

GW - 8

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

---

**1993-1980**

# Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

### Notice Of Publication

XXXXXXXXXXXXX and number XXXXX

XXXXXXXXXXXXX Court of Lea

XXXXXXXXXXXXXXXXXXXX County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, XXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXX same day of the week, for **one (1) day**

XXXXXXXXXXXXXXXXXXXX consecutive weeks, beginning with the issue of

**September 15**, 19**93**

and ending with the issue of

**September 15**, 19**93**

And that the cost of publishing said notice is the sum of \$ **48.60**

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

*Joyce Clemens*  
Subscribed and sworn to before me this **23rd**

day of **September**, 19**93**

*Mrs. Jan Serier*  
Notary-Public-Lea County, New Mexico

My Commission Expires **Sept. 28**, 19**94**

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-8), El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted an application for renewal of a previously approved discharge plan for the Monument Gas Plant located in the NW/4 Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with total dissolved solids concentration of 3500 mg/1 is stored in steel tanks prior to offsite disposal at an OCD approved Class II injection well. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 500 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-46) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted an application for renewal of a previously approved discharge plan for the Eunice Gas Plant located in the NW/4 Section 5, Township 21 South, Range 36 East, NMPM, Lea County,

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of September, 1993.

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

Published in the Lovington Daily Leader September 15, 1993.

STATE OF NEW MEXICO  
County of Bernalillo

SS

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ENERGY, MINERALS & NATURAL  
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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 2nd day of September, 1993.

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

Journal: September 22, 1993

Paul D. Campbell being duly sworn declares and says that he is National Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 22 day of Sept., 1993, and the subsequent consecutive publications on \_\_\_\_\_, 1993.

*Paul D. Campbell*

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 22 day of Sept 1993.

PRICE

\$ 36.57

CE

Statement to come at end of month.

*Bernadette Ortiz*  
BERNADETTE ORTIZ  
NOTARY PUBLIC-NEW MEXICO  
12-18-93

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

State of New Mexico  
 Energy, Minerals and Natural Resources Department  
 OIL CONSERVATION DIVISION  
 P.O. Box 2088  
 Santa Fe, NM 87501

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,  
 OIL REFINERIES AND GAS COMPRESSOR STATIONS**  
 (Refer to OCD Guidelines for assistance in completing the application.)

**RECEIVED**

SEP 07 1993

OIL CONSERVATION DIV.  
 SANTA FE

- I. TYPE: Monument Station - Natural gas compression
- II. OPERATOR: El Paso Natural Gas Company  
 ADDRESS: P. O. Box 1492, El Paso, Texas, 79978  
 CONTACT PERSON: Mr. Philip L. Baca PHONE: 915/541-2323
- III. LOCATION:    /4    /4 Section   1   Township  20-S  Range  36-E   
 Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. Attach a description of current liquid and solid waste disposal procedures.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a contingency plan for reporting and clean-up of spills or releases.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XIII. CERTIFICATION

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

Name: Lori A. Saylor Title: Compliance Engineer

Signature: Lori A. Saylor Date: 09-02-93

**DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.**

**MONUMENT GAS COMPRESSOR STATION**

**DISCHARGE PLAN, GW - 8**

EL PASO NATURAL GAS COMPANY

**RECEIVED**

SEP 07 1993

OIL CONSERVATION DIV.  
SANTA FE

Prepared for:

New Mexico Oil Conservation Division

October 1993

El Paso Natural Gas Company  
304 Texas Street  
El Paso, Texas 79901  
(915) 541-2323

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# MONUMENT GAS COMPRESSOR STATION

## DISCHARGE PLAN

This Discharge Plan has been prepared in accordance with the New Mexico Oil Conservation Division (NMOCD) "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants".

### 1.0 GENERAL INFORMATION

#### 1.1 NAME OF DISCHARGER OR LEGALLY RESPONSIBLE PARTY:

El Paso Natural Gas Company  
304 Texas Street  
El Paso, Texas 79901

(915) 541-2600

Attention:  
Philip L. Baca  
Manager, Environmental Compliance  
Transmission Operations Engineering  
(915) 541-2323

#### 1.2 NAME OF LOCAL REPRESENTATIVE OR CONTACT PERSON:

El Paso Natural Gas Company  
Monument Station  
Drawer C  
Monument, New Mexico 88265

Attention:  
Don C. Howell  
Plant Superintendent  
(505) 394-3255

#### 1.3 LOCATION OF DISCHARGE

The Monument Gas Compressor Station is located in Section 1, Township 20 South, Range 36 East, Lea County, New Mexico: or, approximately five miles southwest of Monument, New Mexico, and three miles west of State Highway

No. 8. Tab "1" contains the most current copy of an aerial photograph of the gas storage facility. This drawing shows a camp housing complex that has been retired and was removed from the site in 1986.

#### 1.4 LOCAL LAND USE

The Monument Station occupies approximately 94 acres. Information regarding land ownership is contained in Figure 3, pp. 5 and 6, of the 1983 Discharge Plan. EPNG incorporates this information by reference.

#### 1.5 TYPE OF OPERATION

El Paso Natural Gas Company's Monument Station is engaged in the compression of natural gas.

The Monument Station natural gas compression facilities consist of seven internal combustion engine compressor drives (five in "A" Plant and two in "B" Plant) that total 10,500 horsepower have the capability of handling a design gas capacity of 102.81 million cubic feet of gas per day. In addition, the plant has an auxiliary generating station utilizing gas fueled engines with a total of 2,625 horsepower. Oil and jacket water is used to cool the engines. The cooling tower is used to cool the compressed gas.

In the past, gas processing facilities were located at the Station which consisted of a dehydration plant, a treating plant, gasoline absorption facilities, and supporting steam generation facilities. These facilities were shut down on February 24, 1976, and retired in place until late 1987 when the facilities were dismantled.

Entrained liquids are removed from the gas stream prior to compression by one (1) gas-liquid scrubber. The compressed gas passes through cooling coils in a mechanical draft cooling tower, then part of the gas stream passes through the one (1) gas-liquid scrubber. The remaining gas does not go through a scrubber. The primary purpose of the scrubber is to remove any small quantities of liquids from the gas stream prior to entering the mainline transportation system.

1.6 AFFIRMATION

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

Donald N. Bigbie  
Signature

9/1/93  
Date

Donald N. Bigbie  
Vice President  
Transmission Operations

## 2.0 PLANT PROCESSES

### 2.1 SOURCES AND QUANTITIES OF EFFLUENT

Presently, the Monument Station discharges commingled wastewater into a wastewater classifier and its effluent is disposed in the Rice Engineering Disposal System. EPNG proposes to continue to discharge the Monument Station wastewater to the classifier and to dispose the effluent from this collection system to the Rice Engineering Disposal System. ✓

#### 2.1.1 Gas-Liquid Scrubber

The inlet gas is treated by the scrubber units which discharge negligible amounts of wastewater. This wastewater is discharge to the wastewater classifier system. The wastewater from the classifier is delivered to the Rice Engineering Disposal System, Monument Branch, by means of two vertical centrifugal-type pumps. The classifier system is discussed in detail in the 1983 Discharge Plan (p. 19). ✓

#### 2.1.2 Cooling Tower Blowdown

Evaporative cooling tower water is used to cool compressed pipeline gas for transmission. Cooling tower water is recycled as much as possible, but some is blowdown and replaced to prevent TDS buildup. The blowdown is approximately 8,690 gallons per day, or 6.03 gallons per minute. ✓

#### 2.1.3 Domestic Sewage

The domestic wastewater discharges of approximately 100 gpd from the plant office is routed to a 1,050 gallon capacity septic tank, and the domestic wastewater discharges of approximately 100 gpd from the breakroom is routed to a 500 gallon capacity septic tank. The effluent is discharged by gravity flow to an internally and externally epoxy-coated steel tank-type classifier. Figures 16 and 17 of the 1983 Discharge Plan illustrate the existing wastewater-producing processes and schematic of the collection system.

#### 2.1.4 Building Floor Drains

Wastewater from the building floor drains is discharged to the classifier. The volume is minimal since it consists of wastewater produced by the washing of the building floors.

#### 2.1.5 Water Treating

The water treatment for make-up to plant process water previously consisted of one zeolite water treater. This was retired in 1991 and abandoned in place.

### 2.1.6 Storm Water

Storm water runoff flows south to southwest from the Station. Most precipitation soaks into the soil or evaporates. Open drains are located in the concrete secondary containment berm areas for the Antipol tank and barrel rack. The drains are gravity feed to the classifier. The amount of storm water run-off entering the system is negligible and will not appreciably change the volume of discharge.

## 2.2 QUALITY CHARACTERISTICS

Table 2, p. 20, of the 1983 Discharge Plan contains the wastewater analyses for each stream. Chemical analyses of two composite wastewater samples are shown in Table 3 of the 1983 Discharge Plan. There is no reason to believe that the character of this waste stream has changed since the operation of this station has not changed, thus EPNG incorporates this data by reference.

## 3.0 TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS

The industrial wastewater at Monument Station includes cooling tower blowdown, scrubber blowdown, wastewater from floor drains, and domestic wastewater. These wastewater streams drain to a 501 barrel capacity fiberglass reinforced plastic (FRP) classifier tank for separation of oil from the water. Oil is sent to a 125 barrel FRP underground tank located adjacent to the classifier. The water is collected in the classifier tank. A float level controller monitors the water level and activates a pump when the water level reaches a determined level. The wastewater is then piped to the injection well belonging to Rice Engineering. Adjacent to the classifier is a 3,000 barrel underground steel contingency tank that receives all overflows and emergency draining from the classifier. Tab "2" contains the drawing of the classifier and oil storage tank piping.

To prevent unintentional and inadvertent discharges, storage tanks are located in concrete secondary containment berms.

## 4.0 SPILL/LEAK PREVENTION AND HOUSEKEEPING PRACTICES

### 4.1 SPILL/LEAK PREVENTION PROCEDURES

The Monument Station is operated in a manner to prevent and mitigate any unplanned release to the environment. Facility processes and storage tanks are regularly observed by a number of personnel during daily operations, and any evidence or sign of spills or leaks are routinely reported to supervisory personnel so that repairs or cleanup can be promptly effected. Routine maintenance procedures conducted at the facility also help to assure that equipment remains functional and minimize the possibility of spills or leaks.

Process and non-process chemicals or additives used at the Station could present a threat to the environment only in the event of a major spill or

release. The majority of the chemicals are used in very small quantities; 25 gallons to 18,000 gallons per year. Hence, any spills or leaks would be very small in volume and easily contained in the immediate area. A list of chemicals used at the Station and their respective Material Data Safety Sheets are provided under Tab "3".

Cleanup procedures would vary with the nature and extent of any unplanned release. Spills of acids are relatively easy to control and general procedures would include neutralization of the material in place before a final evaluation is made on its ultimate disposal. Once neutralization is confirmed by sampling and pH determination, it is quite probable that no further actions would be required to ensure protection of human health and the environment.

Spills or leaks of hydrocarbons could potentially occur from the lube oil storage tanks. The lube oil is stored in two 8,000 gallon aboveground tanks. A leak in these tanks would be contained in the bermed area surrounding the tanks.

#### 4.2 GENERAL HOUSEKEEPING PROCEDURES

EPNG strives to reduce the potential for spills and leaks in all areas. Non-process chemicals are used in relatively small quantities at the Station and are managed in a manner to prevent discharges to the environment. Any chemical spills which might occur would be immediately contained and disposed of according to proper guidelines.

EPNG currently uses a non-halogenated solvent, Varsol, for degreasing operations. The spent solvent which contains various aromatic compounds is combined with other hydrocarbon fractions and discharged to the industrial waste containment system.

#### 5.0 EFFLUENT AND SOLID WASTE DISPOSAL

As mentioned in Section 3.0, EPNG disposes of all industrial aqueous wastes in an on-site internally and externally epoxy-coated steel tank classifier. Figures 16 and 17 of the 1983 Discharge Plan illustrate the existing wastewater producing processes and the collection system in schematic forms.

Industrial and domestic wastewater generated at the Station are pumped through an anthracite/rock filter, then metered and disposed of in the Rice engineering Disposal system, Monument Branch. EPNG began delivering wastewater to the Rice Engineering system on October 26, 1982.

Industrial solid waste is comprised of used oil filters, scrap metal, spent solvent, used engine oil, scrubber blowdown, Station refuse, and empty drums. Used oil, hydrocarbons from the scrubber blowdown, and very small amounts of spent cleaning solvent are collected in the classifier and separated to a 100 barrel underground FRP tank. Used oil filters are collected, drained in a drum, and sent to a central location for incineration. Scrap metal and empty drums are stockpiled in the storage garage

located northwest of the plant office. The Station refuse is disposed of in dumpsters in the Station yard and periodically picked up by a private contractor and taken to the Hobbs Landfill.

Domestic waste consists of septic tank solids and plant garbage. The Station garbage is placed into dumpsters and collected periodically by a private contractor. The septic tanks are cleaned out by a private contractor on an as-needed basis. The solids are disposed of by the contractor in an accepted manner.

## **6.0 SITE CHARACTERISTICS**

Information relative to the hydrology and geology of the site was submitted to the NMOCD in EPNG's original 1983 Discharge Plan application. EPNG incorporates this information by reference.

## **7.0 MONITORING AND REPORTING**

Verbal and written notification of leaks or spills will be made to the NMOCD in accordance with NMOCD Rule 116. Any reportable release of materials regulated by the Code of Federal Regulations, Title 40, Parts 300 and 372 will be reported to the National Response Center, and to the NMED where applicable.

The underground drain line system will be tested every five years prior to renewal of the discharge plan, in accordance with the drainline testing procedures submitted in the 1983 Discharge Plan. Tab "4" contains the test results for 1993.

STATE OF NEW MEXICO

County of Bernalillo

ss

CONSERVATION DIVISION  
RECEIVED

'93 OCT 12 AM 9 28

Paul D. Campbell being duly sworn declares and says that he is National Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 6 day of Oct., 1993, and the subsequent consecutive publications on \_\_\_\_\_, 1993.

*Paul D. Campbell*

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 6 day of Oct 1993.

PRICE \*NOCHARGE

Statement to come at end of month.

*Bernadette O'Neil*

12-18-93

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

*PUBLISHERS CORRECTION*

*JUN. '78*

*↓*

*OCT. '93*

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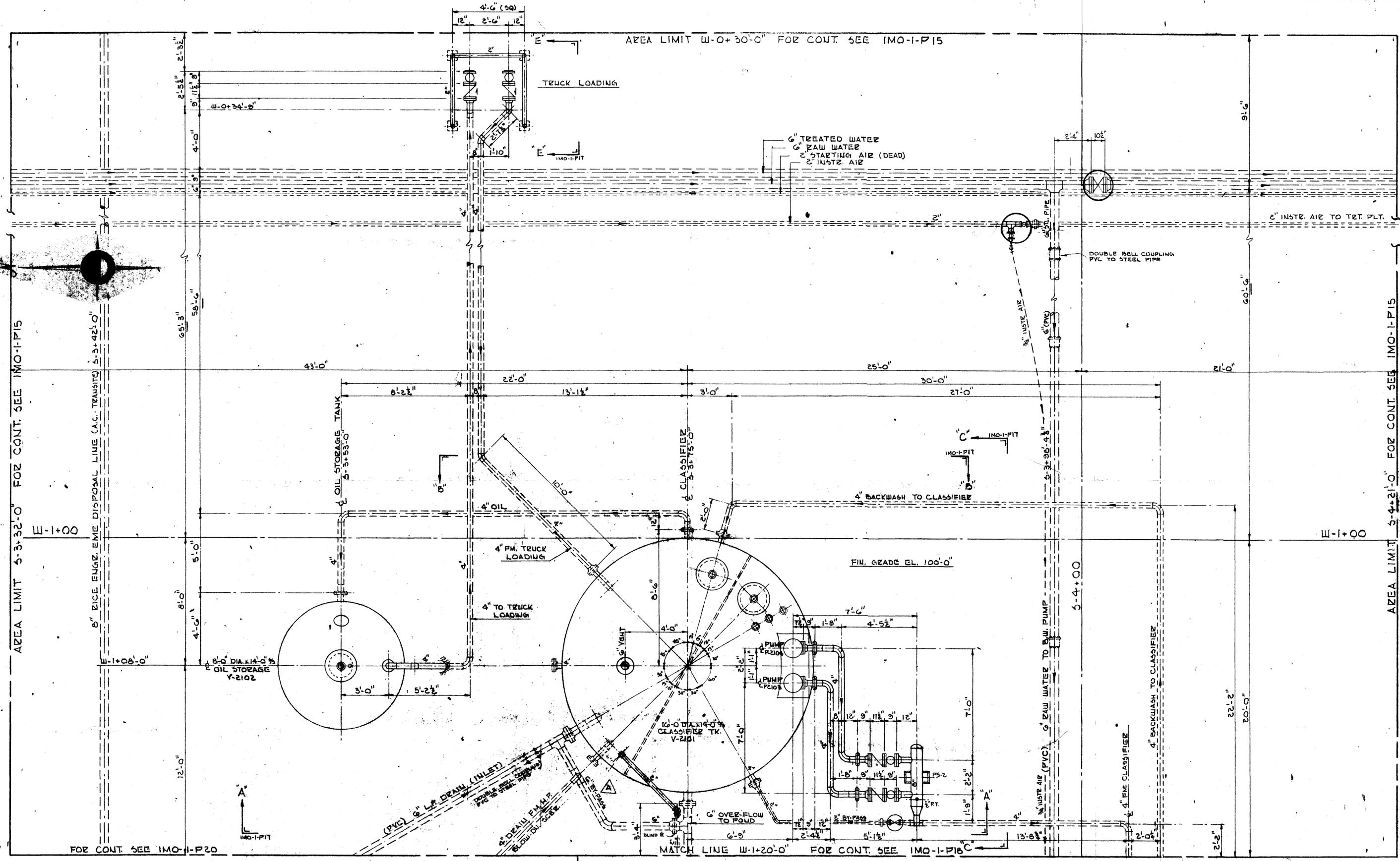
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STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
s/William J. LeMay  
Director

Journal: October 6, 1993







AREA LIMIT 5-3+32'-0" FOR CONT. SEE IMO-1-P15

AREA LIMIT 5-4+21'-0" FOR CONT. SEE IMO-1-P15

FOR CONT. SEE IMO-1-P20

MATCH LINE W-1+20'-0" FOR CONT. SEE IMO-1-P16

LEGEND		REFERENCE DRAWINGS		REVISIONS		PRINT RECORD	
IMO-1-P15	DRAIN LINE CLASS.-AREA - PLAN	A	8-30-84	15	ADD 6" BY-PASS		
IMO-1-P11	CLASS. OIL STG. - ELEVATIONS						

ENG. RECORD	DATE
DRAWN	LJ 11-30-84
CHECKED	
PROJ. APP.	RWM 11-2-84
DESIGN APP.	

<b>El Paso</b> NATURAL GAS COMPANY	
<b>MONUMENT + PLANT DISPOSAL SYSTEM</b> <b>CLASSIFIED, OIL STORAGE &amp; TRUCK LOADING</b> <b>PIPING PLAN</b>	
SCALE: 1/8" = 1'-0"	DWG. NO. IMO-1-P16
BY: K-4276	NO. (MID)

**MONUMENT GAS COMPRESSION STATION  
PLANT CHEMICAL INVENTORY**

<u>Chemical Name</u>	<u>Manufacturer</u>	<u>Storage Area</u>	<u>Maximum Quantity</u>
Toxene 35	Continental Products	N. side engine room	30 gal.
Toxene 37	Continental Products	N. side engine room	30 gal.
HTH Tablets	Olin Corporation	Cooling tower area	600 lbs.
Sodium Nitrite	Texachem	Cooling tower area	55 gal.
Pegasus Oil 490	Mobil Oil Co.	Storage tank	16,000 gal.
Mollub Oil 90	Imperial Oil & Grease	Storage area	55 gal.
Tribol Oil 890	Imperial Oil & Grease	Storage area	55 gal.
Sulfuric acid	Weskem, Inc.	Storage tank	300 gal.
Gasoline	Shell Oil Co.	Storage tank	200 gal.
Varsol	Shell Oil Co.	Storage tank	500 gal.
Tricholoethane	Dow Chemicals	Shop area	55 gal.
Antipol 640 LD	Continental Products	Cooling tower area	500 gal.
Hydrochem A-239	Continental Products	B Cooling tower	55 gal.
Diesel	Chevron	Barrel rack	55 gal.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TOXSENE 35

EPNG MSDS NO: 00003  
PRODUCT ITEM NO: 0012213  
DATE ISSUED: 11/22/1985  
LAST REVISED DATE: / /

MANUFACTURER

NAME: CONTINENTAL PROD. OF TX  
ADDRESS: 100 INDUSTRIAL  
P.O. BOX 3627  
CITY: ODESSA  
STATE: TX ZIP: 79760  
EMERGENCY TELEPHONE: ( )  
24 HOUR TELEPHONE: (915)337-4681

NFPA HEALTH: 2 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0  
TRADE SECRET: N  
TIER II REPORTABLE:

MOLECULAR FORMULA: N/A  
MOLECULAR WEIGHT: N/A  
BOILING POINT: 209 F  
MELTING POINT: N/A  
EVAPORATION RATE: WATER  
VAPOR PRESSURE: UN  
VISCOSITY: N/A  
SPECIFIC GRAVITY: 1.010  
VAPOR DENSITY: N/A  
MATER SOLUBILITY: COMPLETE

FLASH POINT : NONE  
AUTOIGNITION : N/A  
METHOD: NONE  
LEL: N/A  
UEL: N/A

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:  
LIGHT STRAW TO WATER WHITE LIQUID

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TOXSENE 35

SECTION I MATERIAL IDENTIFICATION

Common Name: (used on label) Toxsene 35  
(Trade Name & Synonyms) Toxsene 35  
Chemical Name: N/A  
Chemical Family: N/A  
Cas No. N/A (Information according to Suppliers MSDS)

SECTION II INGREDIENTS AND HAZARDS

Hazardous Component(s) N/A  
Threshold Limit Value (units) N/A

SECTION III PHYSICAL DATA

Boiling Point: 209 degrees F  
Percent Volatile by Volume (%): 80%  
Solubility in Water: Complete  
Appearance and Odor: Light straw to water white liquid  
Flash Point: none  
Special Fire Fighting Procedures: N/A  
Unusual Fire and Explosion Hazards: N/A  
Specific Gravity (H2O = 1): 1.01  
Vapor Density (Air = 1): N/A  
Reactivity in Water: N/A  
Flammable Limits in Air % by Volume: N/A  
Vapor pressure (mm Hg): UN  
Evaporation Rate (\_\_\_\_\_ = 1): Water  
Extinguisher Media: NA  
Auto-Ignition Temperature: N/A

SECTION IV FIRE AND EXPLOSION DATA

Special Fire Fighting Procedures: N/A  
Unusual Fire and Explosion Hazards: N/A  
Flammable Limits in Air % by Volume: N/A  
Extinguisher Media: N/A  
Auto-Ignition Temperature: N/A

SECTION V REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY: Under normal conditions this product is stable. Avoid sources of ignition such as flames, hot surfaces, electrical or frictional sparks, etc.  
INCOMPATIBILITY: Avoid contact with strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS: The material may decompose at high temperatures to form CO and C2.  
CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION: Material is not known to polymerize.

SECTION VI HEALTH AND HAZARD INFORMATION

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TOXSENE 35

Threshold Limit Value: NA

Signs and Symptoms of Exposure

Acute Overexposure: Corrosive. Causes eye damage and skin irritation.

EMERGENCY AND FIRST AID PROCEDURES

Inhalation: Remove to fresh air.

Eyes: Flush eyes with plenty of water for at least 15 minutes.

Call physician.

Skin: Flush skin with plenty of water for at least 15 minutes.

Remove and wash contaminated clothing before reuse.

Ingestion: Fatal if swallowed. Avoid contamination of food.

If swallowed drink promptly large quantities of milk, egg whites, gelatin solution or if these are not available drink large amounts of water. Avoid alcohol. Call physician immediately.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

Toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes.

Do not use, pour, spill or store near heat or open flame.

hose down area of spill. Do not allow this product to come in contact with greenery or plants. Do not allow in drinking water or swimming pool.

Dispose of according to State and Federal Regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

VENTILATION: YES

Local Exhaust: Non-Recirculating

Protective Gloves: Rubber gloves

Eye Protection: Safety goggles or face shield.

Other Protective Clothing or Equipment: Face shield

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: None

OTHER PRECAUTIONS: None

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TOXSENE 37

EPNG MSDS NO: 00004  
PRODUCT ITEM NO: 0012217  
DATE ISSUED: 11/22/1985  
LAST REVISED DATE: / /

MANUFACTURER

NAME: CONTINENTAL PROD. OF TX  
ADDRESS: 100 INDUSTRIAL  
P.O. BOX 3627  
CITY: ODESSA  
STATE: TX ZIP: 79760  
EMERGENCY TELEPHONE: ( )  
24 HOUR TELEPHONE: (915) 337-4681

NFPA HEALTH: 2 FIRE: 2 REACTIVITY: 0 PERSISTENCE: 0  
CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA: N/A  
MOLECULAR WEIGHT: N/A  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: N/A  
MELTING POINT: N/A  
VISCOSITY: N/A  
VAPOR DENSITY: N/A  
EVAPORATION RATE: N/A  
VAPOR PRESSURE: N/A  
SPECIFIC GRAVITY: 1.040  
WATER SOLUBILITY: <5%

FLASH POINT : 127 F TOC  
AUTOIGNITION : N/A  
METHOD: N/A  
LEL: N/A UEL: N/A

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:  
CREAMY BEIGE LIQUID, ORGANIC ODOR

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TOXSENE 37

N/A SECTION I MATERIAL IDENTIFICATION

N/A SECTION II INGREDIENTS AND HAZARDS

N/A SECTION III PHYSICAL DATA

N/A SECTION IV FIRE AND EXPLOSION DATA

N/A SECTION V REACTIVITY DATA

N/A SECTION VI HEALTH AND HAZARD INFORMATION

N/A SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

N/A SECTION VIII SPECIAL PROTECTION INFORMATION

N/A SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET  
PRODUCT NAME: HTH TABLETS (LB)

EPNG MSDS NO: 01231  
PRODUCT ITEM NO: 0062278  
DATE ISSUED: 11/19/1985  
LAST REVISED DATE: / /

MANUFACTURER

NAME: CONTINENTAL PRODUCT OF TX  
ADDRESS: 100 INDUSTRIAL  
P.O. BOX 3627  
CITY: ODESSA  
STATE: TX ZIP: 79760  
EMERGENCY TELEPHONE: ( ) -  
24 HOUR TELEPHONE: (915)337-4681

NFPA HEALTH: FIRE: REACTIVITY:  
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: NA  
MOLECULAR WEIGHT: NA  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: NA  
MELTING POINT: NA  
VISCOSITY: NA  
VAPOR DENSITY: NA  
EVAPORATION RATE: NA  
VAPOR PRESSURE: NA  
SPECIFIC GRAVITY: 0.000  
WATER SOLUBILITY: APPRECIABLE

FLASH POINT :  
AUTOIGNITION :  
METHOD:  
LEL: UEL:

PHYSICAL FORMS PURE: MIX: LIQUID: GAS: SOLID: Y

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: HTH TABLETS (LB)

SECTION I MATERIAL IDENTIFICATION

COMMON NAME (USED ON LABEL): HTH Tablets

CHEMICAL NAME: Calcium Hypochlorite

CHEMICAL FAMILY: Hypochlorite

FORMULA: Ca(OCl)<sub>2</sub>

NEPA DESIGNATION 704

Fire = 0; Health = 2; Reactivity = 3; Specific Hazard = Oxy

HAZARD RATING: 4=Extreme; 3=High; 2=Moderate; 1=Slight; 0=Insignificant

Class 3 Oxidizer (OSHA)

SECTION II INGREDIENTS AND HAZARDS

HAZARDOUS COMPONENT (S): Calcium hypochlorite  
WT %: 70

SECTION III PHYSICAL DATA

SOLUBILITY IN WATER: Appreciable  
APPEARANCE & ODOR: White tablets, slight chlorinous odor

SECTION IV FIRE AND EXPLOSION DATA

EXTINGUISHER MEDIA: Water preferable spray

SPECIAL FIRE FIGHTING PROCEDURES: Drench with water and cool the surrounding drums and area with water.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not a combustible material. Mixing with any foreign material may result in fire and the fire can have great intensity. If drum is closed lid may be blown off or drum may rupture.

SECTION V REACTIVITY DATA

STABILITY: Stable  
CONDITIONS TO AVOID: When heated above 350F it decomposes rapidly with the evolution of oxygen and heat.

INCOMPATIBILITY (MATERIAL TO AVOID): HTH is strong oxidizing agent. It is incompatible with the evolution of oxygen and heat.

HAZARDOUS DECOMPOSITION PRODUCTS: Decomposes rapidly with chemical fuming during the evolution of oxygen and heat.

HAZARDOUS POLYMERIZATION: Will not occur

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: HTH TABLETS (LB)

SECTION VI HEALTH AND HAZARD INFORMATION  
SIGNS AND SYMPTOMS OF EXPOSURE:

1. ACUTE OVEREXPOSURE: May produce severe chemical burns
- EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Remove to fresh air  
EYES: Flood skin with plenty of water for 15 minutes, remove contaminated clothing.  
SKIN: Flood skin with plenty of water for 15 minutes, remove contaminated clothing.  
INGESTION: Drink large quantities of water of milk. Follow with milk of magnesia, vegetable oil or beaten eggs. Call physician immediately.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:  
No smoking or flame. Immediately dispose of spilled HTH by flushing with large amounts of water. Avoid breathing fumes and skin contact.

WASTE DISPOSAL METHOD: Dispose of according to local, State and Federal Regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

N/A

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:  
Mix only with water. HTH is a powerful oxidant, keep away from combustible organic material. DO NOT contaminate with foreign material Use only clean dry container to measure & carry. DO NOT roll or skid container.

No warranty, express or implied of merchantability, fitness for a particular purpose or otherwise is made. Buyer assumes all risk of use storage and handling, Continental Products of Texas shall not be liable any incidental or consequential damages arising directly or indirectly in connection with the purchase, use, storage or handling of this product.



**J. T. Baker Chemical Co.**

222 Red School Lane Phillipsburg, N.J. 08865  
24-Hour Emergency Telephone -- (201) 859-2151

Chemtrec # (800) 424-9300  
National Response Center # (800) 424-8802

**MATERIAL  
SAFETY DATA  
SHEET**

S4466 -01  
Effective: 09/27/85

Sodium Nitrite

Page: 1  
Issued: 09/27/85

SECTION I - PRODUCT IDENTIFICATION

Product Name: Sodium Nitrite  
Formula:  $\text{NaNO}_2$   
Formula Wt: 69.00  
CAS No.: 07632-00-0  
NIOSH/RTECS No.: RA1225000  
Common Synonyms: Nitrous Acid, Sodium Salt; Anti-Rust  
Product Codes: 3782, 3780

PRECAUTIONARY LABELLING

BAKER SOF-T-DATA™ System

HEALTH <b>2</b> MODERATE	FLAMMABILITY <b>0</b> NONE	REACTIVITY <b>3</b> SEVERE	CONTACT <b>2</b> MODERATE
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Laboratory Protection Equipment



Precautionary Label Statements

**DANGER!**  
STRONG OXIDIZER - CONTACT WITH OTHER MATERIAL MAY CAUSE FIRE  
HARMFUL IF SWALLOWED  
CAUSES IRRITATION

Keep from contact with clothing and other combustible materials. Do not store near combustible materials. Avoid contact with eyes, skin, clothing. Keep in tightly closed container. Wash thoroughly after handling. In case of fire, soak with water. In case of spill, sweep up and remove. Flush spill area with water.

SECTION II - HAZARDOUS COMPONENTS

Component	%	CAS No.
Sodium Nitrite	90-100	7632-00-0

SECTION III - PHYSICAL DATA

Boiling Point: N/A  
Vapor Pressure (mmHg): N/A

Continued on Page: 2



J. I. Baker Chemical Co.

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24-Hour Emergency Telephone -- (201) 859-2151Chemtrec # (800) 424-9300  
National Response Center # (800) 424-6802
**MATERIAL  
SAFETY DATA  
SHEET**

34466 -01

Sodium Nitrite

Page: 2

Effective: 09/27/85

Issued: 09/27/85

 -----  
 SECTION III - PHYSICAL DATA (Continued)  
 -----

Melting Point: 271°C ( 520°F) Vapor Density (air=1): 2.4

Specific Gravity: 2.17 Evaporation Rate: N/A  
(H<sub>2</sub>O=1) (Butyl Acetate=1)

Solubility (H<sub>2</sub>O): Appreciable (more than 10 %) & Volatiles by Volume: 0

Appearance & Odor: White to yellow, odorless granules or powder.

 -----  
 SECTION IV - FIRE AND EXPLOSION HAZARD DATA  
 -----

Flash Point: N/A

Fire Extinguishing Media

Use water spray.

Special Fire-Fighting Procedures

Firefighters should wear proper protective equipment and self-contained breathing apparatus with full facepiece operated in positive pressure mode. Move containers from fire area if it can be done without risk. Use water to keep fire-exposed containers cool.

Unusual Fire & Explosion Hazards

Strong oxidizer. Contact with other material may cause fire. Can react violently with shock, friction or heat.

Toxic Gases Produced

nitrogen oxides

 -----  
 SECTION V - HEALTH HAZARD DATA  
 -----

Some experiments with test animals indicated that this substance may be anticipated to be a carcinogen.

Toxicity: LD<sub>50</sub> (oral-rat)(mg/kg) - 85  
LD<sub>50</sub> (ipr-mouse)(mg/kg) - 150

Effects of Overexposure

Ingestion may cause irritation and burning to mouth and stomach.

Emergency and First Aid Procedures

If swallowed, if conscious, immediately induce vomiting.  
In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Flush skin with water.

Continued on Page: 3


**J. I. Baker Chemical Co.**

 222 Red School Lane Phillipsburg, N.J. 08865  
 24-Hour Emergency Telephone -- (201) 859-2151

 Chemtrec # (800) 424-9300  
 National Response Center # (800) 424-8802

**MATERIAL  
SAFETY DATA  
SHEET**

S4466 -01

Sodium Nitrite

Page: 3

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 =====  
 SECTION VI - REACTIVITY DATA  
 =====

Stability: Stable

Hazardous Polymerization: Will not occur

Conditions to Avoid: shock, friction, heat, flame

Incompatibles: cyanides, strong acids, strong reducing agents,  
combustible materials, organic materials

Decomposition Products: oxides of nitrogen

Dried material may explode if exposed to heat, flame, or shock.

