)

MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No.TXR10P710 (7/7/95)(NOT attached)(39)
MONT BELVIEU PLANT, TX USEPA - NPDES Application No. TX0002887 deemed complete (9/23/88) and (5/3/96)
MONT BELVIEU PLANT, TX USEPA TX0111414 Discharge Permit Application Complete (6/14/93)
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MONT BELVIEU PLANT, TX USEPA Stormwater General Permit Notification TXR00C294(12/31/92)*(NOT attached)(19)
MONT BELVIEU TERMINAL, TX USEPA - Stormwater General Permit Notification (NOI) TXR00E567 (12/31/92)*(NOT attached)(NOI attached)(20)
MONT BELVIEU TERMINAL, TX USEPA NPDES- TXG340278 (received 9/28/88)
MONUMENT PLANT, NM USEPA - Stormwater General Permit Notification No. NMR10A327, Joy Compressor Station (PIPELINE) (01/17/95)*(NOT filed 9/26/95)(21)
NO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C289 (12/31/92)*(NOT attached)(NOI attached)(22)
SAND HILLS PLANT, TX USEPA - NPDES - NOI approved (Stormwater) Wolfcamp (PIPELINE) (3/30/93) Permit TXR10D572*(NOT filed 4/13/95)(23)
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10Q150, Meridian (PIPELINE) 1995 Upgrade (08/09/95)*(NOT attached)(24)
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No.TXR10M664, King Mt. Comp. Sta. (PIPELINE) (11/30/94)*(NOT filed 4/13/95)(25)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S520, Wolfcamp (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(26)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S521, Gomez (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(27)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10T722, Crawar (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(28)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10U246, CG-25 Suction (PIPELINE) (5/21/96)*(NOT attached)(29)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10V341, Grayburg 6" Upgrade (7/19/96)(NOT attached)(40)
SAUNDERS PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A084 (5/21/93)*(NOT filed 4/7/95)(30)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N440, Beulah Hazlip (PIPELINE) tie-in (01/17/95)*(NOT attached)(31)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N441,J. H. Lawrence Upgrade (01/17/95)*(NOT attached)(32)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N442, Shell-Hagerman (PIPELINE) (01/17/95)*(NOT filed 6/3/95)(33)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N443, M/b N Low Pressure (PIPELINE) (01/17/95)*(NOT attached)(34)
MONAHANS PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10P103, Chevron Estes Gas (PIPELINE) (06/06/95)*(NOT attached)(35)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10T942, Chevron-Cullar (PIPELINE) (5/21/96)*(NOT attached)(36)
SO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C290 (12/31/92)*(NOT filed 4/7/95)(37))

TONKAWA PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C293 (12/31/92)*(NOT attached)(NOI attached)(38)
VENICE DELTA GATHERING STATION, LA - NPDES Permit # LA0054917 (4/12/78)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit # LAG330050 (10/21/93)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit # LAG330089 (1/24/95)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit # LAG290000 (1/9/95)
VENICE PLANT, LA USEPA - NPDES Permit No. LA003867 (10/24/83)
VENICE PLANT, LA USEPA - NPDES Permit LA0003867 (6/3/83) and (9/23/83)
WARRENGAS TERMINAL, TX USEPA - General Permit TXG340285 (8/27/87)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0063339 (9/22/88)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0107361 (5/8/91)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0103403 (4/25/88)
YSCLOSKEY PLANT, LA USEPA - NPDES Permit # LA0001562 (Originally issued to Shell Western E&P Inc.) (4/6/79)
SAUNDERS PLANT, NM - USEPA - Stormwater General Permit Notification (NOI) TXR10V530 (7/19/96) (NOT attached)(41)

GENERAL PERMIT
STORMWATER PERMITS
EPA FORM 3510-6 (6-92) FILINGS

	Industrial Facility	Individual Filings Construction - Dependent		
Facility	**October 1, 1992 Intent For Coverage NPDES General Permit For Stormwater Discharges**	**NOI Filing Date**	**Activity**	**NOT Filing Date**
Northern Area				
Bluitt	None			-
Bluitt Interconnect Pipeline (2)	None	6/3/93	Pipeline NMR10A117	12/7/95
Canadian (4)	10/1/92 Filing		Gen.Pmt.Cvg. TXR00C292	NOT-8/21/96 NOI-8/22/96
Canadian Pipeline Const. (5)	10/1/92 Filing		Pipeline TXR00D737	4/07/95
Canadian Pipeline (Bracken) (6)	None	11/23/92	Pipeline TXR00D738	4/07/95
Canadian Bracken 1-58 (8)	None	7/21/93	Pipeline TXR10G036	4/07/95
Canadian Alpar 1-95 (7)	None	7/21/93	Pipeline TXR10G035	4/07/95
Canadian Pipeline 1-49 (9)	None	10/13/93	Pipeline TXR10H339	4/07/95
Canadian Pipeline ElPas/No.Nat.(10)	None	7/23/94 and 3/3/95	Pipeline TXR00G271	7/19/95
Canadian Cree Flowers P/L (12)	None	10/28/94	Pipeline TXR10M897	7/19/95
Canadian Red Deer P/L (11)	None	4/13/95	Pipeline TXR10P104	8/21/96
Eunice (13)	10/1/92 Filing		Gen. Pmt. Cvg. NMR00A189	3/10/93
Eunice P/L Construction Project (14)	None	5/02/95	Pipeline-NMR10A408	8/21/96
Leedey	None			-
Mocane	None			-
Monument (21)	None			-
Joy Compressor Sta. Pjt.	None	11/4/94	Pipeline NMR10A327	9/26/95
Saunders	None			-
NGPL Interconnect Pipeline (30)	None	4/2/93	Pipeline NMR10A084	4/07/95
Crosstimbers Pipeline Project (41)	None	5/31/96	Pipeline TXR10V530	8/21/96
North Sherman (22)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C289	NOT-8/21/96 NOI-8/22/96
South Sherman (37)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C290	4/7/95
Chevron Cullar Pipeline (36)	None	10/18/94	Pipeline TXR10T942	8/21/96

M&B North L.P. Pipeline (34)	None	11/29/94	Pipeline TXR10N443	8/21/96
J. H. Lawrence Pipeline Upgrade East/Eagle Oil & Gas (32)	None	11/29/94	Pipeline TXR10N441	8/21/96
Shell Hagerman Pipeline (33)	None	11/29/94	Pipeline TXR10N442	6/03/95
Beulah Hazlip Pipeline (31)	None	11/29/94	Pipeline TXR10N440	8/21/96
Tonkawa (38)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C293	NOT-8/21/96 NOI-8/22/96
Vada	None			-
Southern Area Como	10/1/92 Filing WPC/11/17/95 Valence		Gen. Pmt. Cvg. TXR00C287	12/6/95
Fashing	None			-
Johnson Bayou	None			-
Mermentau	10/1/92 Filing		Gen. Pmt. Cvg. LAR00A473	3/11/93
Monahans	None			-
Monahans S. W. Royalties NXS No. 1 Pipeline (16)	None	10/13/94	Pipeline TXR00F913	8/21/96
Sand Hills to Monahans PL (18)	None	11/4/94	Pipeline TXR10M935	8/21/96
Monahans Tiger #1 Pipeline (17)	None	1/6/95	Pipeline TXR10N685	8/21/96
Monahans Chevron Estes P/L (35)	None	4/13/95	Pipeline TXR10P103	8/21/96
Monahans Worsham P/L (39)	None	5/26/95	Pipeline TXR10P710	8/21/96
Moore's Orchard	None			-
Puckett	None			-
Sand Hills/Azalea	None			-
Sand Hills King Mt. Com. Sta.(25)	None	9/28/94	Pipeline TXR10M664	4/13/95
Sand Hills Wolfcamp PL (23)	None	2/26/93	Pipeline TXR10D572	4/13/95
Meridian PL Upgrade 1995 (24)	None	6/20/95	Pipeline TXR10Q150	8/22/96
Sand Hills Wolfcamp Pipeline (26)	None	12/20/95	Pipeline TXR10S520	4/5/96
Sand Hills Gomez Pipeline (27)	None	12/20/95	Pipeline TXR10S521	4/5/96
Sand Hills Crawar Pipeline (28)	None	1/22/96	Pipeline TXR10T722	4/5/96
Sand Hills CG 25 Suction PL (29)	None	3/14/96	Pipeline TXR10U246	8/21/96
Sand Hills Grayburg 6" Upg. (40)	None	4/23/96	Pipeline TXR10V341	8/21/96
Venice	None			-
Vermilion	None			-

Waddell	None			-
Worsham	None			-
Yscloskey	None			-
Houston Area Mont Belvieu Plant	None			-
MBP Isom Unit Construction (19)	10/1/92 Filing		ISOM TXR00C294	8/21/96
Mont Belvieu Terminal (20)	None	6/16/93	EPA Gen. Pmt. Number TXG340278 TXR00E567	TXR00E567 NOT-8/21/96 NOI-8/22/96
Port Arthur Terminal	None			-
Warrengas Terminal	None			-
Inland And Marine Operations Terminals Calvert City	None			-
Greenville	10/1/92 Filing		Gen. Pmt. Cvg. MSR000852	
Hattiesburg	10/1/92 Filing		Gen. Pmt. Cvg. MSR000853	
Port Everglades	10/1/92 Filing		Gen. Pmt. Cvg. FLR00A629	
Tampa	10/1/92 Filing		Gen. Pmt. Cvg. FLR00A630	
Venice	None			
Petal Gas Storage Co.	None	3/3/93	Pipeline & Appurtenances MSR100103	
LPG Transports Abilene (1)	None	7/23/94	LPG TK. Wash. TXR00F771	NOT-8/21/96 NOI-8/22/96
Breckenridge	None			-
Bridgeport (3)	None	7/23/94	LPG TK. Wash. TXR00F773	NOT-8/21/96 NOI-8/22/96

LPG Transports (cont.) Gladewater (15)	None	7/23/94	LPG TK. Wash. TXR00F774	NOT-8/21/96 NOI-8/22/96
Greenville	None			-
Mont Blevieu	None			-
Closed/Sold Facilities (Including Dismantling) Breckenridge Plant	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C286	12/11/92
South Sherman Comp. Sta.	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C290	4/07/95
Maggie Harris Comp. Sta.	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C288	12/11/92
Shackelford Plant	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C291	12/11/92
Kingfisher Plant	10/1/92 Filing		Gen. Pmt. Cvg. OKR00A724	3/30/93
Knox Plant	10/1/92 Filing		Gen. Pmt. Cvg. OKR00A725	4/07/95
Gulf McKinney Comp. Sta.	10/1/92 Filing		Gen. Pmt. Cvg. OKR00A726	4/07/95
North Snyder Plant (Demolition)	10/1/92 Filing		Demolition TXR00C295	4/07/95
Krotz Springs Plant (Demolition)	10/1/92 Filing		Demolition LAR00A472	4/07/95

Chevron **Warren**

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

D. D. Dunlap
Vice President,
Operations
Phone 918 560 4050
Fax 918 560 4304

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 29, 1996

United States Environmental Protection Agency
Region VI Office
1445 Ross Avenue
Dallas, Texas 75202-2733

Attn.: Ms. Jane Saginaw
Regional Administrator

Re: AUTOMATIC TRANSFER OF NPDES PERMITS
WARREN PETROLEUM COMPANY

Dear Ladies and Gentlemen:

This is to advise you that on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

We trust that the transfer of our NPDES permits may be accomplished automatically according to 40 CFR 122.61 (b), which allows that any NPDES permit may be automatically transferred to a new permittee if:

1. The current permittee notifies the Director at least 30 days in advance of the proposed transfer date;
2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them; and
3. The Director does not notify the existing permittee and the proposed new permittee of his or her intent to modify or revoke and reissue the permit.

Our transfer date will be dependent upon approval of the merger by appropriate governmental agencies. We anticipate such approvals will be obtained and the merger will take place or close on or about August 31, 1996.

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
7/29/96

Warren Petroleum Company, a Division of Chevron USA Inc., and NGC Corporation agree that on the merger closing, the responsibility for compliance with the NPDES permits listed on the Attachment will shift from Warren Petroleum Company, a Division of Chevron USA Inc., to Warren LP. Warren LP will be liable for permit compliance effective the merger close date forward.

We don't anticipate that you will want to modify, revoke or reissue any of the NPDES permits listed on the Attachment before the merger close date.

The new address for the home office will change on September 1, 1996 to:

NGC Corporation
Warren Petroleum Company, Limited Partnership
PO Box 4777
Houston, Texas 77210-4777

Street:
1000 Louisiana Street
Houston, Texas 77002

If you have any questions, please call Bob Langley at 918-560-4471 or J. Dee Morris at 918-560-4119.

Very truly yours,

D. D. Dunlap
Vice President, Operations
Warren Petroleum Company
(a division of Chevron USA Inc.)

Ralph W. Neumann
Ralph Neumann
Vice President, Technical Services
Trident NGL, Inc.
(a NGC Corporation)

Attachment
cc: United States Environmental Protection Agency
Stormwater Notice of Intent/Termination
401 M Street, SW
Washington, DC 20460

Mr. Dale Givens, Secretary
Louisiana Dept. of Environmental Quality
Office of Water Resources
PO Box 82215
Baton Rouge, LA 70884-2215

Mr. Jerry W. Mullican, Director of UIC
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PO Box 12967
Austin, TX 78711-2967

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Attn.: Ms. Jane Saginaw
7/29/96

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SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10Q150, Meridian (PIPELINE) 1995 Upgrade (08/09/95)
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No.TXR10M664, King Mt. Comp. Sta. (PIPELINE) (11/30/94)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S520, Wolfcamp (PIPELINE) (4/5/96)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S521, Gomez (PIPELINE) (4/5/96)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10T722, Crawar (PIPELINE) (4/5/96)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10U246, CG-25 Suction (PIPELINE) (5/21/96)
SAUNDERS PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A084 (5/21/93)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N440, Beulah Hazlip (PIPELINE) tie-in (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N441,J. H. Lawrence Upgrade (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N442, Shell-Hagerman (PIPELINE) (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N443, M/b N Low Pressure (PIPELINE) (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10P103, Chevron Estes Gas (PIPELINE) (06/06/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10T942, Chevron-Cullar (PIPELINE) (5/21/96)
SO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C290 (12/31/92)
TONKAWA PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C293 (12/31/92)
VENICE DELTA GATHERING STATION, LA - NPDES Permit # LA0054917 (4/12/78)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit # LAG330050 (10/21/93)

VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit # LAG330089 (1/24/95)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit # LAG290000 (1/9/95)
VENICE PLANT, LA USEPA - NPDES Permit No. LA003867 (10/24/83)
VENICE PLANT, LA USEPA - NPDES Permit LA0003867 (6/3/83) and (9/23/83)
WARRENGAS TERMINAL, TX USEPA - General Permit TXG340285 (8/27/87)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0063339 (9/22/88)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0107361 (5/8/91)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0103403 (4/25/88)
YSCLOSKEY PLANT, LA USEPA - NPDES Permit # LA0001562 (Originally issued to Shell Western E&P Inc.) (4/6/79)

WARREN PETROLEUM COMPANY
A SUBSIDIARY OF CHEVRON INC.

DISCHARGE PLAN GW-5

EUNICE
GAS PROCESSING PLANT

TABLE OF CONTENTS

SECTION I

GENERAL INFORMATION

WARREN PETROLEUM COMPANY
A SUBSIDIARY OF CHEVRON INC.
UPDATE OF ORIGINAL WASTE WATER DISCHARGE PLAN
EUNICE GAS PROCESSING PLANT
OCTOBER 22, 1980

LIQUID WASTE

In summary, all of the liquid waste water from the plant including the cooling tower blowdown, plant runoff, brine from the Zeolite softner, boiler blowdown, inlet scrubber water, compressor(interstage scrubber) condensate water, and water from the dehydrator are disposed of through the injection well which is annually inspected by the Oil Conservation Division of the New Mexico Energy and Minerals Department. Since all the waste water is disposed in an environmentally acceptable manner, which is already under your authority, Warren Petroleum feels that the operation is in compliance with the amended water quality control commission regulations as referred to in your letter of June 27, 1980.

UPDATE OF WASTEWATER DISCHARGE PLAN
OF MAY, 1984

Liquid Waste
OCD approval from director Joe. D. Ramey for the abandoning and closure of the brine pit.

SECTION III

TOPOGRAPHIC MAPS
EUNICE PLOT PLAN

FIGURE 1

NEW MEXICO
QUADRANGLE LOCATION

SCALE
FEET
2000 0 2000
1" = 2000'

NOTE: BASE MAP TAKEN FROM U.S.G.S. 7.5 MINUTE TOPOGRAPHIC MAP, "EUNICE, N. MEX." DATED 1979, AT A SCALE OF 1:24,000.
APPROXIMATE COORDINATES: ZONE 13
UTM: X=674.320, Y=3588.880
LAT.: 32°25'30"
LONG.: 103°08'46"

NO.	REVISION	DATE	BY

WARREN PETROLEUM COMPANY
TULSA, OKLAHOMA
TITLE V PERMIT APPLICATION

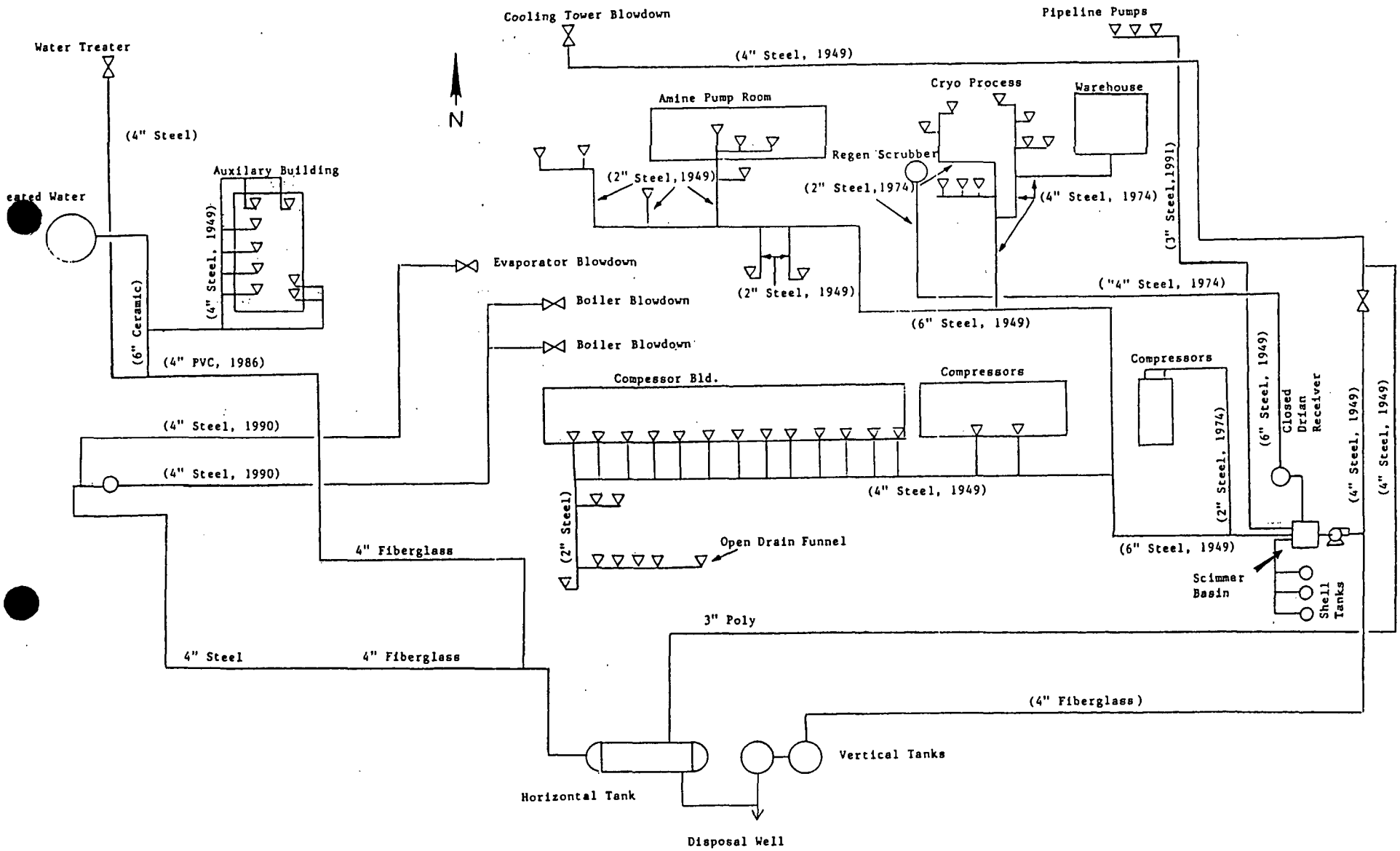
EUNICE GAS PLANT
AREA LOCATION MAP

LEA COUNTY, NEW MEXICO

C·K ASSOCIATES, INC.
AUSTIN, TEXAS

DRAWN	ACS	APPROVED	LMT
CHECKED	LMT	DATE	10-09-95
SHEET	OF	DWG. NO.	A36-314-01

00/00/00



WARREN PETROLEUM COMPANY - A Division of Chevron USA Inc.
EUNICE PLANT #161 - Lea County, NM - WASTE WATER SYSTEM LAYOUT

SECTION IV

SUMMARY OF WASTEWATER DISPOSAL METHODS

PROPOSED DISCHARGE OF WASTE WATER FROM HEAT EXCHANGER BACKWASH

Cooling tower water will be used to backwash water cooled heat exchangers. Water will be recovered and sent to the injection well.