 =====  
 SECTION VII - SPILL AND DISPOSAL PROCEDURES  
 =====
Steps to be taken in the event of a spill or discharge

Wear self-contained breathing apparatus and full protective clothing.  
 Keep combustibles (wood, paper, oil, etc.) away from spilled material.  
 With clean shovel, carefully place material into clean, dry container and  
 cover; remove from area. Flush spill area with water.

Disposal Procedure
 Dispose in accordance with all applicable federal, state, and local  
 environmental regulations.

EPA Hazardous Waste Number: D001, D003 (Ignitable, Reactive Waste)

 =====  
 SECTION VIII - INDUSTRIAL PROTECTIVE EQUIPMENT  
 =====
Ventilation: Use adequate general or local exhaust ventilation  
to keep fume and dust levels as low as possible.Respiratory Protection: None required where adequate ventilation  
conditions exist. If airborne concentration is  
high, use an appropriate respirator or dust mask.Eye/Skin Protection: Safety glasses with sideshields, uniform, butyl  
rubber gloves are recommended.
 =====  
 SECTION IX - STORAGE AND HANDLING PRECAUTIONS  
 =====

SAF-T-DATA™ Storage Color Code: Yellow

Special Precautions
 Keep container tightly closed. Store separately and away from flammable  
 and combustible materials.

 =====  
 SECTION X - TRANSPORTATION DATA AND ADDITIONAL INFORMATION  
 =====

Continued on Page: 4



J. T. Baker Chemical Co.

222 Red School Lane Phillipsburg, N.J. 08865  
24-Hour Emergency Telephone -- (201) 859-2151

Chemtrec # (800) 424-9300  
National Response Center # (800) 424-8802

MATERIAL SAFETY DATA SHEET

S4466 -01

Sodium Nitrite

Page: 4

Effective: 09/27/85

Issued: 09/27/85

SECTION X - TRANSPORTATION DATA AND ADDITIONAL INFORMATION (Continued)

DOMESTIC (D.O.T.)

Proper Shipping Name Sodium nitrite  
Hazard Class Oxidizer  
UN/NA UN1500  
Labels OXIDIZER  
Reportable Quantity 100 LBS.

INTERNATIONAL (I.M.O.)

Proper Shipping Name Sodium nitrite  
Hazard Class 5.1  
UN/NA UN1500  
Labels OXIDIZING AGENT

N/A = Not Applicable or Not Available

The information published in this Material Safety Data Sheet has been compiled from our experience and data presented in various technical publications. It is the user's responsibility to determine the suitability of this information for the adoption of necessary safety precautions. We reserve the right to revise Material Safety Data Sheets periodically as new information becomes available.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOBIL PEGASUS 490

EPNG MSDS NO: 00437  
PRODUCT ITEM NO: 0012047  
DATE ISSUED: / /  
LAST REVISED DATE: 12/30/1992

MANUFACTURER  
NAME: MOBIL OIL CORPORATION  
ADDRESS: 3225 GALLOWS ROAD

CITY: FAIRFAX, VIRGINIA  
STATE: VA ZIP: 22037  
EMERGENCY TELEPHONE: (609)737-4411  
24 HOUR TELEPHONE: (800)662-4525

NFPA HEALTH: FIRE: REACTIVITY:  
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: NA  
MOLECULAR WEIGHT: NA  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: NA  
MELTING POINT: NA  
VISCOSITY: @ 100F, 695.8  
VAPOR DENSITY: NA  
EVAPORATION RATE: NA  
VAPOR PRESSURE: < .1  
SPECIFIC GRAVITY: 0.000  
WATER SOLUBILITY: NEGLIGIBLE

FLASH POINT : >425(218)  
AUTOIGNITION : NA  
METHOD: ASTM D-92  
LEL: .6% UEL: 7.0%

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID: Y

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOBIL PEGASUS 490

SECTION I MATERIAL IDENTIFICATION  
SUPPLIER: Mobil Oil Corp

CHEMICAL NAMES AND SYNONYMS: Pet. Hydrocarbons and Additives

USE OR DESCRIPTION: Natural Gas Engine Oil

SECTION II INGREDIENTS AND HAZARDS  
None

SECTION III PHYSICAL DATA

APPEARANCE: Amber Liquid

ODOR: Mild

PH: NA

VISCOSITY AT 40 C, CS: 132.0

VISCOSITY AT 100 C, CS: 12.5

FLASH POINT F(C): > 425(218)

METHOD: ASTM D-92

MELTING POINT F(C): NA

POUR POINT F(C): 5(-15)

BOILING POINT F(C): > 600(316)

RELATIVE DENSITY, 15/4 C: 0.89

SOLUBILITY IN WATER: Negligible

VAPOR PRESSURE-mm Hg 20C: < .1

NA= NOT APPLICABLE NE= NOT ESTABLISHED D= DECOMPOSES

FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

SECTION IV FIRE AND EXPLOSION DATA  
FLASH POINT F(C): < 425(218) (ASTM D-92)

FLAMMABLE. LEL: .6% UEL: 7.0%

EXTINGUISHING MEDIA: Carbon Dioxide, Foam, Dry Chemical and water fog

SPECIAL FIRE FIGHTING PROCEDURES:

Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fires in enclosed areas, firefighters must use self-contained breathing apparatus. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

UNUSUAL FIRE AND EXPLOSION HAZARDS: None

NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

SECTION V REACTIVITY DATA

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOBIL PEGASUS 490

STABILITY (Thermal, light, etc.): Stable  
CONDITIONS TO AVOID: Extreme heat  
INCOMPATIBILITY (Materials to Avoid): Strong Oxidizers  
HAZARDOUS DECOMPOSITION PRODUCTS: Carbon Monoxide  
HAZARDOUS POLYMERIZATION: Will not occur.

SECTION VI HEALTH AND HAZARD INFORMATION  
--- INCLUDES AFFRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---

THRESHOLD LIMIT VALUE: 5.00 mg/m<sup>3</sup> Suggested for Oil Mist  
EFFECTS OF OVEREXPOSURE: Slight eye and skin irritation.

EMERGENCY AND FIRST AID PROCEDURES:  
--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: Flush thoroughly with water. If irritation persists,  
call a physician.

SKIN CONTACT: Wash contact areas with soap and water.

INHALATION: Not expected to be a problem

INGESTION: Not expected to be a problem. However, if greater than  
1/2 liter (pint) ingested, immediately give 1 to 2 glasses of water  
and call a physician, hospital emergency room or poison control center  
for assistance. Do not induce vomiting or give anything by mouth to  
an unconscious person.

TOXICOLOGICAL DATA  
--- ACUTE TOXICOLOGY ---

ORAL TOXICITY (RATS): Slight toxic --- Based on testing of similar  
products and/or the components.

DERMAL TOXICITY (RABBITS): Slightly toxic --- Based on testing of  
similar products and/or the components.

INHALATION TOXICITY (RATS): Not applicable --- Harmful concentrations  
of mists and/or vapors are unlikely to be encountered through any  
customary or reasonably foreseeable handling, use, or misuse of this  
product.

EYE IRRITATION (RABBITS): May cause slight irritation. --- Based on  
testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): May cause slight irritation on prolonged  
or repeated contact. --- Based on testing of similar products and/or  
the components.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOBIL PEGASUS 490

— SUBCHRONIC TOXICOLOGY (SUMMARY) —

Severely solvent refined and severely hydrotreated mineral base oils have been tested at Mobil Environmental and Health Sciences Laboratory by dermal application to rats 5 days/week for 90 days at doses significantly higher than those expected during normal industrial exposure. Extensive evaluations including microscopic examination of internal organs and clinical chemistry of body fluids, showed no adverse effects.

— CHRONIC TOXICOLOGY (SUMMARY) —

The base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of similar oils showed no evidence of carcinogenic effects.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

ENVIRONMENTAL IMPACT:

In case of accident or road spill notify CHEMTRIEC (800) 424-9300. Report spills as required to appropriate authorities. U.S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard toll free number (800) 424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED:

Absorb on fire retardant treated sawdust, diatomaceous earth, etc. Shovel up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.

WASTE MANAGEMENT:

Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by supervised incineration. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at any governmental approved disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

SECTION VIII SPECIAL PROTECTION INFORMATION

EYE PROTECTION:

Normal industrial eye protection practices should be employed.

SKIN PROTECTION: No special equipment required. However, good personal hygiene practices should always be followed.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOBIL PEGASUS 490

RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate ventilation.

VENTILATION: No special requirements under ordinary conditions of use and with adequate ventilation.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

No special precautions required.

REGULATORY INFORMATION

GOVERNMENTAL INVENTORY STATUS: A11 components registered in accordance with TSCA and EINECS.  
DOT:

Shipping Name: NA

Hazard Class: NA

US OSHA HAZARD COMMUNICATION STANDARD:

Product assessed in accordance with OSHA 29CFR 1910.1200 and determined not to be hazardous.

RCRA INFORMATION:

The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics for ignitability, corrosivity, or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristics Leaching Procedure (TCLP). However, used product may be regulated.

U.S. Superfund Amendments and Reauthorization Act (SARA) Title III:

This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".

SARA (311/312 - Formerly 302) REPORTABLE HAZARD CATEGORIES: None

This product contains no chemicals reportable under SARA (313) toxic release program.

The following product ingredients are cited on the lists below:

CHEMICAL NAME:

CAS #

LIST CITATIONS

ZINC (ELEMENTAL ANALYSIS) (.03%) 7440-66-6  
PHOSPHORODITHIOIC ACID, 0,0-DI CI- 68649-42-3  
14-ALKYL ESTERS, ZINC SALTS (2:1)  
(ZDDP) (.23%)

22  
22

REGULATORY LISTS SEARCHED	
1 = ACGIH ALL	6 = IARC 1
2 = ACGIH A1	7 = IARC 2a
3 = ACGIH A2	8 = IARC 2B
4 = NTP CARC	9 = OSHA CARC
5 = NTP SUS	10 = OSHA Z
11 = TSCA 4	17 = CA P65
12 = TSCA 5a2	18 = CA RTK
13 = TSCA 5e	19 = FL RTK
14 = TSCA 6	20 = IL RTK
15 = TSCA 12b	21 = LA RTK
16 = MHMIS	22 = MI 293
	23 = NJ RTK
	24 = PA RTK
	25 = RI RTK
	26 = RI RTK

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOBIL PEGASUS 490

CARC = CARCINOGEN; SUS = SUSPECTED CARCINOGEN  
NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBs.

\*\*\*\*\* APPENDIX \*\*\*\*\*  
FOR MOBIL USE ONLY: MHC: 1\* 1\* NA 1\* 1\*, MPPEC: A, PPEC: , US92-547  
APPROVE CODE: 13 07/30/92 REO: US - MARKETING  
\*\*\*\*\*

Information given herein is offered in good faith as accurate, but without guarantee. Conditions of use and suitability of the product for particular uses are beyond our control; all risks of use of the product are therefore assumed by the user and we EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. Nothing is intended as a recommendation for uses which infringe valid patents or as extending license under valid patents. Appropriate warnings and safe handling procedures should be provided to handlers and users.

PREPARED BY: Mobil Oil Corporation  
Environmental Health and Safety Department, Princeton, NJ

FOR FURTHER INFORMATION, CONTACT:  
Mobil Oil Corporation, Product Formulation and Quality Control  
3225 Gallows Road, Fairfax, VA 22037 (800) 227-0707 X3265

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOLUB-ALLOY 90

EPNG MSDS NO: 00185  
PRODUCT ITEM NO: 0012149

DATE ISSUED: / /  
LAST REVISED DATE: 08/03/1992

MANUFACTURER

NAME: IMPERIAL OIL & GREASE CO.  
ADDRESS: 10960 WILSHIRE BLVD.

CITY: LOS ANGELES  
STATE: CA ZIP: 90024

EMERGENCY TELEPHONE: (312)478-3577  
24 HOUR TELEPHONE: ( ) -

NFPA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0  
CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA:  
MOLECULAR WEIGHT:

TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: 700F  
MELTING POINT:  
VISCOSITY:  
VAPOR DENSITY: N/A

EVAPORATION RATE:  
VAPOR PRESSURE: LESS THAN 0.05  
SPECIFIC GRAVITY: 0.914  
WATER SOLUBILITY: IN WATER SLIGHT

FLASH POINT : ASTM D92 450F  
AUTOIGNITION :

METHOD:  
LEL:  
UEL:

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*

\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOLUB-ALLOY 90

SECTION I MATERIAL IDENTIFICATION  
TRADE NAME AND SYNONYMS: MOLUB-ALLOY 90

SECTION II INGREDIENTS AND HAZARDS

This is a petroleum base lubricating oil which has no TLV under normal use, but if steadily misted or sprayed into workplace atmosphere, TLV is 5 mg/cubic meter.

SECTION III PHYSICAL DATA

Boiling Point Above 700 F  
Specific Gravity 0.914  
Vapor Pressure Less Than 0.05  
Percent Volatile by Volume Trace  
Vapor Density N/A  
Evaporation Rate N/A except at temperatures above 700 F  
Solubility in Water Slight  
Appearance Dark, Opaque Liquid, Mild Aromatic Odor

SECTION IV FIRE AND EXPLOSION DATA

Flash Point ASTM D92 450 F  
Extinguishing Media Foam, CO2  
Special Fire Fighting Procedures Standard for heavy petroleum fires

SECTION V REACTIVITY DATA

STABILITY Stable  
Conditions to Avoid Exposure to Metallic Red Heat & Open Flame  
Incompatibility Strong Oxidizing Agents

SECTION VI HEALTH AND HAZARD INFORMATION

Emergency and First Aid Procedures:  
Rinse material from eyes with warm water; treat eyes with proprietary eye wash solution. Toxic potential if ingested, do not induce vomiting.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

Clean up Promptly with proprietary oil - drying compound

WASTE DISPOSAL METHOD: Mixing with no. 5 or no. 6 oil, use as road oil, dust and weed control.

SECTION VIII SPECIAL PROTECTION INFORMATION

Respiratory protection N/A  
Ventilation N/A  
Protective Gloves For Highly Sensitive Skin Only  
Eye Protection Only if Oil is being sprayed  
Other Protective Equip. None in normal use.

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: MOLUB-ALLOY 90

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

Precautions Maintain storage arrangement so that any leakage of containers will be readily detected.  
Other Precautions Keep container dry and clean when handling in order to minimize slippage and possible injuries.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRIBOL 890

EPNG MSDS NO: 00192  
PRODUCT ITEM NO: 0012135  
DATE ISSUED: / /  
LAST REVISED DATE: 01/07/1986

MANUFACTURER  
NAME: IMPERIAL OIL & GREASE CO.  
ADDRESS: 10960 WILSHIRE BLVD.

CITY: LOS ANGELES  
STATE: CA ZIP: 90024  
EMERGENCY TELEPHONE: (213) 478-3577  
24 HOUR TELEPHONE: ( ) -

NFPA HEALTH: 0 FIRE: 0 REACTIVITY: 0  
CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA:  
MOLECULAR WEIGHT:  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: ABOVE 600F  
MELTING POINT:  
VISCOSITY:  
VAPOR DENSITY: N/A  
EVAPORATION RATE: N/A  
VAPOR PRESSURE: < 0.05  
SPECIFIC GRAVITY: 0.952  
WATER SOLUBILITY: SLIGHT

FLASH POINT : ASTM D92 490F  
AUTOIGNITION :  
METHOD: CO2, DRY CHEM., FOAM  
LEL: N/A UEL: N/A

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRIBOL 890

SECTION I MATERIAL IDENTIFICATION

N/A

SECTION II INGREDIENTS AND HAZARDS

THIS IS A DIESTER SYNTHETIC BASE LUBRICATING FLUID WHICH HAS NO TLV UNDER NORMAL CONDITIONS AND IS CONSIDERED NON-HAZARDOUS BY THE U. S. DEPARTMENT OF LABOR DEFINITION.

SECTION III PHYSICAL DATA

BOILING POINT: ABOVE 600F  
SPECIFIC GRAVITY: 0.952  
VAPOR PRESSURE: LESS THAN 0.05  
PERCENT VOLATILE BY VOLUME: TRACE  
VAPOR DENSITY: N/A  
EVAPORATION RATE: N/A EXCEPT AT TEMPERATURES ABOVE 600F  
SOLUBILITY IN WATER: SLIGHT  
APPEARANCE AND ODOR: LIGHT YELLOW FLUID, MILD ODOR

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT: ASTM D92 490F  
LEL: N/A  
UEL: N/A  
EXTINGUISHING MEDIA: CO2, DRY CHEMICAL OR FOAM.  
SPECIAL FIRE FIGHTING PROCEDURES:  
DO NOT USE WATER - NORMAL FOR PETROLEUM FIRE.  
UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE

SECTION V REACTIVITY DATA

STABILITY: STABLE  
CONDITIONS TO AVOID: EXPOSURE TO METALLIC RED HEAT AND OPEN FLAME.  
INCOMPATIBILITY: STRONG OXIDIZING AGENTS

SECTION VI HEALTH AND HAZARD INFORMATION

THRESHOLD LIMIT VALUE: N/A  
EFFECTS OF OVEREXPOSURE:  
ORAL - SLIGHTLY TOXIC  
EYE - SLIGHTLY IRRITATING  
SKIN - MAY BE SLIGHTLY IRRITATING  
EMERGENCY AND FIRST AID PROCEDURES:  
ORAL INGESTION - DO NOT INDUCE VOMITING. CONSULT PHYSICIAN.  
EYE - FLUSH WITH WARM WATER, TREAT WITH PROPRIETARY EYE WASH SOLUTION  
SKIN - REMOVE BY WIPING FOLLOWED BY WASHING WITH SOAP WATER.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

CLEAN UP PROMPTLY WHT PROPRIETARY OIL DRYING COMPOUND  
WASTE DISPOSAL METHOD:  
MIXING WITH NO. 5 OR NO. 6 FUEL OIL, USE AS ROAD OIL, DUST AND WEED

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRIBOL 890

CONTROL

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: N/A

VENTILATION: N/A

PROTECTIVE GLOVES: FOR HIGHLY SENSITIVE SKIN ONLY

EYE PROTECTION: ONLY IF FLUID IS MISTED OR SPRAYED

OTHER PROTECTIVE EQUIPMENT: NONE

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:

MAINTAIN STORAGE ARRANGEMENT SO THAT CONTAINER LEAKAGE IS READILY

DETECTED

OTHER PRECAUTIONS:

KEEP CONTAINER DRY AND CLEAN WHEN HANDLING IN ORDER TO MINIMIZE

SLIPPAGE AND POSSIBLE INJURIES.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET  
PRODUCT NAME: SULFURIC ACID (GAL)

EPNG MSDS NO: 00652  
PRODUCT ITEM NO: 0062115  
DATE ISSUED: 12/18/1988  
LAST REVISED DATE: / /

MANUFACTURER  
NAME: PHILLIPS 66 COMPANY  
ADDRESS:

CITY: BARTLESVILLE,  
STATE: OK ZIP: 74004  
EMERGENCY TELEPHONE: (918)661-3865  
24 HOUR TELEPHONE: (918)661-8327

NFPA HEALTH: FIRE: REACTIVITY:  
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: TRADE SECRET: N  
MOLECULAR WEIGHT: TIER II REPORTABLE:

BOILING POINT: EVAPORATION RATE:  
MELTING POINT: VAPOR PRESSURE:  
VISCOSITY: SPECIFIC GRAVITY: 0.000  
VAPOR DENSITY: WATER SOLUBILITY:

FLASH POINT : METHOD:  
AUTOIGNITION : LEL: UEL:

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: SULFURIC ACID (GAL)

SECTION I MATERIAL IDENTIFICATION

SYNONYMS: Oil of Vitreol  
CHEMICAL NAME: Sulfuric Acid  
CHEMICAL FAMILY: Acid,  
CHEMICAL FORMULA: H2SO4  
CAS REG. NO.: 7664-93-9  
PRODUCT NO.: CC5570  
Product and/or Components Entered on EPA's TSCA Inventory: Yes

SECTION II INGREDIENTS AND HAZARDS

HAZARDOUS COMPONENTS/INGREDIENT:  
Sulfuric Acid

CAS NO.: 7664-93-9

% BY WT.: 93 (Min)

OSHA PEL: 1 mg/m3

ACGIH TLV: 1 mg/m3

SECTION III PHYSICAL DATA

APPEARANCE: Colorless, Oily Liquid.  
ODOR: Pungent.  
BOILING POINT: 626 F (330 C)  
VAPOR PRESSURE: 0.02 psia (1 mmHg) at 295 F  
VAPOR DENSITY (Air=1): >1  
SOLUBILITY IN WATER: Complete, generates large amounts of heat.  
SPECIFIC GRAVITY (H2O=1): 1.834 at 60/60F  
PERCENT VOLATILE BY VOLUME: Negligible  
EVAPORATION RATE (Butyl Acetate=1): <1  
VISCOSITY: Not Established.

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT (METHOD USED): Not Applicable

FLAMMABLE LIMITS (% BY VOL. IN AIR): LEL: Not Applicable  
UEL: Not Applicable

FIRE EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide (CO2)

SPECIAL FIRE FIGHTING PROCEDURES: Product is not flammable, but may cause ignition on contact with combustible liquids and solids. Self-contained breathing apparatus and full protective clothing recommended. Water may be used to extinguish burning combustibles, but do not apply directly to acid.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: SULFURIC ACID (GAL)

FIRE AND EXPLOSION HAZARDS: Can cause ignition on contact with combustibles. Exothermic with water. Sulfur oxides and hydrogen gas may be released as decomposition products.

STABILITY: Stable  
SECTION V REACTIVITY DATA

CONDITIONS TO AVOID: Not applicable.

INCOMPATIBILITY (MATERIALS TO AVOID): Oxidizing or reducing materials, metals, combustible materials, and moisture. Avoid adding water to product.

HAZARDOUS POLYMERIZATION: Will not occur.

CONDITIONS TO AVOID: Not Applicable.  
HAZARDOUS DECOMPOSITION PRODUCTS: Sulfuric acid mist and sulfur oxides. Hydrogen gas can be generated as a decomposition product and care must be taken not to ignite.

SECTION VI HEALTH AND HAZARD INFORMATION  
RECOMMENDED EXPOSURE LIMITS:  
OSHA PEL is 1 mg/m<sup>3</sup>; ACGIH TLV is 1 mg/m<sup>3</sup>.

EMERGENCY AND FIRST AID PROCEDURES

EYE: Hold eyelids apart and irrigate eyes with running water for at least 15 minutes and continue to irrigate until otherwise directed by a physician. Treat for shock as necessary.

SKIN: Flood affected area with running water for at least 15 minutes while removing contaminated clothing. Treat for shock as necessary. Seek immediate medical attention.

INHALATION: Immediately remove from exposure. Initiate artificial respiration, cardiopulmonary resuscitation, or treatment for shock as necessary. Administer oxygen as needed. Obtain prompt medical assistance.

INGESTION: If vomitus is bloody, DO NOT attempt to give anything by mouth. Otherwise, immediately rinse the mouth and lips and assist victim in swallowing large amounts of water. DO NOT induce vomiting or attempt chemical neutralization. Treat for shock as necessary. Obtain prompt medical assistance. May present an aspiration hazard.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: SULFURIC ACID (GAL)

ACUTE EFFECTS OF OVEREXPOSURE

EYE:

Corrosive, devastating injury resulting in glaucoma, cataracts, extensive damage to cornea and conjunctiva leading to blindness.

SKIN:

Corrosive; can burn and char the skin which can lead to scarring.

INHALATION:

Irritation of the eyes, nose and respiratory system, coughing; severe overexposure can result in laryngeal, tracheobronchial and even pulmonary edema, bronchoconstriction, laryngeal spasm leading to asphyxiation.

INGESTION:

Corrosive to tissues; immediate pain when taken into the mouth as well as spasm of the larynx, trachea, and bronchi. Epigastric pain, nausea, vomiting, intense thirst, circulatory collapse, perforation of the trachea or stomach, and death. May be aspirated into the lungs if swallowed resulting in pulmonary edema and chemical pneumonitis.

SUBCHRONIC AND CHRONIC EFFECTS OF OVEREXPOSURE:

Chronic conjunctivitis, frequent respiratory infections, emphysema, and digestive disturbances, erosion and/or discoloration of teeth have been reported in persons exposed to sulfuric acid over the course of many years.

OTHER HEALTH EFFECTS:

No known applicable information.

HEALTH HAZARD CATEGORIES:

Corrosive	Animal	Human
	X	X
Target Organ Toxin	X	X

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

PRECAUTIONS REQUIRED IF MATERIAL IS RELEASED OR SPILLED:

Wear protective equipment and/or garments described in Section VIII if exposure conditions warrant. Contain spill. Protect from contact with combustibles. Keep out of water sources and sewers. Neutralize sodium bicarbonate, soda ash, crushed limestone, lime or other alkaline material. Shovel into disposal drums. Flush area with water.

WASTE DISPOSAL (INSURE CONFORMITY WITH ALL APPLICABLE DISPOSAL REGULATIONS):

Burn under controlled conditions or place in other RCRA permitted

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: SULFURIC ACID (GAL)

waste disposal facility.

SECTION VIII SPECIAL PROTECTION INFORMATION  
PERSONAL PROTECTION INFORMATION

VENTILATION:

Use adequate ventilation to control exposure below recommended exposure limits. See Recommended Exposure Limits in Health Hazard Data Section.

RESPIRATORY PROTECTION:

Use NIOSH/MSHA approved full-face, air supplied respiratory protective equipment. Use NIOSH/MSHA approved self-contained breathing apparatus (SCBA) for entry to or escape from unknown atmospheres.

EYE PROTECTION:

Full-face shield and chemical goggles for splash protection.

SKIN PROTECTION:

Rubber gloves. Protective clothing, boots and rubber apron.

NOTE:

Personnel protection information shown in this section is based upon general information as to normal uses and conditions. Where special or unusual uses or conditions exist, it is suggested that the expert assistance of an industrial hygienist or other qualified professional be sought.

PROTECTION REQUIRED FOR WORK ON CONTAMINATED EQUIPMENT:

Wear protective equipment and/or garments described above if exposure conditions warrant. Contact immediate supervisor for specific instructions before work is initiated.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

HANDLING AND STORAGE PRECAUTIONS:

Avoid inhalation and skin and eye contact. Wear protective equipment and/or garments described above if exposure conditions warrant.

Store in cool, dry, well-ventilated area. Provide means of controlling leaks and spills. Avoid contact with materials listed in Reactivity Data. When diluting acid, add acid to water, NEVER add water to acid.

DOT TRANSPORTATION

SHIPPING NAME: Sulfuric Acid.

HAZARD CLASS: Corrosive Material

ID NUMBER: UN 1830

MARKING: Sulfuric Acid/UN1830

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: SULFURIC ACID (GAL)

LABEL: Corrosive.

PLACARD: Corrosive/1830

HAZARDOUS SUBSTANCE/RQ: RQ-1000 1bs/454 kg.

SHIPPING DESCRIPTION: Sulfuric Acid, Corrosive Material, UN 1830

PACKAGING REFERENCE: 49 CFR 173.244 and 173.272.

RCRA CLASSIFICATION/UNADULTERATED PRODUCT AS A WASTE:  
Corrosive.

HAZARD CLASSIFICATION:

This product meets the following hazard definition(s) as defined by the Occupational Safety and Health Hazard Communication Standard (29 CFR Section 1910.1200):  
Health Hazard (Section VI), and Water reactive.

ADDITIONAL COMMENTS:

This product contains the following chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendment and Reauthorization Act of 1986 and 40 CFR Part 372 (see Sec. II):  
Sulfuric Acid.

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NA= Not Applicable  
NE= Not Established

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: GASOLINE, UNLEADED

EPNG MSDS NO: 00351  
PRODUCT ITEM NO: 0062091  
DATE ISSUED: 03/11/1992  
LAST REVISED DATE: 11/13/1986

MANUFACTURER  
NAME: NAVAJO REFINING COMPANY  
ADDRESS: P.O. DRAWER 159

CITY: ARTESIA  
STATE: NM ZIP: 88211  
EMERGENCY TELEPHONE: (800) 432-6866  
24 HOUR TELEPHONE: (915) 533-1244

NFPA HEALTH: FIRE: REACTIVITY:  
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: C4H10 TO C12H26  
MOLECULAR WEIGHT: NA  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: 90-440 F  
MELTING POINT: NA  
VISCOSITY: NA  
VAPOR DENSITY: (AIR=1) 3-4  
EVAPORATION RATE: NO DATA  
VAPOR PRESSURE: @100F 465-698  
SPECIFIC GRAVITY: 0.700  
WATER SOLUBILITY: SLIGHT

FLASH POINT : -45F  
AUTOIGNITION : 830 F  
METHOD: (C.C.)  
LEL: 1.4% UEL: 7.6%

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: GASOLINE, UNLEADED

SECTION I MATERIAL IDENTIFICATION

PRODUCT NAME: UNLEADED GASOLINE  
CAS NUMBER: 8006-61-9  
FORMULA: C<sub>8</sub>H<sub>10</sub> TO C<sub>12</sub>H<sub>26</sub>  
CHEMICAL FAMILY: Petroleum hydrocarbon  
SYNONYMS: Unleaded Gasoline, Petrol, STCC4908178, UN 1203  
No Lead Gasoline.

SECTION II INGREDIENTS AND HAZARDS

HAZARDOUS COMPONENTS	CAS#	VOL%	TLV	PEL (OSHA)
GASOLINE (Containing)	8006-61-9	100	300 ppm	300 ppm
Benzene	71-43-2	1-5	10 ppm	10 ppm
Ethyl benzene	100-43-2	1-3	100 ppm	100 ppm
Cyclohexane	110-82-7	1	300 ppm	300 ppm
Toluene	108-88-3	1-5	100 ppm	100 ppm
Xylene	1330-20-7	4-6	100 ppm	100 ppm
Cumene	98-82-8	1	50 ppm	50 ppm
1,2,4-Trimethyl benzene	95-63-6	1	25 ppm	25 ppm

SECTION III PHYSICAL DATA

BOILING POINT: 90-440 F  
VAPOR PRESSURE: @100 F 465-986mm Hg  
VAPOR DENSITY (Air=1): 3-4  
SOLUBILITY IN WATER: Slight  
ODOR THRESHOLD: 0.25 ppm  
SPECIFIC GRAVITY (Water=1): 0.7-0.8  
% VOLATILE BY VOLUME: 100  
EVAPORATION RATE: No data available  
AUTOIGNITION TEMP: 830F  
APPEARANCE AND ODOR: Clear liquid, Aromatic odor

SECTION IV FIRE AND EXPLOSION DATA

CLASSIFICATION: CLASS IB, FLAMMABLE LIQUID  
FLASH POINT: -45 F (C.C.C.)  
FLAMMABLE LIMITS: LEL = 1.4% UEL = 7.6%  
EXTINGUISHING MEDIA: Foam, Dry Chemical, Carbon Dioxide, Halon  
SPECIAL FIRE FIGHTING PROCEDURES:  
Move container from fire area if possible. Use water to keep fire exposed containers cool. Use foam for spill control.  
UNUSUAL FIRE AND EXPLOSION HAZARDS:  
Evacuate a radius of 1500 feet for uncontrolled fires. Vapors are heavier than air and may travel great distances and flash back.  
Extinguish only if flow can be stopped.  
STABILITY: Stable  
HAZARDOUS POLYMERIZATION: Will not occur  
CONDITIONS TO AVOID/INCOMPATIBILITY: Strong Oxidizers  
HAZARDOUS DECOMPOSITION PRODUCTS: Carbon Monoxide, Carbon Dioxide

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: GASOLINE, UNLEADED

NFPA REACTIVITY = 0 (minimal)

SECTION V REACTIVITY DATA

ROUTES OF ENTRY: Inhalation, ingestion, skin contact

HEALTH HAZARDS: Chronic toxicity, possible cancer, irritation to eyes skin and mucus membranes, pulmonary edema, bronchial pneumonia, asphyxiation, liver and kidney damage, anemia or myocardial damage. CARCINOGENICITY: Gasoline is not listed by NTP or IARC. Benzene is listed by NTP and IARC.

SIGNS AND SYMPTOMS OF EXPOSURE:

INGESTION: DO NOT induce vomiting. Immediately seek medical attention. Give water to dilute, if conscious.

INHALATION: Maintain respirations, assist with artificial respiration if needed and give oxygen if available and trained to do so. Seek medical attention. If liquid is in lungs (aspirated) seek medical care.

EYES: Flush eyes with water for at least 15 minutes. Seek medical attention.

SKIN: Remove gasoline soaked clothing. Wash skin with soap and water. If irritation persists seek medical attention.

NFPA HEALTH = 1 (low)

SECTION VI HEALTH AND HAZARD INFORMATION

N/A

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

Eliminate all sources of ignition. Contain spill. Use water fog to suppress vapor cloud. Use SCBA to avoid breathing vapors. Absorb liquid with sand or clay.

WASTE DISPOSAL: Dispose in accordance with RCRA regulations. Do not put in sewers or any water course.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:

All equipment and storage containers should be properly grounded. This material is subject to OSHA and DOT regulations. Portable metal containers should be bonded to the storage container before transferring liquid.

OTHER PRECAUTIONS:

Avoid breathing vapors. Extremely flammable. Do not weld on containers unless properly cleaned and purged using safe work procedures.

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Use NIOSH/MSHA approved respiratory protection in areas exceeding exposure limits, the type to be determined by the degree of exposure.

VENTILATION: Use in well ventilated area. Mechanical exhaust should be explosion proof.

EYE/SKIN PROTECTION: Rubber gloves, face shields, goggles or safety

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: GASOLINE, UNLEADED

glasses with side shields, coveralls.

WORK/HYGIENIC PRACTICES: remove contaminated clothing as soon as possible. Always wash after handling hazardous chemicals.

NOTICE: This product contains a toxic chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization act of 1986 and 40 CFR Part 372

REFER TO DEPARTMENT OF TRANSPORTATION (DOT) EMERGENCY RESPONSE GUIDE-BOOK GUIDE 27 FOR ADDITIONAL EMERGENCY INFORMATION.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

All equipment and storage containers should be properly grounded. This material is subject to OSHA and DOT regulations. Portable metal containers should be bonded to the storage container before transferring liquid.

OTHER PRECAUTIONS: Avoid breathing vapors. Extremely flammable. Do not weld on containers unless properly cleaned and purged using safe work procedures.

This information is believed to be accurate and as reliable as information available to us. We make no warranty or guarantees as to its accuracy and assume no liability from its use. Users should determine the suitability of the information for their particular purposes.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: VARSOL 1 (EXXON CO)

EPNG MSDS NO: 00038  
PRODUCT ITEM NO: 0048997  
DATE ISSUED: 05/01/1982  
LAST REVISED DATE: / /

MANUFACTURER  
NAME: EXXON CO

ADDRESS:  
P.O. BOX 2180  
CITY: HOUSTON  
STATE: TX ZIP: 77001  
EMERGENCY TELEPHONE: ( )  
24 HOUR TELEPHONE: (713)656-3424

NFPA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0  
CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA: N/A  
MOLECULAR WEIGHT: CA 140  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: 155-205  
MELTING POINT: N/A  
VISCOSITY: N/A  
VAPOR DENSITY: CA 4.8  
EVAPORATION RATE: <0.1  
VAPOR PRESSURE: <10  
SPECIFIC GRAVITY: 0.790  
WATER SOLUBILITY: NEGLEGIBLE

FLASH POINT : CA 42  
AUTOIGNITION : 254C  
METHOD: TCC  
LEL: 0.9  
UEL: 6.0

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:  
WATER-WHITE LIQUID; MINERAL SPIRITS ODOR (NO LONG-LASTING ODOR  
AFTER EVAPORATION).

PRODUCT SYNONYMS  
PETROLEUM SOLVENT  
MINERAL SPIRITS

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: VARSOL 1 (EXXON CO)

SECTION I MATERIAL IDENTIFICATION

N/A

SECTION II INGREDIENTS AND HAZARDS

Mixture of petroleum hydrocarbons	100%	8-hr TWA 100 ppm*
Typical Composition:	Vol %	Rat, Oral
Aromatics (C8 and higher)	18	LD50 >5 g/kg
Olefins	1	
Saturates	81	
Sulfur content 1 ppm		
*ACGIH (1982) TLV for Stoddard Solvent.		Rabbit, Dermal
Animal studies by Exxon Corp. medical		LD50 >2 g/kg

research has shown that male rats exposed to similar vapors at 100 ppm had kidney damage. Additional studies are being conducted to validate these findings and to determine if a revised TLV should be recommended.

SECTION III PHYSICAL DATA

Boiling Point, 1 atm, deg C - 155-205  
Vapor Pressure, 25C, mmHg - <10  
Vapor Density - ca 4.8  
Solubility in Water - Negligible  
Specific Gravity, 15.6/15.6C - ca 0.79  
Evaporation Rate - <0.1  
Volatiles, % - 100  
Molecular Weight (avg) - ca 140  
Appearance and Odor: Water-white liquid; mineral spirits odor (no long-lasting odor after evaporation).

SECTION IV FIRE AND EXPLOSION DATA

Flash Point and Method: ca 42C (108F) TOC  
Autoignition Temp.: 254C  
Flammability Limits in Air: % by Volume @ 25C  
Lower - 0.9  
Upper - 6.0  
Extinguishing Media: Dry chemical, carbon dioxide, foam, water spray or fog. Water spray can be used to keep fire-exposed containers cool to avoid pressure rupture. This material is an OSHA Class II Combustible Liquid. It is a dangerous fire hazard if heated or sprayed in air.  
Firefighters should wear self-contained breathing apparatus for fighting fires in enclosed areas.

SECTION V REACTIVITY DATA

This is a stable material in closed containers at room temperature under normal storage and handling conditions. It does not polymerize.

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: VARSOL 1 (EXXON CO)

Incompatible with strong oxidizing agents such as chlorine, conc. oxygen calcium hypochlorite, nitric acid, etc. Thermal-oxidative degradation may produce carbon monoxide and partially oxidized hydrocarbons.

N/A SECTION VI HEALTH AND HAZARD INFORMATION

N/A SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

N/A SECTION VIII SPECIAL PROTECTION INFORMATION

N/A SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: 1,1,1-TRICHLOROETHANE (BARRELS)

EPNG MSDS NO: 00466  
PRODUCT ITEM NO: 0062205  
DATE ISSUED: / /  
LAST REVISED DATE: 09/01/1978

MANUFACTURER

NAME: (DOM), (PENETONE CORP)  
ADDRESS: (PPG IND INC),  
(SRS, INC)

CITY: EMERGENCY TELEPHONE: ( )  
STATE: ZIP: 24 HOUR TELEPHONE: (518) 385-4085

NFPA HEALTH: FIRE: REACTIVITY:  
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: TRADE SECRET: N  
MOLECULAR WEIGHT: TIER II REPORTABLE:

BOILING POINT: EVAPORATION RATE:  
MELTING POINT: VAPOR PRESSURE:  
VISCOSITY: SPECIFIC GRAVITY: 0.000  
VAPOR DENSITY: WATER SOLUBILITY:

FLASH POINT : METHOD:  
AUTOIGNITION : LEL: UEL:

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: 1,1,1-TRICHLOROETHANE (BARRELS)

SECTION I MATERIAL IDENTIFICATION

MATERIAL NAME:  
1,1,1-TRICHLOROETHANE

OTHER DESIGNATIONS:

METHYL CHLOROFORM, CCl3CH3, GE MATERIAL D5B79, CAS # 000 071 556

TRADE NAMES & MANUFACTURER:

BLACO-THANE (Baron-81akeslee), CHLOROTHENE NU & NG (Dow), DOWLCENE WR (Dow), INHIBISOL (Penetone Corp.), TRI-ETHANE (PPG Ind. Inc.), TRITHENE (SRS, Inc.)

SECTION II INGREDIENTS AND HAZARDS  
INGREDIENT(S) % HAZARD DATA

1,1,1-Trichloroethane *	>90	TLV 350 ppm**
Inhibitor	<10	Unknown
* High purity material is commercially available (DOWLCENE WR). Other commercial materials (Tradenames, Sec.I) can contain up to 10% inhibitor & are designed for cold cleaning or vapor degreasing use or both (TRI-ETHANE).		Human inhalation LCL 27 g/m3 for 10 minutes

\*\* NIOSH has proposed a 10-hr TWA of 200 ppm with a 350 ppm ceiling concentration (15 minutes sampling time) & recently has recommended caution in use.

TCL 920 ppm for  
70 minutes  
(central nervous  
system effects)

SECTION III PHYSICAL DATA

BOILING POINT at 1 atm, deg F: ca 165\*

SPECIFIC GRAVITY, 25/25C-1.30 - 1.336\*

VAPOR PRESSURE AT 20 C, mm Hg: 100

VOLATILES, %: ca 100

VAPOR DENSITY (Air=1): 4.55

EVAPORATION RATE (CCl4=1): 1

WATER SOLUBILITY, g/100g H2O: 0.07 g

MOLECULAR WEIGHT: 133.41

APPEARANCE & ODOR:

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: 1,1,1-TRICHLOROETHANE (BARRELS)

COLORLESS LIQUID WITH A MILD, ETHER-LIKE ODOR WHICH MAY BE JUST PERCEPTIBLE (UNFATIGUED) AT ABOUT 100 PPM IN AIR.

\* PROPERTIES DEPEND ON THE INHIBITOR AND INHIBITOR LEVEL.

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT & METHOD: None

AUTOIGNITION TEMP.: ---

FLAMMABILITY LIMITS IS AIR: (High energy ignition source at 25 C)  
Vol. % . Lower: 8.0 % Upper: 10.5 %.

This material is nearly nonflammable. High energy, such as electric arc, is needed for ignition, and the flame tends to go out when the ignition source is removed. Water fog, carbon dioxide, dry chemical, or foam may be used to fight fires.  
Use self-contained or air-supplied breathing apparatus for protection against suffocating vapors and toxic and corrosive decomposition products.

SECTION V REACTIVITY DATA

This material can be hydrolyzed by water to form hydrochloric acid and acetic acid. It will react with strong caustic, such as caustic soda or caustic potash to form flammable or explosive material.

It requires inhibitor content to prevent corrosion of metals; and when inhibitor is depleted, it can decompose rapidly by reaction with finely divided white metals, such as aluminum, magnesium, zinc, etc. (DO NOT use these metals for fabrications of storage containers for 1,1,1-trichloroethane.)

It will decompose at high temperature or under ultra-violet radiation to produce toxic and corrosive materials (phosgene and hydrogen chloride).

SECTION VI HEALTH AND HAZARD INFORMATION

TLV 350 ppm or 1900 mg/m<sup>3</sup>  
Brief exposure at 800-1000 ppm causes mild eye irritation and a little loss of coordination due to the anesthetic properties of 1,1,1-trichloroethane. Skin contact can cause defatting and, when prolonged or repeated, can produce irritation and dermatitis. It can absorb through the skin.

Eye contact can result in pain and irritation. This material is considered low in toxicity among the chlorinated hydrocarbons.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: 1,1,1-TRICHLOROETHANE (BARRELS)

FIRST AID

EYE CONTACT:

Flush eyes well with plenty of running water for 15 minutes.

SKIN CONTACT:

Remove solvent wet clothing promptly. Wash contact area with warm water and soap. Get medical attention for irritation.

INHALATION:

Remove to fresh air. If needed, apply artificial respiration. Get medical assistance immediately.

NOTE: Advise physician NOT to use adrenalin.

INGESTION:

Get medical assistance! (If a physician not immediately available and the amount swallowed was appreciable, give milk or water to drink and induce vomiting. Repeat several times. Estimated lethal dose for 150 lb man is 0.5 to 1 pint.

PHYSICIAN:

Avoid using sympathomimetic amines in treatment.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

For small spills, mop, wipe or soak up with absorbent material using rubber gloves. Evaporate outdoors or in an exhaust hood.

For large spills, inform safety personnel and evacuate area. Use protective equipment during clean-up (See Sec. VIII) Ventilate area.

Contain liquid: pick up and place in closed metal containers. DO NOT allow to enter water supply sources.

DISPOSAL:

Dispose of via a licensed waste solvent disposal company, or reclaim by filtration and distillation procedures.

SECTION VIII SPECIAL PROTECTION INFORMATION

Provide general and exhaust ventilation to meet TLV requirements.

Gloves and apron (of neoprene, polyethylene or polyvinyl alcohol) should be worn when needed to avoid skin contact. Remove solvent wet clothing promptly. A safety shower should be available to use area.

Chemical goggles or a face shield should be worn if splashing is possible. An eye wash station should be readily available if splashing is probable.

In emergencies or non-routine work, use self-contained or air-supplied breathing apparatus for high or unknown vapor concentrations in air.

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: 1,1,1-TRICHLOROETHANE (BARRELS)

NIOSH recommends use of a full face piece respirator with an organic vapor cartridge or canister for limited time exposure below 1000 ppm. (Full face piece protection is not required below 500 ppm.)

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

Store in closed containers in a cool, well-ventilated area. Keep water-free. Monitor inhibitor level for vapor degreasing use. Use caution in cleaning operations involving white metal fines (see Sec. V). Trichloroethylene contamination may cause decomposition when aluminum is degreased.

Provide regular medical monitoring of those exposed to this material in the workplace.

Preclude those with CNS, liver, or heart disease from exposure.

Personnel using this solvent should avoid drinking alcoholic beverages shortly before, during or soon after exposure.

Exposure of pregnant female rats to high levels of 1,1,1-trichloroethane may have caused birth defects in offspring.

DATA SOURCE(S) CODE: 1-8, 12, 19

Judgments as to the suitability of information herein for purchaser's purposes are necessarily purchaser's responsibility. Therefore, although reasonable care has been taken in the preparation of such information, GENERAL ELECTRIC COMPANY extends no warranties, makes no representations and assumes no responsibility as to the accuracy or suitability of such information for application to purchaser's intended purposes or for consequences of its use.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ANTIPOL 640-LD

EPNG MSDS NO: 001110  
PRODUCT ITEM NO: 0062108

DATE ISSUED: 06/05/1991  
LAST REVISED DATE: 05/28/1991

MANUFACTURER

NAME: CONTINENTAL PROD. OF TX  
ADDRESS: 100 INDUSTRIAL  
P O BOX 3627

CITY: ODESSA  
STATE: TX ZIP: 79760

EMERGENCY TELEPHONE: (800)592-4684  
24 HOUR TELEPHONE: (915)337-4681

NFPA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0  
CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA: NA TRADE SECRET: N  
MOLECULAR WEIGHT: NA TIER II REPORTABLE:

BOILING POINT: 240 EVAPORATION RATE: NA  
MELTING POINT: NA VAPOR PRESSURE: NA  
VISCOSITY: NA SPECIFIC GRAVITY: 1.390  
VAPOR DENSITY: NA WATER SOLUBILITY: COMPLETELY

FLASH POINT : NONE METHOD: NONE UEL: NA  
AUTOIGNITION : NONE LEL: NA

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:  
PALE YELLOW LIQUID/SLIGHT VINEGAR ODOR.

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*

\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ANTIPOL 640-LD

SECTION I MATERIAL IDENTIFICATION

TRADE NAME: Antipol 640-LD  
CHEMICAL NAME: Aqueous Mixture

SECTION II INGREDIENTS AND HAZARDS

Zinc chloride: 7646-85-7 <40% TLV: Air: 1 mg/m<sup>3</sup> (fume)

SECTION III PHYSICAL DATA

Boiling Point: 240  
Sol. in Water: Completely  
Spec. Gravity: 1.39  
% Vol.: 50%  
Appearance and Odor: Pale yellow liquid/slight vinegar odor.  
pH of solution: 1 to 2

SECTION IV FIRE AND EXPLOSION DATA

Extinguishing Media: Foam, CO<sub>2</sub>, dry chemical, halon, water fog.  
Fire Fighter Protection: Self contained breathing apparatus.  
Decomposition Products: CO, CO<sub>2</sub>, Zinc Chloride Fumes, Zinc Oxide or Hydrogen Chloride.

SECTION V REACTIVITY DATA

Stable  
Incompatible Materials: Strong bases (Alkaline materials)  
Decomposition Products: CO, CO<sub>2</sub>, zinc chloride fumes, zinc oxide or hydrogen chloride.  
Hazardous Polymerization: Will not occur.

SECTION VI HEALTH AND HAZARD INFORMATION

Routes of Entry: This material may present a health hazard if it is inhaled or if the liquid contacts skin or eyes.  
Over Exposure Effects: Inhalation: Severe nasal and respiratory damage.  
Skin and Eyes: Severe eye and skin burns, possible ulceration.  
Ingestion: Nausea, vomiting, cramps, throat and stomach damage.

FIRST AID PROCEDURES: Inhalation: Move victim to fresh air. If victim has stopped breathing, give artificial respiration. Get immediate medical attention.  
Ingestion: Do not induce vomiting. Vomiting will cause further damage to throat. Give milk of magnesia. Get immediate medical attention.

Skin Contact: Wash skin with water for 15 minutes. If irritation persists, get medical attention. Wash contaminated clothing before reuse.

EYE CONTACT: Immediately wash eyes with large amounts of water for 15 minutes, lifting eyelids to complete flushing. Get medical attention.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ANTIPOD 640-LD

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES  
Contain spill. Wear suitable protective equipment. Pick up spill with absorbent material.  
Sent to an approved disposal site in accordance with Local, State and Federal Regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION  
Ventilation: Avoid breathing vapors. Ventilate as needed.  
Gloves: Chemical resistant  
Eye Protection: Splash proof goggles and safety glasses  
Other: Eyewash station, safety shower.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS  
Do not store with strong bases. Do not get in eyes, on skin, or on clothing. Keep containers closed.  
The health and safety characteristics of this mixture are not fully known. We advise that it be handled and managed as a hazardous substance.

EPA HAZARD CATEGORY: Immediate (acute) health hazard - corrosive  
DOT LABEL REQUIRED: Corrosive  
CECLA REPORTABLE  
QUANTITY OF MIXTURE: 335 Gallons

SARA TITLE III DATA  
THRESHOLD PLANNING  
QUANTITY: Not Applicable  
OFFSITE RELEASE RQ: 335 Gallons

SECTION 313 TOXIC COMPONENT/S

COMPONENT CHEMICAL NAME	AMOUNT IN MIXTURE
Zinc Chloride (CAS# 7646-85-7)	< 40%

All empty drums or containers should be sent to a certified reconditioner or certified disposal site for proper disposal. Empty containers should not be used in any other way. Misuse of 'empty' drums or containers has resulted in many serious accidents.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: HYDROCHEM A-239

EPNG MSDS NO: 00168  
PRODUCT ITEM NO: 0049910

DATE ISSUED: 02/04/1988  
LAST REVISED DATE: / /

MANUFACTURER

NAME: CONTINENTAL PRODUCT OF TX  
ADDRESS: 100 INDUSTRIAL  
P O BOX 3627  
CITY: ODESSA  
STATE: TX ZIP: 79760

EMERGENCY TELEPHONE: ( )  
24 HOUR TELEPHONE: (915)337-4681

NFPA HEALTH: 3 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA: PROPRIETARY TRADE SECRET: N  
MOLECULAR WEIGHT: NA TIER II REPORTABLE:

BOILING POINT: NA EVAPORATION RATE: NA  
MELTING POINT: NA VAPOR PRESSURE: NA  
VISCOSITY: NA SPECIFIC GRAVITY: 0.000  
VAPOR DENSITY: NA WATER SOLUBILITY: COMPLETE

FLASH POINT : NONE METHOD: NA  
AUTOIGNITION : NA LEL: NA UEL: NA

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:  
LIGHT AMBER LIQUID

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: HYDROCHEM A-239

SECTION I MATERIAL IDENTIFICATION

CHEMICAL NAME: Aqueous Mixture  
CAS NUMBER: Not appropriate  
OSHA HAZARD CLASS: Physical hazard-Corrosive, Health hazard-Eye hazard, Skin hazard, Kidney toxin.

EPA HAZARD CATEGORY: Immediate (acute) health hazard-Corrosive  
DOT LABEL REQUIRED: Corrosive

SECTION II INGREDIENTS AND HAZARDS  
HAZARDOUS COMPONENTS HAZARD % HAZARDOUS DATA

Isopropyl Alcohol (CAS#67-63-0)	Conf.	OSHA (PEL): TWA=400ppm, 980mg/m3 ACGIH (TLV): TWA=400ppm, 980mg/m3 STEL = 500ppm, 1,225 mg/m3
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SECTION III PHYSICAL DATA

BOILING POINT: 216 DEG F  
VAPOR PRESSURE (mmHg): 25  
SOLUBILITY IN H2O: Completely Soluble  
APPEARANCE/ODOR: Brown liquid/Pungent odor  
SPECIFIC GRAVITY (H2O=1): 1.1  
VOLATILITY/VOL (%): 60  
PH OF SOLUTION: 2 to 3

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT: None  
FLAMMABLE LIMITS: None  
EXTINGUISH MEDIA: Foam, CO2, Dry Chemical, Halon, Water Fog  
FIRE FIGHTER PROTECTION: Self Contained Breathing Apparatus  
DECOMPOSITION PRODUCTS: CO, CO2  
UNUSUAL FIRE HAZARD: This material may be burned after evaporation of the water phase.

DOT INFORMATION

SHIPPING NAME: Compound, Water Treating  
HAZARD CLASS: Corrosive Liquid  
ID NUMBER: NA 1760  
WT: 55 gal. Drum = 511#  
% GAL CAN + % #

SECTION V REACTIVITY DATA

N/A

SECTION VI HEALTH AND HAZARD INFORMATION  
Signs and Symptoms of Overexposure

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: HYDROCHEM A-239

ACUTE OVEREXPOSURE: May cause irritation to skin, mucous membranes  
Emergency and First Aid Procedures

Eyes: Flush with plenty of water for 15 minutes.

Inhalation: Remove to fresh air.

Skin: Wash off with plenty of water.

Ingestion: Do not induce vomiting, call physician immediately.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES  
IN CASE SPILL....CONTAIN SPILL:  
Wear suitable protective equipment. Pick up spill with adsorbent  
material.

WASTE DISPOSAL METHOD: Send to an approved disposal site in accordance  
with Federal, State and Local regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Not normally needed.

VENTILATION: Avoid breathing vapors. Ventilate as needed.

SPECIAL: None

PROTECTIVE GLOVES: Chemical resistant

EYE PROTECTION: Splash proof goggles and safety glasses

OTHER PROTECTIVE EQUIPMENT: Eyewash Station, Safety Shower

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

HANDLING AND STORAGE: Do not store with Strong Bases (Alkaline  
materials). Do not get in eyes, on skin, or on clothing. Keep  
containers closed.

PRECAUTIONARY MEASURES: The health and safety characteristics of this  
mixture are not fully known. We advise that it be handled and managed  
as a hazardous substance.

All empty drums or containers should be sent to a certified  
reconditioner or certified disposal site for proper disposal. Empty  
containers should not be used in any other way. Misuse of empty drums  
or containers has resulted in many serious accidents.

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: DIESEL FUEL NO. 2 (CHEVRON)

EPNG MSDS NO: 00869  
PRODUCT ITEM NO: 0062092  
DATE ISSUED: / /  
LAST REVISED DATE: 06/01/1978

MANUFACTURER  
NAME: CHEVRON USA INC.  
ADDRESS: P.O. BOX 1272

CITY: RICHMOND,  
STATE: CA ZIP: 94802  
EMERGENCY TELEPHONE: ( ) -  
24 HOUR TELEPHONE: ( ) -

NFPA HEALTH: FIRE: REACTIVITY:  
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: NA  
MOLECULAR WEIGHT: NA  
TRADE SECRET: N  
TIER II REPORTABLE:

BOILING POINT: 315 - 675 F  
MELTING POINT: NA  
VISCOSITY: 32.8 TO 38.1  
VAPOR DENSITY: NA  
EVAPORATION RATE: NA  
VAPOR PRESSURE: 8.2MMHG @ 100F  
SPECIFIC GRAVITY: 0.860  
WATER SOLUBILITY: INSOLUBLE

FLASH POINT : 135-190 F  
AUTOIGNITION : NA  
METHOD: (P-M)  
LEL: NA UEL: NA

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

\*\*\*\* N/A \*\*\*\*  
\*\*\*\* N/A \*\*\*\*

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: DIESEL FUEL NO. 2 (CHEVRON)

SECTION I MATERIAL IDENTIFICATION  
PRODUCT NAME: CHEVRON DIESEL FUEL NO. 2

WARNING !!  
HARMFUL OR FATAL IF SWALLOWED

HAZARD !!  
DANGER !!  
COMBUSTIBLE

SECTION II INGREDIENTS AND HAZARDS  
A BLEND OF PARAFFINS, NAPHTHENES, AROMATICA & OLEFINS.

100%

SECTION III PHYSICAL DATA

BOILING POINT: 315 - 675F  
VAPOR PRESSURE (mm Hg & temp): 8.2 mm Hg @ 100F  
SPECIFIC GRAVITY (H2O=1): 0.86 - 0.83 33-39 API @ 60F  
SOLUBILITY: miscible with hydrocarbons; insoluble in water  
VISCOSITY: 32.8 to 38.1 SUS @ 100 F  
APPEARANCE,COLOR,ODOR, etc.: Pale yellow liquid.

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT (TEST METHOD): (P-M) 135 - 190F

EXTINGUISHING MEDIA:

CO2, Dry Chemical, Foam, Water spray

SPECIAL FIRE FIGHTING PROCEDURES:

For fires involving this material, do not enter enclosed or confined fire space without proper protective equipment. This may include self-contained breathing apparatus to protect against the hazardous effects of normal products of combustion or oxygen deficiency. Read the entire MSDS.

SECTION V REACTIVITY DATA

STABILITY: Stable  
INCOMPATIBILITY (Materials to Avoid):  
May react with strong oxidizing agents  
HAZARDOUS DECOMPOSITION PRODUCTS:  
Normal combustion forms carbon dioxide and water vapor; incomplete combustion can produce carbon monoxide.  
HAZARDOUS POLYMERIZATION:  
Will not occur.

SECTION VI HEALTH AND HAZARD INFORMATION  
EXPOSURE STANDARD:

No OSHA exposure standard or Threshold Limit Value has been

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: DIESEL FUEL NO. 2 (CHEVRON)

established for this material.

**EYE IRRITATION:**

This material is not expected to be a primary eye irritant. However, minor irritation may be noted following contact. (See Note Below)

**SKIN IRRITATION:**

This material is not expected to be a primary skin irritant. However, minor irritation may be noted following prolonged or frequently repeated contact. Prolonged or frequently repeated skin contact may cause the skin to become dry or cracked from the defatting action of this material. (See Note Below)

**SYSTEMIC EFFECTS:**

This material is not expected to be toxic by ingestion or by skin contact. However, if this material is swallowed and aspirated into lungs, chemical pneumonitis. Prolonged exposure to high vapor concentrations of this material may cause signs and symptoms of central nervous system depression such as headache, dizziness, loss of appetite, weakness, and loss of coordination. Affected persons usually experience complete recovery when removed from the exposure area.

**NOTE:**

We have no laboratory data on this material. These conclusions are derived from the results of laboratory test on similar materials.

**EMERGENCY AND FIRST AID PROCEDURES:**

**EYE CONTACT:**

This material is not expected to be irritating to the eyes. However, if irritation is noticed, eyes should be flushed with fresh water. If irritation persists, get medical attention.

**SKIN CONTACT:**

Remove grossly contaminate clothing and wash skin thoroughly with soap and water. Wash contaminated clothing before reuse.

**INHALATION:**

If there are signs or symptoms of overexposure to vapor or mist of this material (as described in the HEALTH DATA section - SYSTEM EFFECTS), move the individual to an uncontaminated area. If breathing has stopped, apply artificial respiration. Get medical attention immediately.

**INGESTION:**

If this material is swallowed and aspirated, chemical pneumonitis may result. If swallowed, DO NOT induce vomiting; get medical attention

EL PASO NATURAL GAS  
MATERIAL SAFETY DATA SHEET

PRODUCT NAME: DIESEL FUEL NO. 2 (CHEVRON)

immediately.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

Eliminate all sources of ignition in vicinity of spill or released vapor. Clean up spills as soon as possible, observing precautions in the PERSONAL PROTECTION section. Absorb large spills with absorbent clay, diatomaceous earth, or other suitable material. A fire or vapor hazard may exist since these materials will only absorb liquids; they will not absorb the vapors.

WASTE DISPOSAL METHOD:

Place all contaminated materials in disposable containers and bury in an approved dumping area.

SECTION VIII SPECIAL PROTECTION INFORMATION

EYE PROTECTION:

Avoid eye contact with this material. If the conditions or frequency of use increase the danger of exposure, eye contact can best be avoided by wearing chemical-safety goggles.

RESPIRATORY PROTECTION:

No respiratory protection is recommended while working with this material. However, if operating conditions create high vapor or mist concentrations, use of an approved respirator for organic vapors and mist is recommended.

SKIN PROTECTION:

Avoid prolonged or frequently repeated skin contact with this material. If the conditions or frequency of use increase the danger of exposure, skin contact can best be avoided by wearing impervious neoprene or rubber gloves.

VENTILATION:

No special ventilation is recommended while working with this material. However, if operating conditions create high concentrations of vapor or mist, special ventilation may be needed.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

READ AND OBSERVE ALL PRECAUTIONS ON PRODUCT LABEL  
keep away from heat or open flames.

EPN6 MONUMENT FLANT Drain Line  
4" H.P. PDL From 24" DRIP to Scrubber at Classifier

TEST PRESSURE : 50# 1 Hour

TEST DATE: 5-17-93

Tested by - Mike Hall - Merryman Construction

Inspected by - Johnny M. Owen

- (1) blind 2" Valve above ground - 300 series -
- (2) There is a 2" line that is plugged. Drip has been taken out of Service
- (3) Close off Valves on Vessels
- (4) Close Valve off at Texaco Horizontal Scrubber
- (5) Close 2" Valve off header (Cooling tower)
- (6) Close 2" Valve - Regulator - (Cooling tower)
- (7) Close 4" Valve off Header (Cooling tower)
- (8) Close off Valve at Regulator (1<sup>st</sup> Stage B Pt)
- (9) Close off Valve at Regulator (2<sup>nd</sup> Stage B Pt)
- (10) Close Valves off Headers
- (11) Blind 6" Flange at Scrubber



N

16" WELD CAP

4" H.P. DRAIN

DISPOSE POND  
BOTTOM ELEV. 95.0

A

WELL CASING FROM TREATING PLANT

16" WELD CAP

6"

LEE LINE

SEE NO-2-P201



7

FOR CONT. SEE DWG. 110-2-P12 E  
110-2-P20

1" DRAIN FM.  
OCCUR AREA

2" F.G.

6" F.P. GA.



CUT ALL OVER  
DRAINAGE AREA  
THROUGHOUT



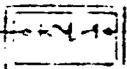
1 1/2" DRAIN.

2" F.G.

5

7

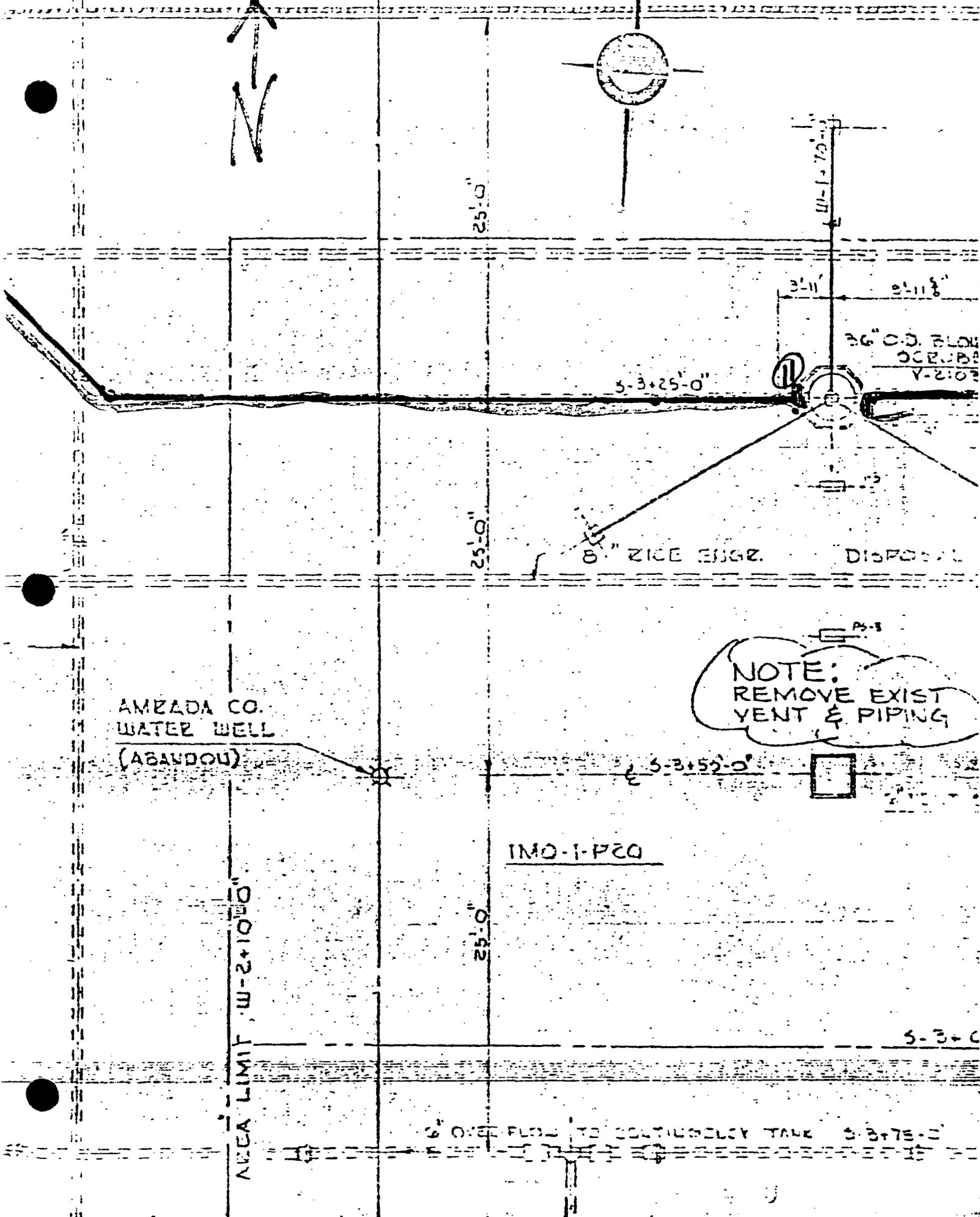
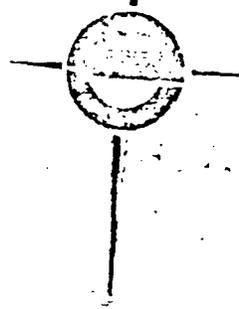
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SEE DWG. 110-2-P21

24-11-50





25'-0"

W-1-1-70"

3'-11"

2'-11 1/2"

5-3+25'-0"

36" O.D. FLOW  
OCCURRING  
7-21-02

25'-0"

8" RICE EDGE

DISPOSAL

AMEZADA CO.  
WATER WELL  
(ABANDON)

NOTE:  
REMOVE EXIST  
VENT & PIPING

5-3+52'-0"

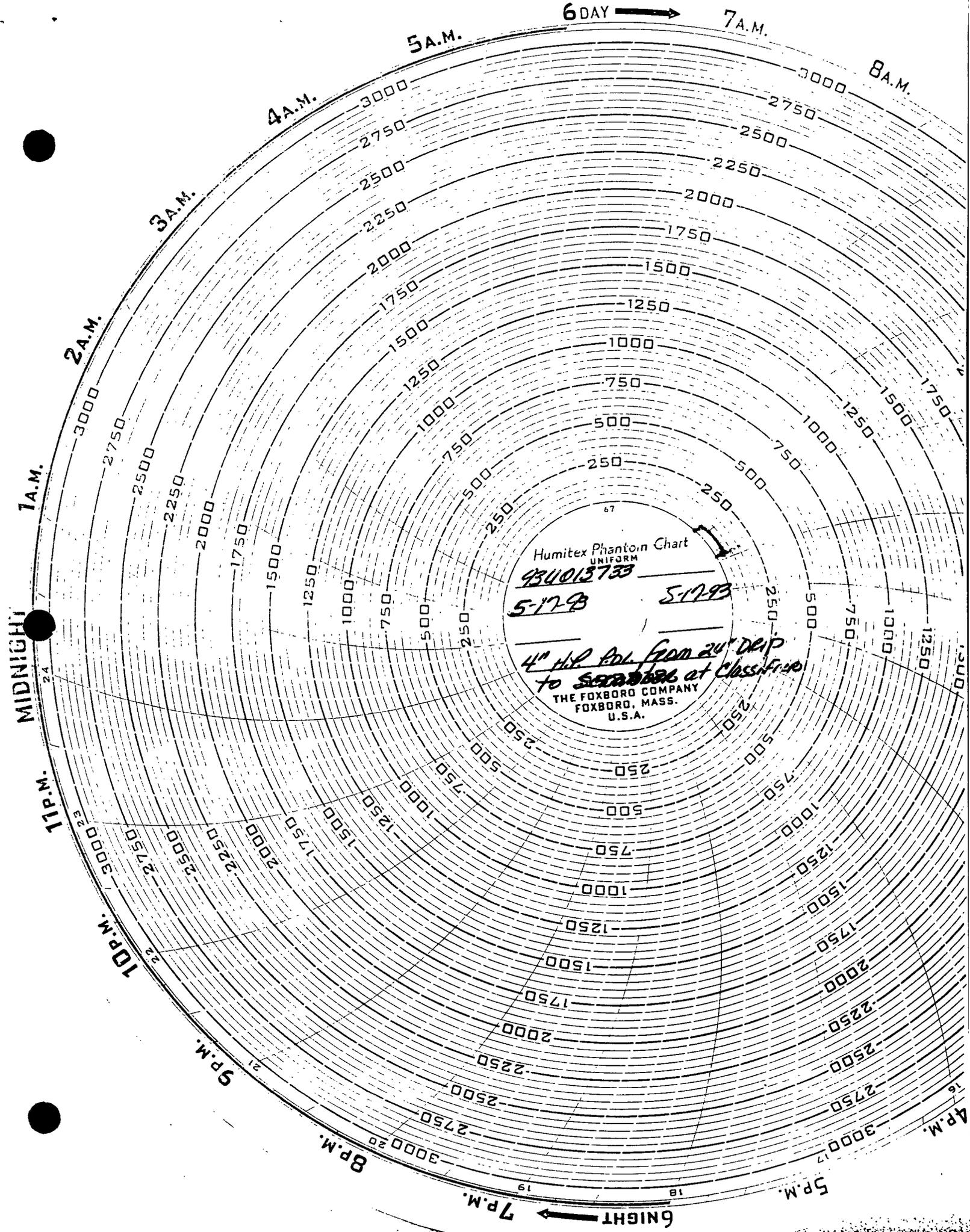
IMO-1-P20

25'-0"

AREA LIMIT W-2+1050"

5-3+C

IF OVER FUSE TO CONTINUOUSLY TAKE 5-3+75-C



6 DAY →

7 A.M.

8 A.M.

5 A.M.

4 A.M.

3 A.M.

2 A.M.

1 A.M.

MIDNIGHT

11 P.M.

10 P.M.

9 P.M.

8 P.M.

7 P.M.

← 6 NIGHT

67

Humitex Phantom Chart  
UNIFORM

934013733

5-17-93

5-17-93

4" H.P. Tol. from 24" DEEP  
to 3000 at Class. 100

THE FOXBORO COMPANY  
FOXBORO, MASS.  
U.S.A.