Sixteen engine Lube Oil Coolers and 21 Gas Coolers will be backwashed twice per year. The amount of water discharged is expected to be 200 gallons for each cooler per backwash.

SUMMARY OF WASTEWATER DISPOSAL METHODS

Location	Wastewater Disposal Methods*
Section 3, Township 22 South Range 37, Lea County, NM	(1) Plant Disposal Well**

*Section XIII of this Plan further describes the disposal of waste materials generated at the Eunice Plant.

**In the event of any shutdown of the injection well, the water would be trucked by Rowland Trucking Co. to the McCasland Disposal System Well Permit #R3694.

SECTION V

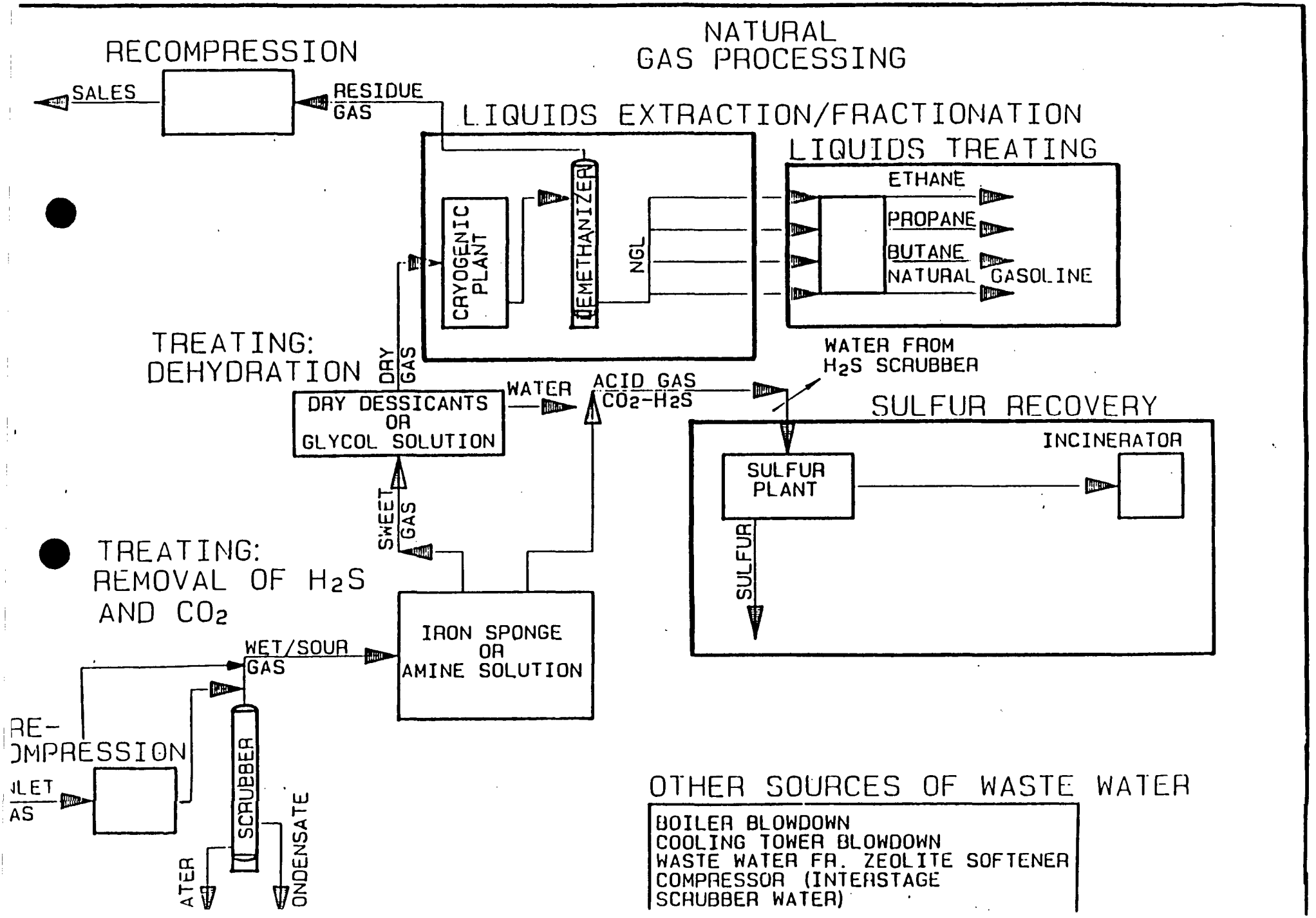
GENERAL DESCRIPTION -

GAS PROCESSING INDUSTRY AND SPECIFIC REFERENCES FOR

EUNICE PLANT

NATURAL GAS PROCESSING FOR THE EUNICE PLANT

The following diagram outlines gas processing for the Eunice Plant.


NATURAL
GAS PROCESSING
RECOMPRESSION
SALES
RESIDUE
GAS
LIQUIDS EXTRACTION/FRACTIONATION
LIQUIDS TREATING
CRYOGENIC
PLANT
DEMETHANIZER
NGL
ETHANE
PROPANE
BUTANE
NATURAL GASOLINE
TREATING:
DEHYDRATION
DRY GAS
DRY DESSICANTS
OR
GLYCOL SOLUTION
WATER
ACID GAS
CO2-H2S
WATER FROM
H2S SCRUBBER
SULFUR RECOVERY
INCINERATOR
SULFUR
PLANT
SULFUR
SWEET
GAS
TREATING:
REMOVAL OF H2S
AND CO2
WET/SOUR
GAS
IRON SPONGE
OR
AMINE SOLUTION
RE-
OMPRESSION
LET
AS
SCRUBBER
ATER
ONDENSATE
OTHER SOURCES OF WASTE WATER
BOILER BLOWDOWN
COOLING TOWER BLOWDOWN
WASTE WATER FR. ZEOLITE SOFTENER
COMPRESSOR (INTERSTAGE
SCRUBBER WATER)

NATURAL GAS PROCESSING FOR THE EUNICE PLANT

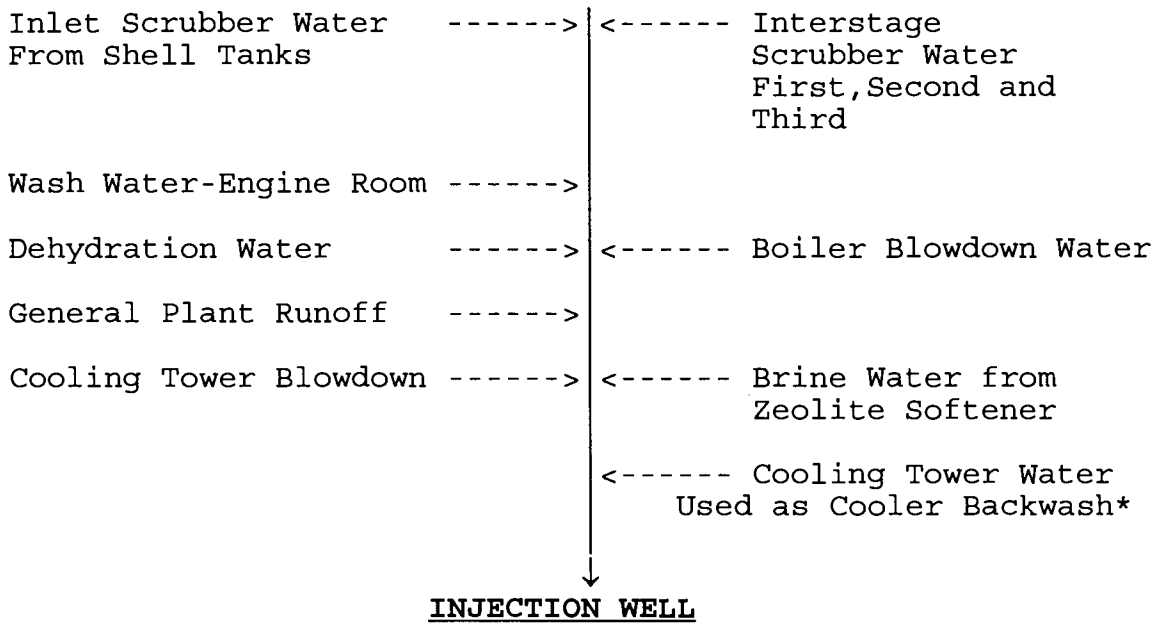
The generalized block flow diagram presented at the beginning of this section lists sources of wastewater that are in association with gas processing. These discharges, along with inlet gas scrubber (process) water, are the major sources for disposal for gas processing plants.

The Wastewater System Disposal diagram for the Eunice Plant directly follows. This diagram also shows the final disposition of the water. This is reiterated on the summary pages presented at the end of this section.

SECTION V - GENERAL DESCRIPTION
GAS PROCESSING INDUSTRY (Continued)

SUMMARY OF WASTE WATER DISCHARGE

EUNICE PLANT



Note:

In the event of any emergency shutdown of the Injection Well, waste water would be hauled from the plant by vacuum truck and delivered to an alternate, state approved well.

*Warren will recover and dispose of the backwash water at the disposal well.
Accidental Spill: Procedures in the Spill Control and Countermeasure Plan would take effect.

All waste water to be injected into the disposal well is stored in the 3 tanks in the immediate vicinity of the disposal well.
The horizontal tank has a capacity of 42,000 gallons, the two vertical tanks have a combined capacity of 18,900 gallons. The disposal well operates on a vacuum and water is gravity fed from the tanks.

SECTION V - GENERAL DESCRIPTION
GAS PROCESSING INDUSTRY (Continued)

Sumps / Sub-Floors

The sumps and sub-floors will be cleaned and visually inspected annually to verify their integrity. This will be documented by a written inspection that will be maintained at the facility.

The sump that is used as a separator/skimmer has a capacity of:

4000 gallons.

Underground Wastewater Lines

The wastewater drain system will be tested this year to demonstrate mechanical integrity. The lines will be isolated into sections that can be tested individually, the testing will be done over an extended period during 1996. For lines that can be blocked in and pressurized we will apply 3 pounds per square inch above normal operating pressure and monitor for 10 minutes. For those lines that cannot be sealed sufficiently to hold pressure we propose to block the down grade end and apply static head pressure and monitor for 10 minutes. All testing will have written documentation identifying piping, method, date and personnel.

SECTION V

GENERAL DESCRIPTION

GAS PROCESSING INDUSTRY

Natural Gas Processing Plants extract liquid hydrocarbons from raw natural gas. Please refer to the block flow diagram which directly follows.

The liquid hydrocarbon components of natural gas are ethane (C2), propane (C3), butane (C4), and natural gasoline (c5+). The remaining gas, from which the liquids are extracted, is almost entirely methane (C1).

Treating for the Removal of Hydrogen Sulfide and Carbon Dioxide

The raw natural gas, termed inlet gas, may contain varying amounts of impurities. The most common contaminates are water (H2O), hydrogen sulfide (H2S), and carbon dioxide (CO2). The gas is compressed and then enters the first phase of natural gas processing, which is treatment to remove the impurities.

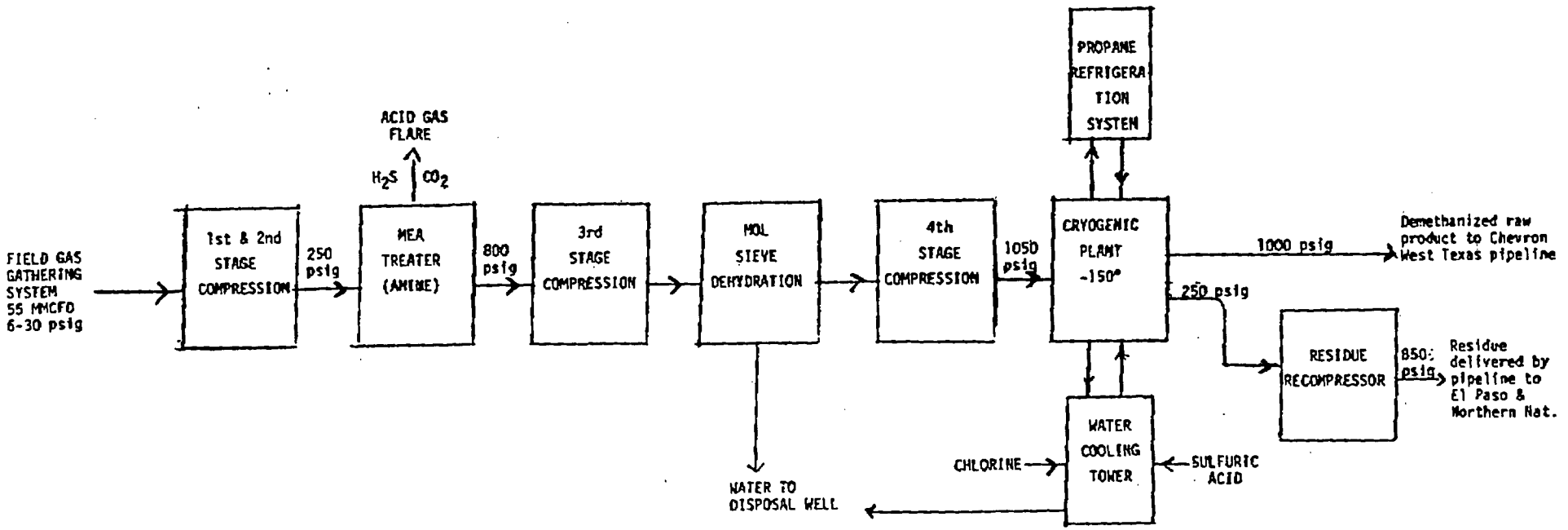
The term acid gas refers to the presence of H2S and CO2 in the raw natural gas. Sour gas has a high concentration of sulfur components. Sweet gas has small quantities of sulfur compounds, usually less than 0.25 grain of H2S per 100 standard cubic feet of gas, and as such, bypasses iron sponge or amine treating.

The acid gas may be removed from the inlet gas stream by and absorption process where the incoming stream contacts a liquid that selectively reacts with and removes the acid gas. This liquid mono- or diethanolamine is regenerated by heat, thereby driving off the gases. The resultant amine liquid then reacts with more acid gas in a continuing cycle of reaction, then regeneration. The gases released from the amine may then be combusted to SO2 in a flare stack, or incinerator. If the acid gas exists in a large concentration, it will not be combusted, but will enter a sulfur recovery plant, which removes elemental sulfur from the stream. Any unoxidized H2S, which occurs in small amounts, is oxidized to SO2 by the sulfur plant incinerator. This incinerator is located after the last sulfur plant catalytic bed. Also note that an H2S scrubber may exist prior to the entry of the gas stream into the sulfur plant. This scrubber removes water from the gas.

WARREN PETROLEUM COMPANY

EUNICE PLANT

SIMPLIFIED PLANT FLOW DIAGRAM



Treating for the Removal of Water

The inlet gas, now minus the acid gas components, enters the next phase of gas processing. This is the removal of water from the gas.

The water may be removed by an absorption, or an absorption process. Both processes may be used in tandem.

Triethylene glycol removes water from the gas by absorption. The glycol is then reconcentrated by removal of the water with heat. This is a continuous cycle. Either alone, or in conjunction with the glycol system, a molecular sieve dehydration system may exist. The molecular sieve is a desiccant which absorbs water from the gas is regenerated by heat to restore its absorptive capability.

Whether removed by glycol or molecular sieve, the water driven off during regeneration exists in the steam phase, then condenses through exchangers and leaves the process as a liquid.

Natural Gas Processing - Removal of Gas Liquids

The extraction of the gas liquids from the gas stream, which is now sweet and dry, is accomplished in several ways. Warren's New Mexico plants use the cryogenic method. Basically, the gas stream is cooled and the non-methane hydrocarbons are then condensed and recovered. In some instances, the liquids are also treated to remove water and or acid gas components.

Natural Gas Processing - Fractionation of Natural Gas Liquids

The natural gas liquids that have been separated out of the inlet stream are fractionated into their individual components. Many of Warren's plants do not fractionate the liquids. These plants remove the gas liquids by pipeline.

Separation of the hydrocarbon components is possible because of the difference in their physical properties, specifically, their boiling points. The distinct gas liquids, along with the purified natural gas, are sold commercially.

The following document, "The Gas Processing Industry: Its Function and Role in Energy Supplies", published by the Gas Processors Association, will provide further details about the industry.

The Gas Processing Industry:

Its Function and Role
in
Energy Supplies

Gas Processors Association
1812 First Place
Tulsa, OK 74103

INTRODUCTION

The gas processing industry is a major segment of the oil and gas industry, distinct from either crude oil or natural gas production, separate from oil refining or gas distribution, yet indispensable to all. As a separate and identifiable function, it is probably the least known and least understood part of the petroleum industry.

In simple terms, the gas processing industry refines raw natural gas from the earth into saleable, useful energy forms for use in a wide variety of applications. Through the gas processing industry's plants flows approximately 60% of the nation's petroleum energy production, which emerges in the form of merchantable natural gas, liquefied petroleum gases, motor fuel components, and raw materials for a myriad of basic petrochemicals.

Natural gas occurs deep below the surface of the earth in two principal forms: associated gas and non-associated gas.

Associated gas is found in crude oil reservoirs, either dissolved in the crude oil, or in conjunction with crude oil deposits. It is produced from oil wells along with the crude. It separates, or is separated from, the oil at the casinghead of the well, which leads to the synonymous term "casinghead gas." It may also be called "oil-well gas" or "dissolved gas." In the industry's beginning, virtually all processed gas was from oil wells.

Non-associated gas occurs in reservoirs separate from crude oil. Its production is not incidental to the production of crude oil. It is commonly called "gas-well gas" or "dry gas." Today about 75% of all natural gas produced is non-associated gas.

In addition, the reservoirs of many oil fields found since 1935 produce neither true gases nor true liquids. The material might properly be called a "two-phase fluid." It is neither a gas because of its high density, nor a liquid because no surface boundary exists between gas and liquid. These reservoirs, called "gas condensate" reservoirs, are usually deeper with higher pressures, which pose special problems in production and processing.

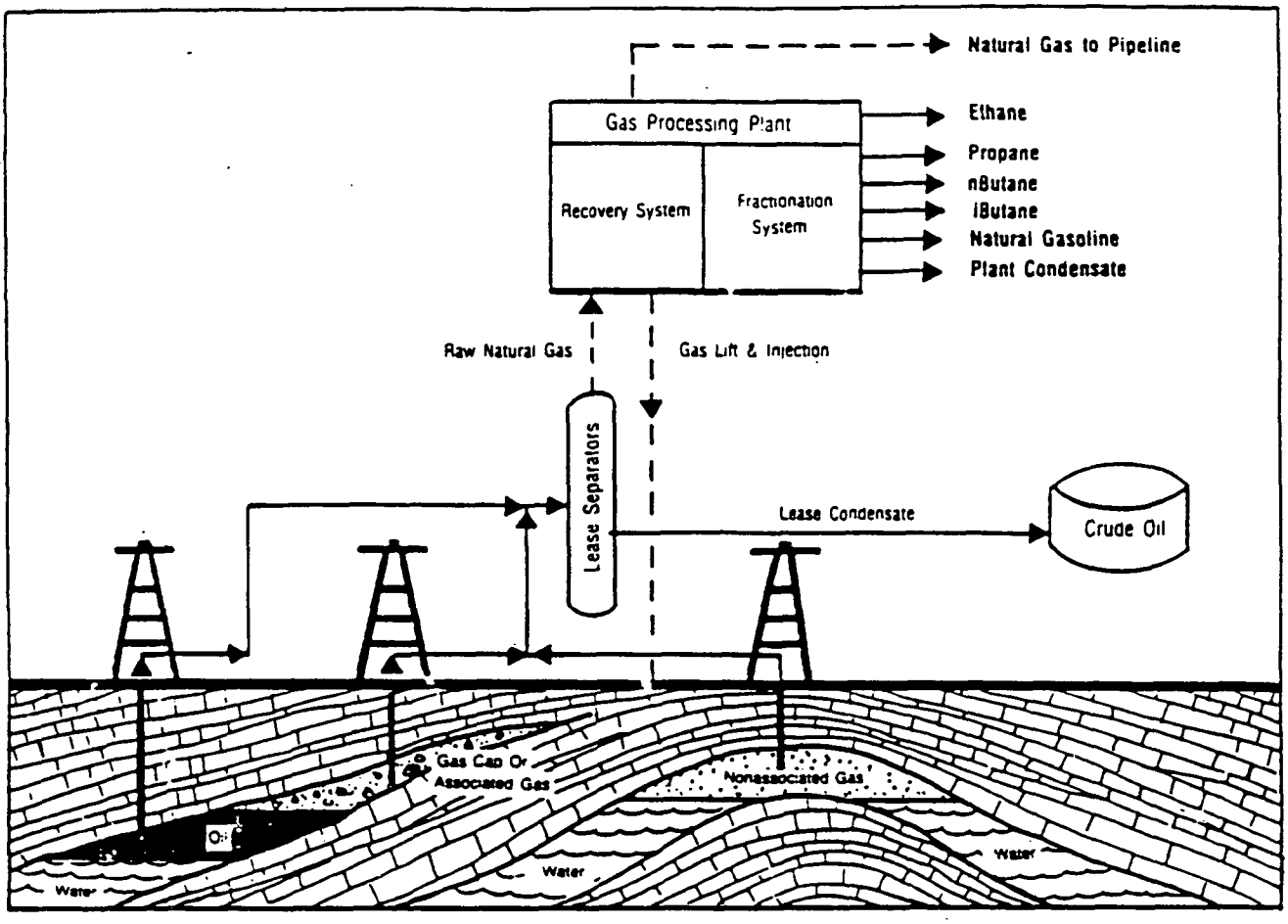
From whatever reservoir, natural gas as produced from the earth has widely varying composition, depending on the field, the formation, or the reservoir from which it is produced. The principal constituents of natural gas are methane and ethane, but most gases contain varying amounts of heavier components, such as propane, butane, pentane, and heavier hydrocarbons that may be removed by any of a number of processing methods.