EPNG Monument Plant Drain Line  
6" ODL from Apron Drain Aux. Building to  
Classifier

Test Pressure - 10" 1 Hour

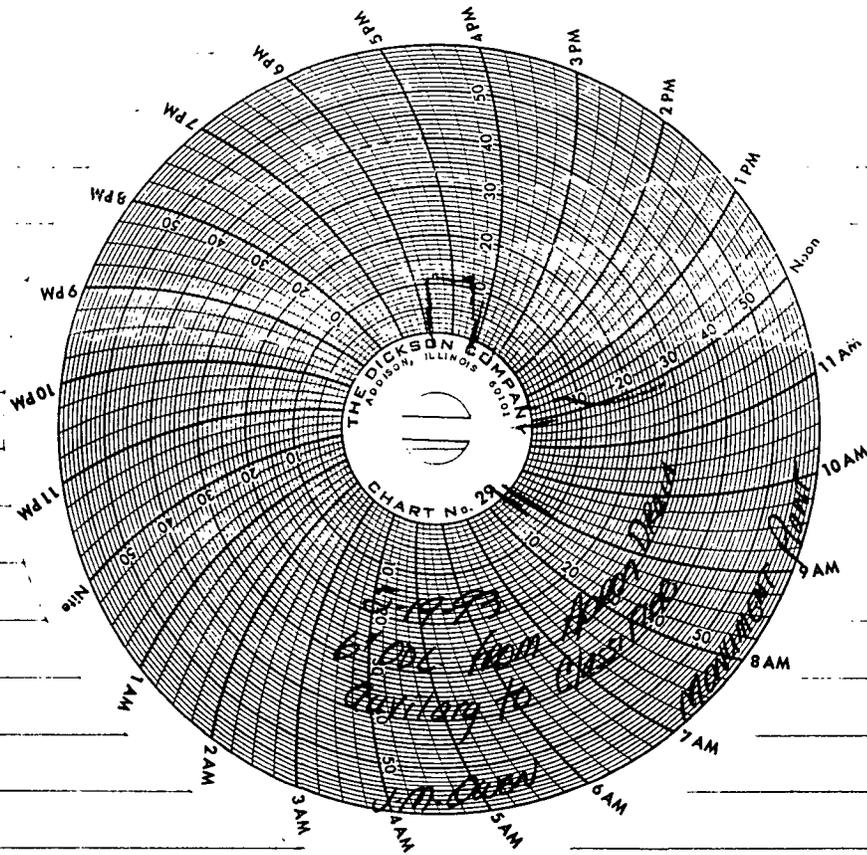
Test Date: 5-19-93

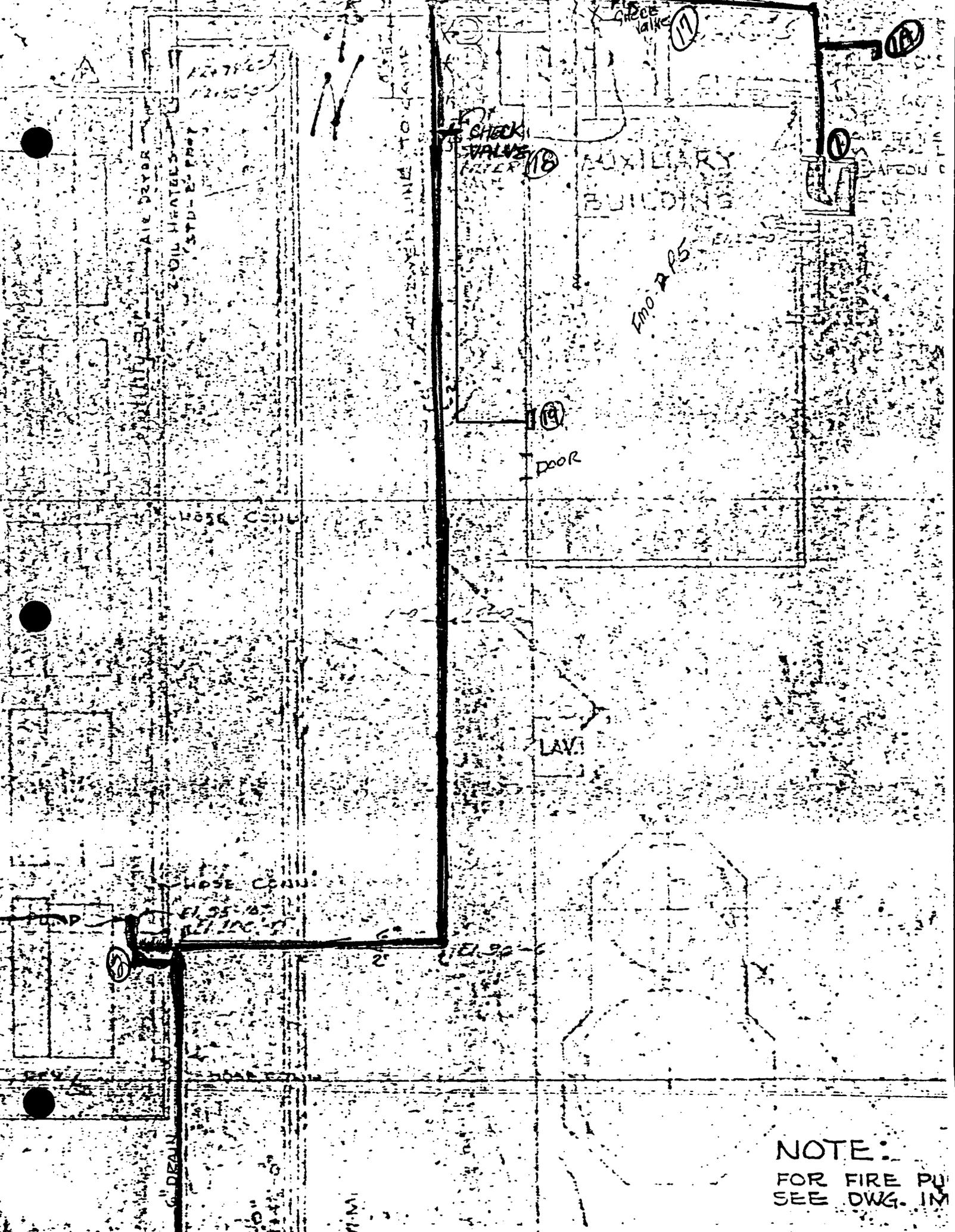
Tested By: Mike Hall Merryman Construction

Inspected By: Johnny M. Owen

- (1) Plug Apron Drain at Aux. Building
- (1A) Close Valve at Air tank
- (2) Plug discharge off Sump pump - (A Comp)
- (3) Plug 1" Vent Line (A Comp)
- (4) Pull Flapper out of Check Valve
- (5) Plug Apron Drain
- (6) Plug Apron Drain
- (7) Close 1" Valve Cooling tower blowdown
- (8) Close Valve Air tank - (B Plant)
- (9) Plug discharge off Sump pump - (B Plant)
- (10) Pull Flapper out of Check Valve - (STOP)
- (11) Close 2" Valve on funnel drain - (inside Building)
- (12) Install 6" blind at Classifier - (5'-4" Deep) (ISO)
- (13) THIS SECTION WAS PLUGGED PERMANENTLY
- (14) Close 4" Valve at tank. Plug 2" Vent line off top  
of tank Blind 4" Flange at top
- (15) Close Valve at Regulator
- (16) SHUT IN BY PASS -
- (17) Pull Flapper out of 2" Check Valve - Northside  
Auxiliary building
- (18) Pull Flapper out of 2" Check Valve - West Side  
Auxiliary building
- (19) INSTALL 2" Expandable Plug in wash tank inside  
Auxiliary building

- (20) SHUT IN 1/2 Valve at C.P. Meter run Box -
- (21) SHUT IN 1" Valve at Pump House - (inside building)
- (22) SHUT IN 4" Valve at Water tank





NOTE:  
FOR FIRE PU  
SEE DWG. IM

APRON DECK

IMO 2-P4

VENT

4" DRAIN

6

GENERATOR

CHECK

COOLING TOWER

APRON DECK

6" STEEL  
6" PVC

20.0

2" DRAIN

REMOVE (EXIST) 6" DRAIN

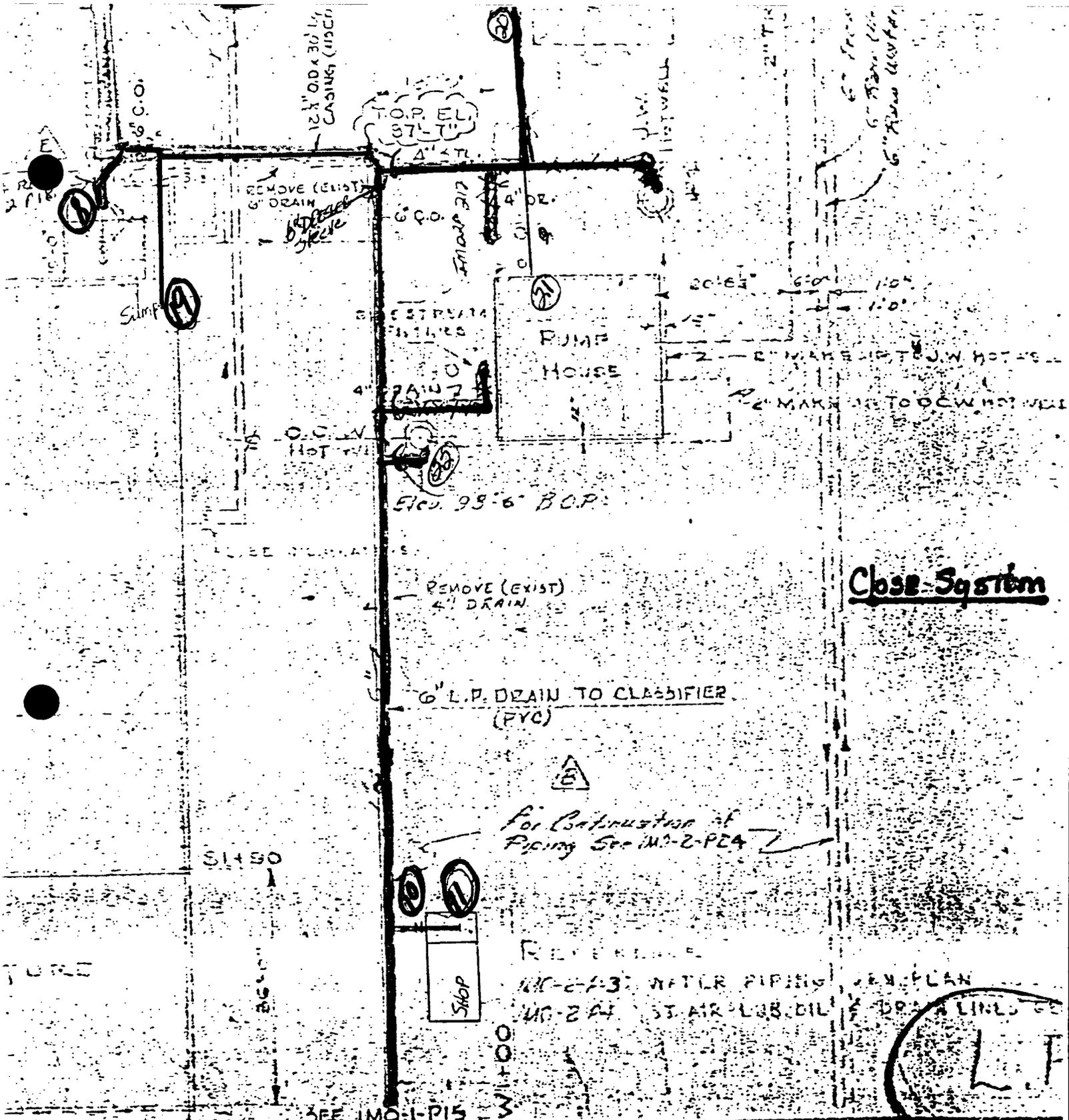
SLOPE (NEW) 6" PVC  
UNDER 30 LINE

W. 3.00

FEND

OIL

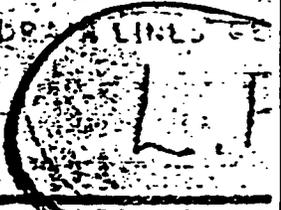
SEE IMO-2-P



Close System

For Construction of Piping See IM-2-PCA

IM-2-3 WATER PIPING PLAN  
IM-2-4 STAIR LUB OIL DRAIN LINES



PRINT RECORD

DATE	TO	NO.	DATE	TO	NO.	DATE	TO
5-10-54	REVISION	10	7-1-54	REVISION	11		
"	"	1	"	"	12		
"	"	2	"	"	13		
"	"	3	7-9-54	REVISION	14		
"	"	4	"	"	15		
"	"	5	"	"	16		
"	"	6	"	"	17		
"	"	7	"	"	18		
"	"	8	"	"	19		
"	"	9	"	"	20		

REVISION

DATE	BY	DESCRIPTION

EL PASO NATURAL GAS  
EL PASO, TEXAS

WARREN MONUM  
COMPRESSOR  
GRAVITY DRAIN AIR TR WATER  
GENERAL PIPING PL

SCALE: 1" = 20'  
DATE:  
DRAWN BY: W.E. [unclear]  
CHECKED:  
TRACED BY:  
APPROVED:

N

AREA LIMIT 5-3+15'-0"

36" O.D. RIGID DUCT  
OPENING  
V-210

4" DRAIN TO CLASSIFIED

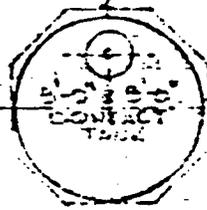
FOR DEAD MAN  
SEE IMO-1-M3

DISPOSAL LINE (AC TO SITE) 5-3+42'-0"

NOTE:  
REMOVE EXIST  
PIPE & PIPING

6" VENT STACK

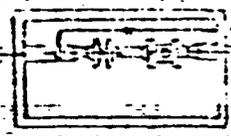
CHLORINE  
STATION



5-3+68'-0"

TRUCK 5-3+75'-0"

6" (PVC)



11" TO PIPE END

5-3+120'-0"

(Deep)  
5-4  
(B)

FIN. GRADE ELEV. 100'-0"

**El Paso**  
Natural Gas Company

ONE PETROLEUM CENTER / BUILDING TWO  
3300 NORTH "A" STREET  
MIDLAND, TEXAS 79705

September 2, 1993

RECEIVED

SEP 07 1993

OIL CONSERVATION DIVISION  
SANTA FE

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Subject: El Paso Natural Gas Company's Monument Station Discharge Plan GW-8  
Renewal Application

Dear Mr. Anderson:

El Paso Natural Gas Company (EPNG) is submitting for your review the Discharge Plan GW-8 Renewal for the EPNG Monument Gas Compressor Station, located in Lea County, New Mexico. Enclosed please find two copies of the renewal application. In addition, enclosed please find a check in the amount of \$50.00 required by the NMWQCC as a filing fee assessment.

If there are any questions or comments regarding this subject or if additional information is found necessary, please feel free to contact me at 915/686-3226.

Sincerely,



Lori A. Saylor, Engineer  
Environmental Compliance Engineering

Enclosures

cc: New Mexico Oil Conservation Division  
District 1 - Hobbs Office  
P. O. Box 1980  
Hobbs, NM 88240  
Attn: Mr. Jerry Sexton

## NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

**(GW-8) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted an application for renewal of a previously approved discharge plan for the Monument Gas Plant located in the NW/4 Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with total dissolved solids concentration of 3500 mg/l is stored in steel tanks prior to offsite disposal at an OCD approved Class II injection well. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

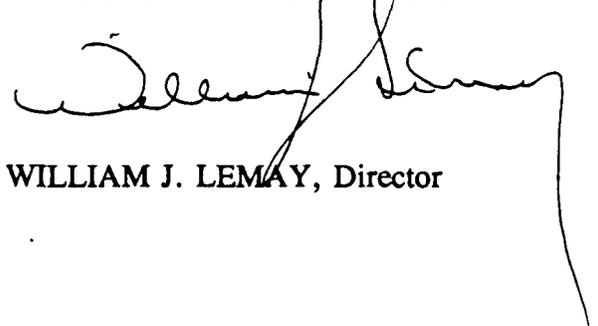
**(GW-46) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted an application for renewal of a previously approved discharge plan for the Eunice Gas Plant located in the NW/4 Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 17,000 gallons per day of cooling tower blowdown water with total dissolved solids concentration of 1300 mg/l is stored in steel tanks prior to offsite disposal offsite at an OCD approved Class II injection well. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 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 5:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 2nd day of September, 1993.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

June 28, 1993

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO.P-111-334-216**

Mr. Donald Bigbie  
Vice President, El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, Texas 79978

**RE: Discharge Plan GW-8  
Monument Gas Plant  
Lea County, New Mexico**

Dear Mr. Payne:

On October 11, 1988, the groundwater discharge plan, GW-8 for the Monument Gas Plant located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). 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 October 11, 1993.

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

Current WQCC Regulations do not allow for an expired discharge plan to receive an extension. Therefore you should submit the renewal application in ample time before the expiration date to allow the review process to be complete prior to expiration to avoid operating out of compliance (without an approved discharge plan).

Mr. Donald Bigbie  
June 29, 1993  
Page 2

Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,

A handwritten signature in cursive script that reads "Roger C. Anderson". The signature is written in dark ink and is positioned above the printed name and title.

Roger C. Anderson  
Environmental Bureau Chief

RCA.cce

xc: OCD Hobbs Office

**El Paso**  
Natural Gas Company

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-2600

July 18, 1989

RECEIVED

William J. LeMay,  
Director  
State of New Mexico  
Oil Conservation Division  
P.O. Box 2088  
State Land Office Building  
Santa Fe, New Mexico 87504

JUL 21 1989  
OIL CONSERVATION DIV.  
SANTA FE

Re: Discharge Plan GW-8 Monument  
Gas Plant Lea County, N.M.

Dear Mr. LeMay:

In response to your letter of June 6, 1989, El Paso completed the design of the berming for the aboveground tanks and the drum storage containment on May 17, 1989. The construction is scheduled to begin on July 21, 1989 and should be completed by August 14.

With the submission of this timetable, it is El Paso's understanding that the discharge plan for Monument Plant has been approved and will not expire until October 11, 1993.

If you have any questions concerning this timetable, please contact me at (915) 541-5399.

Very truly yours,



Donald R. Payne, P.E.  
Manager, Compliance Engineering

mts

c: K.E. Beasley  
D.N. Bigbie  
J. Hill  
W.A. Johnson  
J.R. Midkiff  
J.W. Somerhalder  
H. Van  
J.P. Wheeler

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

June 6, 1989

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

CERTIFIED MAIL  
RETURN RECEIPT NO. P-106-675-033

Mr. Donald N. Bigbie  
Vice President, North Region  
EL PASO NATURAL GAS COMPANY  
P. O. Box 1492  
El Paso, Texas 79978

RE: Discharge Plan GW-8  
Monument Gas Plant  
Lea County, New Mexico

Dear Mr. Bigbie:

The ground water discharge plan (GW-8) renewal for the El Paso Natural Gas Company's Monument Gas Plant located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved with the following conditions:

1. A timetable for the design and construction of the berming for above ground tanks will be submitted for review by July 30, 1989.
2. A timetable for the design and construction of drum storage containment will be submitted for review by July 30, 1989.

The original discharge plan was approved on October 11, 1983 and expired on October 11, 1988. The renewal application consists of the original discharge plan as approved October 11, 1983, the application dated October, 1988 and materials dated April 17, 1989 submitted as supplements to the renewal application.

The discharge plan renewal was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of the environment which may be actionable under other laws and/or regulations.

There will be no routine monitoring or reporting requirements.

Mr. Donald N. Bigbie

June 6, 1989

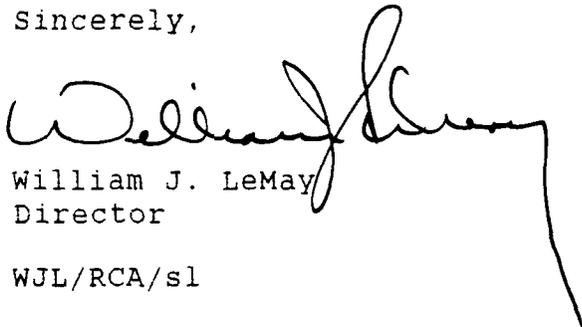
Page -2-

Please note that Section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C., you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan approval is for a period of five (5) years. This approval will expire October 11, 1993. and you should submit an application for renewal in ample time before that date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan or renewal.

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

Sincerely,



William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Hobbs Office  
Henry Van - EPNG, El Paso  
D. R. Payne - EPNG, El Paso

**El Paso**  
Natural Gas Company

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-2600

May 22, 1989

**RECEIVED**

**JUN - 2 1989**

**OIL CONSERVATION DIV,  
SANTA FE**

Mr. Roger C. Anderson  
Environmental Engineer  
New Mexico Oil Conservation Division  
310 Old Santa Fe Trail, 206  
Santa Fe, NM 87504

Re: Discharge Plant GW-46 and GW-8  
EPNG Eunice and Monument Gas Plants

Dear Mr. Anderson:

During your May 22 telephone conversation with Henry Van, you asked about the dry and wet analysis conducted on the soil samples taken by the cooling towers at the above mentioned facilities.

The specific conductance of the soil sample is first analyzed in the dry stage to record the "as received" condition of the soil. Measured amounts of distilled water are added to the sample to moisten the soil until the sample becomes normalized. At this stage the sample is again analyzed for specific conductance and recorded as the wet analysis. Of the two recorded readings, the wet analysis is the official reading. The electrical conductivity testing has indicated that most of the salts have been retained in the upper two feet of the soil tested.

The cooling towers at both Eunice and Monument Plants have undergone maintenance repairs. This will reduce the ponding caused by the over spray during the windy months. The following partial list includes the work completed at both locations:

- The Water Distribution System - At Eunice replaced with a new system. At Monument, the system has been completely cleaned and repaired.
- Drift Pans (Top) - At both Eunice and Monument have been cleaned out and a 6" layer of honey cone plastic sheet has been installed to help control water flow. (Draft Eliminator).
- Field Pans (Bottom) - At both locations have been cleaned out and a 12" layer of honey cone plastic sheet installed to break the water flow. (Draft Eliminator).
- Wind Wall - A new Wind Wall has been installed for the Eunice cooling tower, the Wind Wall for Monument was reconditioned.
- Cooling Tower Joist Supports - At both locations some have been replaced, others repaired.
- Cooling Tower Doors - At both locations some minor repairs and recondition have been done.

May 22, 1989  
Mr. Roger C. Anderson  
Page 2

If you have any questions or if I may be of further assistance, please call me at (915) 541-2407.

Sincerely,

*Osias Uribe*

Osias Uribe  
Environmental Technician  
Environmental & Safety Affairs Department

OU/teb

cc: L.J. Meyer  
G.J. Odegard  
D.R. Payne  
H. Van  
file: 5000, 5007

**El Paso**  
Natural Gas Company

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-5215

DONALD N. BIGBIE VICE PRESIDENT

April 17, 1989

Mr. Roger C. Anderson  
Environmental Engineer  
New Mexico Oil Conservation Division  
310 Old Santa Fe Trail  
Santa Fe, NM 87504

**RECEIVED**

APR 21 1989

OIL CONSERVATION DIV.  
SANTA FE

Reference: Discharge Plan GW-8  
Monument Gas Plant  
Lea County, New Mexico

Dear Mr. Anderson:

In reference to your letter of December 28, 1988, the following are responses to your comments and the additional information you requested. The comments and the additional information are listed per section as indicated in your letter.

Section 3. Effluent Sources

**Question:**

1. Section 3.2.4 states Table 2 (p.20) of the 1983 Discharge Plan contains the wastewater analyses for each stream. Table 2 (p.20) of the OCD 1983 Discharge Plan copy contains the general characteristics of each stream not a detailed analyses. If a detailed analyses of each stream exists, please supply a copy for inclusion in the plan.

**Answer:**

A detailed analysis of each stream has not been conducted. However, enclosed in Tab 1 are the laboratory reports for the classifier effluent from 1983 through 1988.

**Question:**

2. Section 3.3. Is there an SPCC plan in effect at this facility? If so, please provide a copy.

**Answer:**

There is no SPCC plan in effect at this facility.

**Question:**

3. Table 3-1 lists the chemicals used at the plant. The following is a list of the chemicals for which there is no MSD sheet on file either in the 1983 plan or the renewal application.

- 1) Hydrochem D-300
- 2) Hydrochem A-239 (incomplete)
- 3) Fina Upper Cylinder Lube
- 4) Mobil Pegasus 490 (40 wt.)

**Answer:**

Enclosed in Tab 2 are the MSD sheets for the following chemicals:

- 1) Hydrochem D-300
- 2) Hydrochem A-239
- 3) Fina Upper Cylinder Lube
- 4) Mobil 490 (40 wt.)

**Section 4. Effluent Disposal**

**Question:**

1. Section 4.1 describes the classifier. This is the below grade tank described on page 35 of the 1983 plan. Is this tank equipped with leak detection? If not, what method is used to inspect it for possible leaks and at what frequency?

**Answer:**

The classifier is not equipped with a leak detection system. However, every two years EPNG will empty the classifier and inspect for leaks.

**Question:**

2. Section 4.2 discusses disposal of liquids only. Where do you dispose of all solid wastes (i.e., filter media, sludges, trash, filter elements, etc.)?

**Answer:**

All the solid waste is hauled to and disposed of in the City of Hobbs, New Mexico, landfill.

**Section 6. Monitoring and Reporting**

**Question:**

1. This section discusses the drain line testing. The copies of the diagrams of the lines tests are extremely hard to read and correlate

with the drain lines on the plat plan (DWG NO. IMO-1-P1) in the 1983 plan. Is there a schematic specifically showing the drain lines at the plant?

**Answer:**

The following blue line drawings, enclosed in the map pockets in Tab 3, show the lines tested for this facility:

IMO-1-P15  
IMO-2-P4  
IMO-2-P12  
IMO-2-P201  
IMO-2-P214

**Question:**

2. It is stated that annual sampling and analysis of the classifier effluent will be conducted. Has this commitment been followed in the past? Please supply OCD with copies of the results. Also, supply this office with any future results for inclusion in the file.

**Answer:**

Yes, analysis of the classifier effluent has been done. Enclosed in Tab 1 are copies of the analytical results from 1983 through 1988. In the future, annual analytical reports of the classifier effluent will be sent to OCD.

**Question:**

3. An analysis of the cooling tower basin and classifier sludge shall be supplied to the OCD with a request for approval of the proposed method of disposal.

**Answer:**

A copy of the analytical results of the cooling tower basin and classifier sludge will be supplied to OCD with a request for approval of the proposed method of disposal.

**Miscellaneous**

**Questions:**

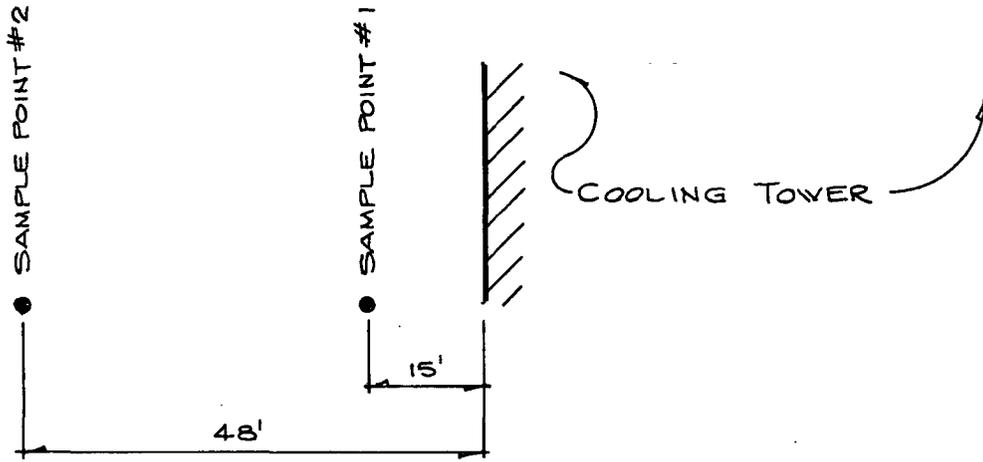
1. Are there any below grade or underground tanks other than the classifier?
2. Are all above grade tanks bermed to contain one third more than the tank volumes?
3. Are there any tile drainage conduits in use? How old are they? How are they tested? What areas do they drain and to where?

4. Are all process and storage areas bermed and/or curbed? Are the bermed and/or curbed areas also paved to prevent spilled liquid infiltration?
5. The cooling towers showed evidence of excessive spray drifting and ponding of water at the base of the tower. How do you plan to eliminate or contain and isolate this ponding to prevent infiltration of the water into the ground?
6. The storage pads for treatment chemicals at the cooling towers have insufficient containment in the event of tank failure. What actions will be taken to increase containment volume capability?
7. Drum storage areas throughout the facility have no containment or pads. What actions will be taken to prevent any spills or leaks from infiltrating into the ground?

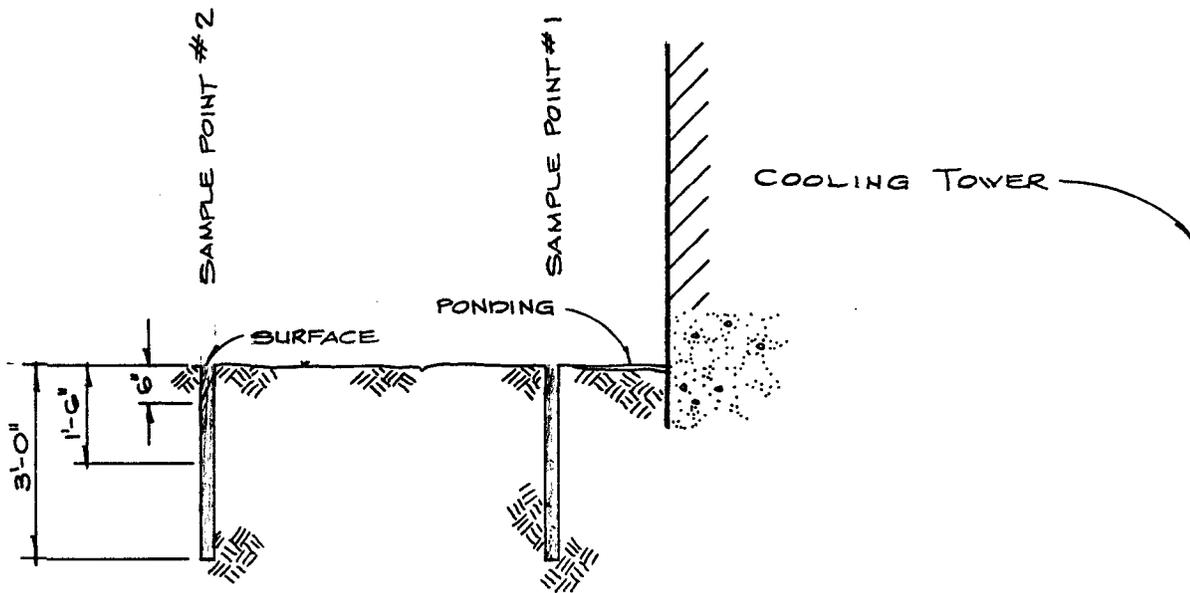
**Answers:**

1. There are no below grade or underground tanks other than the classifier.
2. Above grade tanks are not bermed. However, EPNG's engineering is presently working on the design and construction of berms for all above grade tanks which contain liquids that may pose a potential danger for groundwater contamination. The berms will be constructed to contain one third more than the tank volumes.
3. There are no tile drainage conduits at this location.
4. A survey is being conducted to establish the extent of the berming and curbing needed at this facility. Upon completion, a drawing will be submitted showing the curbs and paved areas in the process and storage areas. The areas which will not show curbs or pavement do not pose a danger to groundwater because the fluid transported in the lines is natural gas.
5. The possibility of impacting the groundwater the cooling tower spray which creates some ponding during windy winter months is minimal. The depth to groundwater under the Monument Plant ranges from 80 feet to 140 feet. We evaluated the migration of salts around the cooling tower and approximately 48 feet from its edge (Figure 1). The samples closest to the cooling tower were taken where the ponding occurs. Table 1 shows the results obtained. These results show that 87% of the salt is retained with the upper 3 feet for sample location number one. In the background area approximately 86% of the salts were found to be retained in the upper 1 1/2 feet. The groundwater in the area has a total dissolved solids content ranging from 1,000 to 10,000 mg/l. Because there is no substantial hydraulic gradient acting on the salts and the depth to groundwater is considerable, we feel that the occasional ponding will not impact the groundwater quality. For this reason, El Paso proposes to continue operating the cooling tower in the same manner as before.