The removal of individual hydrocarbons by processing is possible because of the differences in physical properties. Each component has a distinctive weight, boiling point, and other physical characteristics, making its separation from other components a relatively simple physical operation.

Gas processors describe gas as "rich" (wet), or "lean" (dry) depending on its content of heavy components. These are relative terms, but as used in the industry, a rich gas may contain five or six gallons or more of recoverable hydrocarbons per thousand cubic feet; a lean gas usually contains less than one gallon of recoverable liquids per thousand cubic feet.

Natural gas may also contain water, hydrogen sulfide, carbon dioxide, nitrogen, helium, or other components that may be diluents and/or contaminants. In any case, natural gas as produced rarely is suitable for pipe line transportation or commercial use. Natural gas in commercial distribution systems is composed almost entirely of methane and ethane, with moisture and other contaminants removed to very low concentrations.

Therefore, all natural gas is processed in some manner to remove unwanted



water vapor, solids and/or other contaminants that would interfere with pipe line transportation or marketing of the gas. In addition, and equally important, most natural gas is processed to separate from the gas those hydrocarbon liquids that have higher value as separate products.

These natural gas liquids (NGL's) are part of a family of saturated hydrocarbons called paraffins. Each compound has a chemical formula C_nH_{2n-2}. The principal natural gas liquids include:

Ethane: Exists as a liquid only under very high pressures (800 psi) or at extremely low temperatures (−135°F). It is recovered and transported in either the liquid or gaseous state principally for use as feedstock for ethylene, the most important basic petrochemical produced today.

Propane: Recovered and handled as a liquid at pressures over 200 pounds, or at temperatures below −44°F. Its principal uses are as feedstock for production of ethylene and propylene, and as LP-gas for heating fuel, engine fuel, and industrial fuel.

Butane: Recovered and handled as a liquid under moderate pressure. Its principal uses are to provide needed volatility to gasoline motor fuel; as domestic LP-gas fuel, either alone or in mixtures with propane; and as a feedstock for the manufacture of butadiene, a key ingredient of synthetic rubber.

Iso-butane: The chemical isomer of butane, it is fractionated and produced as a separate product principally for the manufacture of alkylate, a vital ingredient of high-octane motor gasoline.

Natural Gasoline: A mixture of pentanes and heavier hydrocarbons, with small amounts of butane and iso-butane. Industry specifications define its physical

properties in terms of vapor pressure at 100°F (10 to 34 psi), and percentage evaporated at 140°F (25 to 85%). It is recovered as a liquid, principally for use as a motor fuel component.

If the gas contains hydrogen sulfide, a poisonous gas, it is removed and further processed for recovery of elemental sulfur. Most carbon dioxide is removed to prevent destructive corrosion and to inject into crude oil reservoirs for enhanced oil recovery (EOR). Some helium is extracted for its unique properties as an inert gas.

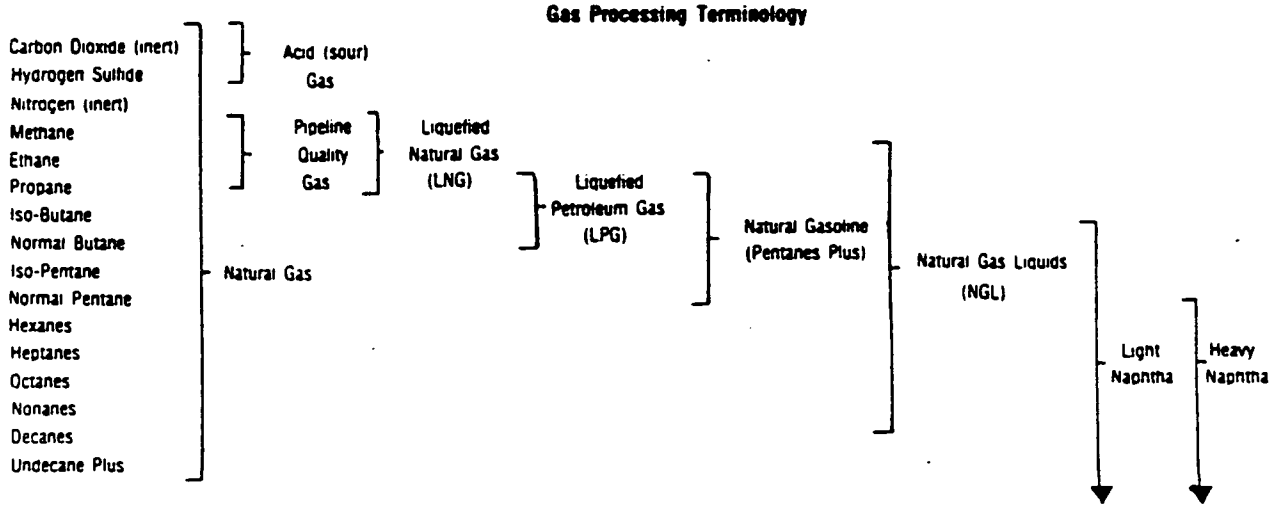
In addition, gas processing performs vital functions, both economically and technically, in the recovery of crude oil through reservoir pressure maintenance, miscible floods, and other secondary recovery methods. Many of these projects would not be economically possible except for the revenues generated by extraction and sale of natural gas liquids.

PROCESSING AND MANUFACTURE

Natural gas processing involves two basic operations: (1) extraction of the natural gas liquids from the gas stream; and (2) fractionation of the natural gas liquids into their separate components. Additional processing is usually required to treat and condition both the natural gas and the gas liquids.

Natural gas processing may be as simple as drying the gas by passing it through a fixed bed of a desiccant material, or it may be as complex as complete liquefaction of the total gas stream by cooling to extremely low temperatures. Extraction of heavier gas liquids (pentane and heavier) can be achieved by simple compression and moderate cooling of the natural gas stream.

However, the modern gas processing industry uses a variety of sophisticated processes to treat natural gas and extract natural gas liquids from the gas stream. The two most important extraction processes are the absorption and cryogenic expander processes. Together, these processes account for an estimated 90% of total natural gas liquids production.



ABSORPTION PROCESS

The basic step in the absorption process is removal of NGL components from the natural gas by contact with an absorbing oil. Liquid recovery is enhanced by refrigerating the absorption oil. Recovery levels may also be increased by lowering the molecular weight of the absorption oil. Depending on operating conditions, approximately 85% of the propane and essentially all of the heavier natural gas liquids are absorbed in the oil. The lighter fractions – methane, ethane, and some of the propane – are not recovered in the absorbing oil and pass through the absorber tower as merchantable pipeline quality natural gas.

The bottoms effluent from the absorption tower consists of rich absorption oil mixed with absorbed propane, butanes, pentanes, and other heavier natural gas liquids. This stream is then fed to lean oil stills where the absorbed liquids are distilled from the absorber oil by heating the mixture to a temperature above the boiling point of the natural gas liquids, but below that of the absorber oil. The stripped absorber oil is then recirculated to the absorption tower, and the mixed stream of natural gas liquids is piped to the fractionation system for further separation into individual NGL components.

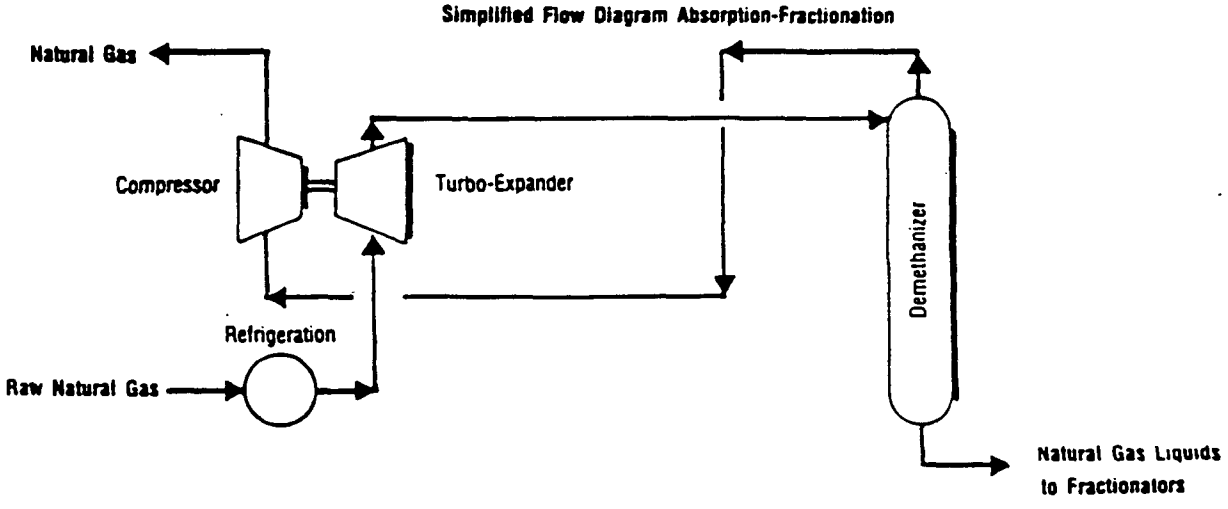
The fractionation system may be an integral part of the gas processing plant, or it may be a "central fractionator" many miles from the primary production. A central fractionator may receive mixed streams of natural gas liquids from many plants.

TURBO EXPANDER PROCESS

In recent years, ethane has become increasingly desirable as a petrochemical feedstock. This has resulted in the construction of many plants that recover ethane and heavier hydrocarbons from natural gas at temperatures ranging down to minus 150°F.

Combinations of external refrigeration and liquid flash-expansion refrigeration with gas turbo expansion cycles are employed to attain the low temperatures desired for high ethane recovery.

In the turbo-expander process, the absorber and still facilities are replaced by an expansion turbine, which accomplishes the separation of gas liquids from the natural gas stream by auto-refrigeration to extremely low temperatures.



Recoveries of 90-95% ethane and all of the heavier hydrocarbons have been achieved with the expander process. The mixed liquid product from the expander plant is then fractionated or may be delivered by pipeline to a central fractionation facility for fractionation into separate NGL components.

FRACTIONATION

Fractionation of a mixed NGL stream into separate components is accomplished by controlling the temperature of the stream in a fractionator to take advantage of the difference in boiling points of separate products. Fractionators are usually named for the overhead or top product. Therefore, a deethanizer implies that the top product is ethane; a depropanizer indicates that the top product is propane, etc. Natural gas liquids are normally fractionated by boiling the lighter products from the heavier products in the following order:

Deethanizer: The first step in the fractionating sequence is to separate the ethane and propane, with the ethane going overhead and the propane and heavier components passing from the bottom of the fractionator.

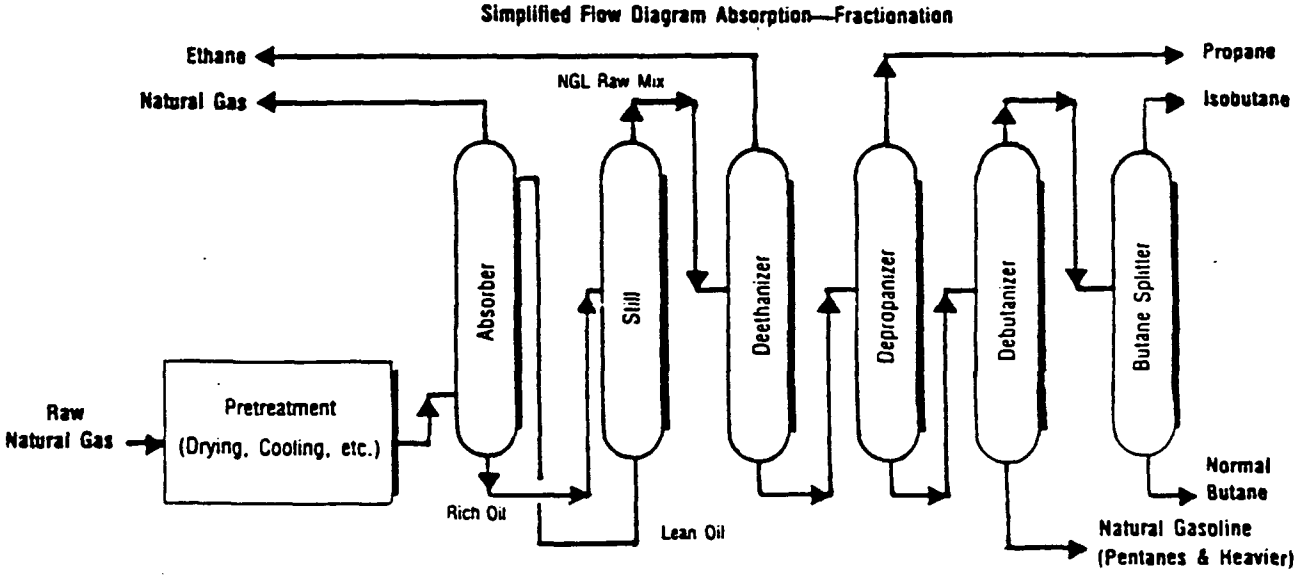
Depropanizer: The next step in the processing sequence is to separate the propane and the isobutane, with the propane going overhead and the isobutane and heavier components passing from the bottom of the depropanizer.

Debutanizer: The next fractionation step is separation of the butanes from the pentanes plus stream. The butanes (both iso and normal) pass overhead and the pentanes plus pass from the bottom of the fractionator.

Butane Splitter or Deisobutanizer: When it is desirable to do so, the butanes which pass overhead from the debutanizer may be separated into iso and normal butanes. The isobutane goes overhead and the normal butane is drawn from the bottom of the tower.

OTHER ROUTINE GAS PROCESSING

As noted earlier, both natural gas and natural gas liquids may require additional treating or processing, either before or after extraction of liquids.



The most common treatment of natural gas is removal of excess water vapor, which is necessary to prevent formation of hydrates and freezing in pipeline transmission systems. Techniques for dehydrating natural gas include:

–Absorption using liquid desiccants, usually a glycol compound

–Adsorption, using solid desiccants such as silica gel, activated alumina, or molecular sieves

–Dew point depression by injection of anti-freeze compounds such as glycols or alcohols

–Expansion refrigeration which cools the gas stream below the dew point of entrained water vapor.

Removal of excess moisture from some natural gas liquids, principally propane, is also necessary and is accomplished most often with solid desiccants or molecular sieves.

Additional treatment of both natural gas and natural gas liquids is usually required to remove hydrogen sulfide and carbon dioxide. This process in the industry is called "sweetening." Many process methods are used, most of which rely on either chemical reactions, physical solution, or adsorption. Each process has unique advantages, depending on the concentration of hydrogen sulfide, carbon dioxide, and other conditions.

The most common chemical processes are based on contact with amine solutions. These solutions react with unwanted acid gas constituents to form other compounds which can then be removed.

Physical solvent processes include a number of patented chemicals and processing schemes which function much the same as the oil absorption process for removal of liquids from gas.

Adsorption processes involve the removal of unwanted components by passing the gas or liquid through a bed of solid material that has been designed or treated to selectively extract carbon dioxide, hydrogen sulfide, or other contaminants.

SULFUR RECOVERY

The sour gas effluent from a sweetening unit must be further treated, either for disposal or for recovery of sulfur contained in the gas. At plants where hydrogen sulfide concentrations are very low, it is not economical to install sulfur recovery facilities. In these cases, the sour gas is disposed of by incineration.

At higher concentrations, the sour gas is usually processed in a sulfur recovery facility to recover elemental sulfur. The Claus process is the most widely used process for converting hydrogen sulfide into elemental sulfur. The process utilizes thermal and catalytic reactions to achieve conversion of up to 97% of hydrogen sulfide to elemental sulfur. "Tail gas clean up" processes reduce sulfur emissions significantly and boost overall efficiency of sulfur recovery to 98+%.

OTHER SPECIALIZED GAS PROCESSING

Depending on gas composition and other factors, the gas processing function may also include additional processing such as:

- Carbon dioxide removal and transport for enhanced oil recovery
- Helium recovery for commercial sale
- Nitrogen removal to increase heating value of the gas
- Liquefaction of the total gas stream to produce liquefied natural gas.

All of these process functions require specialized processes and additional investment.

PROFILE OF THE U.S. GAS PROCESSING INDUSTRY

PROCESSING PLANTS

There are approximately 859 gas processing plants in the United States, most of which are located in five states: Texas, Louisiana, Oklahoma, Kansas, and New Mexico. These five states account for about 86% of total U.S. gas processing capacity, gas processed, and natural gas liquids production.

Plant sizes range from less than 1 million cubic feet per day up to more than 2.5 billion cubic feet per day. The 200 smallest plants (about 25% of total) are less than 10 million cubic feet per day capacity, and account for only about 1% of total industry capacity.

The 200 largest plants (25% of total) have capacities greater than 80 million cubic feet per day and account for nearly 80% of total industry capacity. Approximately 92% of total gas capacity is in 375 plants (44% of total) with capacities greater than 35 million cubic feet per day. Production of natural gas liquids averages less than 2,000 barrels per day per plant, with maximum production ranging up to 25,000 barrels per day in the largest plants.

Approximately 100 of the 859 U.S. gas processing plants include sulfur recovery facilities, with a total capacity of about 4,500 tons per day of elemental sulfur. Sulfur production from gas plants accounts for about 13% of total U.S. sulfur production.

In addition, there are approximately 20 central fractionating plants operating in the United States. These fractionators may handle the mixed natural gas liquids production of a single separation facility, or may process mixed streams from many plants, some of which may be located hundreds of miles away. These fractionators separate these raw mixed NGL streams from recovery facilities into saleable products such as ethane, propane, butane, or specified mixtures, according to the user's needs.

COMPANIES

The U.S. gas processing industry is composed of an estimated 300 companies, ranging in size from the largest integrated oil companies to the single plant owner-operator.

The 20 largest gas processing companies produce about 70% of total U.S. production of natural gas liquids.