FIGURE 1  
MONUMENT PLANT



PLAN VIEW



SECTION VIEW

MONUMENT PLANT

TABLE 1

SPECIFIC CONDUCTANCE OF SOILS NEAR THE COOLING TOWER

SAMPLE NUMBER	SAMPLE LOCATION *	DEPTH OF SAMPLE	DRY ANALYSIS (umhos)	WET ANALYSIS (umhos)
1	AREA A	SURFACE	0	3446
	AREA A	6"	150	574
	AREA A	1' 6"	26	1138
	AREA A	3' 0"	104	459
2	AREA B	SURFACE	0.31	2193
	AREA B	6"	7.31	856
	AREA B	1' 6"	3.96	679
	AREA B	3' 0"	9.39	303

\* SEE FIGURE 1

Ponding usually occurs in the winter months, and, due to the high evaporation rate, ponding does not occur during 75% of the year.

- 6/7. Containment berms at the Monument Plant will be installed to keep the plant in compliance with the state and federal regulations. The berms will consist of a concrete wall that is 6" wide and 1.5' high. The volume inside the berm will equal or exceed 1.33 times the volume the tank or tanks inside the berm. Table 2 lists the tanks, volume and proposed berm size. The existing pads under the acid tanks will not be used.

The berms are for emergency only; any spill liquids will be removed as soon as possible. No attempt will be made to seal the bottom of the bermed area. A capped, 2" plastic pipe will be provided through the wall to drain rainwater. A concrete step will be built into at least two walls to improve access and safety.

Table 2. Proposed Berms

TANK	VOLUME	PROPOSED BERM SIZE		
		L	W	H
Gasoline	312 gal	7'	5'	1.5'
Versol	573 gal	10'	7'	1.5'
Acid	400 gal	11.25'	4.25'	1.5'
Makeup Oil (2 Tanks)	8,990 gal	52'	52'	1.5'

If you have questions, please contact Dr. Henry Van at 915/541-2832 or Mr. Don R. Payne at 915/541-5399.

Very truly yours,

  
Donald N. Bigbie  
Vice President  
South Region

DNB:HV:cds  
Enclosures

cc: D. R. Payne (w/ encl)  
H. Van (w/ encl)

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

*Budges  
Sally*

GARREY CARRUTHERS  
GOVERNOR

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

December 28, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Charles W. Hagen, Vice President  
EL PASO NATURAL GAS COMPANY  
South Region  
P. O. Box 1492  
El Paso, Texas 79978

RE: Discharge Plan GW-8  
Monument Gas Plant  
Lea County, New Mexico

Dear Mr. Hagen:

The Oil Conservation Division (OCD) is in the process of reviewing the above referenced discharge plan renewal application. The application, dated October, 1988, was received by the OCD on September 30, 1988. The following comments and requests for additional information are based on our review of data submitted in the application, the data contained in the original discharge plan as approved on October 11, 1983, and OCD site visit of November 29, 1988.

Section 3. Effluent Sources

1. Section 3.2.4 states Table 2 (p.20) of the 1983 Discharge Plan contains the wastewater analyses for each stream. Table 2 (p.20) of the OCD 1983 Discharge Plan copy contains the general characteristics of each stream not a detailed analyses. If a detailed analyses of each stream exists, please supply a copy for inclusion in the plan.
2. Section 3.3. Is there an SPCC plan in effect at this facility? If so, please provide a copy.
3. Table 3-1 lists the chemicals used at the plant. The following is a list of the chemicals for which there is no MSD sheet on file either in the 1983 plan or the renewal application.

1. Hydrochem D-300
2. Hydrochem A-239 (incomplete)
3. Fina Upper Cylinder Lube
4. Mobil Pegasus 90 (40 wt)

#### Section 4. Effluent Disposal

1. Section 4.1 describes the classifier. This is the below grade tank described on page 35 of the 1983 plan. Is this tank equipped with leak detection? If not, what method is used to inspect it for possible leaks and at what frequency?
2. Section 4.2 discusses disposal of liquids only. Where do you dispose of all solid wastes (ie. filter media, sludges, trash, filter elements, etc)?

#### Section 6. Monitoring and Reporting

1. This section discusses the drain line testing. The copies of the diagrams of the lines tests are extremely hard to read and correlate with the drain lines on the plat plan (DWG NO. IMO-1-P1) in the 1983 plan. Is there a schematic specifically showing the drain lines at the plant?
2. It is stated that annual sampling and analysis of the classifier effluent will be conducted. Has this commitment been followed in the past? Please supply the OCD with copies of the results. Also, supply this office with any future results for inclusion in the file.
3. An analysis of the cooling tower basin and classifier sludge shall be supplied to the OCD with a request for approval of the proposed method of disposal.

#### Miscellaneous

1. Are there any below grade or underground tanks other than the classifier?
2. Are all above grade tanks bermed to contain one third more than the tank volumes?
3. Are there any tile drainage conduits in use? How old are they? How are they tested? What areas do they drain and to where?
4. Are all process and storage areas bermed and/or curbed? Are the bermed and/or curbed areas also paved to prevent spilled liquid infiltration?

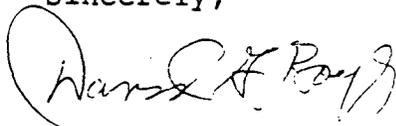
Mr. Charles W. [redacted]gen  
December 28, 1988  
Page -3-

5. The cooling towers showed evidence of excessive spray drifting and ponding of water at the base of the tower. How do you plan to eliminate or contain and isolate this ponding to prevent infiltration of the water into the ground?
6. The storage pads for treatment chemicals at the cooling towers have insufficient containment in the event of tank failure. What actions will be taken to increase containment volume capability?
7. Drum storage areas throughout the facility have no containment or pads. What actions will be taken to prevent any spills or leaks from infiltrating into the ground?

The submission of the information requested and commitments to correct deficiencies with reasonable timetables will allow the review of your application to continue.

If you have any questions, please contact me at (505) 827-5884.

Sincerely,



*RCA*  
Roger C. Anderson  
Environmental Engineer

RCA/sl

cc: OCD - Hobbs Office  
Donald R. Payne - EPNG  
H. Van - EPNG

**RECEIVED**

APR 21 1989

OIL CONSERVATION DIV.  
SANTA FE

---

Everything  
after this  
in folder



**EL PASO** NATURAL GAS COMPANY

**CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES**

Date received 5-20-88

Lab No. P88768

SLD code No.

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

**CHEMICAL ANALYSES:** Check individual items for analysis (Mark appropriate box(es))

TYPE of CHEMICAL ANALYSIS:  Organic  Radiological

INTERIM PRIMARY PARAMETER GROUP:  Complete Secondary  Waste WATER  RAW WATER

Water Supply System Code No.  1  2  3 City or Location \_\_\_\_\_

Monument Plant \_\_\_\_\_ Report to \_\_\_\_\_

Collection Date 5-20-88 Collection Time \_\_\_\_\_ Collector's remarks \_\_\_\_\_

Classified by J. Tuten Owner EPNG Address \_\_\_\_\_

TYPE of SYSTEM (Check one):  PRIVATE  PUBLIC:  Community  Non-community

SOURCE:  Spring  Lake  Well-Depth \_\_\_\_\_

Drain  Stream  Pool  Other (specify) \_\_\_\_\_

LAT. \_\_\_\_\_ LONG. \_\_\_\_\_

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	mg/l	HEAVY METALS	mg/l	PARAMETER	mg/l	ORGANIC	mg/l
00930 Sodium (as Na)		00940 Chloride (as Cl)		70300 Total Filterable Residue		01000 Arsenic		Chromium Hexavalent	0 0 0 2	39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)		38260 Foaming Agents (as Lat)		01005 Barium	8 2 2			39732 Lindane	
00900 Tot. Hardness (as CaCO <sub>3</sub> )		00620 Nitrate (as N)		00095 Conductance Micromhos 25°C		01025 Cadmium	0 1 4 7			38270 Methoxychlor	
00915 Calcium (as Ca)		00430 Alkalinity (as CaCO <sub>3</sub> )		00400 pH		01030 Chromium	0 0 2 1			39400 Toxaphene	
00925 Magnesium (as Mg)		00440 Bicarbonate (as HCO <sub>3</sub> )		01330 Odor		01049 Lead	0 6 3			39730 2, 4, 5-TP (Silver)	
01045 Iron-Total (as Fe)		00445 Carbonate (as CO <sub>3</sub> )		00080 Color		07180 Mercury	0 0 0 2			39740 COD (ppm)	7 2 4
01056 Manganese (as Mn)		00945 Sulfate (as SO <sub>4</sub> )		00070 Turbidity		01145 Selenium	0 0 0 1				
						01075 Silver	0 1 2 6				

LABORATORY REMARKS: \_\_\_\_\_

Reviewed by \_\_\_\_\_

Date reported \_\_\_\_\_



**EL PASO NATURAL GAS COMPANY**

**CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES**

Date received 8-25-87 Lab No. P87693 SLD code No.

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

**CHEMICAL ANALYSES:** Check individual items for analysis (Mark appropriate box(es))

INTERIM PRIMARY PARAMETER GROUP TYPE OF CHEMICAL ANALYSIS

1  2  3  Complete Secondary  Organic  Radiological

Water Supply System Name: Monument Plant City or Location: \_\_\_\_\_ County: \_\_\_\_\_

Collection Date: 8-24-25-87 Collection Point: Classifier

Collected By: J. Tuten Owner: EPNG

Report to: \_\_\_\_\_ Address: \_\_\_\_\_

Waste WATER RAW WATER

Check one:  Waste WATER  RAW WATER

SOURCE:  Drain  Spring  Lake  Well-Depth \_\_\_\_\_  Stream  Pool  Other (specify) \_\_\_\_\_

LAT. \_\_\_\_\_ LONG \_\_\_\_\_

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	mg/l	HEAVY METALS	mg/l	PARAMETER	mg/l	ORGANIC	mg/l
00930 Sodium (as Na)		00940 Chloride (as Cl)		70300 Total Filterable Residue		01000 Arsenic	001	Chromium Hexavalent		39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)	018	38260 Foaming Agents (as Las)		01005 Barium	694			39732 Lindane	
00900 Tot. Hardness (as CaCO <sub>3</sub> )		00620 Nitrate (as N)	010	00095 Conductance Micromhos 25°C		01025 Cadmium	059			38270 Methoxychlor	
00915 Calcium (as Ca)		00430 Alkalinity (as CaCO <sub>3</sub> )		00400 pH		01030 Chromium	049	RADIOLOGICAL pCi/l		39400 Toxaphene	
00925 Magnesium (as Mg)		00440 Bicarbonate (as HCO <sub>3</sub> )		01330 Odor		01049 Lead	001	03501 Gross Beta		39730 2, 4-D	
01045 Iron-Total (as Fe)		00445 Carbonate (as CO <sub>3</sub> )		00080 Color		07180 Mercury	002	09501 Radium-226		39740 2, 4, 5-TP (Silvex)	
01056 Manganese (as Mn)		00945 Sulfate (as SO <sub>4</sub> )		00070 Turbidity		01145 Selenium	001	11501 Radium-228		COD (ppm)	900
						01075 Silver	012				

LABORATORY REMARKS:

Reviewed by \_\_\_\_\_

Date reported \_\_\_\_\_



# EL PASO NATURAL GAS COMPANY

## CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received 1/7/86  
 Lab No. P86-005  
 SLD code No

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis (Mark appropriate boxes)

INTERIM PRIMARY PARAMETER GROUP:  1  2  3

TYPE OF CHEMICAL ANALYSIS:  Organic  Radiological

Water Supply System Name: Monument  
 City or Location: \_\_\_\_\_  
 County: \_\_\_\_\_

Check one:  WASTE WATER  RAW WATER

Collection Date: 1/6/7/86  
 Collection Time: 24 hr comp  
 Classifier: EPNG

Collected By: Joe Tuten  
 Owner: \_\_\_\_\_

TYPE OF SYSTEM (Check one):  PRIVATE  PUBLIC  Community  Non-community

Water Supply System Code No.: \_\_\_\_\_

Collector's remarks: \_\_\_\_\_

Report to: \_\_\_\_\_  
 Address: \_\_\_\_\_

SOURCE:  Drain  Stream  Lake  Well-Depth \_\_\_\_\_  
 Other (specify) \_\_\_\_\_

LAT. \_\_\_\_\_ LONG. \_\_\_\_\_

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	mg/l	HEAVY METALS	mg/l	PARAMETER	mg/l	ORGANIC
00930 Sodium (as Na)	202	00940 Chloride (as Cl)	1633	70300 Total Filterable Residue		01000 Arsenic	<	Chromium Hexavalent	001	39390 Endrin
00935 Potassium (as K)		00950 Fluoride (as F)	24	38260 Foaming Agents (as Las)		01005 Barium	001	Copper (ppm)	100	39732 Lindane
00900 Tot. Hardness (as CaCO <sub>3</sub> )	840	00620 Nitrate (as N)	454	00095 Conductance Micromhos 25°C	1560	01025 Cadmium	<	Zinc (ppm)	100	38270 Methoxychlor
00915 Calcium (as Ca)	208	00430 Alkalinity (as CaCO <sub>3</sub> )	82	00400 pH	6.4	01030 Chromium	001	RADIOLOGICAL pCi/l Gross Alpha		39400 Toxaphene
00925 Magnesium (as Mg)	768	00440 Bicarbonate (as HCO <sub>3</sub> )	100	01330 Odor		01049 Lead	<	Gross Beta		39730 2, 4-D
01045 Iron-Total (as Fe)	128	00445 Carbonate (as CO <sub>3</sub> )		00080 Color		07180 Mercury	<	Radium-226		39740 2, 4, 5-TP (Silvex)
01056 Manganese (as Mn)	100	00945 Sulfate (as SO <sub>4</sub> )	5491	00070 Turbidity	79	01145 Selenium	<	Radium-228		
Boron (ppmB)	0.75	Silica (ppmSi)	133	TDS (ppm)	1400	01075 Silver	<			COI (ppm)

LABORATORY REMARKS: \_\_\_\_\_

Reviewed by: \_\_\_\_\_  
 Date reported: \_\_\_\_\_



**CHEMICAL and PHYSICAL ANALYSES  
for WATER SAMPLE**

Date received 4-4-85  
Lab No. P85125  
SLD user code No

Customer SLD Lab Annex I for proper presentation of sample(s) TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis (Mark appropriate box(es))  
 1  2  3  Complete Secondary

Interim Primary Parameter Group TYPE of CHEMICAL ANALYSIS  
 1  2  3

Water Supply System Name: Monument Plant  
 City or Location: Lea  
 County: Report to: Address: Collector's remarks: Collector's name: Joe Tuten

Monument Plant  
 Collection Time: 24 hr. comp.  
 Classification: Owner: EPNG

TYPE of SYSTEM (Check one)  
 PRIVATE  PUBLIC:  Community  Non-community  Non-community

SOURCE:  Spring  Lake  Well-Depth:  Other (Specify):  
 Drain  Stream  Pool

Check one:  Organic  Radiological  
 Waste WATER  RAW WATER

LAT. LONG.

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	HEAVY METALS	mg/l	PARAMETER	ORGANIC	mg/l
00930 Sodium (as Na)	5918	00940 Chloride (as Cl)	10934	70300 Total Filterable Residue	01000 Arsenic	< 0.01	Chromium < Hexavalent	39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)	18	38260 Foaming Agents (as Las)	01005 Barium	164	Copper < 0.01	39732 Lindane	
00900 Tot. Hardness (as CaCO <sub>3</sub> )	3880	00620 Nitrate (as N)	034	00095 Conductance Micromhos 25°C	01025 Cadmium	0005	Zinc	38270 Methoxychlor	
00915 Calcium (as Ca)	1040	00430 Alkalinity (as CaCO <sub>3</sub> )	620	00400 pH	01030 Chromium	< 0.01	RADIOLOGICAL pCi/l Gross Alpha	39400 Toxaphene	
00925 Magnesium (as Mg)	3072	00440 Bicarbonate (as HCO <sub>3</sub> )	7564	01330 Odor	01049 Lead	< 0.01	Gross Beta	39730 2,4-D	
01045 Iron-Total (as Fe)	091	00445 Carbonate (as CO <sub>3</sub> )	00	00060 Color	07160 Mercury	006	Radium-226	39740 2,4,5-TP (Silvex)	
01056 Manganese (as Mn)	020	00945 Sulfate (as SO <sub>4</sub> )	6960	00070 Turbidity	01145 Selenium	< 0.005	Radium-228		
Boron (ppmB)	31	Silica (ppmSi)	625	TDS	01075 Silver	< 0.01			

LABORATORY REMARKS:

Reviewed by: \_\_\_\_\_  
 Date reported: \_\_\_\_\_

P-84-186

CONTACT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis (Mark appropriate box(es))

INTERIM PRIMARY PARAMETER GROUP:  1  2  3  Complete Secondary

TYPE OF CHEMICAL ANALYSIS:  Organic  Radiological

Water Supply System Name: **MONUMENT PLANT** City or Location: **MONUMENT, N.M.** County: **LEA**

Collection Date: **6-45-84** Collection Time: **24hr. Comp.** Classifier Tank

Collected By: **J. TUGEN** Owner: **EPNG**

Water Supply System Code No.  1  2  3

Check one:  Waste Water  RAW WATER

Report to: \_\_\_\_\_ Address: \_\_\_\_\_

SOURCE:  Drain  Lake  Spring  Well-Depth \_\_\_\_\_

PRIVATE  COMMUNITY  Non-community

TYPE OF SYSTEM (Check one):  PRIVATE  COMMUNITY  Non-community

LAT. \_\_\_\_\_ LONG. \_\_\_\_\_

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	HEAVY METALS	mg/l	PARAMETER	mg/l	ORGANIC
00930 Sodium (as Na)		00940 Chloride (as Cl)		70300 Total Filterable Residue	01000 Arsenic		Chromium Hexavalent	015	39390 Endrin
00935 Potassium (as K)		00950 Fluoride (as F)	165	38260 Foaming Agents (as Las)	01005 Barium			060	39732 Lindane
00900 Tot. Hardness (as CaCO <sub>3</sub> )		00620 Nitrate (as N)	53	00095 Conductance Micromhos 25°C	01025 Cadmium			2005	38270 Methoxychlor
00915 Calcium (as Ca)		00430 Alkalinity (as CaCO <sub>3</sub> )		00400 pH	01030 Chromium		RADIOLOGICAL pCi/l	01	39400 Toxaphene
00925 Magnesium (as Mg)		00440 Bicarbonate (as HCO <sub>3</sub> )		01330 Odor	01049 Lead		03501 Gross Beta	01	39730 2, 4-D
01045 Iron-Total (as Fe)		00445 Carbonate (as CO <sub>3</sub> )		00080 Color	07180 Mercury		09501 Radium-226	010	39740 2, 4, 5-TP (Silvex)
01056 Manganese (as Mn)		00945 Sulfate (as SO <sub>4</sub> )		00070 Turbidity	01145 Selenium		11501 Radium-228	005	
					01075 Silver			201	

LABORATORY REMARKS:

Reviewed by

# EMERALD NATURAL GAS CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received: \_\_\_\_\_ Lab No. **83-147** SLD user code No \_\_\_\_\_

CONSULT SLD Lab Annex L for proper presentation of sample(s) TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis (Mark appropriate box(es))

INTERIM PRIMARY PARAMETER GROUP:  1  2  3  Complete Secondary

TYPE OF CHEMICAL ANALYSIS:  Organic  Radiological

Water Supply System Name: **MONUMENT PLANT WASTE WATER** City or Location: **MONUMENT** County: **LEA**

Water Supply System Code No.  1  2  3

Collection Date: **11/28 11/29/83** Collection Time: **24hr. Comp.** Collector's remarks: \_\_\_\_\_

Collected By: **S. Meadows** Owner: **EPNG**

TYPE OF SYSTEM (Check one):  PRIVATE  COMMUNITY  NON-COMMUNITY

SOURCE:  Drain  Stream  Lake  Well-Depth \_\_\_\_\_

LAT. \_\_\_\_\_ LONG. \_\_\_\_\_

Report to: \_\_\_\_\_ Address: \_\_\_\_\_

Check one:  WASTE WATER  RAW WATER

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	HEAVY METALS	mg/l	PARAMETER	ORGANIC	mg/l
00930 Sodium (as Na)	•	00940 Chloride (as Cl)	•	70300 Total Filterable Residue	01000 Arsenic	•	Chromium Hexavalent	39390 Endrin	•
00935 Potassium (as K)	•	00950 Fluoride (as F)	9	38260 Foaming Agents (as Lat)	01005 Barium	•		39732 Lindane	•
00900 Tot. Hardness (as CaCO <sub>3</sub> )	•	00620 Nitrate (as N)	20	00095 Conductance Micromhos 25°C	01025 Cadmium	•		38270 Methoxychlor	•
00915 Calcium (as Ca)	•	00430 Alkalinity (as CaCO <sub>3</sub> )	•	00400 pH	01030 Chromium	•		39400 Toxaphene	•
00925 Magnesium (as Mg)	•	00440 Bicarbonate (as HCO <sub>3</sub> )	•	01330 Odor	01049 Lead	•		39730 2,4-D	•
01045 Iron-Total (as Fe)	•	00445 Carbonate (as CO <sub>3</sub> )	•	00080 Color	07180 Mercury	•		39740 2,4,5-TP (Silvex)	•
01056 Manganese (as Mn)	•	00945 Sulfate (as SO <sub>4</sub> )	•	00070 Turbidity	01145 Selenium	•			
					01075 Silver	•			

LABORATORY REMARKS: \_\_\_\_\_

Reviewed by \_\_\_\_\_

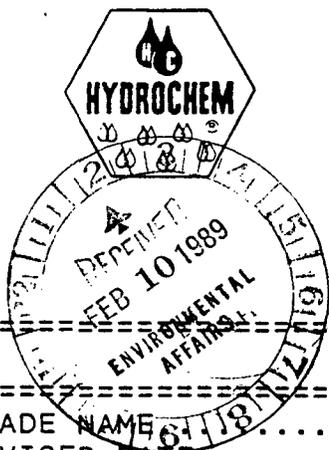


Continental Prod

7-21-88

# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681



Hydrochem D-300

053-0640-300

=====

### SECTION I - IDENTIFICATION

=====

TRADE NAME..... Hydrochem D-300  
 REVISED DATE..... June 27, 1988  
 CHEMICAL NAME..... Aqueous Mixture  
 CAS NUMBER..... Not Appropriate  
 OSHA HAZARD CLASS..... Health hazard - Irritant  
 EPA HAZARD CATAGORY..... Immediate (acute) health hazard - Irritant  
 DOT LABEL REQUIRED..... NONE  
 EMERGENCY PHONE NUMBER... 1-800-592-4684 OR 1-915-337-4681

=====

### SECTION II - HAZARDOUS INGREDIENTS

=====

HAZARDOUS COMPONENTS	HAZARDOUS %	HAZARDOUS COMPONENT DATA
----------------------	-------------	--------------------------

None of the components have been determined to be hazardous.

=====

### SECTION III - PHYSICAL DATA

=====

BOILING POINT..... 216 Deg F  
 VAPOR PRESSURE (mm Hg)... 25  
 SOLUBILITY IN H2O..... Completely soluble  
 APPEARANCE/ODOR..... Light Amber liquid / Slight pungent odor  
 SPECIFIC GRAVITY (H2O=1). 1.1  
 VOLATILITY/VOL(%)..... 70  
 PH OF SOLUTION..... 7.0 to 9.0

=====

### SECTION IV - FIRE AND EXPLOSION HAZARD DATA

=====

FLASH POINT..... None  
 FLAMMABLE LIMITS..... None  
 EXTINGUISH MEDIA..... Foam, CO2, Dry Chemical, Halon, Water Fog  
 FIRE FIGHTER PROTECTION.. Self Contained Breathing Apparatus  
 DECOMPOSITION PRODUCTS... CO, CO2  
 UNUSUAL FIRE HAZARD..... This material may be burned after evaporation of the water phase.



# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

## Hydrochem D-300

=====

### SECTION V - HEALTH HAZARD DATA

=====

ROUTES OF ENTRY..... This material may present a health hazard if it is aspirated or if the liquid contacts skin or eyes.

OVER EXPOSURE EFFECTS	INHALATION:	SKIN AND EYES	INGESTION:
	Irritation if aspirated.	Irritation	Nausea, Vomiting, Cramps, Throat and Stomach Burning Sensation.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE.. None are known.

IS ANY COMPONENT LISTED AS A CARCINOGEN?	NTP?	IARC MONOGRAPHS?	OSHA?
	No	No	No

FIRST AID PROCEDURES.....

INHALATION: (Aspiration) Move victim to fresh air. If victim has stopped breathing, give artificial respiration. Get immediate medical attention.

INGESTION: Give large amounts of water and induce vomiting. Get immediate medical attention.

EYE CONTACT: Wash eyes with large amounts of water for 15 minutes. Get medical attention.

SKIN CONTACT: Wash skin with soap and water. If irritations persists, get medical attention. Wash contaminated clothing before reuse.

=====

### SECTION VI - REACTIVITY DATA

=====

CHEMICAL STABILITY..... Stable

CONDITIONS TO AVOID..... Not Applicable

INCOMPATIBLE MATERIALS... Strong Acids and Strong Bases

DECOMPOSITION PRODUCTS... CO, CO2

HAZARDOUS POLYMERIZATION. Will not occur



# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

## Hydrochem D-300

=====

### SECTION VII - SPILL OR LEAK PROCEDURE

=====

IN CASE OF SPILL..... CONTAIN SPILL. Wear suitable protective equipment.  
Pick up spill with adsorbent material.

WASTE DISPOSAL METHOD.... Send to an approved disposal site in accordance with  
Federal, State, and Local regulations.

=====

### SECTION VIII - SPECIAL PROTECTION

=====

RESPIRATORY PROTECTION... Not normally needed.

VENTILATION..... Avoid breathing misted vapors. Ventilate as needed.

SPECIAL..... None

PROTECTIVE GLOVES..... Chemical resistant

EYE PROTECTION..... Splash proof goggles and safety glasses

OTHER PROTECTIVE  
EQUIPMENT..... Eyewash Station, Safety Shower

=====

### SECTION IX - SPECIAL PRECAUTIONS

=====

HANDLING AND STORAGE..... Do not store with Strong Acids or Strong Bases. Do  
not get in eyes, on skin, or on clothing. Keep  
containers closed.

PRECAUTIONARY MEASURES... The health and safety characteristics of this mixtur  
are not fully known. We advise that it be handled  
and managed as a hazardous substance.

All empty drums or containers should be sent to a certified reconditioner or  
certified disposal site for proper disposal. Empty containers should not be  
used in any other way. Misuse of 'empty' drums or containers has resulted in  
many serious accidents.



EPN G code  
Drums = 053-0523-100  
5 gal can 053-0523-200

# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

## Hydrochem A-239

### SECTION I - IDENTIFICATION

TRADE NAME..... Hydrochem A-239  
REVISED DATE..... February 4, 1988  
CHEMICAL NAME..... Aqueous Mixture  
CAS NUMBER..... Not Appropriate  
OSHA HAZARD CLASS..... Physical hazard - Corrosive, Health hazard - Eye hazard, Skin hazard, Kidney toxin.  
EPA HAZARD CATEGORY..... Immediate (acute) health hazard.- Corrosive  
DOT LABEL REQUIRED..... Corrosive  
EMERGENCY PHONE NUMBER... 1-800-592-4684 OR 1-915-337-4681

### SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	HAZARDOUS %	HAZARDOUS COMPONENT DATA
Isopropyl Alcohol (CAS# 67-63-0)	Conf.	OSHA (PEL): TWA = 400 ppm, 980 mg/m <sup>3</sup> . ACGIH (TLV): TWA = 400 ppm, 980 mg/m <sup>3</sup> , STEL = 500 ppm, 1,225 mg/m <sup>3</sup> .

### SECTION III - PHYSICAL DATA

BOILING POINT..... 215 Deg F  
VAPOR PRESSURE (mm Hg)... 25  
SOLUBILITY IN H<sub>2</sub>O..... Completely soluble  
APPEARANCE/ODOR..... Brown liquid / Pungent odor  
SPECIFIC GRAVITY (H<sub>2</sub>O=1). 1.1  
VOLATILITY/VOL(%)..... 60  
PH OF SOLUTION..... 2 to 3

### SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT..... None  
FLAMMABLE LIMITS..... None  
EXTINGUISH MEDIA..... Foam, CO<sub>2</sub>, Dry Chemical, Halon, Water Fog  
FIRE FIGHTER PROTECTION.. Self Contained Breathing Apparatus  
DECOMPOSITION PRODUCTS... CO, CO<sub>2</sub>  
UNUSUAL FIRE HAZARD..... This material may be burned after evaporation of the water phase.

#### D.O.T. Information

Shipping Name: Compound, Water Treating

Hazard Class: Corrosive Liquid

I.D. # NA 1760

Wt. 55 gal Drum = 511 #

5 gal can = 50 #



# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

Hydrochem A-239

## SECTION V - HEALTH HAZARD DATA

ROUTES OF ENTRY..... This material may present a health hazard if it is inhaled (aspirated) or if the liquid contacts skin or eyes.

OVER EXPOSURE  
EFFECTS

INHALATION:

Severe Nasal and  
Respiratory  
damage.

SKIN AND EYES

Severe Eye and  
Skin burns,  
possible  
ulceration.

INGESTION:

Nausea,  
Vomiting,  
Cramps,  
Throat and  
Stomach  
damage.

MEDICAL CONDITIONS

AGGRAVATED BY EXPOSURE.. None are known.

IS THIS COMPONENT  
CLASSIFIED AS A  
FLAMMABLE LIQUID?

NO

IARC MONOGRAPHS?

No

OSHA?

No

FIRST AID PROCEDURES..... INHALATION: Move victim to fresh air. If victim has stopped breathing, give artificial respiration. Get immediate medical attention.  
INGESTION: DO NOT induce vomiting. Vomiting will cause further damage to throat. Give milk of magnesia. Get immediate medical attention.  
EYE CONTACT: Immediately wash eyes with large amounts of water for 15 minutes, lifting eye lids to complete flushing. Get medical attention.  
SKIN CONTACT: Wash skin with water for 15 minutes. If irritations persists, get medical attention. Wash contaminated clothing before reuse.

## SECTION VI - REACTIVITY DATA

CHEMICAL STABILITY..... Stable  
CONDITIONS TO AVOID..... Not Applicable  
INCOMPATIBLE MATERIALS... Strong Bases (Alkaline materials)  
DECOMPOSITION PRODUCTS... CO, CO2  
HAZARDOUS POLYMERIZATION: Will not occur



# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

Hydrochem A-239

## SECTION VII - SPILL OR LEAK PROCEDURE

IN CASE OF SPILL..... CONTAIN SPILL. Wear suitable protective equipment.  
Pick up spill with adsorbent material.  
WASTE DISPOSAL METHOD.... Send to an approved disposal site in accordance with  
Federal, State, and Local regulations.

## SECTION VIII - SPECIAL PROTECTION

RESPIRATORY PROTECTION... Not normally needed.  
VENTILATION..... Avoid breathing vapors. Ventilate as needed.  
SPECIAL..... None  
PROTECTIVE GLOVES..... Chemical resistant  
EYE PROTECTION..... Splash proof goggles and safety glasses  
OTHER PROTECTIVE  
EQUIPMENT..... Eyewash Station, Safety Shower

## SECTION IX - SPECIAL PRECAUTIONS

HANDLING AND STORAGE..... Do not store with Strong Bases (Alkaline materials).  
Do not get in eyes, on skin, or on clothing. Keep  
containers closed.  
PRECAUTIONARY MEASURES... The health and safety characteristics of this mixture  
are not fully known. We advise that it be handled  
and managed as a hazardous substance.

All empty drums or containers should be sent to a certified reconditioner or  
certified disposal site for proper disposal. Empty containers should not be  
used in any other way. Misuse of empty drums or containers has resulted in  
many serious accidents.

FINA OIL AND CHEMICAL COMPANY  
8350 North Central Expressway  
Dallas, Texas 75206  
214/750-2400

MATERIAL SAFETY DATA SHEET

Date of Issue:

---

SECTION 1 - PRODUCT IDENTIFICATION

---

PRODUCT TRADE NAME: FINA Upper Cylinder Lubricant  
TRANSPORTATION EMERGENCY PH NO (CHEMTREC): (800) 424-9300  
CHEMICAL FAMILY NAME: Hydrocarbon Mixture

---

SECTION 2 - HAZARDOUS INGREDIENTS

---

Material or component	Volume (%)	TLV
NONE		

---

SECTION 3 - PHYSICAL DATA

---

VAPOR PRESSURE: Not determined  
SPECIFIC GRAVITY: (H<sub>2</sub>O=1) .88  
WATER SOLUBILITY: Negligible  
PERCENT VOLATILE: Not determined  
VAPOR DENSITY: Not determined  
EVAPORATION RATE: Not determined  
ODOR AND APPEARANCE: Light color, with sharp lube odor

---

SECTION 4 - FIRE AND EXPLOSION HAZARDS

---

FLASH POINT: (Method used - COC) 278°F  
UPPER FLAMMABLE LIMIT: Not determined  
LOWER FLAMMABLE LIMIT: Not determined  
EXTINGUISHING MEDIA: Dry Chemical, CO<sub>2</sub>, Foam, Halon, Water Fog Pattern  
SPECIAL FIREFIGHTING PROCEDURES: None  
UNUSUAL FIRE AND EXPLOSION HAZARDS: None

---

## SECTION 5 - HEALTH HAZARDS DATA

---

TLV: None established. Oil mist = 5 mg./cu. meter  
ACUTE EFFECTS OF OVEREXPOSURE:  
ORAL TOXICITY: Greater than 5000 mg./kg. in rats. Based on data from components.  
EYE IRRITATION: May cause eye irritation. Based on data from other components.  
SKIN IRRITATION: Lubricating oils are generally considered no more than mildly irritating to the skin. Prolonged and repeated contact may lead to various skin disorders, such as Dermatitis, Oil Acne or Folliculitis.  
CHRONIC EFFECTS OF OVEREXPOSURE: Signs and symptoms of chronic exposure resemble those of Acute Exposure.

---

## SECTION 6 - EMERGENCY FIRST AID PROCEDURES

---

SKIN: Wash with soap and water  
EYE: Flush with water or eyewash. See physician if irritation persists.  
INHALATION: Remove to fresh air.  
ORAL: Do not induce vomiting. In general, no treatment is necessary unless large quantities of product are ingested. However, get medical advice.

---

## SECTION 7 - REACTIVITY DATA

---

STABILITY: Stable  
INCOMPATIBILITY: Strong Oxidizers.  
POLYMERIZATION: Will not occur.  
CONDITION AND MATERIALS TO AVOID: Avoid heat, open flame and oxidizing materials.

---

## SECTION 8 - HANDLING AND STORAGE PRECAUTIONS

---

Store away from high heat and open flames.  
Disposal should be in compliance with Federal, State and local laws.

### LEGAL DISCLAIMER:

While the information herein is believed to be reliable, no guarantee is made as to its accuracy or completeness. The conditions of use, handling, storage, and disposal, and the suitability of the product for particular uses are beyond our control. Consequently, all risks involving the use of the product are assumed by the user. WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.

FINA OIL AND CHEMICAL COMPANY  
8350 North Central Expressway  
Dallas, Texas 75206  
214/750-2400

MATERIAL SAFETY DATA SHEET

Date of Issue:

---

SECTION 1 - PRODUCT IDENTIFICATION

---

PRODUCT TRADE NAME: FINA Upper Cylinder Lubricant  
TRANSPORTATION EMERGENCY PH NO (CHEMTREC): (800) 424-9300  
CHEMICAL FAMILY NAME: Hydrocarbon Mixture

---

SECTION 2 - HAZARDOUS INGREDIENTS

---

Material or component	Volume (%)	TLV
NONE		

---

SECTION 3 - PHYSICAL DATA

---

VAPOR PRESSURE: Not determined  
SPECIFIC GRAVITY: (H<sub>2</sub>O=1) .88  
WATER SOLUBILITY: Negligible  
PERCENT VOLATILE: Not determined  
VAPOR DENSITY: Not determined  
EVAPORATION RATE: Not determined  
ODOR AND APPEARANCE: Light color, with sharp lube odor

---

SECTION 4 - FIRE AND EXPLOSION HAZARDS

---

FLASH POINT: (Method used - COC) 278°F  
UPPER FLAMMABLE LIMIT: Not determined  
LOWER FLAMMABLE LIMIT: Not determined  
EXTINGUISHING MEDIA: Dry Chemical, CO<sub>2</sub>, Foam, Halon, Water Fog Pattern  
SPECIAL FIREFIGHTING PROCEDURES: None  
UNUSUAL FIRE AND EXPLOSION HAZARDS: None

---

## SECTION 5 - HEALTH HAZARDS DATA

---

TLV: None established. Oil mist = 5 mg./cu. meter  
ACUTE EFFECTS OF OVEREXPOSURE:  
ORAL TOXICITY: Greater than 5000 mg./kg. in rats. Based on data from components.  
EYE IRRITATION: May cause eye irritation. Based on data from other components.  
SKIN IRRITATION: Lubricating oils are generally considered no more than mildly irritating to the skin. Prolonged and repeated contact may lead to various skin disorders, such as Dermatitis, Oil Acne or Folliculitis.  
CHRONIC EFFECTS OF OVEREXPOSURE: Signs and symptoms of chronic exposure resemble those of Acute Exposure.

---

## SECTION 6 - EMERGENCY FIRST AID PROCEDURES

---

SKIN: Wash with soap and water  
EYE: Flush with water or eyewash. See physician if irritation persists.  
INHALATION: Remove to fresh air.  
ORAL: Do not induce vomiting. In general, no treatment is necessary unless large quantities of product are ingested. However, get medical advice.

---

## SECTION 7 - REACTIVITY DATA

---

STABILITY: Stable  
INCOMPATIBILITY: Strong Oxidizers.  
POLYMERIZATION: Will not occur.  
CONDITION AND MATERIALS TO AVOID: Avoid heat, open flame and oxidizing materials.

---

## SECTION 8 - HANDLING AND STORAGE PRECAUTIONS

---

Store away from high heat and open flames.  
Disposal should be in compliance with Federal, State and local laws.

### LEGAL DISCLAIMER:

While the information herein is believed to be reliable, no guarantee is made as to its accuracy or completeness. The conditions of use, handling, storage, and disposal, and the suitability of the product for particular uses are beyond our control. Consequently, all risks involving the use of the product are assumed by the user. WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, EXPRESS OR IMPLIED, INCLUDING THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.

## MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 10/26/82

## \*\*\*\*\* I. PRODUCT IDENTIFICATION \*\*\*\*\*

MOBIL PEGASUS 490

SUPPLIER: MOBIL OIL CORP.  
HEALTH EMERGENCY TELEPHONE: (212) 883-4411  
CHEMICAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES  
TRANSPORT EMERGENCY TELEPHONE: (800) 424-9300 (CHEMTREC)  
USE OR DESCRIPTION: GAS ENGINE OIL

## \*\*\*\*\* II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES \*\*\*\*\*

APPEARANCE: ASTM 4.0 LIQUID                      ODDOR: MILD                      PH: NA  
VISCOSITY AT 100 F, SUS: 670.0                      AT 40 C, CS: 128.0  
VISCOSITY AT 210 F, SUS: 72.0                      AT 100 C, CS: 13.6  
FLASH POINT F(C): >480(249)                      (ASTM D-92)  
MELTING POINT F(C): NA                      POUR POINT F(C): 10(-12)  
BOILING POINT F(C): > 600(316)  
RELATIVE DENSITY, 15/4 C: 0.879                      SOLUBILITY IN WATER: NEGLIGIBLE  
VAPOR PRESSURE-MM HG 20C: < .1

NA=NOT APPLICABLE    NE=NOT ESTABLISHED    D=DECOMPOSES  
FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

## \*\*\*\*\* III. INGREDIENTS \*\*\*\*\*

	WT PCT (APPROX)	EXPOSURE LIMITS MG/M3	SOURCES PPM (AND NOTES)
HAZARDOUS INGREDIENTS:			
NONE			

OTHER INGREDIENTS:  
REFINED MINERAL OILS                      >95  
ADDITIVES AND/OR OTHER INGREDIENTS,                      < 5

KEY TO SOURCES: A=ACGIH-TLV, A\*=SUGGESTED-TLV, M=MOBIL, O=OSHA  
NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS.

## \*\*\*\*\* IV. HEALTH HAZARD DATA \*\*\*\*\*

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---  
EFFECTS OF OVEREXPOSURE: NOT EXPECTED TO BE A PROBLEM.

## \*\*\*\*\* V. EMERGENCY AND FIRST AID PROCEDURES \*\*\*\*\*

--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: FLUSH WITH WATER.  
SKIN CONTACT: WASH CONTACT AREAS WITH SOAP AND WATER.  
INHALATION: NOT EXPECTED TO BE A PROBLEM.  
INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER (PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND CALL A PHYSICIAN, HOSPITAL EMERGENCY ROOM OR POISON CONTROL CENTER FOR ASSISTANCE. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

## \*\*\*\*\* VI. FIRE AND EXPLOSION HAZARD DATA \*\*\*\*\*

FLASH POINT F(C): &gt; 480(249) (ASTM D-92)

FLAMMABLE LIMITS. LEL: .6 UEL: 7.0

EXTINGUISHING MEDIA: CARBON DIOXIDE, FOAM, DRY CHEMICAL AND WATER FOG.

SPECIAL FIRE FIGHTING PROCEDURES: FOR FIRES IN ENCLOSED AREAS,

FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS.

UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE

NFPA HAZARD ID: HEALTH: 0, FLAMMABILITY: 1, REACTIVITY: 0

## \*\*\*\*\* VII. REACTIVITY DATA \*\*\*\*\*

STABILITY (THERMAL, LIGHT, ETC.): STABLE

CONDITIONS TO AVOID: EXTREME HEAT

INCOMPATIBILITY (MATERIALS TO AVOID): STRONG OXIDIZERS

HAZARDOUS DECOMPOSITION PRODUCTS: CARBON MONOXIDE.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

## \*\*\*\*\* VIII. SPILL OR LEAK PROCEDURE \*\*\*\*\*

ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE

AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE

REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING

INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE

NUMBER 800-424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT

TREATED SAWDUST, DIATOMACEOUS EARTH, ETC. SHOVEL UP AND DISPOSE OF

AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH

CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT

CHARACTERISTICS AT TIME OF DISPOSAL.

WASTE MANAGEMENT: PRODUCT IS SUITABLE FOR BURNING IN AN ENCLOSED,

CONTROLLED BURNER FOR FUEL VALUE OR DISPOSAL BY SUPERVISED

INCINERATION. SUCH BURNING MAY BE LIMITED PURSUANT TO THE RESOURCE

CONSERVATION AND RECOVERY ACT. IN ADDITION, THE PRODUCT IS

SUITABLE FOR PROCESSING BY AN APPROVED RECYCLING FACILITY OR CAN BE

DISPOSED OF AT ANY GOVERNMENT APPROVED WASTE DISPOSAL FACILITY.

USE OF THESE METHODS IS SUBJECT TO USER COMPLIANCE WITH APPLICABLE

LAWS AND REGULATIONS AND CONSIDERATION OF PRODUCT CHARACTERISTICS

AT TIME OF DISPOSAL.

## \*\*\*\*\* IX. SPECIAL PROTECTION INFORMATION \*\*\*\*\*

EYE PROTECTION: NO SPECIAL EQUIPMENT REQUIRED.

SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL

HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.

RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY

CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.

VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE

AND WITH ADEQUATE VENTILATION.

## \*\*\*\*\* X. SPECIAL PRECAUTIONS \*\*\*\*\*

NO SPECIAL PRECAUTIONS REQUIRED.

\*\*\*\*\* XI. TOXICOLOGICAL DATA \*\*\*\*\*  
---ACUTE---

ORAL TOXICITY (RATS): LD50: > 5 G/KG 0/10 RATS DIED AT THIS DOSAGE LEVEL. SLIGHTLY TOXIC (ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

DERMAL TOXICITY (RABBITS): LD50: > 2 G/KG 0/10 RABBITS DIED AT THIS DOSAGE LEVEL. SLIGHTLY TOXIC (ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

INHALATION TOXICITY (RATS): NOT APPLICABLE ---HARMFUL CONCENTRATIONS OF MISTS AND/OR VAPORS ARE UNLIKELY TO BE ENCOUNTERED THROUGH ANY CUSTOMARY OR REASONABLY FORESEEABLE HANDLING, USE, OR MISUSE OF THIS PRODUCT.

EYE IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. EYE IRRITATION SCORES: 0 AT 24 HOURS, 0 AT 48 HOURS, 0 AT 72 HOURS--- BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

SKIN IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. PRIMARY IRRITATION SCORE: 0/8---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

---CHRONIC OR SPECIALIZED (SUMMARY)---

THE BASE OILS IN THIS PRODUCT ARE SEVERELY SOLVENT REFINED AND/OR SEVERELY HYDROTREATED. TWO YEAR MOUSE SKIN PAINTING STUDIES OF SIMILAR OILS SHOWED NO EVIDENCE OF CARCINOGENIC EFFECTS. SEVERELY SOLVENT REFINED AND SEVERELY HYDROTREATED MINERAL BASE OILS HAVE BEEN TESTED AT MOBIL ENVIRONMENTAL AND HEALTH SCIENCES LABORATORY BY DERMAL APPLICATION TO RATS 5 DAYS/WEEK FOR 90 DAYS AT DOSES SIGNIFICANTLY HIGHER THAN THOSE EXPECTED DURING NORMAL INDUSTRIAL EXPOSURE. EXTENSIVE EVALUATIONS INCLUDING MICROSCOPIC EXAMINATION OF INTERNAL ORGANS AND CLINICAL CHEMISTRY OF BODY FLUIDS, SHOWED NO ADVERSE EFFECTS.

\*\*\*\*\* XII. REGULATORY INFORMATION \*\*\*\*\*

TSCA INVENTORY STATUS: ALL COMPONENTS REGISTERED.

D.O.T. SHIPPING NAME: NOT APPLICABLE

D.O.T. HAZARD CLASS: NOT APPLICABLE

US OSHA HAZARD COMMUNICATION STANDARD: PRODUCT ASSESSED IN ACCORDANCE WITH OSHA CFR 1910.1200 AND DETERMINED NOT TO BE HAZARDOUS.

RCRA INFORMATION: THE UNUSED PRODUCT, IN OUR OPINION, IS NOT SPECIFICALLY LISTED BY THE EPA AS A HAZARDOUS WASTE (40 CFR, PART 261D); DOES NOT EXHIBIT THE HAZARDOUS CHARACTERISTICS OF IGNITABILITY, CORROSIVITY, OR REACTIVITY, AND IS NOT FORMULATED WITH THE METALS CITED IN THE EP TOXICITY TEST. HOWEVER, USED PRODUCT MAY BE REGULATED.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
ZINC (ELEMENTAL ANALYSIS) (0.018 PCT)	7440-66-6	15

--- KEY TO LIST CITATIONS ---

1 = OSHA 2, 2 = ACGIH, 3 = IARC, 4 = NTP, 5 = NCI,  
6 = EPA CARC, 7 = NFPA 49, 8 = NFPA 325M, 9 = DOT HMT, 10 = CA RTK,  
11 = IL RTK, 12 = MA RTK, 13 = MN RTK, 14 = NJ RTK, 15 = MI 293,  
16 = FL RTK, 17 = PA RTK.

--- NTP, IARC, AND OSHA INCLUDE CARCINOGENIC LISTINGS ---

\*\*\*\*\*  
INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT  
WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR  
PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT  
ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL  
WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF  
MERCHANTIABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE  
USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A  
RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING  
LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING  
PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

\*\*\*\*\*  
PREPARED BY: MOBIL OIL CORPORATION  
ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ  
FOR FURTHER INFORMATION, CONTACT:  
MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL  
3225 GALLOWES ROAD, FAIRFAX, VA 22037 (703) 849-3265

\*\*\*\*\* APPENDIX \*\*\*\*\*  
FOR MOBIL USE ONLY: (FILL NO: RN612DA201) MHC: 1\* 1\* NA 0\* 0\* PPEC:  
US82-090 APPROVE REVISED: 10/26/82





**DISCHARGE PLAN GW-8  
MONUMENT GAS PLANT**

**RESPONSES TO OCD'S COMMENTS**

**RECEIVED**

APR 21 1989

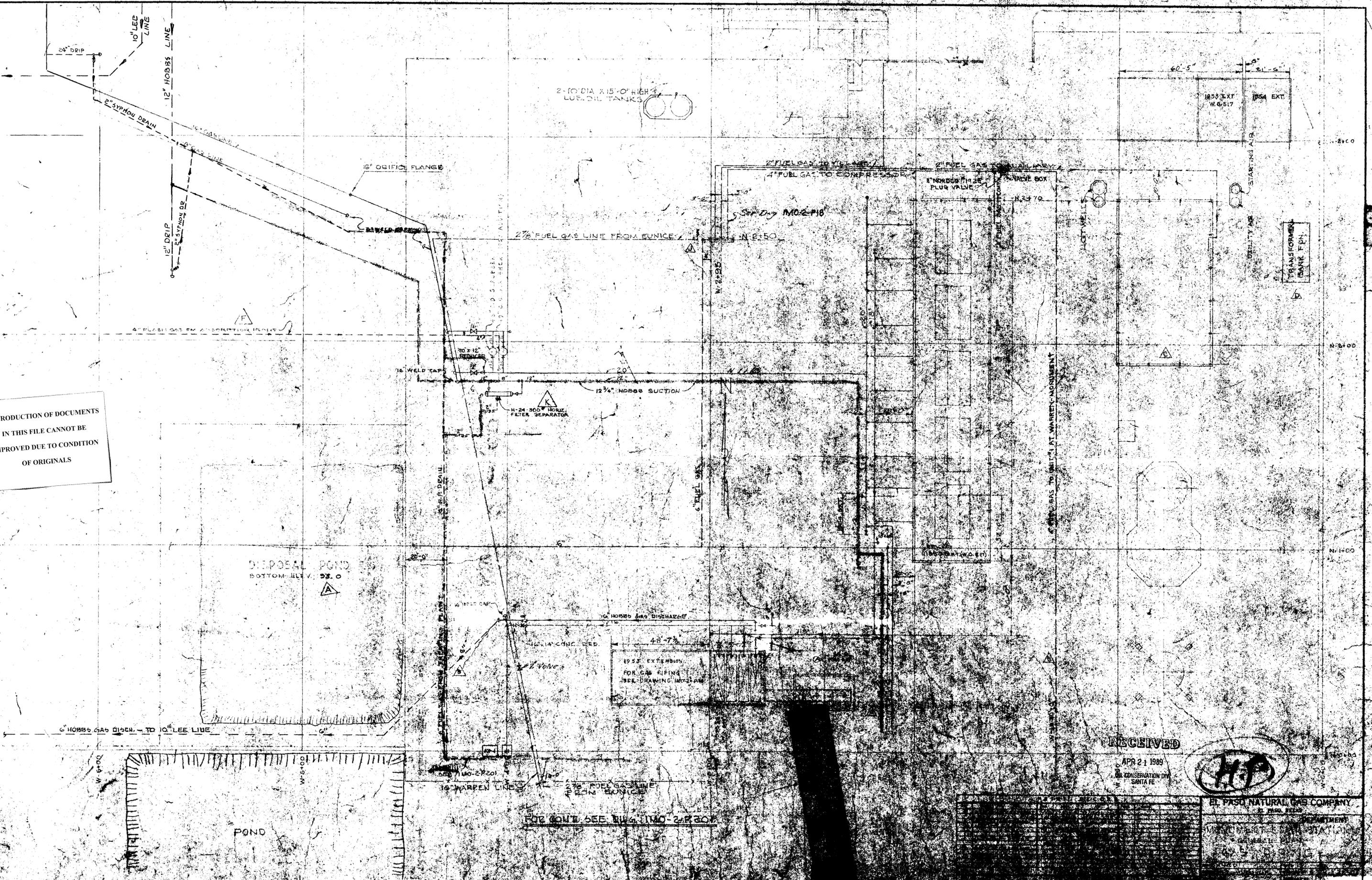
OIL CONSERVATION DIV.  
SANTA FE







REPRODUCTION OF DOCUMENTS  
IN THIS FILE CANNOT BE  
IMPROVED DUE TO CONDITION  
OF ORIGINALS



RECEIVED  
APR 21 1989  
CONSERVATION DIV  
SANTA FE



EL PASO NATURAL GAS COMPANY  
EL PASO, TEXAS

CONSERVATION DIVISION  
SANTA FE, NEW MEXICO

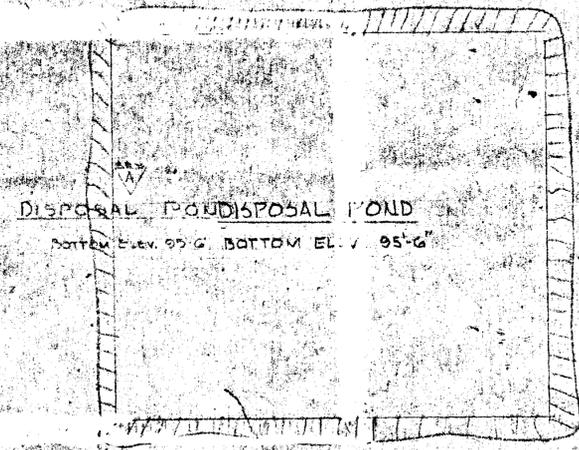
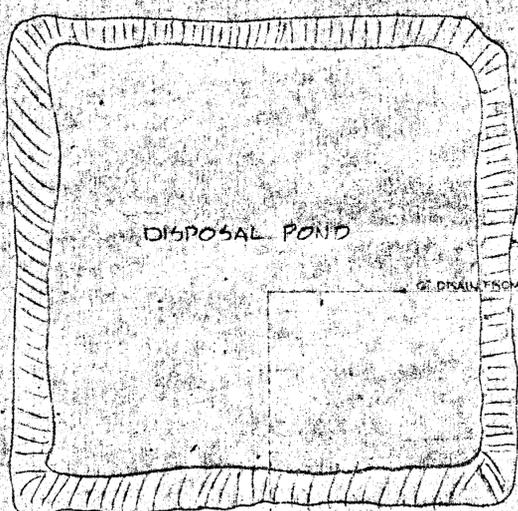
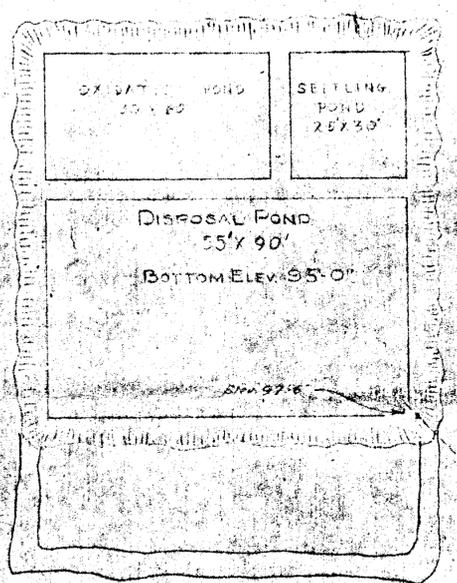
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DATE: 10/1/88

2

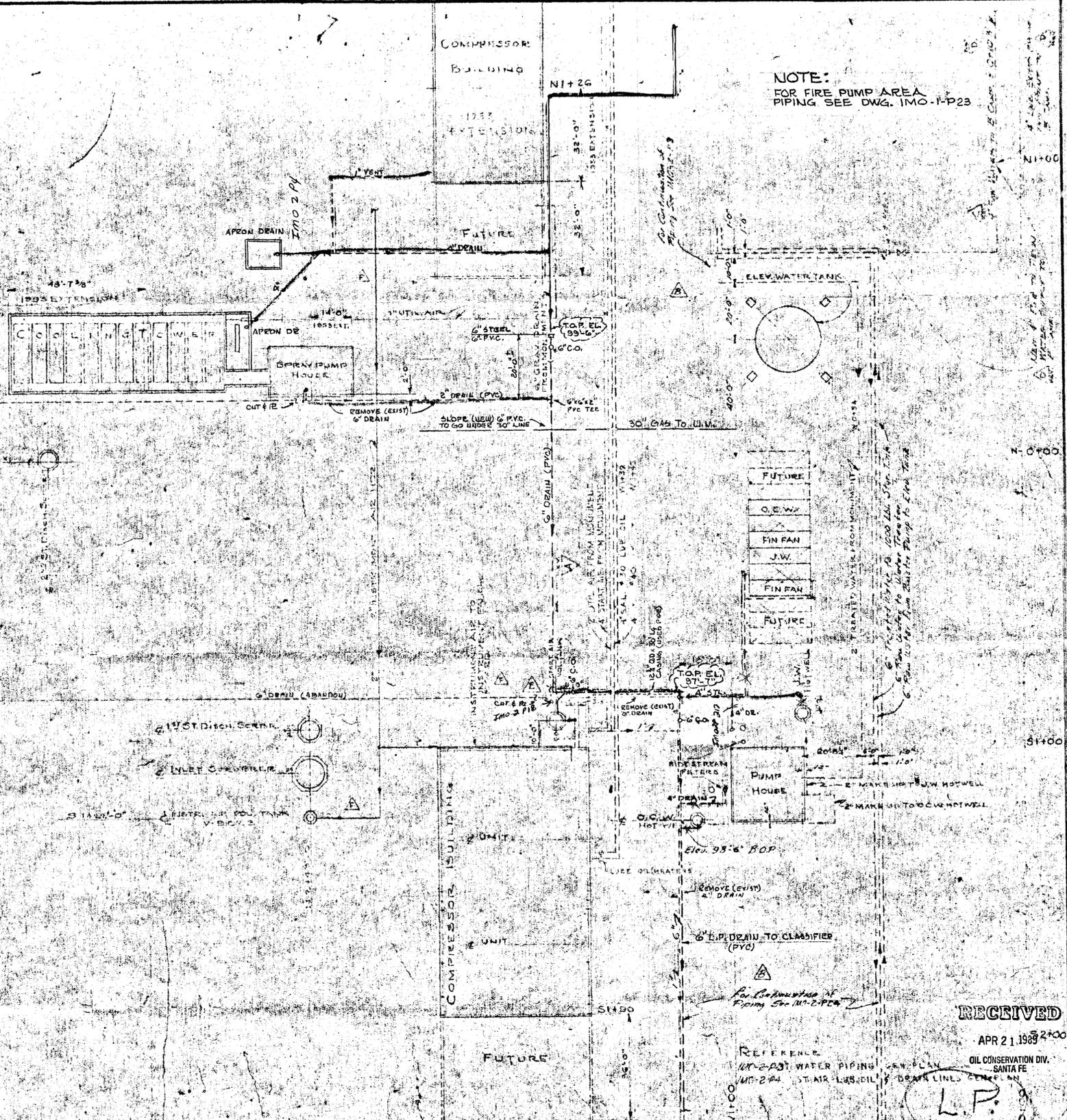
MARKED PRINT

INT





REPRODUCTION OF DOCUMENTS  
IN THIS FILE CANNOT BE  
IMPROVED DUE TO CONDITION  
OF ORIGINALS



NOTE:  
FOR FIRE PUMP AREA  
PIPING SEE DWG. IMO-1-P23

RECEIVED  
APR 21 1989 2:00

REFERENCE:  
IMO-201 WATER PIPING GEN. PLAN  
IMO-202 AIR TR. WATER, LUB. OIL LINES  
IMO-203 GRAVITY DRAIN, AIR TR. WATER, LUB. OIL LINES  
IMO-204 AIR TR. WATER, LUB. OIL LINES  
SEE IMO-1-P15

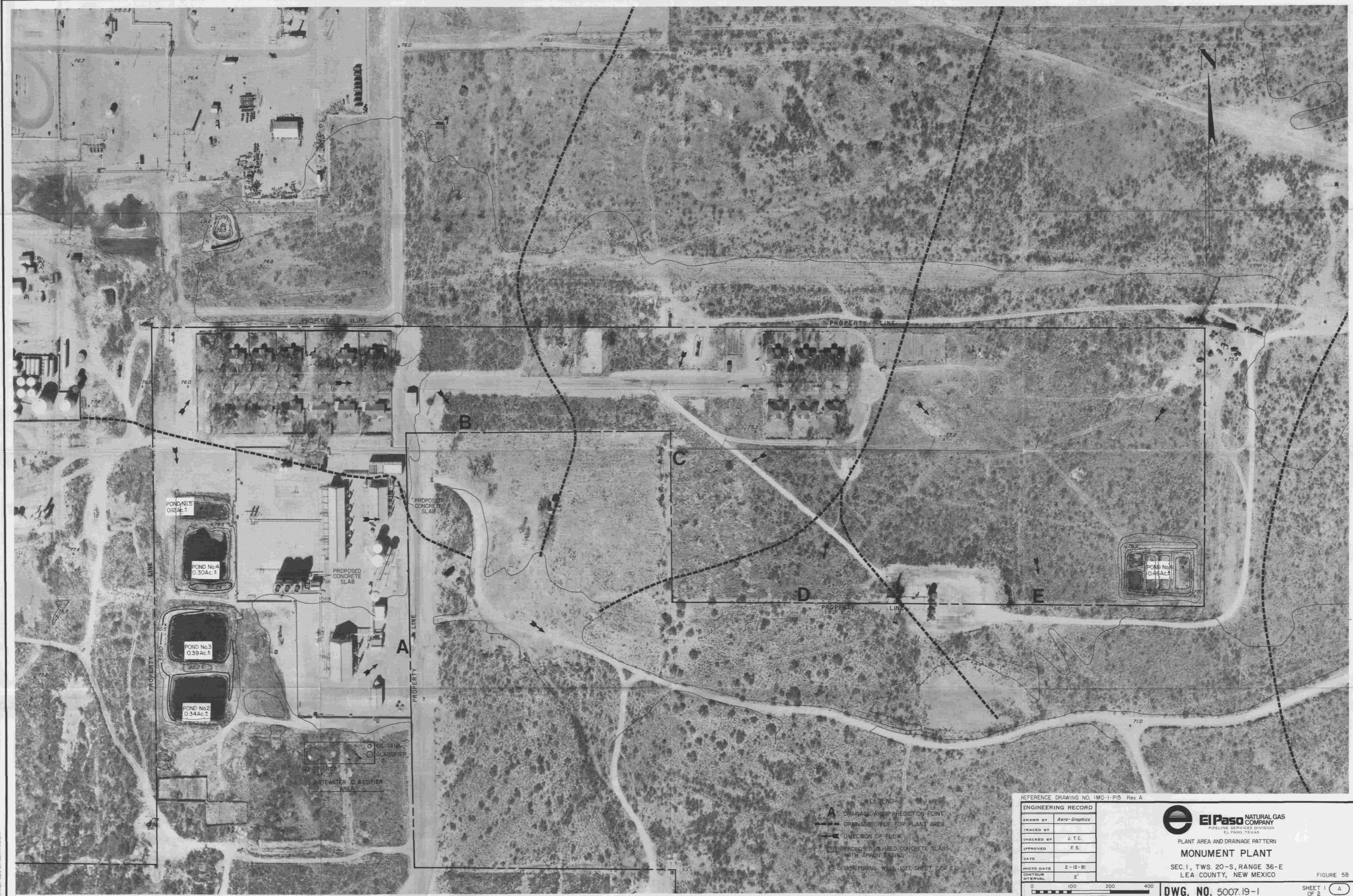
EL PASO NATURAL GAS COMPANY  
EL PASO, TEXAS

DEPARTMENT  
WARREN MONUMENT  
COMPRESSOR STATIONS  
GRAVITY DRAIN-AIR TR. WATER, LUB. OIL LINES  
GENERAL PIPING PLAN

SCALE 1" = 20'  
DATE: 4-21-88  
DRAWN BY: W.E. JR.  
CHECKED BY: [Signature]

DWG. No. IMO-2-P24  
W. O. NO. [ ]

PRINT RECORD			
NO.	DATE	TO	NO.
1	10/22/87	ISSUED	1
2	11/10/87	REVISED	2
3	12/15/87	REVISED	3
4	1/15/88	REVISED	4
5	2/15/88	REVISED	5
6	3/15/88	REVISED	6
7	4/15/88	REVISED	7
8	5/15/88	REVISED	8
9	6/15/88	REVISED	9
10	7/15/88	REVISED	10
11	8/15/88	REVISED	11
12	9/15/88	REVISED	12
13	10/15/88	REVISED	13
14	11/15/88	REVISED	14
15	12/15/88	REVISED	15
16	1/15/89	REVISED	16
17	2/15/89	REVISED	17
18	3/15/89	REVISED	18
19	4/15/89	REVISED	19
20	5/15/89	REVISED	20
21	6/15/89	REVISED	21
22	7/15/89	REVISED	22
23	8/15/89	REVISED	23
24	9/15/89	REVISED	24
25	10/15/89	REVISED	25
26	11/15/89	REVISED	26
27	12/15/89	REVISED	27
28	1/15/90	REVISED	28
29	2/15/90	REVISED	29
30	3/15/90	REVISED	30
31	4/15/90	REVISED	31
32	5/15/90	REVISED	32
33	6/15/90	REVISED	33
34	7/15/90	REVISED	34
35	8/15/90	REVISED	35
36	9/15/90	REVISED	36
37	10/15/90	REVISED	37
38	11/15/90	REVISED	38
39	12/15/90	REVISED	39
40	1/15/91	REVISED	40
41	2/15/91	REVISED	41
42	3/15/91	REVISED	42
43	4/15/91	REVISED	43
44	5/15/91	REVISED	44
45	6/15/91	REVISED	45
46	7/15/91	REVISED	46
47	8/15/91	REVISED	47
48	9/15/91	REVISED	48
49	10/15/91	REVISED	49
50	11/15/91	REVISED	50
51	12/15/91	REVISED	51
52	1/15/92	REVISED	52
53	2/15/92	REVISED	53
54	3/15/92	REVISED	54
55	4/15/92	REVISED	55
56	5/15/92	REVISED	56
57	6/15/92	REVISED	57
58	7/15/92	REVISED	58
59	8/15/92	REVISED	59
60	9/15/92	REVISED	60
61	10/15/92	REVISED	61
62	11/15/92	REVISED	62
63	12/15/92	REVISED	63
64	1/15/93	REVISED	64
65	2/15/93	REVISED	65
66	3/15/93	REVISED	66
67	4/15/93	REVISED	67
68	5/15/93	REVISED	68
69	6/15/93	REVISED	69
70	7/15/93	REVISED	70
71	8/15/93	REVISED	71
72	9/15/93	REVISED	72
73	10/15/93	REVISED	73
74	11/15/93	REVISED	74
75	12/15/93	REVISED	75
76	1/15/94	REVISED	76
77	2/15/94	REVISED	77
78	3/15/94	REVISED	78
79	4/15/94	REVISED	79
80	5/15/94	REVISED	80
81	6/15/94	REVISED	81
82	7/15/94	REVISED	82
83	8/15/94	REVISED	83
84	9/15/94	REVISED	84
85	10/15/94	REVISED	85
86	11/15/94	REVISED	86
87	12/15/94	REVISED	87
88	1/15/95	REVISED	88
89	2/15/95	REVISED	89
90	3/15/95	REVISED	90
91	4/15/95	REVISED	91
92	5/15/95	REVISED	92
93	6/15/95	REVISED	93
94	7/15/95	REVISED	94
95	8/15/95	REVISED	95
96	9/15/95	REVISED	96
97	10/15/95	REVISED	97
98	11/15/95	REVISED	98
99	12/15/95	REVISED	99
100	1/15/96	REVISED	100



POND No. 5  
0.12 Ac. ±

POND No. 4  
0.30 Ac. ±

POND No. 3  
0.39 Ac. ±

POND No. 2  
0.34 Ac. ±

OIL TANK  
CLASSIFIER

WATERWATER CLASSIFIER AREA

PROPOSED CONCRETE SLAB

POND No. 6  
0.46 Ac. ±

- LEGEND
- A DRAINAGE AREA PREDICTION POINT
  - DRAINAGE DIVIDE FOR PLANT AREA
  - DIRECTION OF FLOW
  - ▭ PROPOSED CURBED CONCRETE SLABS WITH APRON BRIMS
  - MONITORING WELL (SEE SHEET 2 OF 2)

REFERENCE DRAWING NO. 1MO-1-P15 Rev. A

ENGINEERING RECORD	
DRAWN BY	Aero-Graphics
TRACED BY	
CHECKED BY	J.T.C.
APPROVED BY	F.S.
DATE	
FIELD DATE	2-12-81
CONTOUR INTERVAL	2'