U.S. GAS PROCESSING PLANTS

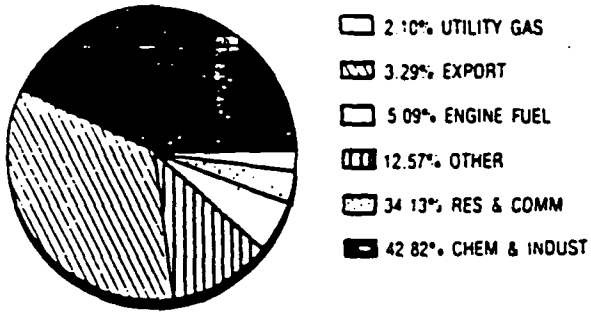
State	No. Plants	Gas Capacity, mmcfd	Gas throughput, mmcfd	NGL Products, m B/D
Texas	411	25,090	13,380	618
Louisiana	100	22,601	14,070	333
Oklahoma	103	4,765	3,110	145
Kansas	23	4,894	2,648	45
New Mexico	41	3,626	2,211	96
	678	60,976	35,419	1,237
Other	181	9,508	5,738	218
U.S. Total	859	70,484	41,157	1,455

NATURAL GAS LIQUIDS SUPPLY/DEMAND

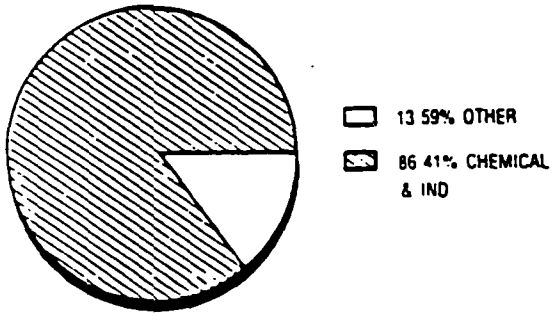
U.S. gas plant production of natural gas liquids totals some 570 million barrels per year, or approximately 1.5 million barrels per day. The distribution of this production during 1984 is as follows:

Ethane	28.7%
Propane	34.2%
Normal and Iso-Butane	19.6%
Pentanes plus, including plant condensate	17.5%

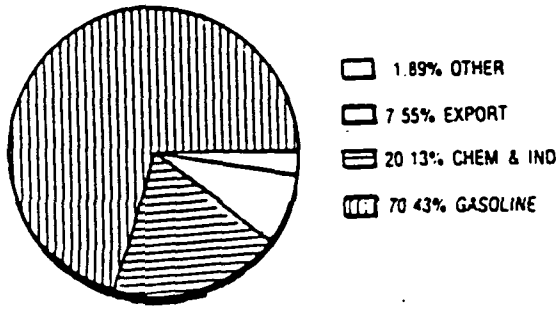
PROPANE CONSUMPTION



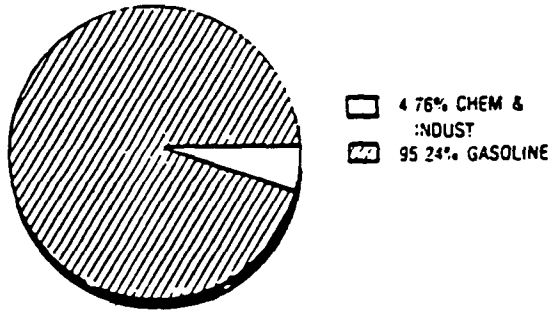
ETHANE CONSUMPTION



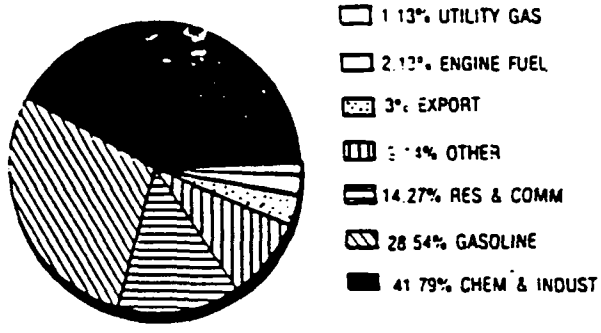
BUTANE CONSUMPTION



PENTANES + CONSUMPTION



NGL CONSUMPTION



PHYSICAL PROPERTIES OF NATURAL GAS LIQUIDS COMPONENTS

Component	Vapor Pressure psia @ 100 F.	Boiling Point @ 14.7 psia	Specific Gravity 60 F./60 F.
Methane	(5,000)	−259	0.3
Ethane	(800)	−127	0.356
Propane	190	−43.7	0.508
n-Butane	51.6	31.1	0.584
i-Butane	72.2	10.9	0.536
n-Pentane	15.6	96.9	0.631
i-Pentane	20.4	82.1	0.625
Hexane	5.0	155.7	0.664
Heptane	1.6	209.2	0.688

In addition, field facilities handling natural gas prior to delivery into a gas processing plant produce an estimated 350 thousand barrels per day of lease condensate, which is usually transported to refineries along with crude oil.

Total U.S. supply of natural gas liquids is augmented by refinery production and imports.

Refineries produce and market about 120 million barrels per year, or about 325 thousand barrels per day, of natural gas liquids, mainly propane. Refinery yields of natural gas liquids amount to 2-3% of total crude oil charged to the refinery.

Total imports of natural gas liquids are approximately 70 million barrels per year, or roughly 200 thousand barrels per day. About 80% of these imports are from Canada.

Approximately 80% of total U.S. natural gas liquids production is consumed in three major uses: petrochemical feedstocks; motor gasoline manufacture; and residential and commercial heating fuels. The remainder is used in a wide variety of applications, including engine fuels, industrial fuels, utility peak shaving, crop drying, and other agricultural and process fuel applications.

TRANSPORTATION AND STORAGE

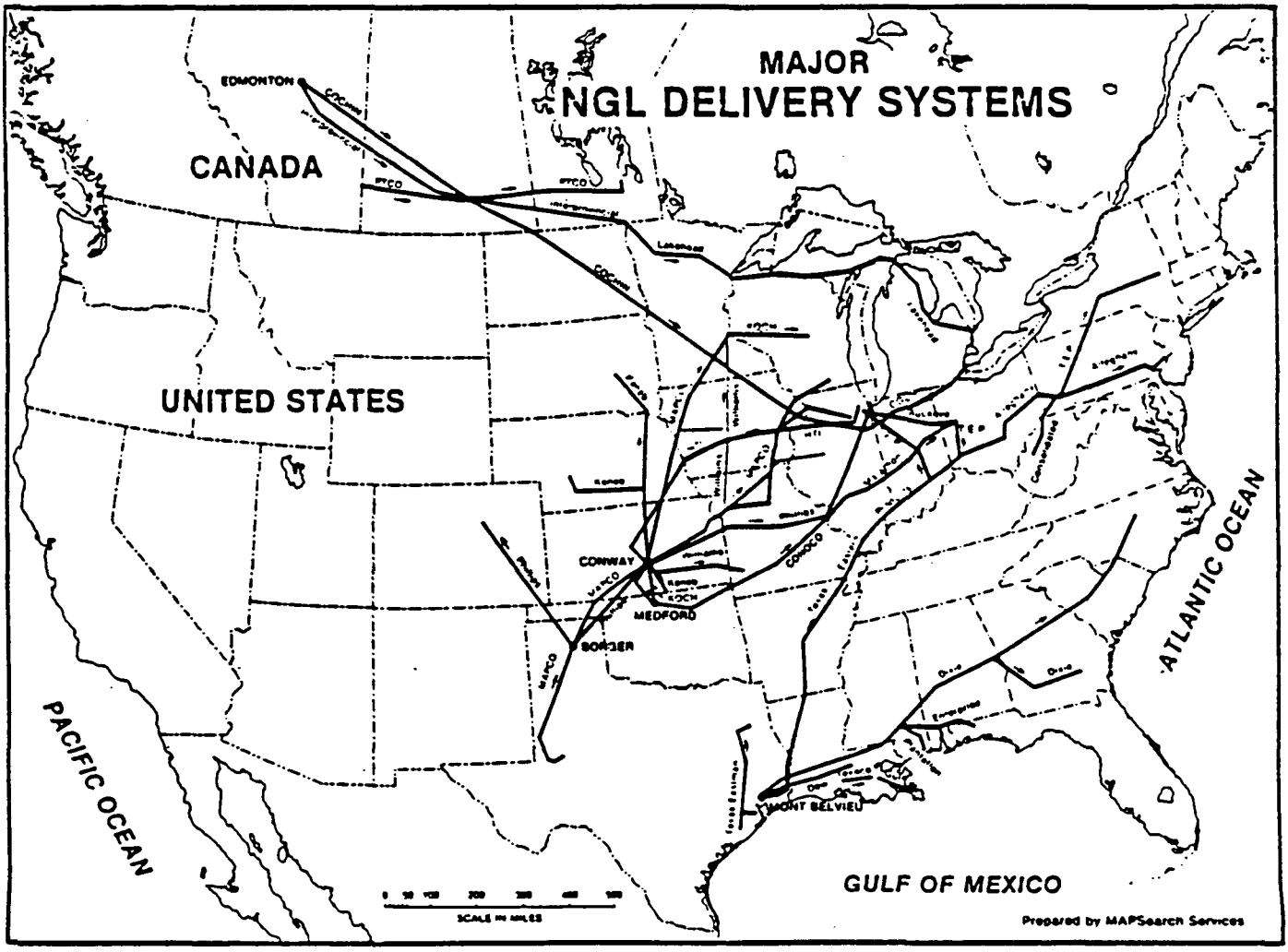
A national network of some 70 thousand miles of high pressure pipelines transport unfractionated NGL streams from production areas to fractionating centers and then transport finished products to major markets.

Four major pipelines extend from the West Texas-New Mexico fields to the major terminal and fractionation center of the U.S. – Mont Belvieu, Texas, located near the petrochemical and refining center of the nation. Other pipeline systems deliver West Texas-New Mexico natural gas liquids to a second major terminal, storage, and fractionation point in central Kansas.

From Mont Belvieu, two major pipeline systems deliver LP-gas fuels to the northeastern and southeastern United States.

Several pipeline systems extend from central Kansas storage and fractionating facilities into west and upper midwest markets.

Total natural gas liquids production is relatively constant throughout the year. However, depending on weather and other factors, demand may vary considerably. Therefore the industry has installed and operates underground storage facilities totaling nearly half a billion barrels capacity. The bulk of this capacity is located near the refining and petrochemical complexes of the Texas and Louisiana Gulf Coasts, with a second major installation in the midcontinent hub of central Kansas.



SECTION VI

HYDROLOGIC & GEOLOGIC DATA

SECTION VI

HYDROLOGIC & GEOLOGIC DATA

Wastewater is removed from the Eunice Plant as described throughout this document. Warren does operate one injection well for removal of waste water from this plant.

The Eunice Plant uses water from its wells and from the city of Eunice. Three of our wells located 1.5 miles northeast of the plant show water at an elevation of 3285' above sea level.

Further hydrologic and/or geologic data will be researched at the request of the Oil Conservation Division.

SECTION VII

CHEMICAL ANALYSES

SECTION VII
CHEMICAL ANALYSES

The information provided herein describes the sources and disposition of wastewater from the Eunice Plant which has a disposal system whereby no effluent is allowed to enter a navigable waterway.

Contingency measures would be taken by the plant for wastewater disposal should normally used removal methods ever be rendered inoperable. These procedures have been carefully formulated and would take effect in the event that an emergency would necessitate their implementation.

Section VIII, which follows contains a current copy of the Spill Prevention Control and Countermeasure (SPCC) Plan for the facility. The SPCC Plan is maintained on site and would be implemented in the event of a spill.

Wastewater sample analyses are attached. To obtain highly consistent analyses of the effluent would be difficult due to the several sources throughout each plant which combine to provide the whole.

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Report of tests on	Water	**File No.**	6923501
Client	Warren Petroleum Company	**Report No.**	69683
Delivered by	Tim Huffer	**Report Date**	12-27-90
		Date Received	12-11-90

Identification Vertical Tank, Sampled by Client

REPORT OF ORGANICS ANALYSIS

Date of Analysis 12-12-90 **Method** EPA 601
Technique Purge and Trap GC/MS **Analyst** W. Kucera

Compound	ug/L
Chloromethane	34
Bromomethane	*10
Vinyl Chloride	*10
Chloroethane	*10
Methylene Chloride	* 5
1,1-Dichloroethene	* 5
1,1-Dichloroethane	* 5
trans-1,2-Dichloroethene	* 5
Chloroform	96
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
trans-1,3-Dichloropropene	* 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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Report of tests on	Water	File No.	6923501
Client	Warren Petroleum Company	Report No.	69683
Delivered by	Tim Huffer	Report Date	12-27-9
		Date Received	12-11-9

Identification Vertical Tank, Sampled by Client

REPORT OF TOTAL METALS

Parameters	Results mg/L	Date Performed	Analyst	Test Method
Aluminum	*1.0	12-18-90	A. Johnston	SW846, 7020
Arsenic	0.08	12-20-90	A. Johnston	SW846, 7061
Boron	0.39	12-27-90	J. Goede	SW846, 6010
Cadmium	*0.05	12-18-90	A. Johnston	SW846, 7130
Mercury	*0.02	12-13-90	A. Johnston	SW846, 7470
Molybdenum	*2.5	12-18-90	A. Johnston	SW846, 7480
Nickel	*0.2	12-18-90	A. Johnston	SW846, 7520
Selenium	*0.01	12-20-90	A. Johnston	SW846, 7741

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Delivered by	Tim Huffer	**Report Date**	12-27-9
		Date Received	12-11-9

Identification Vertical Tank, Sampled by Client

REPORT OF ORGANICS ANALYSIS

Date of Analysis 12-13-90
Analyst J. Barnett

Method SW846, 5030/802

Compound	mg/L
Benzene	13.86
Toluene	26.61
Ethyl Benzene	3.55
m, p - Xylenes	4.70
o-Xylene	1.85

REPORT OF CHEMICAL ANALYSIS

Parameters	Results mg/L	Date Performed	Analyst	Methods
Phenols	16.6	12-20-90	A. Johnston	SW 846, 9066
Nitrate as N	23	12-11-90	A. Johnston	Standard Method 4500 $-NO_3$,F
Nitrite as N	26	12-11-90	A. Johnston	Standard Method 4500-NO_3,F

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Report of tests on	Water	File No.	692350
Client	Warren Petroleum Company	Report No.	69684
Delivered by	Tim Huffer	Report Date	12-27-
		Date Received	12-11-

Identification Horizontal Tank, Sampled by Client

REPORT OF ORGANICS ANALYSIS

Date of Analysis 12-12-90
Technique Purge and Trap GC/MS

Method EPA 601
Analyst W. Kucera

Compound	ug/L
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
trans-1,3-Dichloropropene	* 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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Report of tests on	Water	File No.	6923501
Client	Warren Petroleum Company	Report No.	69684
Delivered by	Tim Huffer	Report Date	12-27-9
		Date Received	12-11-9

Identification Horizontal Tank, Sampled by Client

REPORT OF TOTAL METALS

Parameters	Results mg/L	Date Performed	Analyst	Test Method
Aluminum	*1.0	12-18-90	A. Johnston	SW846, 7020
Arsenic	*0.01	12-20-90	A. Johnston	SW846, 7061
Boron	0.30	12-27-90	J. Goede	SW846, 6010
Cadmium	*0.05	12-18-90	A. Johnston	SW846, 7130
Mercury	*0.02	12-13-90	A. Johnston	SW846, 7470
Molybdenum	*2.5	12-18-90	A. Johnston	SW846, 7480
Nickel	*0.2	12-18-90	A. Johnston	SW846, 7520
Selenium	*0.01	12-20-90	A. Johnston	SW846, 7741

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Delivered by	Tim Huffer	**Report Date**	12-27-9
		Date Received	12-11-9

Identification Horizontal Tank, Sampled by Client

REPORT OF ORGANICS ANALYSIS

Date of Analysis 12-11-90
Analyst J. Barnett

Method SW846, 5030/802

Compound	mg/L
Benzene	*0.005
Toluene	*0.005
Ethyl Benzene	*0.005
m, p - Xylenes	*0.005
o-Xylene	*0.005

REPORT OF CHEMICAL ANALYSIS

Parameters	Results mg/L	Date Performed	Analyst	Methods
Phenols	*0.05	12-20-90	A. Johnston	SW 846, 9066
Nitrate as N	11	12-11-90	A. Johnston	Standard Method 4500 $-NO_3$, F
Nitrite as N	*0.1	12-11-90	A. Johnston	Standard Method 4500-NO_3, F

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Report of tests on	Water	File No.	6923501
Client	Warren Petroleum Company	Report No.	69682
Delivered by	Tim Huffer	Report Date	12-27-9
		Date Received	12-11-9

Identification Cooling Tower, Sampled by Client

REPORT OF ORGANICS ANALYSIS

Date of Analysis 12-12-90 Method EPA 601
Technique Purge and Trap GC/MS Analyst W. Kucera

Compound	ug/L
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
trans-1,3-Dichloropropene	* 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

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Report of tests on Water
Client Warren Petroleum Company
Delivered by Tim Huffer

File No. 6923501
Report No. 69682
Report Date 12-27-9
Date Received 12-11-9

Identification Cooling Tower, Sampled by Client

REPORT OF TOTAL METALS

Parameters	Results mg/L	Date Performed	Analyst	Test Method
Aluminum	*1.0	12-18-90	A. Johnston	SW846, 7020
Arsenic	0.02	12-20-90	A. Johnston	SW846, 7061
Boron	0.33	12-27-90	J. Goede	SW846, 6010
Cadmium	*0.05	12-18-90	A. Johnston	SW846, 7130
Mercury	*0.02	12-13-90	A. Johnston	SW846, 7470
Molybdenum	*2.5	12-18-90	A. Johnston	SW846, 7480
Nickel	*0.2	12-18-90	A. Johnston	SW846, 7520
Selenium	0.03	12-20-90	A. Johnston	SW846, 7741

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Report of tests on	Water	**File No.**	6923501
Client	Warren Petroleum Company	**Report No.**	69682
Delivered by	Tim Huffer	**Report Date**	12-27-9
		Date Received	12-11-9

Identification Cooling Tower, Sampled by Client

REPORT OF ORGANICS ANALYSIS

Date of Analysis 12-11-90
Analyst J. Barnett

Method SW846, 5030/802

Compound	mg/L
Benzene	*0.005
Toluene	*0.005
Ethyl Benzene	*0.005
m, p - Xylenes	*0.005
o-Xylene	*0.005

REPORT OF CHEMICAL ANALYSIS

Parameters	Results mg/L	Date Performed	Analyst	Methods
Phenols	*0.05	12-20-90	A. Johnston	SW 846, 9066
Nitrate as N	28	12-11-90	A. Johnston	Standard Method 4500 $-NO_3$,F
Nitrite as N	*0.1	12-11-90	A. Johnston	Standard Method 4500-NO_3,F

*Denotes "less than"

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SOUTHERN LABORATORIES: 9669 GROGANS MILL ROAD • THE WOODLANDS, TX 77380 • TELEPHONE: 713 • 367-6201

Water Analysis Report

Warren Petroleum
P.O. Box 1909
Eunice, NM 88231

Date Submitted: 12/10/90
Date Reported: 01/09/91

Attn: Tim Huffer

Sample Description: WW Vert Tk
Date Sampled: 12/11/90

Laboratory ID: A1217040

TEST	VALUE	UNITS	METHOD
pH	6.9	pH	Betz C238.1
P-Alkalinity, as CaCO3	0	mg/l	Betz C005.1
M-Alkalinity, as CaCO3	595.	mg/l	Betz C004.1
Conductivity	3410	umhos	Betz C216.2
Conductivity at pH 8.3	N/A	umhos	Betz C217.2
Chloride	722	mg/l	Betz C008.1
Sulfate and Sulfite, as SO4	61.	mg/l	Betz C023.1
Calcium, total, as CaCO3	209.	mg/l	Betz C116.1
Copper, total	< 0.05	mg/l	Betz C125.1
Hardness, total, as CaCO3	328.	mg/l	Betz C128.1
Iron, total	0.23	mg/l	Betz C132.1
Magnesium, total, as CaCO3	117.	mg/l	Betz C144.1
Sodium, total, as Na	335.	mg/l	Betz C153.1
Potasium, total, as K	10.4	mg/l	Betz C150.1
Barium, total, as Ba	0.03	mg/l	Betz C106.1
Chromium, total, as CrO4	0.06	mg/l	Betz C119.1
Cobalt, total, as Co	< 0.01	mg/l	Betz C123.1
Lead, total, as Pb	0.1	mg/l	Betz C136.1
Zinc, total, as Zn	0.01	mg/l	Betz C166.1
Total Anions, as CaCO3	-1676		
Total Cations, as CaCO3	1070		

William W Walker
Laboratory Manager

BETZ LABORATORIES, INC.

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SOUTHERN LABORATORIES: 9669 GROGANS MILL ROAD • THE WOODLANDS, TX 77380 • TELEPHONE: 713 • 367-6201

Water Analysis Report

Warren Petroleum
P.O. Box 1909
Eunice, NM 88231

Date Submitted: 12/10/90
Date Reported: 01/09/91

Attn: Tim Huffer

Sample Description: Cooling Tower
Date Sampled: 12/05/90

Laboratory ID: A1210006

TEST	VALUE	UNITS	METHOD
pH	7.8	pH units	Betz C238.1
P-Alkalinity, as CaCO3	0	mg/l	Betz C005.1
M-Alkalinity, as CaCO3	73.	mg/l	Betz C004.1
Conductivity	5360	umhos	Betz C216.2
Conductivity at pH 8.3	N/A	umhos	Betz C217.2
Chloride	1070	mg/l	Betz C008.1
Sulfate and Sulfite, as SO4	1790	mg/l	Betz C023.1
Phosphate, ortho, as PO4	14.5	mg/l	Betz C017.1
Phosphate, inorganic, as PO4	15.5	mg/l	Betz C021.1
Phosphate, total, as PO4	15.5	mg/l	Betz C019.1
Silica, as SiO2	183.	mg/l	Betz C245.1
Calcium, total, as CaCO3	833.	mg/l	Betz C116.1
Copper, total	< 0.05	mg/l	Betz C125.1
Hardness, total, as CaCO3	1580.	mg/l	Betz C128.1
Iron, total	0.07	mg/l	Betz C132.1
Magnesium, total, as CaCO3	735.	mg/l	Betz C144.1
Sodium, total, as Na	868.	mg/l	Betz C153.1
Potasium, total, as K	38.	mg/l	Betz C150.1
Barium, total, as Ba	0.1	mg/l	Betz C106.1
Chromium, total, as CrO4	0.05	mg/l	Betz C119.1
Cobalt, total, as Co	< 0.01	mg/l	Betz C123.1
Lead, total, as Pb	0.08	mg/l	Betz C136.1
Zinc, total, as Zn	0.02	mg/l	Betz C166.1
Total Anions, as CaCO3	3504		
Total Cations, as CaCO3	-3451		

William W Walker

BETZ LABORATORIES, INC.