0 100 200 400  
SCALE IN FEET

**EI Paso** NATURAL GAS COMPANY  
PIPELINE SERVICES DIVISION  
EL PASO, TEXAS

PLANT AREA AND DRAINAGE PATTERN  
**MONUMENT PLANT**  
SEC. 1, TWS. 20-S, RANGE 36-E  
LEA COUNTY, NEW MEXICO

DWG. NO. 5007.19-1

FIGURE 5B  
SHEET 1 OF 2  
REV. A

Contour Lines Have Been Adjusted To Match Rectified Photo Base



REPRODUCTION BY: **aero-graphics**

Contour Lines Have Been Adjusted To Match Rectified Photo Base

- LEGEND
- A** DRAINAGE AREA PREDICTION POINT
  - DRAINAGE DIVIDE FOR PLANT AREA
  - DIRECTION OF FLOW
  - PROPOSED CURBED CONCRETE SLABS WITH APRON DRAINS (SEE SHEET 1 OF 2)
  - ⊙** MONITORING WELL

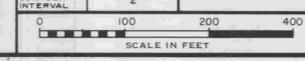
REFERENCE DRAWING NO. IMO-1-PI5 Rev. A

**ENGINEERING RECORD**

DRAWN BY	Aero-Graphics
TRACED BY	
CHECKED BY	J. T. C.
APPROVED	F. S.
DATE	
PHOTO DATE	2-12-81
CONTOUR INTERVAL	2'

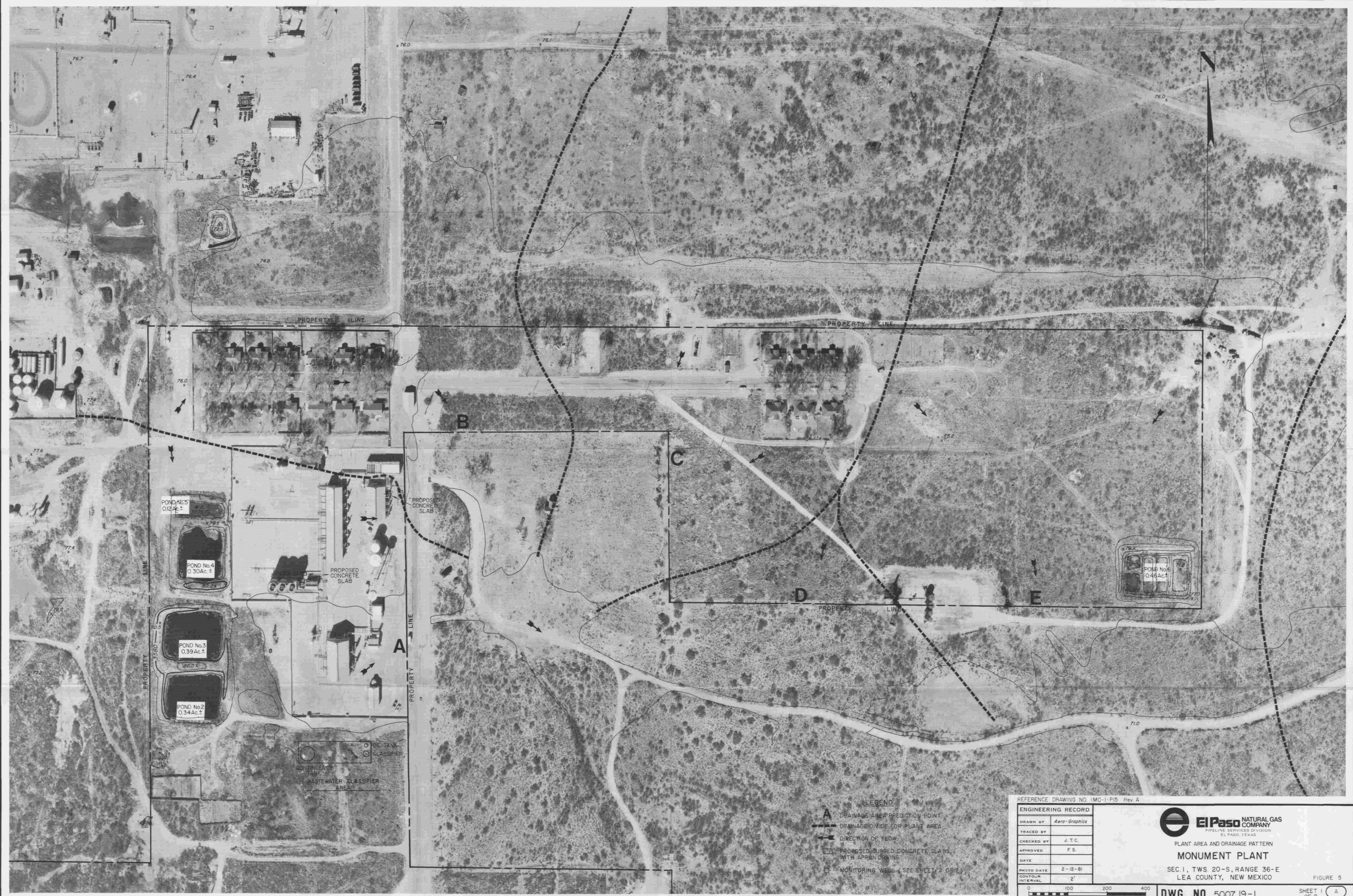


PLANT AREA AND DRAINAGE PATTERN  
**MONUMENT PLANT**  
 SEC. 1, TWS. 20-S, RANGE 36-E  
 LEA COUNTY, NEW MEXICO



**DWG. NO. 500719-1**

FIGURE 5B  
 SHEET 2 OF 2  
 REV. A



POND No. 5  
0.12 Ac. ±

POND No. 4  
0.30 Ac. ±

POND No. 3  
0.39 Ac. ±

POND No. 2  
0.34 Ac. ±

CONTINGENCY TANK

WASTEWATER CLASSIFIER AREA

○ OIL TANK

○ CLASSIFIER

PROPOSED CONCRETE SLAB

PROPOSED CONCRETE SLAB

POND No. 6  
0.46 Ac. ±

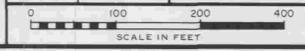
- LEGEND**
- A DRAINAGE AREA PREDICTION POINT
  - DRAINAGE DIVIDE FOR PLANT AREA
  - DIRECTION OF FLOW
  - ▭ PROPOSED CURBED CONCRETE SLABS WITH APRON DRAINS
  - MONITORING WELL (SEE SHEET 2 OF 2)

REFERENCE DRAWING NO. 1MG-1-PI5 Rev. A

ENGINEERING RECORD	
DRAWN BY	Aero-Graphics
TRACED BY	
CHECKED BY	J. T. C.
APPROVED	F. S.
DATE	
PHOTO DATE	2-12-81
CONTOUR INTERVAL	2'

**El Paso NATURAL GAS COMPANY**  
PIPELINE SERVICES DIVISION  
EL PASO, TEXAS

PLANT AREA AND DRAINAGE PATTERN  
**MONUMENT PLANT**  
SEC. 1, TWS 20-S, RANGE 36-E  
LEA COUNTY, NEW MEXICO



DWG. NO. 5007.19-1

FIGURE 5  
SHEET 1 OF 2  
REV. A

REPRODUCTION BY Aero-Graphics

Contour Lines Have Been Adjusted To Match Rectified Photo Base

Notes of Bob  
RTR

Southern Plant Tours  
11/29/88

EPN's Monument Plant  
Henry Van - EPN's EI Pass  
Tom Whaley - Lead Repairman  
Bob Sisker - Plant Supervisor  
Larry Meyer - Eng. Middlesex

Classify - Testing EQ  
Integrity - Hard open?

Cooling Tower Sample

8811291D35  
Sp. Cond. 1702  $\mu$ mhos @ 17.5°C  
Sample Co. CIA, HAN

8811291040 - Tap Water  
Sp. Cond @ 21°C

(No Sample Co.)  
Enam EPN's - CE 142, pH 7.7

Cooling Tower needs  
drinking water to prevent  
ponding. Bag of wing panels  
can be used.



New Mexico Health and Environment Department  
 SCIENTIFIC LABORATORY DIVISION  
 700 Camino de Salud NE  
 Albuquerque, NM 87106 — (505) 841-2555

860  
 WNN

**GENERAL WATER CHEMISTRY  
 and NITROGEN ANALYSIS**

DATE RECEIVED <u>12 12 188</u>	LAB NO. <u>WC-4775</u>	USER CODE <input type="checkbox"/> 59300 <input type="checkbox"/> 59600 <input checked="" type="checkbox"/> OTHER: <u>82235</u>
Collection DATE <u>12/12/88</u>	SITE INFORMATION	Sample location <u>EPNG Monument Plant</u>
Collection TIME <u>1033</u>		Collection site description <u>Cooling tower Sump</u>
Collected by Person/Agency <u>Boyer/Anderson IOCD</u>		

SEND FINAL REPORT TO  
 ENVIRONMENTAL BUREAU  
 NM OIL CONSERVATION DIVISION  
 State Land Office Bldg, PO Box 2088  
 Santa Fe, NM 87504-2088  
 Attn: David Boyer  
 Phone: 827-5812

**RECEIVED**  
 JAN 09 1989  
 OIL CONSERVATION DIVISION  
 SANTA FE

Station/well code 205, R36E, 1.1  
 Owner \_\_\_\_\_

**SAMPLING CONDITIONS**

<input type="checkbox"/> Bailed	<input type="checkbox"/> Pump	Water level	Discharge	Sample type <u>Grab</u>
<input checked="" type="checkbox"/> Dipped	<input type="checkbox"/> Tap	Conductivity (Uncorrected) <u>1700 µmho</u>	Water Temp. (00010) <u>17.5 °C</u>	Conductivity at 25°C (00094) _____ µmho
pH (00400) <u>—</u>				
Field comments				

**SAMPLE FIELD TREATMENT — Check proper boxes**

No. of samples submitted 1  NF: Whole sample (Non-filtered)  F: Filtered in field with 0.45 µm membrane filter  A: 2 ml H<sub>2</sub>SO<sub>4</sub>/L added

NA: No acid added  Other-specify: \_\_\_\_\_  A: 5ml conc. HNO<sub>3</sub> added  A: 4ml fuming HNO<sub>3</sub> added

**ANALYTICAL RESULTS from SAMPLES**

NA	Units	Date analyzed	From <u>NS</u> , NA Sample:	Date Analyzed
<input checked="" type="checkbox"/> Conductivity (Corrected) 25°C (00095)	µmho	<u>12/19</u>	<input checked="" type="checkbox"/> Calcium <u>16</u> mg/l	<u>12/05</u>
<input type="checkbox"/> Total non-filterable residue (suspended) (00530)	mg/l		<input checked="" type="checkbox"/> Potassium <u>0</u> mg/l	<u>12/1</u>
<input checked="" type="checkbox"/> Other: <u>Lab pH</u>		<u>12/15</u>	<input checked="" type="checkbox"/> Magnesium <u>6.7</u> mg/l	<u>12/05</u>
<input type="checkbox"/> Other:			<input checked="" type="checkbox"/> Sodium <u>528</u> mg/l	<u>12/11</u>
<input type="checkbox"/> Other:			<input checked="" type="checkbox"/> Bicarbonate <u>34.6</u> mg/l	<u>12/15</u>
<b>A-H<sub>2</sub>SO<sub>4</sub></b>			<input checked="" type="checkbox"/> Chloride <u>171</u> mg/l	<u>12/15</u>
<input type="checkbox"/> Nitrate-N +, Nitrate-N total (00630)	mg/l		<input checked="" type="checkbox"/> Sulfate <u>870</u> mg/l	<u>12/15</u>
<input type="checkbox"/> Ammonia-N total (00610)	mg/l		<input checked="" type="checkbox"/> Total Solids <u>1764</u> mg/l	<u>12/12</u>
<input type="checkbox"/> Total Kjeldahl-N ( )	mg/l		<input checked="" type="checkbox"/> <u>CDs</u> <u>0</u>	<u>12/15</u>
<input type="checkbox"/> Chemical oxygen demand (00340)	mg/l		<input checked="" type="checkbox"/> <u>BR</u> <u>5.56</u> µg/l	<u>12/06</u>
<input type="checkbox"/> Total organic carbon ( )	mg/l		<input checked="" type="checkbox"/> Cation/Anion Balance <u>0</u>	
<input type="checkbox"/> Other:			Analyst	Date Reported <u>1 5 89</u>
<input type="checkbox"/> Other:				Reviewed by <u>(Signature)</u>

Laboratory remarks 171

FOR OCD USE -- Date Owner Notified 2/2/89 Phone or Letter? (Letter?) Initials (Signature)

CATIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
Ca	0.80	16.00	<3.0
Mg	0.55	6.70	<0.3
Na	22.97	528.00	<10.0
K	0.20	8.00	<0.3
Mn	0.00	0.00	
Fe	0.00	0.00	
SUMS	24.52	558.70	
Total Dissolved Solids=			1764
Ion Balance =			104.27%

ANIONS			
ANALYTE	MEQ.	PPM	DET. LIMIT
HC03	0.57	34.60	<1.0
SO4	18.13	870.00	<10.0
CL	4.82	171.00	<5.0
NO3	0.00	0.00	< 0.
C03	0.00	0.00	< 1.
NH3	0.00	0.00	< 0.
PO4	0.00	0.00	< 0.
	23.52	1075.60	

WC No. = 8804775  
Date out/By vs [Signature]

**RECEIVED**  
JAN 09 1983  
OIL CONSERVATION DIVISION  
SANTA FE





STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

October 24, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Charles W. Hagan,  
Vice President, South Region  
El Paso Natural Gas Company  
P.O. Box 1492  
El Paso, TX 79978

RE: Discharge Plan Renewals  
GW-8, Monument  
GW-10, Jal No. 3  
GW-40, Eunice Mainline Engine  
Room

Dear Mr. Hagan:

The Oil Conservation Division has received your applications dated September 23, 1988 for renewal of the above-referenced discharge plans. Part of the review process includes a visit to the facilities. Members of the Environmental Bureau's staff are planning a trip to southeast New Mexico for the latter part of November and would like to include a visit to the three facilities during that time. We will be finalizing our plans the first or second week of November and I will be contacting you concerning convenient times for the visit.

After the facility visits and further OCD review of the plans, specific comments and information can be exchanged. A public notice will be published on or before November 4, 1988.

If there are any questions, please do not hesitate to call me at (505) 827-5885.

Sincerely,

Roger C. Anderson  
Environmental Engineer

RCA/ag

cc: Oil Conservation Division - Hobbs  
Donald R. Payne - EPNG  
Dr. Henry Van - EPNG

**DISCHARGE PLAN GW-8  
RENEWAL APPLICATION  
FOR  
EL PASO NATURAL GAS CO.  
MONUMENT GAS PLANT**



**LEA COUNTY, NEW MEXICO  
OCTOBER, 1988**

DISCHARGE PLAN GW-8 RENEWAL APPLICATION

FOR

EL PASO NATURAL GAS COMPANY

MONUMENT GAS PLANT

LEA COUNTY, NEW MEXICO

October 1988

Submitted to:

NEW MEXICO OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, New Mexico 87501

AFFIRMATION:

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



\_\_\_\_\_  
Signature  
A. H. Carameros  
Vice President

September 23, 1988

\_\_\_\_\_  
Date

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APPENDIX

- A MATERIAL SAFETY DATA SHEETS
- B RESULTS OF DRAIN LINE TESTING

2016 10 10 10:00 AM  
08 10 10  
100

## 1.0 EXECUTIVE SUMMARY

El Paso Natural Gas Company, P.O. Box 1492, El Paso, Texas 79978, proposes to discharge approximately 3,528,000 gallons per year of wastewater to an internally and externally epoxy-coated steel tank-type classifier. The wastewater from the classifier tank is pumped through an anthracite/rock filter and disposed in the Rice Engineering Disposal System, Monument Branch. The wastewater is generated at the Monument Plant which is located in Section 1, T-20-S, R-36-E, Lea County, New Mexico. Approximately 90% of the wastewater is blowdown from the Monument Plant's cooling tower, and 10% from domestic sewage, engine room drains and the water treater.

Presently, the Monument Plant discharges commingled wastewater into a wastewater classifier and its effluent is disposed in the Rice Engineering Disposal System. EPNG proposes to continue to discharge the Monument Plant wastewater to the classifier and to dispose the effluent from this collection system to the Rice Engineering Disposal System.

EPNG is wholly committed to carrying out sound disposal practices and to this end submits the plan outlining the proposed procedures. Likewise, EPNG is committed to cooperating fully with NMOCD in honoring requests for additional information or clarification of existing information related to the Discharge Plan.

## 2.0 GENERAL INFORMATION

### 2.1 NAME OF DISCHARGER/LEGALLY RESPONSIBLE PARTY

All correspondence regarding this discharge plan should be sent to EPNG South Region headquarters at the address below:

Charles W. Hagen  
Vice President  
South Region  
El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, TX 79978  
(915) 541-2600

### 2.2 LOCAL REPRESENTATIVE OR CONTACT

A copy of all correspondence and all questions should be directed to the South Region Compliance Engineer:

Donald R. Payne  
El Paso Natural Gas Company  
South Region  
P. O. Box 1492  
El Paso, TX 79978  
(915) 541-5399

EPNG requests that copies of correspondence also be sent to:

Environmental and Safety Affairs  
El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, TX 79978  
ATTN: H. Van  
(915) 541-2832

### 2.3 LOCATION OF DISCHARGE

The Monument Plant is located in Section 1, T-20-S, R-36-E, Lea County, New Mexico, approximately 3.5 miles southwest of Monument, New Mexico. Figures 1, 2, 3 and 6 (pp. 2, 3, 4, 5, 6, and 9) of the 1983 Discharge Plan show the location of the plant.

### 2.4 LOCAL LAND USE

The Monument Plant occupies approximately 94 acres and can be seen in the 1981 aerial photograph in Figure 2 of the 1983 Discharge Plan. However, the Plant does not have the 18-house camp for the employees. This camp has been closed permanently.

Information regarding land ownership is contained in Figure 3 (pp. 5 and 6) of the 1983 Discharge Plan.

### 2.5 DESCRIPTION OF OPERATIONS

El Paso Natural Gas Company's Monument Plant is engaged in the compression of natural gas.

The Monument Plant natural gas compression facilities consist of seven internal combustion engine compressor drives (five in "A" plant and two in "B" plant) tha total 10,500 horsepower having the capability of handling a design gas capacity of 102.81 million cubic feet of gas per day. In addition, the plant has an auxiliary generating station utilizing gas fueled engines with a total of 2,625 horsepower. Oil and jacket water is used to cool the engines. The cooling tower is used to cool the compressed gas.

Closed gas processing facilities at the Plant consist of dehydration plant, a treating plant, natural gas liquids

absorption facilities and supporting steam generation facilities. These facilities have been retired in place and dismantled in 1987.

Entrained liquids are removed from the gas stream prior to compression by one gas-liquid scrubber. The compressed gas passes through cooling coils in a mechanical draft cooling tower, then part of the gas stream passes through one gas-liquid scrubber. The remaining gas does not go through a scrubber. The primary purpose of the scrubber is to remove any small quantities of liquids from the gas stream prior to entering the mainline transportation system.

## 2.6 REGULATORY INDEX

Table 2-1 presents the regulatory index. This table provides a cross reference between WQCC Regulations and this discharge plan.

TABLE 2-1  
REGULATORY INDEX

WQCC Regulation Required in Discharge Plan	Section in Discharge Plan
1-201	1.0, 2.0
1-202	3.2.3
1-203	3.3.4
3-106 C.1	3.2
3-106 C.2	2.3, Fig. 2-1, 5.3.2.
3-106 C.3	1.0, 5.3
3-106 C.4	5.4
3-106 C.5	3.0, 4.0
3-106 C.6	5.1
3-106 C.7	7.0
3-107	6.0
3-108.B	1.0

### 3.0 EFFLUENT SOURCES, CHARACTERISTICS AND DISPOSAL

#### 3.1 WASTE SOURCES, QUANTITY AND FLOW CHARACTERISTICS

##### 3.1.1 GAS LIQUID SCRUBBER

Wastewater discharge from the scrubber is negligible.

##### 3.1.2 COOLING TOWER BLOWDOWN

The Plant cooling tower blowdown is approximately 8,690 gallons per day, or 6.03 gallons per minute.

##### 3.1.3 DOMESTIC SEWAGE

The domestic wastewater discharges from the three toilets is routed to an internally and externally epoxy-coated steel tank-type classifier. Figures 16 and 17 of the 1983 Discharge Plan show the existing wastewater-producing processes and schematic of the collection system.

##### 3.1.4 BUILDING FLOOR DRAINS

Wastewater from the building floor drains is discharged to the classifier. The volume is minimal since it consists of wastewater produced by the washing of building floors.

##### 3.1.5 WATER TREATING

Water treatment for make-up to plant process water consists of one zeolite water treater with an approximate minimum rate of 25 gallons per minute and an approximate maximum rate of 75 gallons per minute. The regeneration cycle for the treater generates approximately 576 gallons of water per day. All the water is supplied by Phillips 66 Natural Gas Company.

##### 3.1.6 STORM WATER

The arrangement of the wastewater collection/classifier system precludes the possibility of storm water run-off entering the system and appreciably changing the volume of discharge. No open drains which collect storm water are connected to the system.

## **3.2 WASTE QUANTITY AND FLOW CHARACTERISTICS**

### **3.2.1 GAS-LIQUIDS SCRUBBER**

The inlet gas is treated by the scrubber units which discharge negligible amounts of wastewater. This wastewater is discharged to the wastewater classifier system. The wastewater from the classifier is delivered to the Rice Engineering Disposal System, Monument Branch, by means of two vertical centrifugal-type pumps. The classifier system is discussed in detail in the 1983 Discharge Plan (p. 19).

### **3.2.2 COOLING TOWER BLOWDOWN**

Evaporative cooling tower water is used to cool compressed pipeline gas for transmission. Cooling tower water is recycled as much as possible, but some is blowdown and replaced to prevent TDS buildup. The blowdown is approximately 8,690 gallons per day, or 6.03 gallons per minute.

### **3.2.3 DOMESTIC SEWAGE**

About 200 gpd are generated from the three restrooms. The domestic sewage discharges to the classifier system.

### **3.2.4 BUILDING FLOOR DRAINS**

Wastewater from the building floor drains is discharged to the classifier system. The flow is minimal since it consists of wastewater produced by the washing of building floors.

### **3.2.5 STORM WATER**

Storm water is collected in open drains and discharged to grade.

### **3.2.6 WASTEWATER ANALYSIS**

Table 2 (p. 20) of the 1983 Discharge Plan contains the wastewater analyses for each stream. Chemical analyses of two composite wastewater samples are shown in Table 3 of the 1983 Discharge Plan. There is no reason to believe that the character of this waste stream has changed since the operation of this plant has not changed.

## **3.3 SPILL/LEAK PREVENTION AND HOUSEKEEPING PRACTICES**

### **3.3.1 OPERATING AND MAINTENANCE PROCEDURES**

The Monument Plant is operated in a manner to prevent and mitigate any unplanned releases to the environment. Plant processes are regularly observed by a number of personnel during daily operations, and any evidence or sign of spills or leaks

are routinely reported to supervisory personnel so that repairs or cleanup can be promptly effected. Routine maintenance procedures conducted at the Plant also help to assure that equipment remains functional and minimize the possibility of spills or leaks.

### 3.3.2 CHEMICAL AND ENVIRONMENTAL HAZARDS

Process and non-process chemicals or additives (Table 8 of the 1983 Discharge Plan) used at the Plant could present a threat to the environment only in the event of a major spill or release. Appendix A contains the new Material Safety Data Sheets for chemicals now being used not listed in the 1983 Discharge Plan. The majority of the chemicals are used in small quantities (25 gallons to 22,000 gallons per year). Hence any spills or leaks would be very small in volume and easily contained in the immediate area.

### 3.3.3 CLEANUP PROCEDURES

Cleanup procedures would obviously vary with the nature and extent of any unplanned release. Spills of acids are relatively easy to control and general procedures would include neutralization of the material in-place before a final evaluation is made on its ultimate disposal. Once neutralization is confirmed by sampling and pH determination, it is quite probable that no further actions would be required to ensure protection of human health and the environment.

Spills or leaks of hydrocarbons could potentially occur from the lube oil, or waste oil storage tanks. Lube oils are stored in 55-gallon drums. The location of these drums and the structures in the area would preclude any releases from reaching natural drainage.

### 3.3.4 REPORTING

Should a release of materials occur, EPNG will provide verbal notification to NMOCD as soon as possible after discovery as required by NMOCD and WQCC Regulation 116 and 1-203, respectively.

### 3.3.5 GENERAL HOUSEKEEPING PROCEDURES

EPNG strives to reduce the potential for spills and leaks in all areas. Existing records and interviews with plant personnel indicate that no reportable spills have occurred at Monument Plant.

Non-process chemicals are used in relatively small quantities at the Plant and are managed in a manner to prevent discharges to the environment. Any chemical spills which might occur would be

immediately contained and disposed of according to proper guidelines.

TABLE 3-1

CHEMICALS USED AT THE MONUMENT PLANT  
(AVERAGE ANNUAL AMOUNTS)

COOLING TOWERS

✓ Antipol-640	Anti-corrosion	548 gal
Hydrochem D-300	Dispersant	30 lbs
✓ Chlorine (HTH)	Biocide	1,500 gal
✓ Sulfuric Acid	pH Control	60 gal
✓ Toxene 35	Biocide	24 gal

CLOSED JACKET AND OIL COOLING WATER SYSTEM

✓ Chromine-T	Corrosion Inhibitor	
Hydrochem A-239 inc	pH Control	30 gal

LUBE OIL

✓ Molylube 890	Gear Boxes Lubrication	42 gal
Fina Upper Cylinder Lube	Lubricant	
Mobil Pegasus 90 (40 wt)	Crankcase Lubricant	18,000 gal

DEGREASER

✓ Mark II	Degreaser for Plant Floors	84 gal
✓ Varsol	General Purpose Solvent Cleaner	2,400 gal

WATER TREATING

✓ Brine (10#)	Zeolite Regeneration	22,050 gal
---------------	----------------------	------------

HERBICIDES

✓ Hyvar	Weed Killer	Unknown Amount
✓ Karmex	Weed Killer	Unknown Amount
✓ Krovar II	Weed Killer	Unknown Amount

4.0 EFFLUENT DISPOSAL

4.1 EXISTING OPERATIONS

EPNG disposes of all industrial aqueous wastes in an on-site internally and externally epoxy-coated steel tank-type

classifier. Figures 16 and 17 (pp. 32 and 33) of the 1983 Discharge Plan show the existing wastewater-producing processes

and the collection system in schematic forms. No changes have been made to this system since 1983.

#### 4.2 OFF-SITE DISPOSAL

Industrial and domestic refuse generated in the Plant is being pumped through an anthracite/rock filter, then metered and disposed of in the Rice Engineering Disposal System, Monument Branch. El Paso began delivering wastewater to the Rice Engineering system in October 1982. The industrial solid waste is comprised of used oil filters from compressor engines and office garbage. All the solid waste is hauled and disposed in the City of Hobbs landfill.

#### 4.3 PROPOSED MODIFICATIONS

EPNG proposes to continue to discharge its wastewater generated at the Monument Plant to the classifier located on the Plant property and the classifier effluent discharged to Rice Engineering Disposal System, Monument Branch.

#### 5.0 SITE CHARACTERISTICS

Site characteristics of the Monument Plant area are described in the 1983 Discharge Plan (pp. 39-43).

##### 5.1 REGIONAL GEOLOGY

The regional geology is described in the 1983 Discharge Plan (pp. 39-41).

##### 5.2 LOCAL GEOLOGY

The local geology is described in the 1983 Discharge Plan (pp. 39-41).

##### 5.3 REGIONAL AND LOCAL HYDROLOGY AND GROUNDWATER QUALITY

The regional and local hydrology and groundwater quality is discussed in the 1983 Discharge Plan (pp. 42-46).

##### 5.4 SURFACE WATER HYDROLOGY AND FLOODING POTENTIAL

The surface water hydrology and flooding potential of the Monument Plant is described in the 1983 Discharge Plan (pp. 25 and 29).

## 6.0 MONITORING AND REPORTING

Because the "discharge site" is under the care and control of Rice Engineering, El Paso will perform the following evaluation to ensure that the wastewater collection systems operated by El Paso in the Plant do not also become "discharge sites." The Plant underground drain systems (shown in Figure 22 of the 1983 Discharge Plan, Map Pocket) will be tested to ensure the integrity of the drain system. Appendix B contains the 1988 results of the pressure testing of the drain lines. Test procedures are structured so that each line is pressure tested for a specified time period to verify that no line is leaking. Any leaks identified will be repaired. The drain line test procedure is found in Appendix J of the 1983 Discharge Plan.

Annual sampling and analysis of the wastewater stream (classifier effluent) delivered to the disposal system will be conducted and a Plant file maintained. A monthly report to NMOCD on Form C 120-8, describing disposal volumes, is now being submitted. The wastewater flow records will be periodically reviewed to determine if any unexplained changes in disposal volumes have developed. If any such anomalies occur, an inspection of the collection system will be conducted to identify the cause. Any records related to integrity testing and waste characteristics will be retained by El Paso for five years.

Sludge will be removed from the cooling tower basin and the classifier as needed and will be evaluated and disposed of in an approved landfill. Any changes, anticipated or otherwise, to the disposal system will, of course, be reported to NMOCD.

## 7.0 BASIS FOR APPROVAL

The existing site conditions and proposed continued use of the present wastewater disposal system at the EPNG Monument Plant act together to ensure that there will be no present or future adverse effects to groundwater as a result of discharges to existing wastewater management units. No present or future users of groundwater in the Plant area would be affected by the facility's waste management practices for the following reasons:

- o EPNG proposed to continue using existing waste management units and their effluent discharged to the Rice Engineering Disposal System, Monument Branch.
- o There is no significant potential for wastewater release due to flooding by a 100-year storm (1983 Discharge Plan, pp. 25 and 29).

8.0 REFERENCES CITED

EPNG Discharge Plan for Monument Plant, Lea County, New Mexico, August 1983.

Handwritten notes on the left side of the page, including the word "plant" and other illegible scribbles.

Handwritten notes on the right side of the page, including the word "plant" and other illegible scribbles.

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APPENDIX A

MATERIAL SAFETY DATA SHEETS



EPN G Code  
Drums = 053-0523-100  
5 gal can 053-0523-200

# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

## Hydrochem A-239

### SECTION I - IDENTIFICATION

TRADE NAME..... Hydrochem A-239  
 REVISED DATE..... February 4, 1988  
 CHEMICAL NAME..... Aqueous Mixture  
 CAS NUMBER..... Not Appropriate  
 OSHA HAZARD CLASS..... Physical hazard - Corrosive, Health hazard - Eye hazard, Skin hazard, Kidney toxin.  
 EPA HAZARD CATEGORY..... Immediate (acute) health hazard - Corrosive  
 DOT LABEL REQUIRED..... Corrosive  
 EMERGENCY PHONE NUMBER... 1-800-592-4684 OR 1-915-337-4681

### SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	HAZARDOUS %	HAZARDOUS COMPONENT DATA
Isopropyl Alcohol (CAS# 67-63-0)	Conf.	OSHA (PEL): TWA = 400 ppm, 980 mg/m <sup>3</sup> . ACGIH (TLV): TWA = 400 ppm, 980 mg/m <sup>3</sup> , STEL = 500 ppm, 1,225 mg/m <sup>3</sup> .

### SECTION III - PHYSICAL DATA

BOILING POINT..... 216 Deg F  
 VAPOR PRESSURE (mm Hg)... 25  
 SOLUBILITY IN H<sub>2</sub>O..... Completely soluble  
 APPEARANCE/ODOR..... Brown liquid / Pungent odor  
 SPECIFIC GRAVITY (H<sub>2</sub>O=1). 1.1  
 VOLATILITY/VOL (%)..... 60  
 PH OF SOLUTION..... 2 to 3

### SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT..... None  
 FLAMMABLE LIMITS..... None  
 EXTINGUISH MEDIA..... Foam, CO<sub>2</sub>, Dry Chemical, Halon, Water Fog  
 FIRE FIGHTER PROTECTION.. Self Contained Breathing Apparatus  
 DECOMPOSITION PRODUCTS... CO, CO<sub>2</sub>  
 UNUSUAL FIRE HAZARD..... This material may be burned after evaporation of the water phase.

#### D.O.T. Information

Shipping Name: Compound, Water Treating

Hazard Class: Corrosive Liquid

I.D. # NA 1760

Wt. 55 gal Drum = 511 #

5 gal Can = 50 #



# Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760 • (915) 337-4681

Hydrochem A-239

## SECTION VII - SPILL OR LEAK PROCEDURE

IN CASE OF SPILL..... CONTAIN SPILL. Wear suitable protective equipment.  
Pick up spill with adsorbent material.  
WASTE DISPOSAL METHOD.... Send to an approved disposal site in accordance with  
Federal, State, and Local regulations.

## SECTION VIII - SPECIAL PROTECTION

RESPIRATORY PROTECTION... Not normally needed.  
VENTILATION..... Avoid breathing vapors. Ventilate as needed.  
SPECIAL..... None  
PROTECTIVE GLOVES..... Chemical resistant  
EYE PROTECTION..... Splash proof goggles and safety glasses  
OTHER PROTECTIVE  
EQUIPMENT..... Eyewash Station, Safety Shower

## SECTION IX - SPECIAL PRECAUTIONS

HANDLING AND STORAGE..... Do not store with Strong Bases (Alkaline materials).  
Do not get in eyes, on skin, or on clothing. Keep  
containers closed.  
PRECAUTIONARY MEASURES... The health and safety characteristics of this mixture  
are not fully known. We advise that it be handled  
and managed as a hazardous substance.

All empty drums or containers should be sent to a certified reconditioner or  
certified disposal site for proper disposal. Empty containers should not be  
used in any other way. Misuse of empty drums or containers has resulted in  
many serious accidents.

## MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 08/23/83

\*\*\*\*\* I. PRODUCT IDENTIFICATION \*\*\*\*\*  
MOBIL PEGASUS 485

SUPPLIER: MOBIL OIL CORP.  
CHEMICAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES  
USE OR DESCRIPTION: INDUSTRIAL LUBRICANT

HEALTH EMERGENCY TELEPHONE: (212) 883-4411  
TRANSPORT EMERGENCY TELEPHONE: (800) 424-9300 (CHEMTREC)  
PRODUCT TECHNICAL INFORMATION: (800) 662-4525

## \*\*\*\*\* II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES \*\*\*\*\*

APPEARANCE: ASTM 5.0 LIQUID                      ODOR: MILD                      PH: NA  
VISCOSITY AT 100 F, SUS: 650.0                      AT 40 C, CS: 72.0  
VISCOSITY AT 210 F, SUS: 70.0                      AT 100 C, CS: 13.0  
FLASH POINT F(C): 480(249)                      (ASTM D-92)  
MELTING POINT F(C): NA                      POUR POINT F(C): 10(-12)  
BOILING POINT F(C): > 600(316)  
RELATIVE DENSITY, 15/4 C: 0.89                      SOLUBILITY IN WATER: NEGLIGIBLE  
VAPOR PRESSURE-MM HG 20C: < .1

NA=NOT APPLICABLE    NE=NOT ESTABLISHED    D=DECOMPOSES  
FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

## \*\*\*\*\* III. INGREDIENTS \*\*\*\*\*

	WT PCT (APPROX)	EXPOSURE LIMITS MG/M3	SOURCES PPM (AND NOTES)
HAZARDOUS INGREDIENTS:			
NONE			

OTHER INGREDIENTS:  
REFINED MINERAL OILS                      >90  
ADDITIVES AND/OR OTHER INGREDIENTS.                      <10

KEY TO SOURCES: A=ACGIH-TLV, A\*=SUGGESTED-TLV, M=MOBIL, O=OSHA  
NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS.