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SOUTHERN LABORATORIES: 9669 GROGANS MILL ROAD • THE WOODLANDS, TX 77380 • TELEPHONE: 713 • 367-6201

Water Analysis Report

Warren Petroleum
P.O. Box 1909
Eunice, NM 88231

Date Submitted: 12/10/90
Date Reported: 01/09/91

Attn: Tim Huffer

Sample Description: Waste DHWT
Date Sampled: 12/05/90

Laboratory ID: A1210008

TEST	VALUE	UNITS	METHOD
pH	8.8	pH	Betz C238.1
P-Alkalinity, as CaCO3	25.	mg/l	Betz C005.1
M-Alkalinity, as CaCO3	120.	mg/l	Betz C004.1
Conductivity	5530	umhos	Betz C216.2
Conductivity at pH 8.3	5440	umhos	Betz C217.2
Chloride	1160	mg/l	Betz C008.1
Sulfate and Sulfite, as SO4	1620	mg/l	Betz C023.1
Phosphate, ortho, as PO4	3.3	mg/l	Betz C017.1
Phosphate, inorganic, as PO4	3.4	mg/l	Betz C021.1
Phosphate, total, as PO4	3.4	mg/l	Betz C019.1
Silica, as SiO2	150.	mg/l	Betz C245.1
Calcium, total, as CaCO3	724.	mg/l	Betz C116.1
Copper, total	< 0.05	mg/l	Betz C125.1
Hardness, total, as CaCO3	1350	mg/l	Betz C128.1
Iron, total	0.06	mg/l	Betz C132.1
Magnesium, total, as CaCO3	621.	mg/l	Betz C144.1
Sodium, total, as Na	939.	mg/l	Betz C153.1
Potasium, total, as K	33.	mg/l	Betz C150.1
Barium, total, as Ba	0.09	mg/l	Betz C106.1
Chromium, total, as CrO4	0.05	mg/l	Betz C119.1
Cobalt, total, as Co	< 0.01	mg/l	Betz C123.1
Lead, total, as Pb	0.07	mg/l	Betz C136.1
Zinc, total, as Zn	0.02	mg/l	Betz C166.1
Total Anions, as CaCO3	3392		
Total Cations, as CaCO3	-3442		

William Wadelton

SECTION VIII

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Warren Petroleum Eunice Plant personnel will follow the SPCC guidelines on spill/leak reporting for the Eunice facility. These guidelines will conform to the Water Quality Control Commission Section 1203 and to NMOCD Rule 116 for spill/leak reporting.

The Eunice Plant SPCC is due for renewal in October of 1996, after the plan has been updated and certified a copy will be sent to the OCD Discharge Plan Engineer and to the OCD District Office for replacement of this copy.

WARREN PETROLEUM COMPANY

A DIVISION OF CHEVRON U.S.A. INC.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

EUNICE PLANT

EUNICE, NEW MEXICO

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

CONTENTS

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PART I. GENERAL INFORMATION

FACILITY NAME: Eunice Plant

FACILITY CLASSIFICATION: Onshore Gas Processing Facility

FACILITY LOCATION: 1½ Miles Southeast of City
Eunice, New Mexico

OWNER AND OPERATOR: Warren Petroleum Company
A Division of Chevron U.S.A. Inc.
P. O. Box 1909
Eunice, New Mexico 88231

SPILL PREVENTION CONTACT: ~~F. C. Noah~~ D. L. Ishmael, Facility Manager

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SPCC PLAN AREA OF APPLICABILITY:

This SPCC Plan shall cover the area of the Eunice Plant property as shown in Appendix "B" of this Plan.

Did the facility experience any reportable spill during the twelve months prior to January 10, 1974, the effective date of 40 CFR, Part 112? No.

MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described. Also, the Spill Contingency Plan located in Appendix "A" retains the commitment of management for its proper execution in securing the necessary manpower, equipment and materials to expeditiously control and remove any harmful quantity of oil discharged from this facility.

F. C. Noah, Facility Manager

Memorandum

As manager of this facility I am familiar with operations and with the SPCC Plan as certified on June 22, 1990.

Operations have not changed since the certification date therefore the plan still reflects the needs of the plant and the provisions of 40CPR, Part 112. This will serve as recertification with contact phone updates being the only change.

S. T. Wilson
Date: 10/19/93

CERTIFICATION

I, Scott T. Wilson, being a registered Professional Engineer, having examined this facility and being familiar with the provisions of 40 CFR, Part 112, do hereby attest that this SPCC Plan has been prepared in accordance with good engineering practices.

Scott T. Wilson
Signature

9113
License

(SEAL)

New Mexico
State

June 22, 1990
Date

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PART II. SPILL PREVENTION

Major Equipment Failure Prediction

There are a number of different equipment failures which could result in the release of oil or other substances. Equipment for which a spill potential exists for the release of oil or other substances is summarized in Table I, showing the nature of the equipment failure.

Precautionary Measures

The major equipment failure scenarios have been identified and assessed. Raw mix spillage will vaporize at atmospheric pressure. Containment structures are in place for some of the other materials stored at the facility. Management does commit manpower and equipment to the prevention, control and cleanup of any spill that occurs.

A plot plan has been used as an additional tool in mapping out the various materials stored at the facility. A copy of this plot plan may be found in Appendix "B", as referenced in the Spill Contingency Plan.

Storage Tank Design

All storage tanks have been built in accordance with industry standards at the time of their construction. This includes general structure, compatibility of materials used in construction and materials to be contained, and support structures and operating parameters, such as temperature and pressure.

All storage tanks have been provided with adequately sized and rated pressure relief systems to prevent accidental overpressure.

Storage Tank Overfill

All tanks, while being filled, are monitored locally to ensure that overfill doesn't occur.

Facility Truck Loading/Unloading Docks

All loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation. Drains and outlets on tank trucks are checked for leakage before loading/unloading or departure.

The use of additional preventive systems, such as containment structures and diversionary structures, is unnecessary for product, and propane storage, as vaporization will occur at atmospheric pressure. No containment or diversionary structures are in place at the lube oil or methanol storage areas. Since all lines in the facility, including those on the loading rack docks, are inspected regularly to assure line integrity and since all other associated pipe system components (loading arms, valves, etc.) are visually inspected regularly (including loading/unloading operations) by the operator, further protective systems and equipment are not necessary within the scope of this SPCC Plan.

In the unlikely event of a line rupture or any other possible release from the facility property, the Spill Contingency Plan will be activated for expedient assessment, containment and cleanup of the spill. This plan is located in Appendix "A". The required "Commitment of Manpower" by Management for the Spill Contingency Plan is located in Part 1. General Information of the SPCC Plan under "Management Approval".

Inspections

In order to ensure that storage tank and piping system integrity is maintained, regular visual inspections are conducted, as well as periodic nondestructive thickness testing (ultrasonic).

Visual inspections shall be conducted in areas surrounding the storage tanks at least daily and more frequently as time permits.

For a more detailed guideline of the inspection procedures and records of such inspections and tests, refer to Appendix "C".

Facility Security

The facility property is secured with a chain link fence along the perimeter of the property. The front entrance gate is locked when the facility is unattended. All valves are within the fences of facility yard. The facility property is adequately illuminated to detect any discharges, releases, or acts of vandalism during non-daylight hours.

Personnel Training

All employees, as part of their formal instruction, are trained in the proper operation and maintenance of equipment, as it pertains to their position, to prevent discharges of oil or other substances to the ground and navigable water courses. As part of their training, they are made aware of applicable pollution control laws, rules and regulations affecting the facility.

Ongoing training is conducted through spill prevention briefings, which are held on at least an annual basis. These briefings include a review of spills, SPCC Plan adequacies and deficiencies in response to past spills and recently developed precautionary measures for spill prevention or mitigation.

For more specifics and documentation of the training actually conducted, please refer to the Training Section of the Central Environmental Filing System located in the office building.

TABLE I. SPILL PREDICTION

Equipment	Major Type of Failure	Contents	Capacity (Barrels)	Flow Rate (bbls/hr)	Flow Direction
		T A N K S			
1	Leak	Slop/Drip	500	50	S.E.
2	Leak	Slop/Drip	500	50	S.E.
3	Leak	Slop/Drip	500	50	S.E.
4	Leak	Lube Oil	315	30	S.E.
5	Leak	Lube Oil	283	30	S.E.
6	Leak	MEA	80	20	S.E.
7	Rupture	Demethanized Product	700	250	Vapor
8	Leak	Methanol	200	50	S.E.
9	Rupture	Propane	240	240	Vapor
10	Leak	Acid	30	15	S.E.
11	Leak	Boiler Treatment	76	8	S.E.
12	Leak	Cooling Tower Treatment	29	5	S.E.

Appendix "A"

WARREN PETROLEUM COMPANY

A DIVISION OF CHEVRON U.S.A. INC.

SPILL CONTINGENCY PLAN

EUNICE PLANT

EUNICE, NEW MEXICO

Appendix "A"

SPILL CONTINGENCY PLAN

CONTENTS

List of Tables

SPILL CONTINGENCY PLAN

PURPOSE AND SCOPE

Purpose

The purpose of this Spill Contingency Plan is to provide procedural guidance on containment and cleanup in order to mitigate or eliminate the effects of a spill which poses a threat of contaminating the waters of the United States and New Mexico. Management commits manpower and equipment to the prevention, control and cleanup of all spills.

Another purpose of this plan is to provide guidance in notifying (telephone and written) the proper federal, state and local agencies to fulfill reporting requirements set forth in federal and state regulations, such as CERCLA, RCRA, SARA Title III, CWA and State of New Mexico, Energy and Minerals Department, Rule 116.

Scope

The scope shall cover all spills which occur on the Eunice, New Mexico Facility property which is operated by Warren Petroleum Company.

SPILL CONTINGENCY PLAN

CONTAINMENT AND CLEANUP PROCEDURES

When a spill of any substance which is covered by the Spill Prevention Control and Countermeasure Plan occurs, a rapid response of the facility personnel to stop the substance flow to the spill area and to contain the spill is imperative in mitigating the impact on the environment and cleanup costs.

Once a spill has been discovered to have occurred, the following sequence of events should be carried out for containment and cleanup:

1. Identify and shutoff the source of discharge causing the spill (obtain help, if needed).

2. Determine which substance was spilled.

3. Notify the Plant Supervisor or Facility Manager of the spill. He will then notify appropriate personnel. See pages 4 through 7 of the Notification Procedure Section.

4. a. If the spill is small enough for Warren personnel to clean up, then obtain absorbent material, from the warehouse to clean up the spill.

   b. If the spill is beyond Warren's handling capabilities, the Facility Manager (or Supervisor in charge) will alert a qualified contractor for cleanup of the spill.

   c. The Facility Manager (or Supervisor in charge) will interface with the E.P.A. Investigator and will monitor the progress of the cleanup operation until the investigator has given his approval of adequacy of the cleanup.

SPILL CONTINGENCY PLAN

NOTIFICATION PROCEDURES

When the Spill Contingency Plan has been activated, it is necessary that the proper Warren personnel and governmental agencies are notified of the spill, its nature and extent.

There are two general types of notifications: internal and external. Internal refers to notifications within the facility, the company and the corporation. External refers to notifications to governmental agencies, contractors, media, etc. All non-supervisory personnel shall be responsible for notification internally, to the extent of notifying Eunice Plant personnel, especially the Facility Manager (or supervisor in charge). See Table III of this section for a list of supervisors and their telephone numbers.

Once the Facility Manager (or supervisor in charge) has been notified, he is responsible for all subsequent notification requirements, as outlined below:

1. Determine the spill size (gallonage) and area affected by the spill. From this, determine the "Spill Category" from Table I on page 3.

2. Report the spill to the appropriate agencies, by telephone, as outlined below.

   a. Major and Medium spills are to be reported to the appropriate agencies immediately.

   b. Minor spills are to be reported to the appropriate agencies as soon as possible (within 24 hours).

   c. All spills covered under the SPCC Plan shall be reported to the agencies listed in Table II on page 4.

d. Complete a copy of the "Agency Telephone Notification Form" in "Appendix E" for each agency contacted, noting all topics discussed in the conversation and incorporate in the subsequent written report.

e. Notify Environmental Affairs in Tulsa of the incident for assistance.

3. Follow-up the telephone notification with a written report, as outlined below:

a. All incidents which trigger this Spill Contingency Plan shall be reported to Environmental Affairs in Tulsa, as soon as possible, as shown in Table II, on page 4, of these procedures.

b. If a written report is required by any agency, Environmental Affairs shall give assistance in determining what the reporting requirements are, and shall review and submit the report to the appropriate agencie(s).

c. As a minimum reporting requirement, a written report shall be submitted to Environmental Affairs describing the incident in its entirety.

d. All spills, regardless of size, shall be documented in the form of a written report and submitted to the Environmental File System (File VI.A.4) for a minimum of three (3) years.

e. If a spill is to be reported to the EPA Regional Administrator, as outlined in Table II, it shall contain the following:

- Initial start-up date of the facility.
- Maximum storage or handling capacity and daily average throughput.

- Description of the facility, including process flows, plot plan and topographic map.
- Copy of the SPCC Plan.
- Cause of the spill(s).
- Corrective action(s) taken.
- Additional preventive measure(s) taken.

TABLE I. SPILL CATEGORIES

Spill Category	Spill Description
Major	10,000 gallons, or more, of oil into inland navigable water.
	100,000 gallons, or more, of oil into coastal navigable waters.
	Any quantity of a hazardous substance that poses a substantial threat to the public health or welfare.
Medium	1,000 - 10,000 gallons of oil into inland navigable waters.
	10,000 - 100,000 gallons of oil into coastal navigable water.
	Any quantity of a hazardous substance which exceeds its reportable quantity* (RQ).
Minor	1,000 gallons, or less, of oil into inland navigable waters.
	10,000 gallons, or less, of oil into coastal navigable waters.
	Any quantity of a hazardous substance which is below its reportable quantity* (RQ).

*Reportable Quantities (RQ) are located in Appendix "F".

NEW MEXICO - EUNICE PLANT

TABLE II. REPORTING REQUIREMENTS AND TELEPHONE NUMBERS

SUBSTANCE	QUANTITY RELEASED			CONTACTS												
				FEDERAL		STATE							LOCAL		CHEVRON	
	LAND	WATER	AIR	EPA	NRC	NMEID[10]	NMEID[11]	NMOCD[12]	NMCC[13]	NMEID[14]	NMDPS[15]	NMERC[16]	LEPC[17]	FD[18]	WPCEA[19]	CCC
Oil[3,9]	////////	Any[10]	////////	T,W	T[1]	T,W[2]		T,W								
	5 bbl	1 bbl	////////			T,W		T,W							W	
	////////	////////	1 bbl			T,W[8]	T,W	T,W							W	
CERCLA Hazardous[4]	////////	RQ[7]	////////		T	T,W		T,W							T,W	
	RQ[7]	////////	////////		T	T,W		T,W							T,W	
	////////	////////	RQ[7]		T		T,W	T,W							T,W	
RCRA Hazardous[5]	////////	RQ[7]	////////		T			T,W		T,W					T,W	
	RQ[7]	////////	////////		T			T,W		T,W					T,W	
SARA Hazardous[6]	////////	RQ[7]	////////		T			T,W			T,W	T,W	T,W	T	T,W	
	RQ[7]	////////	////////		T			T,W			T,W	T,W	T,W	T	T,W	
	////////	////////	RQ[7]		T		T,W	T,W			T,W	T,W	T,W	T	T,W	
Natural or Other Gas Pipeline	Any	Any	Any						T,W						T,W	

ACRONYM	DESCRIPTION	TELEPHONE NUMBERS DAYLIGHT	AFTER HOURS
EPA	Environmental Protection Agency - Region VI	(214) 655-2222	Same
NRC	National Response Center	(800) 424-8802	Same
NMEID[10]	New Mexico Environmental Improvement Div. Ground Water Bureau - Santa Fe	(505) 827-0188 or (505) 827-2915	(505) 827-9329
NMEID[11]	New Mexico Environmental Improvement Div. Air Quality Division - Santa Fe	(505) 827-0062	(505) 827-9329
NMOCD[12]	N.Mexico Energy, Minerals & Ntrl Resources Dept.-Oil Conservation Division - Santa Fe DISTRICT I - Hobbs	(505) 827-5800 and (505) 393-6161	(505)471-1068 & Same
NMCC[13]	New Mexico State Corporation Commission Pipeline Division - Santa Fe	(505)827-4176/4497 or(505) 827-4521 or(505) 827-4009 or(505) 827-4494	(505) 983-1810 (505) 473-1923 (505) 473-0717 (505) 892-2274
NMEID[14]	New Mexico Environmental Improvement Div. Hazardous Waste Bureau	(505) 827-2929	(505) 827-9329
NMDPS[15]	New Mexico Department of Public Safety Chemical Safety Bureau	(505) 827-9000	Same
NMERC[16]	New Mexico Emergency Response Commission	(505) 827-9222	Same
LEPC[17]	Local Emergency Planning Commission	(505) 397-9289	Same
FD[18]	Fire Department - Eunice	(505) 394-2112	Same
WPCEA[19]	Warren Petroleum Co.-Environmental Affairs Alternate Number	(918) 560-4119 (918) 560-4138	(918) 663-3397 (918) 492-5717
CCC	Chevron Corporate Compliance	(415) 894-6993	

NOTES:

1. Telephonic notifications are represented by "T" above.
2. Written notifications are represented by "W" above.
3. All petroleum based products, including LPG's, lube oil, gasoline, etc.
4. All substances found on the EPA list of CERCLA hazardous substances and reportable quantities.
5. All substances found on the EPA list of RCRA hazardous substances list or substances that are hazardous by characteristic (toxicity, reactivity, corrosivity and ignitability).
6. All substances found on the EPA list of SARA extremely hazardous substances.
7. Reportable Quantity - See Appendix "F".
8. Major Upset and Maintenance and Oil Spill Reporting - See Appendix "G".
9. Report 42 gallon oil spills for a single occurrence, or if two spills have occurred within a twelve (12) month period or a discharge of oil or other water contaminant whose quantity may, with reasonable probability injure or be detrimental to human health, animal or plant life, or property or unreasonably interfere with the public welfare or use of property. Written report to be submitted within seven (7) days to the appropriate agency.
12. Report any fire, break, leak, spill or blowout on Form NM-7.
19. Report on GO-140.

Oil:

Report any discharge from any facility of oil or other water contaminant whose quantity may, with reasonable probability, injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, as soon as possible after learning of such a discharge, but in no event more than 24 hours thereafter to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Ground Water Bureau
(8 to 5) (505) 827-2915
(505) 827-0188
(24-hour) (505) 827-9329 (Alternate)

Notes:

1. Verbal reports shall include the following items:
   a. The name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility.
   b. The name and address of the facility.
   c. The date, time, location, and duration of the discharge.
   d. The source and cause of discharge.
   e. A description of the discharge, including its chemical composition.
   f. The estimated volume of the discharge.
   g. Any actions taken to mitigate immediate damage from the discharge.
2. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification verifying the prior oral notification as to each of the items in Note 1, providing any appropriate additions or corrections to:

   New Mexico Health and Environment Department
   Environmental Improvement Division
   Chief, Ground Water Bureau
   Harold Runnels Building
   1100 St. Francis Drive
   Santa Fe, NM 87503

Report any fire, break, leak, spill, or blowout at any injection or disposal facility or at any oil and gas drilling, producing, transporting, or processing facility to:

New Mexico Energy, Minerals and Natural Resources Department, Santa Fe
Oil Conservation Division
(8 to 5) (505) 827-5800

In addition, make **"immediate"** and/or **"subsequent"** notifications for any fire, break, leak, spill, or blowout to the appropriate district office (refer to notes for details and map for nearest district offices):

NM-1

District	City	Numbers	Home
I	Hobbs	(505) 393-6161	(505) 393-6161
II	Artesia	(505) 748-1283	(505) 746-4126
III	Aztec	(505) 334-6178	(505) 334-2709
IV	Santa Fe	(505) 827-5810	(505) 471-1068

Notes:

1. **"Immediate notification"** shall be as soon as possible after discovery in person or by telephone to the appropriate district office or, if after business hours, to the district supervisor. Immediate notification to be followed by subsequent notification.
2. **"Subsequent notification"** shall be a complete written report of the incident in duplicate to the appropriate district office within 10 days after discovery of the incident.
3. Verbal or written reports shall include:
   a. Location of the incident by quarter-quarter, section, township, and range.
   b. Location by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground.
   c. Nature and quantity of the loss.
   d. General conditions prevailing in the area to include precipitation, temperature, and soil conditions.
   e. Measures that have been taken and are being taken to remedy the situation.
4. Notifications shall be in accordance with the following:
   a. Well blowout—immediate notification.
   b. Major and minor breaks, spills or leaks; gas leaks and line breaks; tank fires; drilling pits, slush pits, storage pits and ponds:

Material	Quantity (bbls unless otherwise noted)	Water-course[1]	Notification
Crude Oil or Condensate	≥25	No	Immediate
	5<25	No	Subsequent
	≥1	Yes	Immediate
(Tank Fires)	≥25	—	Immediate
(Tank Fires)	5<25	—	Subsequent
(Endanger Life or Property)	Any Quantity	—	Immediate
Salt Water	≥100	No	Immediate
	≥25	Yes	Immediate
	25<100	No	Subsequent
(Endanger Life or Property)	Any Quantity	—	Immediate

Material	Quantity (bbls unless otherwise noted)	Water-course[1]	Notification
Gas			
(Endanger Life or Property)	Any Quantity	—	Immediate
(No Danger)	≥1000 MCF	—	Subsequent
Related Materials[2]			
(Endanger Life or Property) —Drilling pits, slush pits, storage pits and ponds	Any Quantity	—	Immediate
(Endanger Life or Property)	Any Quantity	—	Immediate
(No Danger)	Any Quantity	—	Subsequent

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

[2]Related materials include hydrocarbons, hydrocarbon waste or residue, strong caustics, strong acids or other deleterious chemicals or harmful contaminants.

5. The following notification form shall be submitted in duplicate to the appropriate district office within 10 days after discovery of the incident. This applies to both Immediate and Subsequent Notifications. Refer to the map for addresses.

6. If the discharge of oil or other water contaminant is in such quantity so that it may injure or be detrimental to humans, animal, or plant life, or property, or interfere with public welfare or property, any person in charge of the discharging facility shall immediately take appropriate and necessary steps to contain and remove or mitigate the damage caused by the discharge.

Report leaks from natural gas and other gas pipelines within 2 hours of discovery to:

New Mexico State Corporation Commission, Santa Fe
Pipeline Division

Office Numbers (8 to 5)	Home Numbers	
(505) 827-4176 or 4497	(505) 983-1810	(Rey S. Medina)
(505) 827-4521 (Alternate)	(505) 473-1923	(Albino O. Zuniga)
(505) 827-4009 (Alternate)	(505) 473-0717	(Ray Elliott)
(505) 827-4494 (Alternate)	(505) 892-2274	(Joe Johnson)

Hazardous Substances: Same as Oil.

Hazardous Wastes:

Report spills to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Hazardous Waste Bureau
(8 to 5) (505) 827-2929
(24-hour) (505) 827-9329

Hazardous Materials:

Same as Oil.

Excess Air Emissions:

Report excess emissions within 24 hours or no later than the next working day to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Air Quality Bureau
(8 to 5) (505) 827-0062
(24-hour) (505) 827-9329

Wastewater Excursions:

Same as Oil.

Underground Tank Leaks:

Report any known or suspected release from a UST system, any spill, or any other emergency situation within 24 hours to:

New Mexico Health and Environment Department, Santa Fe
Environmental Improvement Division
Hazardous Waste Bureau
(8 to 5) (505) 827-2894
(24-hour) (800) 827-9329 (Alternate)

Notes:

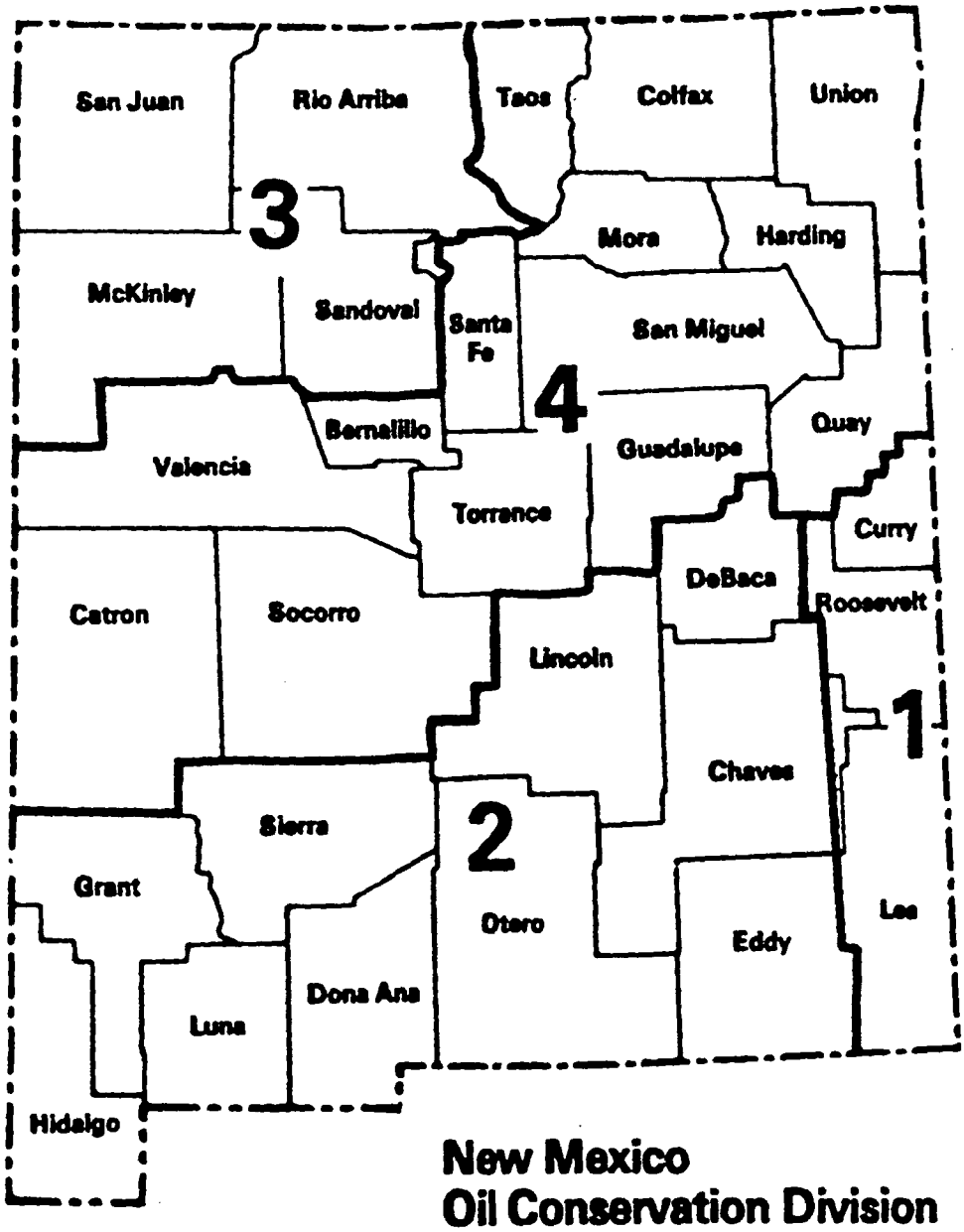
1. Verbal report shall include:
   a. The name, address, and telephone number of the agent in charge of the site at which the UST system is located, as well as of the owner and the operator of the system.
   b. The name and address of the site at which the UST system is located and the location of the UST system on that site.
   c. The date, time, location, and duration of the spill, release, or suspected release.
   d. The source and cause of the spill, release, or suspected release.
   e. A description of the spill, release, or suspected release, including its chemical composition.
   f. The estimated volume of the spill, release, or suspected release.
   g. Action taken to mitigate immediate damage from the spill, release, or suspected release.

2. Written notice describing the spill, release, or suspected release and any investigation or follow-up action taken or to be taken must be mailed or delivered within seven (7) days of the incident. The written notice shall verify the prior oral notification as to each of the items of information listed above and provide any appropriate additions or corrections to the information contained in the prior oral notification. The written notice must be submitted to:

Carl Souder, Manager, Underground Storage Tank Program
New Mexico Environmental Improvement Division
Runnels Building
1190 St. Francis Drive
Santa Fe, NM 87583

SARA Title III: Report releases and submit written follow-up emergency notice(s) to:

New Mexico Emergency Response Commission
Attention: Sam Larcomb
Department of Public Safety
Title III Bureau
P.O. Box 1628
Santa Fe, NM 87504-1628
(505) 827-9222



New Mexico
Oil Conservation Division
District Offices

District	City	Numbers	Addresses
1	Hobbs	(505) 393-6161	1000 W. Broadway, 88240
2	Artesia	(505) 748-1283	324 W. Main, 88210
3	Aztec	(505) 334-6178	1000 Rio Brazo, 87410
4	Santa Fe	(505) 827-5810	P.O. Box 2088, 87504

NM-6

State of New Mexico
Energy and Minerals Department

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

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

Name of Operator				Address			
Report of	Fire	Break	Spill	Leak	Blowout	Other*	
Type of Facility	Drlg Well	Prod Well	Tank Btty	Pipe Line	Gaso Plnt	Oil Rfy	Other*
Name of Facility							
Location of Facility (Quarter/Quarter Section or Footage Description)				Sec.	Twp.	Rge.	County
Distance and Direction From Nearest Town or Prominent Landmark							
Date and Hour of Occurrence				Date and Hour of Discovery			
Was Immediate Notice Given?	Yes	No	Not Required	If Yes, To Whom			
By Whom				Date and Hour			
Type of Fluid Lost				Quantity of Loss _____ BO _____ BW		Volume Recovered _____ BO _____ BW	
Did Any Fluids Reach a Watercourse?	Yes	No	Quantity				
If Yes, Describe Fully**							
Describe Cause of Problem and Remedial Action Taken**							
Describe Area Affected and Cleanup Action Taken**							
Description of Area	Farming	Grazing	Urban	Other*			
Surface Conditions	Sandy	Sandy Loam	Clay	Rocky	Wet	Dry	Snow
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)**							
I Hereby Certify That the Information Above Is True and Complete to the Best of My Knowledge and Belief Signed _____ Title _____ Date _____							

*Specify

**Attach Additional Sheets if Necessary

INCIDENT

NM-7

State of New Mexico
Energy and Minerals Department

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

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

Name of Operator				Address			
Report of	Fire	Break	Spill	Leak	Blowout	Other*	
Type of Facility	Drlg Well	Prod Well	Tank Btty	Pipe Line	Gaso Plnt	Oil Rfy	Other*
Name of Facility							
Location of Facility (Quarter/Quarter Section or Footage Description)				Sec.	Twp.	Rge.	County
Distance and Direction From Nearest Town or Prominent Landmark							
Date and Hour of Occurrence				Date and Hour of Discovery			
Was Immediate Notice Given?	Yes	No	Not Required	If Yes, To Whom			
By Whom				Date and Hour			
Type of Fluid Lost				Quantity of Loss _____ BO _____ BW		Volume Recovered _____ BO _____ BW	
Did Any Fluids Reach a Watercourse?	Yes	No	Quantity				
If Yes, Describe Fully**							
Describe Cause of Problem and Remedial Action Taken**							
Describe Area Affected and Cleanup Action Taken**							
Description of Area	Farming	Grazing	Urban	Other*			
Surface Conditions	Sandy	Sandy Loam	Clay	Rocky	Wet	Dry	Snow
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)**							
I Hereby Certify That the Information Above Is True and Complete to the Best of My Knowledge and Belief Signed _____ Title _____ Date _____							

*Specify

**Attach Additional Sheets if Necessary

INCIDENT

State of New Mexico
Energy and Minerals Department

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

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

Name of Operator				Address			
Report of	Fire	Break	Spill	Leak	Blowout	Other*	
Type of Facility	Drlg Well	Prod Well	Tank Btty	Pipe Line	Gaso Plnt	Oil Rfy	Other*
Name of Facility							
Location of Facility (Quarter/Quarter Section or Footage Description)			Sec.	Twp.	Rge.	County	
Distance and Direction From Nearest Town or Prominent Landmark							
Date and Hour of Occurrence			Date and Hour of Discovery				
Was Immediate Notice Given?	Yes	No	Not Required	If Yes, To Whom			
By Whom				Date and Hour			
Type of Fluid Lost				Quantity of Loss _____BO _____BW	Volume Recovered _____BO _____BW		
Did Any Fluids Reach a Watercourse?	Yes	No	Quantity				
If Yes, Describe Fully**							
Describe Cause of Problem and Remedial Action Taken**							
Describe Area Affected and Cleanup Action Taken**							
Description of Area	Farming	Grazing	Urban	Other*			
Surface Conditions	Sandy	Sandy Loam	Clay	Rocky	Wet	Dry	Snow
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)**							
I Hereby Certify That the Information Above Is True and Complete to the Best of My Knowledge and Belief							
Signed			Title		Date		

*Specify

**Attach Additional Sheets if Necessary

INCIDENT

TABLE III.
EUNICE, NEW MEXICO
SUPERVISOR TELEPHONE LIST

Title	Name	Home Telephone
Facility Manager	~~S. T. Wilson~~ D. L. Ishmael	~~505-397-4874~~
Operations Supervisor	B. E. Hobbs	505-392-1331
Field Supervisor	J. M. Collis	505-392-2637
Maintenance Supervisor	B. W. Turner	505-394-2465
Plant Engineer	~~E. L. Estrada~~ G. V. Gegelman	~~505-392-6324~~ 505-392-7627
Compliance Coordinator	C. W. Wrangham	505-392-2369

EUNICE PLANT #161

EMERGENCY NOTIFICATION

UPDATE: January 18, 1996

EMPLOYEE NAME	PHONE
APPLETON, A. L.	397-4085
BEVEL, G.A.	392-2572
BUSTAMANTE, R. P.	394-3415
CARLSON, D. H.	393-8117
COCKERILLE, A. A.	392-1055
COLLIS, J. M.	392-2637
COOPER, R.D.	395-2721
EVANS, E. F.	392-5270
GEGELMAN, J.V.	392-7627
HARRIS, D. E.	394-3190
HILL, V. L.	392-4194
HOBBS, B. E.	392-1331
HOLLADAY, R. D.	392-2813
ISHMAEL, D.L.	505-370-1830 **
JENKINS, C. G.	394-2128
JURNEY, D. R.	394-2021
KEMP, C. F.	394-2273
KNAPP, G. L.	393-0821
KOVALOFF, R. R.	392-8088
MASSINGALE, D. W.	394-2918
MILLER, D. K.	394-2431
RODGERS, R. L.	394-3093
SAENZ, E.	394-3461
SIMS, B. N.	394-2728
SPEER, J. C.	394-2385
SKINNER, C. L.	394-3472
SPITZER, C. R.	392-1314
TURNER, B. W.	394-2465
TYREE, M. R.	394-2685
WADE, R.L.	392-4862
WALKER, C. V.	394-2906
WRANGHAM, C.W.	392-2369 **
ZIEGLER, R. L.	394-3665

EMERGENCY NOTIFICATION	PHONE
TRANSWESTERN PIPELINE	
WEEKDAYS 7AM-4PM (Bud White)	915-686-3673
AFTER 5:00 PM (Ray Noseff - Home)	505-392-6495
EL PASO NATURAL	
WEEKDAYS 7:00 AM -- 3:30 PM	505-394-2822
EUNICE TECH. (Jerald Jones-Home)	505-395-3187
EUNICE TECH. (John Epperson-Home)	505-392-1353
JAL AREA SUPV. (Tom Clinton)	505-395-3973
TULSA GAS CONTROL (Mobile)	918-625-8853
CHEVRON PIPELINE - EMERGENCY	713-226-2086
CHEVRON PIPELINE - CAHOMA	1-800-351-1950
GAUGER - Buddy Wright	505-393-5586
EOTT ENERGY COPR.	
Bobby Gardune (24 Hrs.)	505-392-1992
EOTT CONTROL CENTER - Midland,TX	1-800-266-3688
Monument Plant	505-393-2823

EUNICE PLANT - MOBILE PHONES

SUPERVISOR ON WEEK-END DUTY

1-505-369-7423

FIELD SUPERVISOR - J.M. Collis 1-505-369-7348

** phone number addition

EMPLSTC

TABLE V.

MISCELLANEOUS TELEPHONE NUMBERS

	CONTACT	NAME	TELEPHONE
*	Ambulance	Eunice/Hobbs	394-2112/292-3215
	Hospital	Lea Regional	392-6581
*	Fire Department	Eunice	394-2112
*	Police Department	Eunice	394-2112
*	Sheriff	Eunice/Lovington	394-2020/397-1217
	Spill Cleanup	McCasland Service	394-2581

* - These emergency contacts will respond to 911 calls, also.

Statutory Authority

New Mexico Statutes Annotated (NMSA) Chapter 70 Oil and Gas, Article 2, §§ 70-2-1 through 70-2-36, Oil and Gas Act.

NMSA Chapter 30 Criminal Offenses, Article 16, §§ 30-16-46 through 30-16-48.

NMSA Chapter 70 Oil and Gas, Article 7, §§ 70-7-1 through 70-7-21, Statutory Unitization Act.

NMSA Chapter 74 Environmental Improvement, Article 6, §§ 74-6-1 through 74-6-4, 74-6-6 through 74-6-13, Water Quality Act.

Regulations

New Mexico Oil Conservation Division (OCD) Rules and Regulations, Section B Miscellaneous Rules.

Activities Regulated

1. This Section applies to miscellaneous rules of the OCD. OCD Section B.

Activities Excluded from Regulation

None is specified.

Agencies

1. The OCD shall have, and is hereby given, jurisdiction and authority over all matters relating to the conservation of oil and gas and the prevention of waste of potash as a result of oil or gas operations in this state. NMSA § 70-2-6.
2. The Oil Conservation Commission (Commission) shall have concurrent jurisdiction and authority with the OCD to the extent necessary for the Commission to perform its duties as required by law. NMSA § 70-2-6.

Requirements

1. **Scope of rules and regulations.** OCD Rule 1.
   a. The following general rules of statewide application have been adopted by the OCD of the New Mexico Energy and Minerals Department to conserve the natural resources of the state of New Mexico, to prevent waste, to protect correlative rights of all owners of crude oil and natural gas, and to protect fresh waters. Special rules, regulations and orders have been and will be issued when required and shall prevail as against general rules, regulations and orders if in conflict therewith. However, whenever these general rules do not conflict with special rules heretofore or hereafter adopted, these general rules shall apply. OCD Rule 1(a).
   b. The OCD may grant exceptions to these rules after notice and hearing, when the granting of such exceptions will not result in waste but will protect correlative rights or prevent undue hardship. OCD Rule 1(b).

Notification of fire, breaks, leaks, spills, and blowouts. OCD Rule 116. The OCD shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the state of New Mexico by the person operating or controlling such facility.

"Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

a. **Well blowouts.** Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.) OCD Rule 116-1.

b. **"Major" breaks, spills, or leaks.** Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 bbl or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 bbl or more of salt water does reach a watercourse or enters a steam or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below. OCD Rule 116-2.

c. **"Minor" breaks, spills, or leaks.** Notification of breaks, spills, or leaks of 5 bbl or more but less than 25 bbl of crude oil or condensate, or 25 bbl or more but less than 100 bbl of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below. OCD Rule 116-3.

d. **Gas leaks and gas line breaks.** Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1,000 or more million of cubic feet (Mcf) of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below. OCD Rule 116-4.

e. **Tank fires.** Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 bbl but less than 25 bbl, notification shall be "subsequent notification" described below. OCD Rule 116-5.

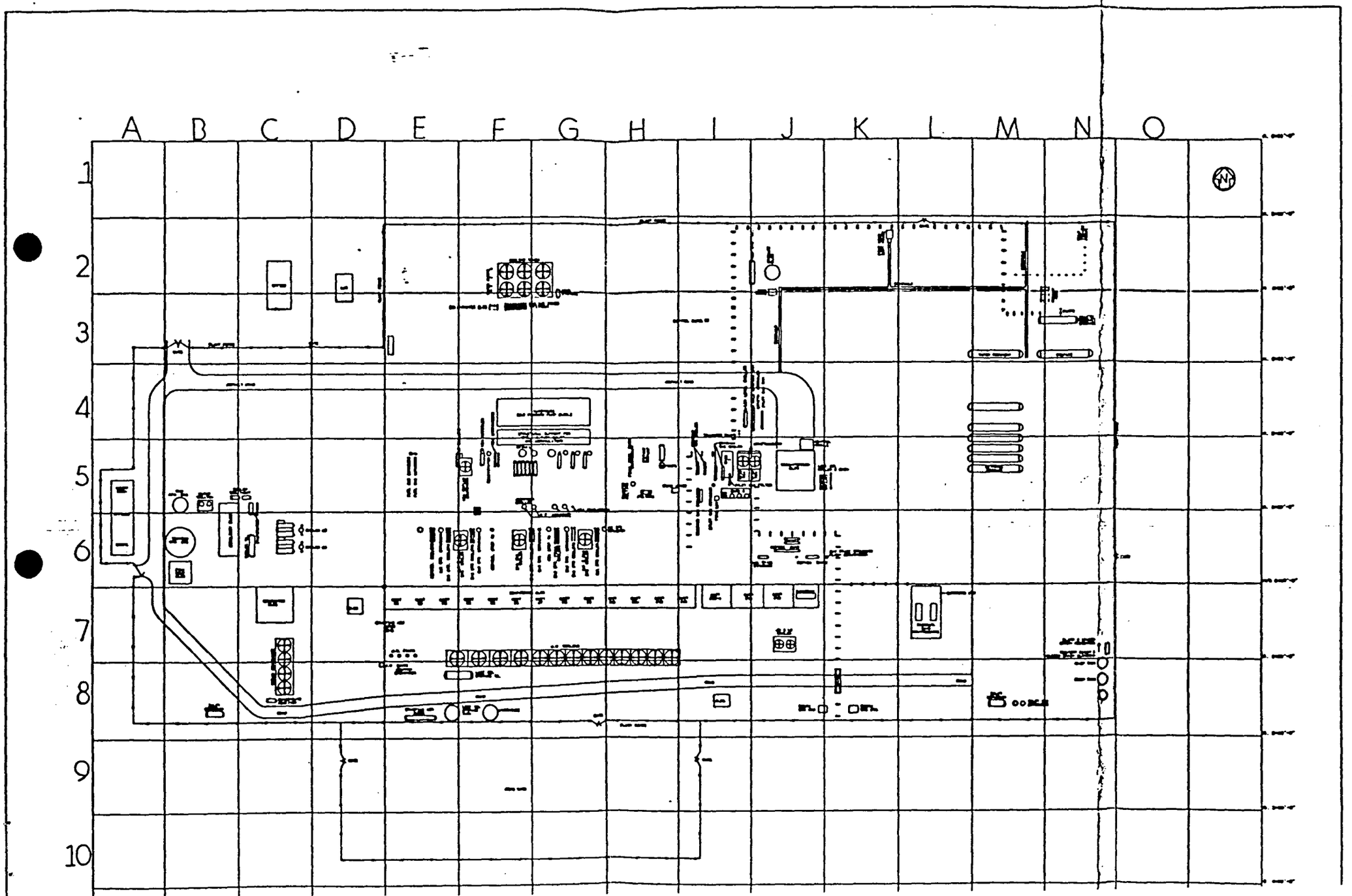
f. **Drilling pits, slush pits, and storage pits and ponds.** Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill. OCD Rule 116-6.

Immediate notification. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the OCD district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in duplicate to the appropriate district office of the OCD within 10 days after discovery of the incident.

Subsequent notification. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the OCD district in which the incident occurred within 10 days after discovery of the incident.

Content of notification. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

Watercourse. For the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.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Appendix "C"

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

INSPECTION PROCEDURES

Bulk Storage Tanks

All storage tanks which are listed in Table I of this SPCC Plan shall be visually inspected annually to (1) determine the general soundness of the structure of the tank wall (no creasing due to collapse), (2) determine the structural soundness of the tank supports, (3) locate corrosion sites, and (4) discover any leakage from the tank and/or its appurtenances.

Records of these inspections shall be kept in the Environmental File System (File VI.A.3).

Relief valves shall be tested and recertified according to the Eunice Plant's testing program.

Records of relieve valve recertifications shall be kept in the Files located in the Facility Office Building for a period of three years from the date of inspection.

Aboveground Piping Systems

All aboveground pipe, valves, fittings and supports shall be regularly examined by operating personnel for leakage, corrosion and structural defects. Valves which require locking under the SPCC Plan or for general security purposes shall be examined to ensure they are locked. This is to include pumps, exchangers, loading arms and vessels.

Any deficiencies noted shall be reported to the appropriate supervisor for documentation and corrective action.

SPCC Protective Systems

All protective systems which include containment structures, diversionary structures, pumps, valves, etc., shall be regularly examined by operating personnel. Any deficiencies shall be reported to the appropriate supervisor for documentation and corrective action.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

BULK STORAGE TANK ANNUAL INSPECTION REPORT*

Tank No.	Date	Comments	Inspector

*Test reports are retained after this form and are kept as a part of this report. This report shall remain in the Environmental File System (File VI.A.3) for a period of three (3) years from the date of this document.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

SPILL/RELEASE REPORTS

Any spill or release shall be documented in a written report. The report should contain the following:

- Incident time and date
- Company name and address
- Physical Location
- Spill/Release substance and quantity
- Cause of Spill/Release
- Impact on the area affected, specifying the receiving medium
- Remedial actions employed
- Success of cleanup efforts
- Agency(ies) notified (Agency Telephone Notification Form(s))
- Agency(ies) appearing on site to investigate and accounting of communication with them
- Name and address of non-company reporter(s) of incident
- Any other pertinent facts necessary in describing, explaining or elaborating on the spill/release
- Any corrective/preventive actions planned to be employed to prevent future occurrences of the same type of incident, if available.

Based on the Notification Procedures located in the Spill Contingency Plan (Section "3" of Appendix "A" of the SPCC Plan), send copies of the report to the appropriate agency(ies), as well as Environmental Affairs in Tulsa.

A copy of the report shall also be submitted to the Environmental File System (File VI.A.4) and remain there for a minimum of three (3) years from the incident date.

Also, certain agencies require incident reports be filed on their forms. A copy of these forms may be found in Appendix "H".

Review the reporting guidelines to Chevron Corporate Compliance and file a completed (signed) Form GO-140 with Environmental Affairs in Tulsa. This is required in addition to the above requirements.

If any questions surface involving any reporting requirements, contact Environmental Affairs in Tulsa.

Appendix "E"

SPILL CONTINGENCY PLAN

AGENCY TELEPHONE NOTIFICATION FORM

INFORMATION OBTAINED

Agency Name:_____ Date:_____/_____/_____

Agency Representative:_____ Time:_____(AM/PM)

Representative's Title:_____

Telephone Number:(_____)_____-_____

Is a written report required?_____Yes_____No

INFORMATION REPORTED

Facility Name: Eunice Plant

Facility Location: 0.6 Miles South of Texas Avenue on 4th Street
Eunice, New Mexico

Owner and Operator: Warren Petroleum Company
A Division of Chevron U.S.A. Inc.
P. O. Box 1909
Eunice, New Mexico 88231

Incident Date: _____/_____/_____

Incident Time: _____(AM/PM)

Incident Type: _____fire, _____explosion, _____oil release,
_____SARA release, _____CERCLA release,
_____RCRA release, _____VOC release.

Substance(s)

Type:_____butane, _____pentane, _____gasoline, _____butadiene, _____isoprene
_____diesel, _____other.

Quantity:_____BBL, _____MSCF, _____LBS

Spill Category: _____Major, _____Medium, _____Minor

SPILL CONTINGENCY PLAN
AGENCY TELEPHONE NOTIFICATION FORM (CONTINUED)

Appendix "E"

Receiving Medium: _____water, _____land, _____air

Release/Incident Location: _____

_____

Name of Waters Involved (if any):_____Groundwater

_____Other (Specify:_____)

Cause of incident (if known): _____

Extent of Damage Already Incurred: _____

_____

_____

Any Injuries Involved?____Yes____No. How Many? ____Employees ____Public

Current Remedial Actions Being Taken: _____

_____

_____

_____

Estimate of Ultimate Extent of Damage (Include Area Likely to be Affected):

_____

_____

_____

_____

Reporter

Name: _____

Signature: _____

Title: _____

Telephone: (_____) _____ - _____

Note: Include this document as part of the written Spill/Release Report.

SECTION IX

WASTE MANAGEMENT PLAN

SECTION IX
WASTE MANAGEMENT PLAN

This Waste Management Plan has been developed to meet Corporate and Governmental requirements concerning disposal of various operating materials at the end of its useful life.

At the present time, the Eunice Plant does not generate any RCRA hazardous wastes. If, or when, it should be determined a hazardous waste exists, it will be disposed of according to RCRA standards, with documentation and proper manifests to an approved hazardous waste disposal site. Formal contracts will be negotiated and disposal sites will be selected, per Chevron's current approved hazardous waste site list.

SECTION IX. - WASTE MANAGEMENT PLAN (Continued)

1. The following list shows the typed, expected amounts, and the source of wastes which are generated at the Eunice facility:

ITEM	* Classification	TYPE	EXPECTED AMOUNT	SOURCE	METHOD OF DISPOSAL	Final Disposition
Filter	NH	Amine, Dust Oil, Product	650 Cartridges/yr	Amine, Oil,gas filter and air intake cases	Truck	Waste Control of New Mexico
Cooling Tower Blowdown	Exempt	Water	8333 bbls. Per Month	Cooling Tower	pipe line	Eunice SWD 1
Boiler Blowdown Water	Exempt	Water	Included above	Boiler	pipeline	Eunice SWD 1
Wash Water	Exempt	Water	included above	Equip. / Maintenance	pipeline	Eunice SWD #1
Plant Trash	NH	Paper, Wood cardboard, household items, small concrete, etc.	936 cu. yds. per year	Office, Shop etc	Truck	Waste Control of New Mexico
Cooling Tower Basin Sludge	NH	Sludge, slurry mix	2 yards per year	Cooling Tower	Tilled into plant landfill	Eunice Plant Yard
Oil/ Scrubber Tank Bottoms	Exempt	Oil sludge, sand, dirt, scrubber bottoms	Infrequent, varied amounts	Scrubbers, oil tanks	Tank Truck	Pollution Control Inc.
Solvent	NH	140	17 gals per month	Parts washing bin	Oil Recovery Tank	Shell pipeline
Steel Drums	NH	Lube oil, antifreeze, chemicals,	10 Drums/ year disposed of locally	Outside vendors	Emptied and returned to vendor or crushed and sent to landfill	Various Vendors Waste Control of New Mexico
Concrete	NH		Infrequent, varied amounts	Various in-plant	Plant landfill or truck offsite	Waste Control of New Mexico
Molecular Sieve activated alumina, ~~sulfur plant catalyst~~; ion exchange, resin, etc.	NH	solid particles	Infrequent varied amounts	Dehydrators, sulfur plant water treaters	Plant landfill	Plant Yard
Amine	Exempt	MEA	250 gals. / Mo.	MEA Reclaimer	Disposal Well	Eunice SWD #1
Amine Reclaimer Bottoms	Exempt	Slurry, sludge	1100 cu.ft. / Yr	MEA Reclaimer		
Oil Rags	NH	Rags	1000lbs. / Yr.	Maintenance	Recycle	Western Uniform
Brine Water	Exempt	Saturated	208 bbls. / Month	Zeolite Beds	Pipeline	Eunice SWD #1
Hydrostatic Test Water	NH	Water	Infrequent	pipeline and vessels	pipeline	same
Used Oil	NH	Engine Oil	10 bbls. / Month	Engines	Oil Recovery Tank	Shell Pipeline

*NE Non-Exempt, Exempt, NH Non-Hazardous, Hazardous

DEW 5/13/96

* Will submit disposal requests to OCD Santa Fe office— Don to resubmit this page.

SECTION IX. - WASTE MANAGEMENT PLAN (Continued)

ITEM	*Classification	TYPE	EXPECTED AMOUNT	SOURCE	DISPOSAL METHOD	FINAL DISPOSITION
Used Lab Chemicals	NH	Liquids	40 gals. Per Month	Lab	Recovery Vessel	Safety Kleen
Scrap Iron	NH	Metal	20 tons/year	Old piping etc.	Recycle	Scrap retail dealers
Oil contaminated dirt	NH	Dirt	Infrequent, varied amounts	Leaks	Remediation	Insitu treatment
Produced Water from Compression	Exempt	Water	150 bbls./ Month	Green Gas	Injection Well	Eunice SWD #1

* Oil and water collected in scrubbers in separated with the oil being treated to remove water and sold to Shell Pipeline Company. The water is combined with the plant discharge and sent to the injection well.

SECTION IX - WASTE MANAGEMENT PLAN (Continued

Consolidated list of lab chemicals used by Warren Petroleum and Betz in the lab.

Substances used in our lab by Warren employees;

1. Hydrocloric Acid
2. Methyl Alcohol Anhydrous
3. Starch Indicator 1% contains Mecurie Iodide preservative
4. Phospate reagent phosner 3
5. PH 7 Buffer
6. Sodium Thiosulfate (N10)
7. Polassium Iodate Iodide
9. Water Hardness Buffer
10. Edta Tetrant
11. Gallic Acid
12. Conductivity Standard
13. Sodium Hydroxide in Methanol
14. Sodium Thiosulphate 1/10 normal
15. Sulfuric Acid 1/10 normal
16. Silver Nitrate
17. Solfuric Acid Solution 5%
18. Hardness Indicator 0.5% w/v Eriochrome black T in 2 methoxyethanol APHA
19. Methyl Red 0.1% w/v aqueous solution
20. Molydate Reagent
21. Methyl Orange 0.1% w/v aqueous solution
22. Methyl Purple Indicator
23. Nickel Sulfate 5% w/v aqueous
24. Bromocresoe Green - Methyl Red
25. Phenolphthalein Indicator 1% w/v in 95% alcohol
26. Iodine 1/10 normal

Substances used by Betz in our lab

1. Molybdouanadate Reagent
2. Ferrover
3. Ferrozine
4. Boric Acid
5. Tolytriazole Reagent
6. Hardness Buffer
7. Hardness Indicator
8. Hexaver (CDTA) 0.0800M
9. Hexaver (CDTA) 0.8000M
10. Sodium Hydroxide 8N
11. Calcium Indicator
12. Acid Reagent for Silica
13. Molybdate Reagent for Silica
14. Iodine - Iodate 0.3998N
15. Dissolved oxygen 3 Reagent

16. Starch Indicator
17. Sulfuric Acid 1.600N
18. Phenolphtaline
19. Bromcresol Green - Methyl Red
20. Polymer Buffer II
21. Polymer Reagent

SECTION IX - WASTE MANAGEMENT PLAN (Continued)

1.a. The Eunice Plant transformers have been tested and found not to have any PCB's.

2. For the listed wasted, operating procedures are followed to minimize the amounts generated, such as; steel drums are exchanged with vendors, molecular sieve is regenerated if practical.

3. All wastes listed in No. 1 have been properly classified as hazardous or non-hazardous. If a waste cannot be positively identified as hazardous or non-hazardous, then the Warren Petroleum Environmental Affairs Department is contacted to recommend an outside company to do testing and analysis.

4. The necessary safety precautions for handling each waste listed in No. 1 above is taken to avoid adverse health affects. The Safety Department and Environmental Department are contacted when specific precautions are needed. Reference to the Material Safety Data Sheets (MSDS) is made concerning proper handling of all products.

5. Potential for waste recycling is considered when the use of wastes is feasible in alternative processes, such as re-injecting water into producing formation for enhanced oil recovery.

SECTION X

CLOSURE PLAN

CLOSURE PLAN-EUNICE PLANT
WARREN PETROLEUM COMPANY
AS PART OF THE
DISCHARGE PLAN

Pursuant to WQCC 3:107.A.11, Warren Petroleum Company will take all reasonable and necessary measures to prevent the exceedance of WQCC Section 3103 quality standards should Warren Petroleum choose to permanently close the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

SECTION XI

CLASS V WELL
(SEPTIC SYSTEM)

REMEDIATION AREA CLOSURE

Class V Well

Warren Petroleum Company will submit a work plan proposal for investigating any possible contamination of the Class V Well Septic System. The plan will be submitted to the Oil Conservation Division by June 15, 1996.

Remediation Area Closure

Warren Petroleum Company will submit a work plan proposal for closure of the remediation area to the Oil Conservation Division by June 15, 1996.

SECTION XII

INJECTION WELL PERMIT

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT

NO. OF COPIES RECEIVED		
DISTRIBUTION		
SANTA FE		
OFFICE		
TRANSPORTER	OIL	
	GAS	
OPERATOR		
PRORATION OFFICE		

ROUTE		INT.
	FLT. MANAGER	
	P. SUPERVISOR	
	M. SUPERVISOR	
	F. SUPERVISOR	
	SR. ADM. SPEC.	
	SR. CLERK	

OIL CONSERVATION DIVISION

P. O. BOX 2088
SANTA FE, NEW MEXICO 87501

REQUEST FOR ALLOWABLE AND AUTHORIZATION TO TRANSPORT OIL AND NATURAL GAS

I.

Operator: Chevron U. S. A. Inc.

Address: P. O. 670, Hobbs, New Mexico 88240

Reason(s) for filing (Check proper box)

- [ ] New Well
- [ ] Recompletion
- [x] Change in Ownership

Change in Transporter of:

- [ ] Oil
- [ ] Casinghead Gas
- [ ] Dry Gas
- [ ] Condensate

Other (Please explain): Effective 7-01-85 Change of operator

If change of ownership give name and address of previous owner: Gulf Oil Corp. P. O. Box 670, Hobbs, NM 88240

II. DESCRIPTION OF WELL AND LEASE

Lease Name	Well No.	Pool Name, Including Formation	Kind of Lease	Lease No.
Eunice Plant #161	SWD 1	San Andres	State, Federal or Fee (Fee circled)	

Location: Unit Letter H ; 2255' Feet From The North Line and 908' Feet From The East Line of Section 3 Township 22-S Range 37E , NMPM, Lea County

III. DESIGNATION OF TRANSPORTER OF OIL AND NATURAL GAS

Name of Authorized Transporter of Oil [ ] or Condensate [ ]	Address (Give address to which approved copy of this form is to be sent)
SALT WATER DISPOSAL WELL	Warren Petroleum, Box 1909, Eunice, NM 88231
Name of Authorized Transporter of Casinghead Gas [ ] or Dry Gas [ ]	**Address (Give address to which approved copy of this form is to be sent)**
CHEVRON USA, Warren Petroleum Company	Warren Petroleum, Box 1909, Eunice, NM 88231

If well produces oil or liquids, give location of tanks.	Unit	Sec.	Twp.	Rge.	Is gas actually connected?	When

If this production is commingled with that from any other lease or pool, give commingling order number:

NOTE: *Complete Parts IV and V on reverse side if necessary.*

VI. CERTIFICATE OF COMPLIANCE

I hereby certify that the rules and regulations of the Oil Conservation Division have been complied with and that the information given is true and complete to the best of my knowledge and belief.

Rex O. Zimmerman
(Signature)

PLANT MANAGER - EUNICE
(Title)

9/15/86
(Date)

OIL CONSERVATION DIVISION

APPROVED SEP 17 1986, 19

BY ORIGINAL SIGNED BY JERRY SEXTON

TITLE DISTRICT I SUPERVISOR

This form is to be filed in compliance with RULE 1104.

If this is a request for allowable for a newly drilled or deepened well, this form must be accompanied by a tabulation of the deviation tests taken on the well in accordance with RULE 111.

All sections of this form must be filled out completely for allowable on new and recompleted wells.

Fill out only Sections I, II, III, and VI for changes of owner, well name or number, or transporter, or other such change of condition.

Separate Forms C-104 must be filed for each pool in multiply completed wells.

VII B 2 c(3)3

RECEIVED
SEP 25 1986

EUNICE PLANT
SWD #1

Non-hazardous liquids may be injected onto Class II Wells.

Class II wells are wells which inject fluids:

1. Which are brought to the surface in connection with conventional oil or natural gas production and may be commingled with waste waters from gas plants which are an integral part of production operations, unless those waters are classified as hazardous waste at the time of injection.

2. For enhanced recovery of oil and gas; and

3. For storage of hydrocarbons which are liquid at standard temperature and pressure.

The Agency believes that the design, enforcement, and implementation of existing State and Federal regulations can clearly be improved.

Public comments on the Geothermal ...ergy Portion of Report to Congress: ...ly two comments specifically ...ddressed geothermal energy wastes.

One commenter presented additional information relating to damages resulting from the offsite disposal of geothermal energy production wastes (such as hydrogen sulfide abatement wastes which test nonhazardous by California standards) in commercial facilities. The information alleged potential damages and/or risk by contamination of surface and ground water from the disposal of hydrogen sulfide abatement wastes in centralized or commercial disposal facilities in California. These facilities are designated strictly for the disposal of geothermal energy production wastes determined to be nonhazardous by California standards.

The other commenter specifically addressing geothermal energy, fully supported the conclusions of the report and stated that the California statutes regarding the management of geothermal energy wastes are comprehensive and effective.

The Agency continues to believe that ...eothermal energy wastes are generally ...ll regulated under existing State and ...ederal programs. However, the Agency acknowledges that at least one significant undesirable disposal practice is occurring and has taken this into consideration in making this final regulatory determination.

D. Determination of the Scope of the Temporary RCRA Exemption

Based on the language of RCRA section 3001(b)(2)(A) of the 1980 amendments to RCRA, review of the statute, and supporting legislative history, the Agency believes that the following wastes were included in the temporary exemption set forth in the statute.

- Produced water;
- Drilling fluids;
- Drill cuttings;
- Rigwash;
- Drilling fluids and cuttings from offshore operations disposed of onshore;
- Geothermal production fluids; and
- Hydrogen sulfide abatement wastes from geothermal energy production.
- Well completion, treatment, and ...ulation fluids;
- Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste;
- Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments;
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes;
- Workover wastes;
- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves;
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge;
- Cooling tower blowdown;
- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream);
- Packing fluids;
- Produced sand;
- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation;
- Hydrocarbon-bearing soil;
- Pigging wastes from gathering lines;
- Wastes from subsurface gas storage and retrieval, except for the nonexempt wastes listed below;
- Constituents removed from produced water before it is injected or otherwise disposed of;
- Liquid hydrocarbons removed from the production stream but not from oil refining;
- Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons;
- Materials ejected from a producing well during the process known as blowdown;
- Waste crude oil from primary field operations and production; and
- Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment.

The Agency believes that the following wastes were not included in the original exemption:

- Unused fracturing fluids or acids;
- Gas plant cooling tower cleaning wastes;
- Painting wastes;
- Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids;
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste;
- Refinery wastes;
- Liquid and solid wastes generated by crude oil and tank bottom reclaimers;
- Used equipment lubrication oils;
- Waste compressor oil, filters, and blowdown;
- Used hydraulic fluids;
- Waste solvents;
- Waste in transportation pipeline-related pits;
- Caustic or acid cleaners;
- Boiler cleaning wastes;
- Boiler refractory bricks;
- Boiler scrubber fluids, sludges, and ash;
- Incinerator ash;
- Laboratory wastes;
- Sanitary wastes;
- Pesticide wastes;
- Radioactive tracer wastes;
- Drums, insulation, and miscellaneous solids.

In order to determine the scope of the exemption, the Agency reviewed the statute and legislative history. The Agency interprets the term "other wastes associated" to include rigwash, drill cuttings, and wastes created by agents used in facilitating the extraction, development and production of the resource, and wastes produced by removing contaminants prior to the transportation or refining of the resource. Drill cuttings and rigwash are generally co-mingled with drilling muds, and the Agency therefore has grouped them with large-volume wastes for purposes of discussion in this determination. The remaining wastes on the above list of exempt wastes are considered "associated wastes" for purposes of this determination.

The Agency has determined that produced water injected for enhanced recovery is not a waste for purposes of RCRA regulation and therefore is not subject to control under RCRA Subtitle C or RCRA Subtitle D. Produced water used in enhanced recovery is beneficially recycled and is an integral part of some crude oil and natural gas production processes. Produced water injected in this manner is already regulated by the Underground Injection Control program under the Safe Drinking Water Act. The Agency notes, however, that if the produced water is stored in surface impoundments prior to injection, it may be subject to RCRA Subtitle D regulations.

III. Factors Considered in Regulatory Determination

Section 3001(b)(2)(B) of RCRA states that in making the regulatory determination, the Agency must "utilize the information developed or accumulated pursuant to the study required under section 8002(m)." Clearly, Congress envisioned that the

Pat Sanchez

From: Wayne Price
Sent: Tuesday, April 23, 1996 2:20 PM
To: Pat Sanchez
Cc: Jerry Sexton
Subject: Warren Eunice Plant Inspection -GW-5

Dear Pat,

Per your request please find enclosed my comments for the inspection conducted on April 10, 1996.

Warren Personnel: Don Wallach, B. Hobbs, Cal Wrangham
NMOCD Personnel: W Price, Pat Sanchez

Warren conducted safety meeting.

The following are highlights which need to be addressed which would not normally be covered under the standard conditions.

1. Lab waste should be segregated, classified, stored and disposed of properly.

2. The lab septic system should be investigated for hazardous and/or WQCC constituents.

3. I.D. all waste streams. Determine if hazardous solvents go into waste water system. Ex MEK, Carb. cleaner, parts cleaners, etc. if not then determine the ultimate disposal.

4. Boiler chemical storage area should be bermed and pad.

5. Sandblast media is non-exempt and should be tested and disposed of properly.

6. Recommend that Warren commit to installing secondary containment under tanks at the plant oil/water sep. system.

7. Warren should demonstrate that their waste water going to the class II well is exempt waste.

8. Eliminate all discharges to the ground, i.e. cleaning water discharging out-side of the fence area.

9. Inform Warren that previous approvals from NMOCD for closures on leaks, spills, pits etc, or pressure test on the UIC well is still Warren's responsibility if the closure or investigations did not address contaminates in the vadose zone or ground water.

10. Include the Bio-farm in permit or dispose of soils off-site. Waste concrete and dirt piles. This could be classified as a open dump, ex old car body etc.

11. Due to the routine standing oils in the comp. pits (sump) Warren should install secondary contaminate, or coating or liner in these pits. They should be hydro-static tested annually. The emphasis should be focused on primary and secondary containment rather than the issue of whether it is a pad or sump.
It is a mute point, with all the leaks they have. Also if their investigation reveals leaks or cracks, then they should determine vertical extent of contamination.

12. Investigate the old bone yard where all the old flow meters are stored and determine if "mercury" is a problem. If not have them demonstrate this in writing.

13. Recommend Warren provide a plant one line flow diagram that describes all the plants waste streams.

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

April 22, 1996

CERTIFIED MAIL
RETURN RECEIPT NO.Z-765-963-137

Mr. Donnie E. Wallis
Environmental Specialist
Warren Petroleum Company
P.O. Box 1909
Eunice, NM 88231

RE: Renewal Inspection
Discharge Plan GW-005
Eunice Gas Plant

Dear Mr. Wallis:

The New Mexico Oil Conservation Division (OCD) has completed this inspection report as part of the permit renewal process for discharge plan GW-005. The following OCD staff members were present during the renewal inspection on Wednesday April 10, 1996 - Mr. Wayne Price and Mr. Patricio Sanchez. The purpose of this report is to provide Warren Petroleum Company with the information that is needed to ensure that the NMOCD can renew GW-005 on or before the expiration date of May 16, 1996. However, it will be Warren Petroleum Company's responsibility to provide the OCD with commitments and time lines that are approvable at least 10 working days before GW-005 expires.

- Warren Petroleum Company will submit a plan to pressure test all below grade lines to 3 psig above normal working pressure of the line - see OCD "Discharge Plan Guidelines, Revised 12-95" page 9. **The testing plan must be approved by the Santa Fe OCD office.** Also, all below grade sumps that do not have leak detection and secondary containment must be cleaned and inspected for integrity yearly - with written documentation kept at the facility so that OCD may view the inspection results at any time during a facility inspection. Any below grade sump or tank that is found not to have integrity shall be reported to the Santa Fe OCD office with a proposed corrective action plan to repair the sump or below grade tank and identify possible contamination.

Note: Any new sumps, below grade tanks, double lined evaporation ponds, or modifications to the discharge plan will be approved by the OCD Santa Fe office before installation or alteration of an approved permit condition or commitment - Please see the enclosed "Discharge Plan Guidelines, Revised 12-95" for other items that require OCD approval.

- It is the OCD's understanding that all solid waste that is generated at the facility is subject to a company "Waste Management Plan" that provides for waste characterization and disposal methods - Warren Petroleum Company shall verify that all the items covered in the "Waste Management Plan" cover the NMOCD Discharge Plan guidelines 12/95 requirements for waste disposal. Include the "Waste Management Plan" as part of the Discharge Plan Renewal.

- Warren Petroleum must also ensure that current spill reporting and corrective action measures fall in line with WQCC 1203 and NMOCD Rule 116 requirements. All reportable spills are to be reported within 24 hours to the Hobbs District office at (505)-393-6161.

- A work plan to address the Class V well at the facility that was connected to the lab sink needs to be proposed by Warren Petroleum Company - The plan shall address the nature of the sludge in the septic as well as the leech line drainage area, and vertical extent of possible contamination so that WQCC Groundwater Standards will not be exceeded. Lab waste can no longer be disposed of in the septic - and Warren needs to identify an alternate disposal method. **Note:** If the sludge and leech line drainage area test Hazardous per TCLP and RIC , or contain listed Hazardous Waste - Warren Petroleum Company will contact the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau at (505)- 827-1558 for guidance.

- The chemicals in the lab area should be listed, and any that are not needed should be removed from the facility.

- See Photo No. 9 - Landfarm area.
  The records that the OCD has in permit GW-005 do not indicate OCD approval of the remmediation area. The OCD has not received any treatment zone monitoring information or approved of any contaminated soil spreading at the cell area. Warren shall refer to the OCD "Landfarm Guideline" and propose a discharge plan modification to allow the continued use of the remmediation area. The modification proposal will include operating and monitoring procedures as outlined in the OCD "Landfarm Guideline."

- The Chemical storage area at the boiler feed needs to have and impermeable pad placed under it - see photo No. 3.

- Warren Petroleum needs to certify that all wastes that are injected into the Class II disposal well are exempt from RCRA Subtitle C regulations.

- The floor drains in the old turbine warehouse need to capped.

- Warren Petroleum has the option to submit actual work plans by June 15, 1996 but shall commit to these time lines in the renewal that will be submitted 10 working days before the permit expires on May 16, 1996.

If Warren Petroleum Company has any questions with regards to this inspection report feel free to contact the OCD (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist

enclosure

xc: Mr. Wayne Price

Affidavit of Publication

RECEIVED

MAR 2 5 1996

Environmental Bureau
Oil Conservation Division

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

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

That the notice which is hereto attached, entitled Notice Of Publication

and 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, for one (1) day consecutive weeks, beginning with the issue of March 12, 19 96 and ending with the issue of March 12, 19 96

And that the cost of publishing said notice is the sum of $ 44.00 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 18th day of March, 19 96

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 98

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

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

(GW-005) - Warren Petroleum Company, Mr. David Ishmael, (505)-394-2534, P.O. Box 1909, Eunice, NM 88231, has submitted a Discharge Plan Renewal Application for the Eunice Gas Plant located in the NE/4, Section 3, Township 22 South, Range 37 East, N.M.P.M., Lea County, New Mexico. Approximately 45,000 gallons per day of RCRA exempt process wastewater with a total dissolved solids concentration of approximately 3,600 mg/L is disposed of in an OCD permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration ranging from 400 to 2,000 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 thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

Given under the Seal of the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico on this 6th day of March, 1996.

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

SEAL

Published in the Lovington Daily Leader March 12, 1996.

The Santa Fe New Mexican

Since 1849. We Read You.

CONSERVATION DIVISION
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'96 MAR 13 AM 8 52

NM OIL CONSERVATION
ATTN: PAT SANCHEZ
2040 S. PACHECO
SANTA FE NM 87505

RECEIVED
MAR 18 1996
Environmental Bureau
Oil Conservation Division

pub March

AD NUMBER: 478918 ACCOUNT: 56689

LEGAL NO: 59266 P.O. #: 96-199-002997

164 LINES once at $ 65.60

Affidavits: 5.25

Tax: 4.43

Total: $ 75.28

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

Energy, Minerals and Natural Resources Department
Oil Conservation Division

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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 6th day of March, 1996.

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

Legal #59266
Pub. March 14, 1996

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 59266 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 14 day of March 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 14 day of March A.D., 1996

OFFICIAL SEAL
LAURA E. HARDING
NOTARY PUBLIC -- STATE OF NEW MEXICO
MY COMMISSION EXPIRES 11/23/99

Laura E. Harding

202 East Marcy Street • P.O. Box 2048 • Santa Fe, New Mexico 87501
505-983-3303 • (FAX) 505-984-1785

NOTICE OF PUBLICATION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of March, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

by WILLIAM J. LEMAY, Director Deputy Director

WJL/pws

NO EFFECT FINDING
The described action will have no effect on listed species, wetlands, or other important wildlife resources.
S.E.A.
Date March 13, 1996
Consultation # GWOCD96-1
Approved by
U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 10:00 AM	Date 3-12-96
Originating Party		**Other Parties**
Donnie Wallis - w/ Warren Pet. 393-2823		Pat Sanchez - OCD

Subject Eunice Plant GW-005 D.P. renewal.

Discussion Talked about plan format - let Donnie know that the plan should be consolidated into one document - old plan w/ several renewals kind of confusing

Need to look at New Guidelines and other Renewals in 1995 and submit a consolidated up to date D-P.

Conclusions or Agreements Mr. Wallis will have the new Document in by the end of April 1996. Public Notice will run out on or about 4/14/96

Distribution File.

Signed Robin U. Smith

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of March, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

by WILLIAM J. LEMAY, Director

WJL/pws

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/5/96

or cash received on _____ in the amount of $ 50.00

from Warren Pet.

for Eunice G.P. GW-005

(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: [signature] Date: 3/25/96

Received in ASD by: Angela Herrera Date: 3-29-96

Filing Fee X New Facility ___ Renewal ___

Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

Chevron **Warren**

Warren Petroleum Company
P.O. Box 1589, Tulsa, OK 74102-1589

No. [redacted]

93-516
929

Date 3-5-96

Pay to the order of NMED-WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE, NM 87505

Amount $ 50.00

[signature]

Two signatures required if $1,500 or more

Norwest Bank Lewistown, N.A.
404 West Broadway
Lewistown, MT 59457

[redacted]

WP-82139 (3-93)

Warren Petroleum Company - P.O. Box 1589 - Tulsa, Oklahoma 74102

Description	Invoice Number	Amount
GW-015		
NMED-WATER QUALITY MANAGEMENT filing fee Eunice Plt		50.00

RECEIVED
MAR 6 1996
Environmental Bureau
Oil Conservation Division

Accounting Division Use Only	Amount DR (CR) Dollars	Cts.	Acct.	Analysis	JT INT	Facility	Reference 1: Date Mo.	Reference 1: Date Yr.	Reference 1: Prop. No. / Pur. Order / Exch. No. / Other ID	Reference 2: W.O.	ELE	A.F.E.	Mat Class	Oth. Fac.	Misc.	ECOL	TAX	AFU	State: NAT	State: ST
Voucher	6 7 8	9 10 11 12 13 14 15 16	17 18 19 20	21 22 23 24 25 26 27	28	29 30 31 32 33	39 40	41 42	43 44 45 46 47 48	49 50 51 52 53	54 55 56	57	58	59 60 61	62 63 64					

Chevron Warren

March 5, 1996

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

Discharge Plan GW-005 Renewal
Eunice Gas Processing Plant

Gentlemen:

Please accept this letter as Warren's renewal of the Eunice Plant Discharge Plan as required by WQCC Sec. 3106. I have also attached a check in the amount of $50.00 which constitutes our filing fee for the Discharge Plan renewal. Also enclosed is a Closure Plan as required by WQCC Sec. 3107.A.11. Please note that we have made the changes to the facility that you requested during your February 6, 1991 site visit. These changes were documented by letter to the Oil Conservation Department as they were completed. At this time we have no plans to make any changes to the system. If we find that any future changes are required we will notify your agency so that we will meet all applicable state requirements.

If any further information is needed or any questions answered please contact me at (505) 396-3221 or Linda Johnson at (918) 560-4138.

Sincerely,

Donnie E. Wallis

Donnie E. Wallis
Environmental Specialist
New Mexico Area

Attachments
xc: OCD Hobbs

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

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

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Environmental Bureau
Oil Conservation Division

Revised 12/1/95
Submit Original
Plus 1 Copies
to Santa Fe
1 Copy to appropriate
District Office

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: GAS PLANT
2. Operator: WARREN PETROLEUM Company
   Address: P.O. BOX 1909 EUNICE, NM 88231
   Contact Person: David Ishmael Phone: 505-394-2534
3. Location: ____ /4 NE /4 Section 3 Township 22 S Range 37E
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION

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

NAME: David Ishmael Title: Plant Manager

Signature: Dave Ishmael BY Date: 3-1-96

Cal Wrangham
Compliance Coordinator

Warren Petroleum Company - P.O. Box 1589 - Tulsa, Oklahoma 74102

Description	Invoice Number	Amount
NMED-WATER QUALITY MANAGEMENT filing fee Eunice Plt		50.00

Accounting Division Use Only	Amount DR (CR) Dollars	Cts.	Acct.	Analysis	JT INT	Facility	Reference 1 Date Mo.	Reference 1 Date Yr.	Reference 1 Prop. No. Pur. Order Exch. No. Other ID	Reference 2 W.O. / ELE / A.F.E. / Mat Class / Oth. Fac. / Misc.	ECOL	TAX	AFU	State NAT	State ST
Voucher	6 7 8 / 9 10 11 / 12 13 14 / 15 16		17 18 19 20	21 22 23 24 25 26 27	28	29 30 31 32 33	39 40	41 42	43 44 45 46 47 48	49 50 51 52 53 / 54 55 56 57 58			59 60 61	62 63 64	

RECEIVED
MAR 6 1996
Environmental Bureau
Oil Conservation Division

Chevron **Warren**

Warren Petroleum Company
P.O. Box 1589, Tulsa, OK 74102-1589

No. [redacted]

93-516
929

Date 3-5-96

Amount $ 50.00

Pay to the order of NMED-WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE, NM 87505

Norwest Bank Lewistown, N.A.
404 West Broadway
Lewistown, MT 59457

Two signatures required if $1,500 or more

[redacted]

WP-82139 (3-93)

CLOSURE PLAN-EUNICE PLANT
WARREN PETROLEUM COMPANY
AS PART OF THE
DISCHARGE PLAN

Pursuant to WQCC 3:107.A.11, Warren Petroleum Company will take all reasonable and necessary measures to prevent the exceedance of WQCC Section 3103 quality standards should Warren Petroleum choose to permanently close the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☐ Telephone ☒ Personal | Time 3-6-96 | Date 8:00 AM

Originating Party	Other Parties
Mr. Don Wallis & Linda Johnson Warren Petroleum Company	Pat Sanchez - OCD

Subject: Eunice Gas Plant - Discharge Plan GW-005 Renewal

Discussion: Mr. Wallis & Ms. Johnson brought in renewal application letter as well as $50 Filing Fee. (1) Discussed WQCC changes - (A) Part 4 - New Abatement regulations (B) 3.107.A.11 - closure plan (C) Permit conditions. (D) Land Farm - "Bio-remmediation cell" - would file as a major modification - I suggested if he knew about when cell would be put in - to file as part of this renewal - use Land Farm Guidelines for operation & construction. (2.) Might (At my suggestion) consolidate a previous discharge plan approvals/renewals w/ 12/95 Guidelines into one document - Told them Not required.

Conclusions or Agreements: Mr. Wallis wants to pursue #(2.) above and a possible Bio-rem. cell also. Issue public notice.

Distribution: File.

Signed: Patricia W. Sanchez

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

February 28, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-029

Mr. Ken Stinson
Warren Petroleum Company
P.O. Box 1589
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-005 Renewal
Eunice Gas Processing Plant
Lea County, New Mexico

Dear Stinson:

On May 16, 1981, the groundwater discharge plan, GW-005, for the Eunice Gas Processing Plant located in the NE/4, Section 3, 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 9, 1986, and again on May 9, 1991. This 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 May 16, 1996.

On October 17, 1995, Warren Petroleum Company was notified of the upcoming expiration. If the discharge plan renewal is not received and approved by the OCD by May 16, 1996, the facility will be required to cease operations until the OCD receives and approves the discharge plan renewal.

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

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 the discharge plan renewal request.

The discharge plan renewal application for the Eunice Gas Processing Plant is subject to the WQCC Regulations 3114 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 WQCC Regulations and OCD Guidelines and Application form as revised December, 1995 are enclosed.

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 Warren Petroleum Company no longer have any actual or potential discharges a discharge plan is not needed, please notify this office and include a closure plan for the facility pursuant to WQCC Section 3107 A.11. If Warren Petroleum has any questions regarding this matter, please do not hesitate to contact Pat Sanchez at (505) 827-7156.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

Enclosure

xc: OCD Hobbs Office

Linda L. Johnson
Environmental Specialist
Manufacturing Department
Phone 918 560 4138
Fax 918 560 4044
918 560 4111

Warren Petroleum Company
1350 South Boulder
Tulsa, OK 74119
Mail: P.O. Box 1589
Tulsa, OK 74102