## \*\*\*\*\* IV. HEALTH HAZARD DATA \*\*\*\*\*

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---  
EFFECTS OF OVEREXPOSURE: NOT EXPECTED TO BE A PROBLEM.

## \*\*\*\*\* V. EMERGENCY AND FIRST AID PROCEDURES \*\*\*\*\*

--- FOR PRIMARY ROUTES OF ENTRY ---  
EYE CONTACT: FLUSH WITH WATER.  
SKIN CONTACT: WASH CONTACT AREAS WITH SOAP AND WATER.  
INHALATION: NOT EXPECTED TO BE A PROBLEM.  
INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER (PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND CALL A PHYSICIAN, HOSPITAL EMERGENCY ROOM OR POISON CONTROL CENTER FOR ASSISTANCE. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

\*\*\*\*\* VI. FIRE AND EXPLOSION HAZARD DATA \*\*\*\*\*

FLASH POINT F(C): 480(249) (ASTM D-92)  
FLAMMABLE LIMITS, LEL: .6 UEL: 7.0  
EXTINGUISHING MEDIA: CARBON DIOXIDE, FOAM, DRY CHEMICAL AND WATER FOG.  
SPECIAL FIRE FIGHTING PROCEDURES: FOR FIRES IN ENCLOSED AREAS,  
FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS.  
UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE  
NFPA HAZARD ID: HEALTH: 0, FLAMMABILITY: 1, REACTIVITY: 0

\*\*\*\*\* VII. REACTIVITY DATA \*\*\*\*\*

STABILITY (THERMAL, LIGHT, ETC.): STABLE  
CONDITIONS TO AVOID: EXTREME HEAT  
INCOMPATIBILITY (MATERIALS TO AVOID): STRONG OXIDIZERS  
HAZARDOUS DECOMPOSITION PRODUCTS: CO.  
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

\*\*\*\*\* VIII. SPILL OR LEAK PROCEDURE \*\*\*\*\*

ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE  
AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE  
REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING  
INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE  
NUMBER 800-424-8802.  
PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT  
TREATED SAWDUST, DIATOMACEOUS EARTH, ETC. SHOVEL UP AND DISPOSE OF  
AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH  
CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT  
CHARACTERISTICS AT TIME OF DISPOSAL.  
WASTE MANAGEMENT: PRODUCT IS SUITABLE FOR BURNING IN AN ENCLOSED,  
CONTROLLED BURNER FOR FUEL VALUE OR DISPOSAL BY SUPERVISED  
INCINERATION. SUCH BURNING MAY BE LIMITED PURSUANT TO THE RESOURCE  
CONSERVATION AND RECOVERY ACT. IN ADDITION, THE PRODUCT IS  
SUITABLE FOR PROCESSING BY AN APPROVED RECYCLING FACILITY OR CAN BE  
DISPOSED OF AT ANY GOVERNMENT APPROVED WASTE DISPOSAL FACILITY.  
USE OF THESE METHODS IS SUBJECT TO USER COMPLIANCE WITH APPLICABLE  
LAWS AND REGULATIONS AND CONSIDERATION OF PRODUCT CHARACTERISTICS  
AT TIME OF DISPOSAL.

\*\*\*\*\* IX. SPECIAL PROTECTION INFORMATION \*\*\*\*\*

EYE PROTECTION: NO SPECIAL EQUIPMENT REQUIRED.  
SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL  
HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.  
RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY  
CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.  
VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE  
AND WITH ADEQUATE VENTILATION.

\*\*\*\*\* X. SPECIAL PRECAUTIONS \*\*\*\*\*

NO SPECIAL PRECAUTIONS REQUIRED.

## \*\*\*\*\* XI. TOXICOLOGICAL DATA \*\*\*\*\*

## ---ACUTE---

ORAL TOXICITY (RATS): SLIGHTLY TOXIC(ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

DERMAL TOXICITY (RABBITS): SLIGHTLY TOXIC(ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

INHALATION TOXICITY (RATS): NOT APPLICABLE ---HARMFUL CONCENTRATIONS OF MISTS AND/OR VAPORS ARE UNLIKELY TO BE ENCOUNTERED THROUGH ANY CUSTOMARY OR REASONABLY FORESEEABLE HANDLING, USE, OR MISUSE OF THIS PRODUCT.

EYE IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

SKIN IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

## ---CHRONIC OR SPECIALIZED (SUMMARY)---

THE BASE OILS IN THIS PRODUCT ARE SEVERELY SOLVENT REFINED AND/OR SEVERELY HYDROTREATED. TWO YEAR MOUSE SKIN PAINTING STUDIES OF SIMILAR OILS SHOWED NO EVIDENCE OF CARCINOGENIC EFFECTS. SEVERELY SOLVENT REFINED AND SEVERELY HYDROTREATED MINERAL BASE OILS HAVE BEEN TESTED AT MOBIL ENVIRONMENTAL AND HEALTH SCIENCES LABORATORY BY DERMAL APPLICATION TO RATS 5 DAYS/WEEK FOR 90 DAYS AT DOSES SIGNIFICANTLY HIGHER THAN THOSE EXPECTED DURING NORMAL INDUSTRIAL EXPOSURE. EXTENSIVE EVALUATIONS INCLUDING MICROSCOPIC EXAMINATION OF INTERNAL ORGANS AND CLINICAL CHEMISTRY OF BODY FLUIDS, SHOWED NO ADVERSE EFFECTS.

## \*\*\*\*\* XII. REGULATORY INFORMATION \*\*\*\*\*

TSCA INVENTORY STATUS: ALL COMPONENTS REGISTERED.

D.O.T. SHIPPING NAME: NOT APPLICABLE

D.O.T. HAZARD CLASS: NOT APPLICABLE

US OSHA HAZARD COMMUNICATION STANDARD: PRODUCT ASSESSED IN ACCORDANCE WITH OSHA CFR 1910.1200 AND DETERMINED NOT TO BE HAZARDOUS.

RCRA INFORMATION: THE UNUSED PRODUCT, IN OUR OPINION, IS NOT SPECIFICALLY LISTED BY THE EPA AS A HAZARDOUS WASTE (40 CFR, PART 261D); DOES NOT EXHIBIT THE HAZARDOUS CHARACTERISTICS OF IGNITABILITY, CORROSIVITY, OR REACTIVITY, AND IS NOT FORMULATED WITH THE METALS CITED IN THE EP TOXICITY TEST. HOWEVER, USED PRODUCT MAY BE REGULATED.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
ZINC (ELEMENTAL ANALYSIS) (0.025 PCT)	7440-66-6	15

## --- KEY TO LIST CITATIONS ---

1 = OSHA Z, 2 = ACGIH, 3 = IARC, 4 = NTP, 5 = NCI,  
6 = EPA CARC, 7 = NFPA 49, 8 = NFPA 325M, 9 = DOT HMT, 10 = CA RTK,  
11 = IL RTK, 12 = MA RTK, 13 = MN RTK, 14 = NJ RTK, 15 = MI 293,  
16 = FL RTK, 17 = PA RTK.

--- NTP, IARC, AND OSHA INCLUDE CARCINOGENIC LISTINGS ---

\*\*\*\*\*  
INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

\*\*\*\*\*  
PREPARED BY: MOBIL OIL CORPORATION  
ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ  
FOR FURTHER INFORMATION, CONTACT:  
MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL  
3225 GALLOWS ROAD, FAIRFAX, VA 22037 (703) 849-3265

\*\*\*\*\* APPENDIX \*\*\*\*\*  
FOR MOBIL USE ONLY: (FILL NO: RN1022D1001) MHC: 1\* 1\* NA 0\* 0\* PPEC:  
US83-002 APPROVE REVISED: 08/23/83



APPENDIX B  
RESULTS  
OF  
DRAIN LINE TESTING

TO Larry Meyer  
FROM Johnny M. Owen

DATE September 21, 1988  
PLACE Pipeline Maintenance

RE: DRAIN LINE TESTS

JAL #3 Drain Lines

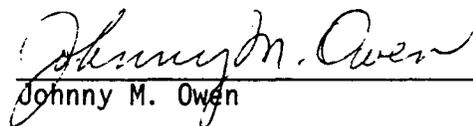
Replaced all bad pipe that was found during test of these lines. All drain lines were tested for one hour. All tests showed no leaks.

EUNICE PLANT Drain Lines

Replaced all bad pipe that was found during test of these lines. All drain lines were tested for one hour. All tests showed no leaks.

MONUMENT PLANT Drain Lines

All drain lines are in good shape at Monument. No pipe was replaced at this plant. All pipe was tested for one hour. All tests showed no leaks.

  
\_\_\_\_\_  
Johnny M. Owen

ps

cc: File

## MONUMENT DRAIN LINES

### 6" ODL from Apron Drain at Auxiliary Building to Classifier

1. Plug with 2" expandable plug in apron drain at Aux. Building.
- 1a Close air tank valve.
2. Plug discharge off sump pump.
3. Plug 1" vent line off "A" Compressor Building.
4. Pull flapper out of check valve.
5. Install expandable plug.
6. Install expandable plug.
7. Close 1" valve off cooling tower blowdown.
8. Close valve on air tank "B" Plant.
9. Plug discharge off sump pump.
10. Pull flapper out of 4" check valve.
11. Close 2" valve inside building on funnel drain.
12. Install 6" blind at classifier.
13. There is a 6" blind stays in this set of flanges at all times.
14. Close 4" valve off tank. Plug 2" vent line, blind 4" flange off top of tank.
15. Close valve off regulator.
16. Close valve off by-pass.

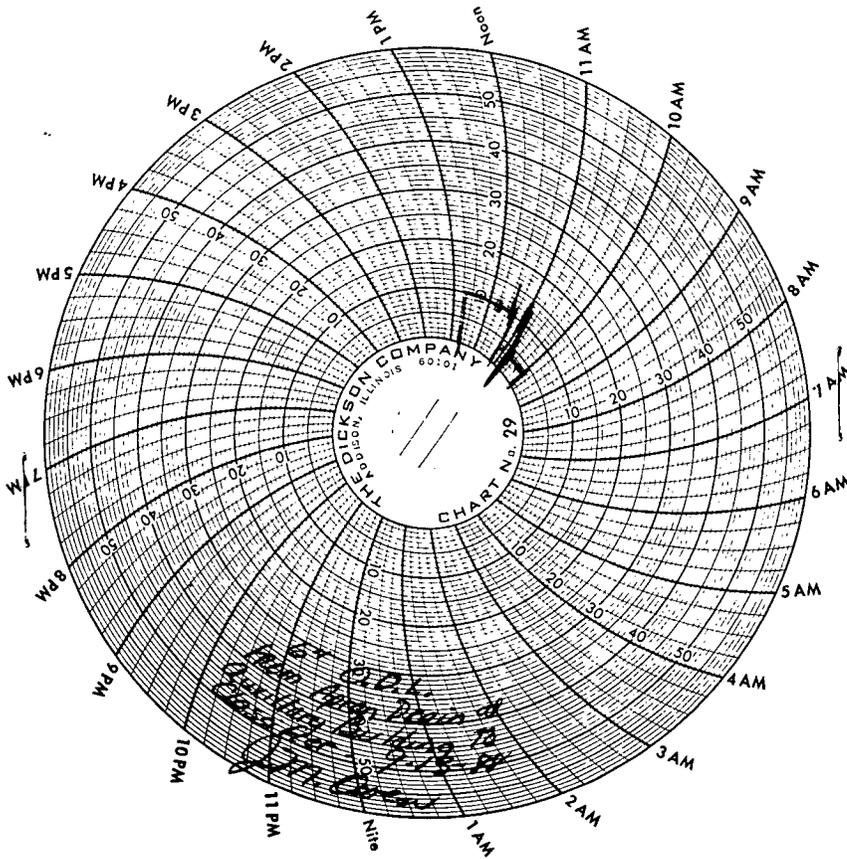
**REMARKS:** Side stream filters and all vessels at auxiliary are not tied into drain system. Three inch line from apron drain ties into the 6" drain system. The 2" line that shows going to "A" Compressor sump is no longer in service. The 1" line that shows going from southwest corner of "A" compressor does not exist. All lines around pump house and fin fans are tied into a closed system and do not drain into the 6" O.D.L.

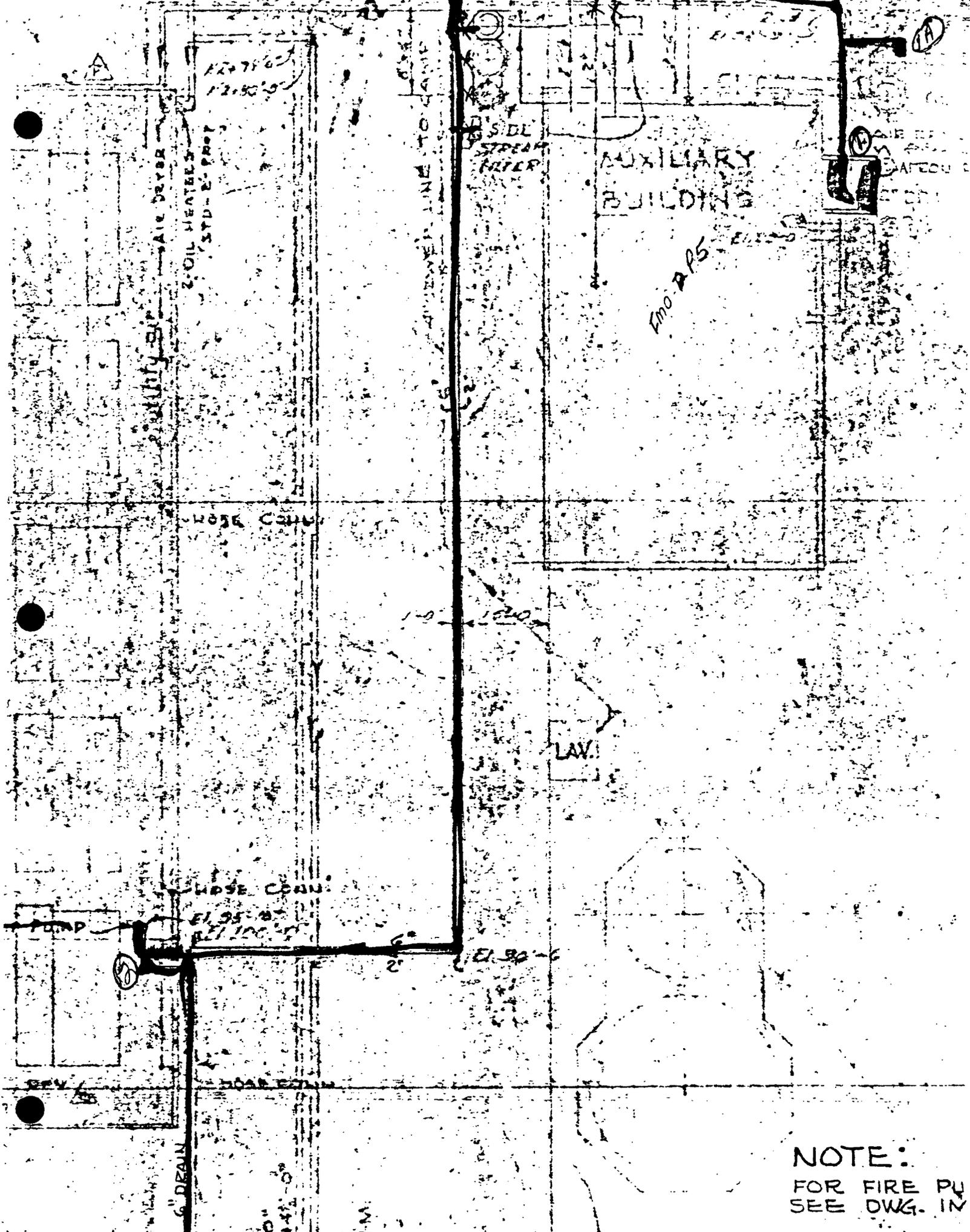
TEST PRESSURE: 10# - 1 Hour

DATE TESTED: Sept. 13, 1988

TESTED BY: Johnny M. Owen - E.P.N.G.  
Mike Hall - Merryman Construction

MONUMENT DRAIN LINES





SALE DRYER  
2 OIL HEATERS  
STD-E-PROT

SIDE  
STREAM  
FILTER

AUXILIARY  
BUILDING

IMO APS

HOSE CONN.

HOSE CONN.

EL. 95'-0"  
EL. 100'-0"

EL. 90'-0"

LAV.

6" DRAIN

10" J-44'-0"

Y.M.

NOTE:  
FOR FIRE PU  
SEE DWG. IN

COOLING TOWER

APRON DE

4" DRAIN

REMOVE (EXIST) 6" DRAIN

SLOPE (NEW) 6" P.V.C. UNDER 30 LINS

6" OIL LINE

SEWAGE LINE

DRAIN LINE

SEE MO-2-P

W. 3' 00"

20' 0"

MO-2-P4

3

1" vent

6" DRAIN

4" VENT

CHECK

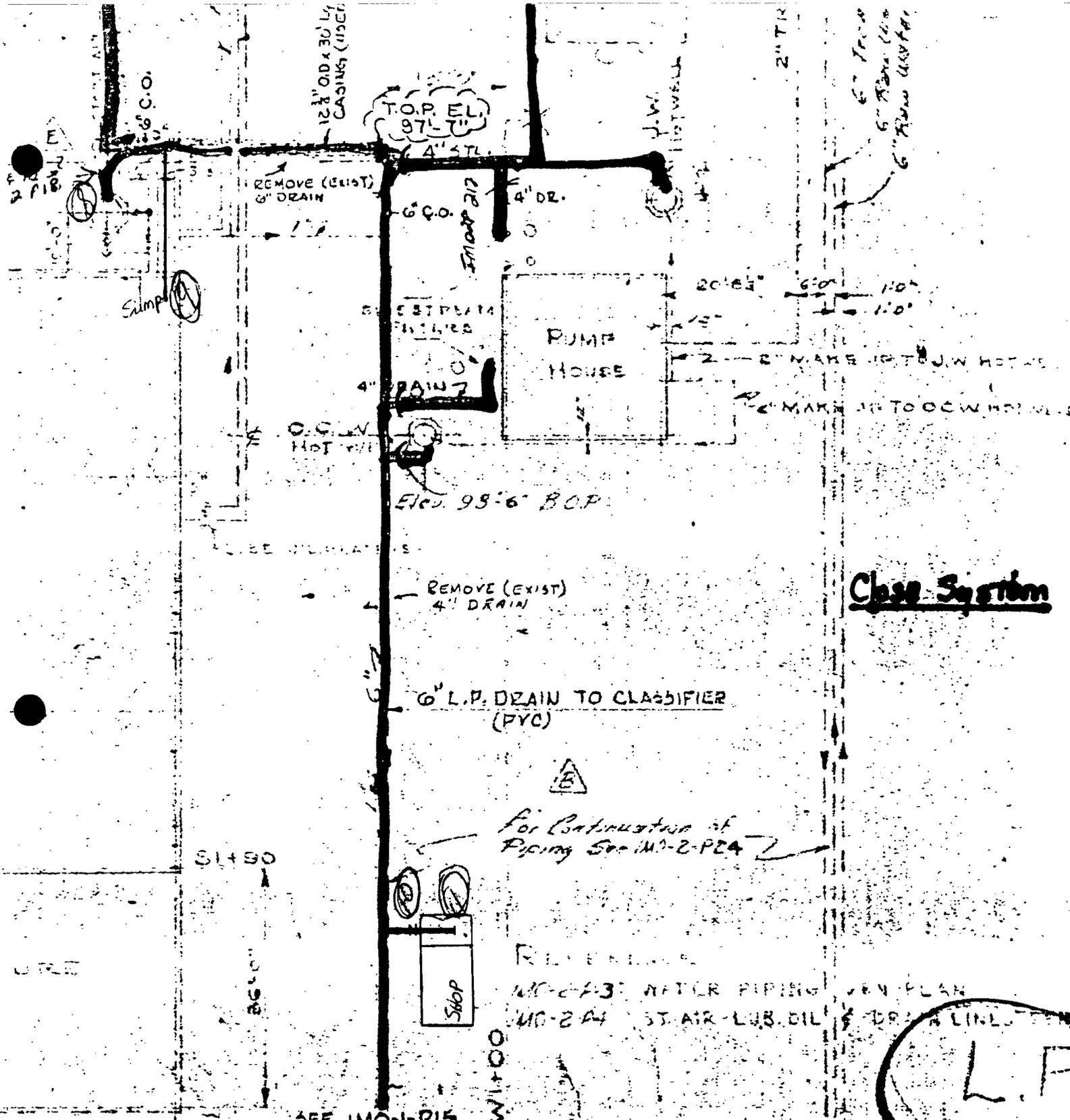
6" STEEL  
6" P.V.C.

SPRAY (3000 PSI)

WATER

OPERATOR

WAX



Class System

For Continuation of Piping See IM-2-PCA

REVISIONS  
 IM-2-3 WATER PIPING GEN PLAN  
 IM-2-4 ST. AIR-LUB. OIL & DR. A LINES

L.F.

PRINT RECORD

DATE	TO	NO.	DATE	TO	NO.	DATE	TO
7-20-54	WALKER	10	7-25-54	WALKER	11		
"	"	1	"	"	12		
"	"	2	"	"	13		
"	"	3	"	"	14		
"	"	4	7-29-54	"	15		
"	"	5	"	"	16		
"	"	6	"	"	17		
"	"	7	"	"	18		
"	"	8	"	"	19		
"	"	9	"	"	20		

REVISION

DATE	BY	DESCRIPTION
		ADD IN PIPING TO LOCATE DRAIN LINES & AIR

EL PASO NATURAL GAS  
 EL PASO, TEXAS

D  
 WARREN MONUMENT  
 COMPRESSOR  
 GRAVITY DRAIN-AIR-TR-WATER  
 GENERAL PIPING PLAN

SCALE: 1" = 20'  
 DATE: 7-20-54  
 DRAWN BY: W.E.S.  
 CHECKED BY:  
 TRACED BY:  
 APPROVED BY:

AREA LIMIT 5-3+15'-0"

20" OD. 3.0' DOLL  
OCC. 11.12  
V-212

2" DEATH DE. 11.12.15.17

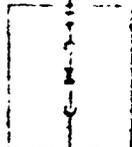
FOR DEAD MAN  
SEE IMO-1-M3

DIEFODAL LINE (20 TO SITE) 5-3+42'-0"

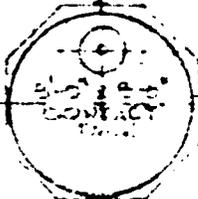
NOTE:  
MOVE EXIST  
& PIPING



6" VENT STACK



CHECK  
STATION

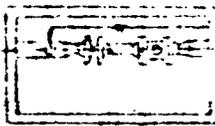


CONTACT

5-3+68'-0"

5-3+75'-0"

6" (PVC)



6" PVC

1120'-0"

FIN. GRADE 111.100'-0"

## MONUMENT DRAIN LINES

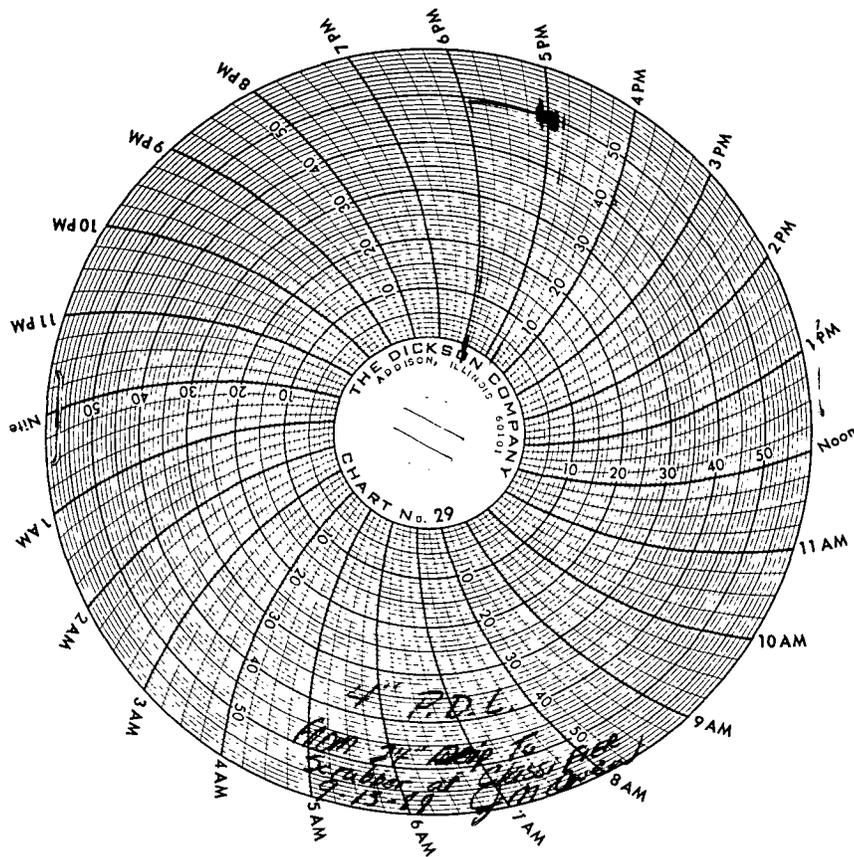
### H.P. 4" P.D.L. from 24" Drip to Scrubber at Classifier

1. Blind 2" valve above ground
2. There is a 2" line that is plugged. Drip has been taken out of service. Bleed air from this point.
3. Close off valves on vessels.
4. Close off valves off Texaco Horizontal scrubber.
5. Close 2" valve off header (cooling tower).
6. Close off valves off regulator (cooling tower).
7. Close off 4" valve off header (cooling tower).
8. Close off valves off regulator - 1st stage ("B" Plant).
9. Close off valves off regulator - 2nd stage ("B" Plant).
10. Close off valves off headers.
11. Blind 6" flange off scrubber. Fill line from this point.

TEST PRESSURE: 50# - 1 Hour

DATE TESTED: Sept. 13, 1988

TESTED BY: Johnny M. Owen - E.P.N.G.  
Mike Hall - Merryman Construction



4" FLARE GAS PM ABSORPTION TOWER



12" DRIP  
2" SYPHON DR

2" SYPHON DRAIN

12" 11033

16" OFFICE PLUMB



20" X 12" REDUCED

10" C.D. S.W. 1/4  
10" C.D. S.W. 1/4 (1952 ACQUISITION)

20 X 12"  
REF

16 WELD CAP



4" H.P. DRAIN

20'-0"

DISPOSAL POND  
BOTTOM ELEV. 95.0



6 WELD CAP

TUELS GAS FROM TREATING PLANT



LEE LINE

6"

5+00

SEE MO-2-P201

FOR CONT. SEE DWG IMO-2-PL-6  
IMO-2-PL-5

DRAIN FM.  
SCOR AREA

W.F.G.

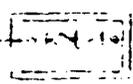
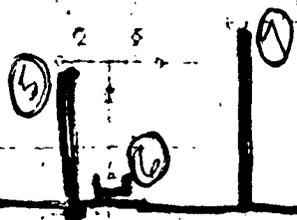
6" PL GA.



SEE DWG  
IMO-2-PL-5  
IMO-2-PL-6



W.F.G.  
12" DISCH.



SEE DWG IMO-2-PL-5  
IMO-2-PL-6

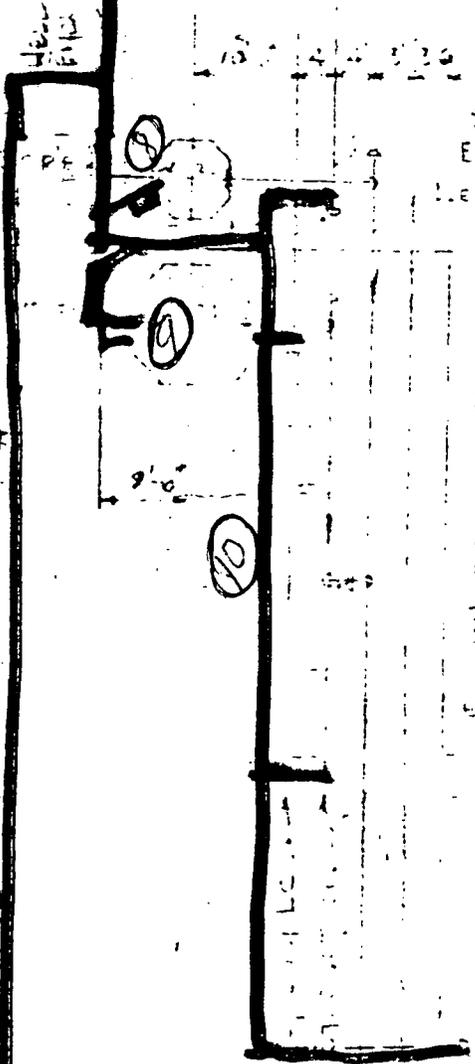


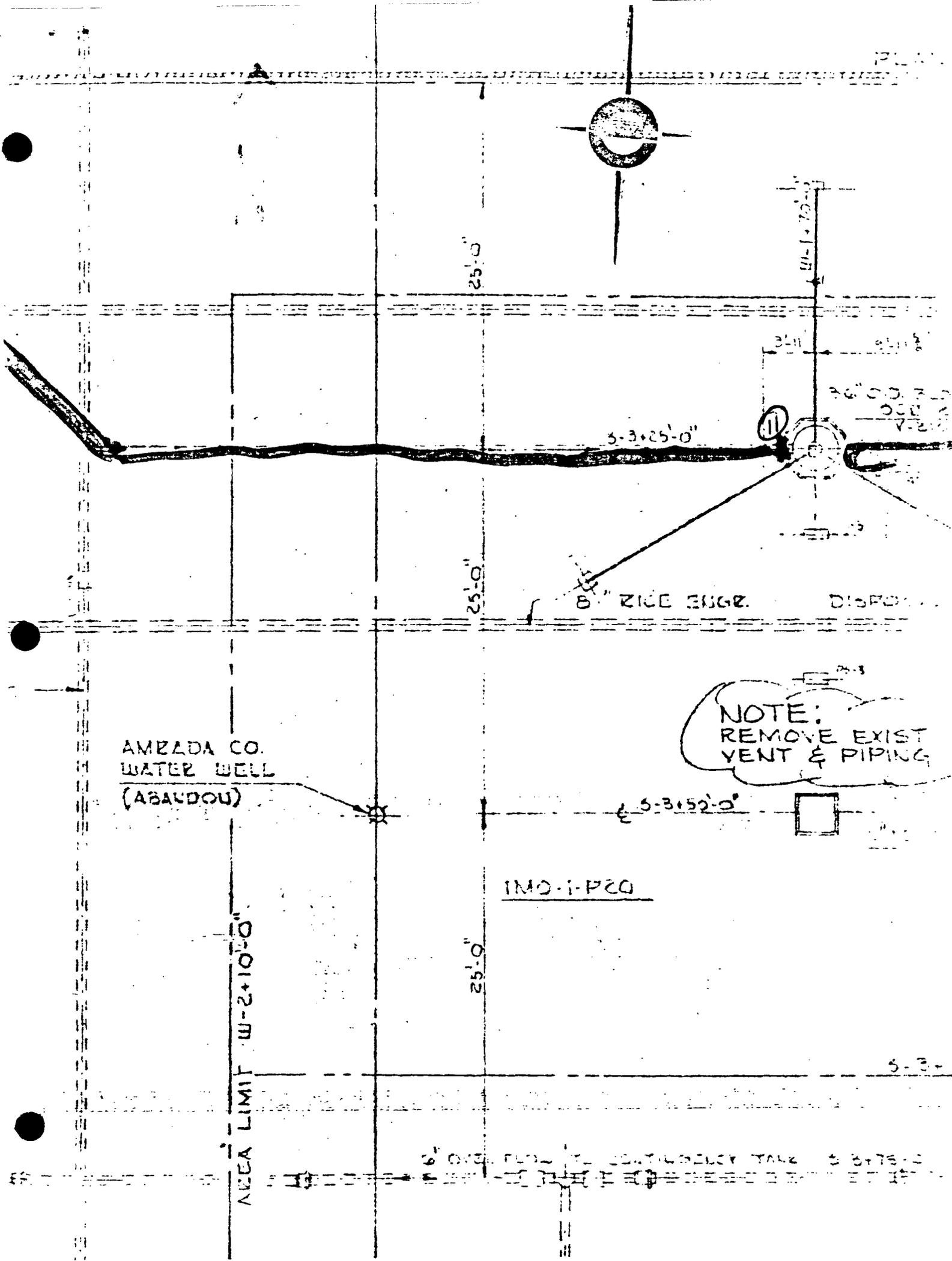
PLANT SAND FENCE

4" DRAIN  
(REMOVE TO FENCE)

← S. DISCH

1" CLASSIFIER





25'-0"

25'-0"

S-3-25'-0"

25'-0"

8" RICE EDGE

DISPO...

AMZADA CO.  
WATER WELL  
(ABANDON)

NOTE:  
REMOVE EXIST  
VENT & PIPING

S-3-52'-0"

IMO-1-P20

25'-0"

AREA LIMIT W-2+10'-0"

S-3-

6- ON... TAKE S-3-75-0

**El Paso** NATURAL GAS  
COMPANY

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

ALEXANDER H. CARAMEROS VICE PRESIDENT

September 23, 1988

Mr. William J. LeMay, Director  
Energy, Minerals and Natural Resources Department  
New Mexico Oil Conservation Division  
310 Old Santa Fe Trail #206  
Santa Fe, NM 87504

RE: Discharge Plan GW-8 for El Paso Natural  
Gas Company - Monument Gas Plant

Dear Mr. LeMay:

Enclosed for your review is the completed Discharge Plan for the El Paso Natural Gas Company Monument Gas Plant. The plan details proposed methods and techniques to ensure compliance with the New Mexico Water Quality Act and New Mexico Water Quality Control Commission Regulations.

El Paso respectfully requests approval of this plan and will meet with agency personnel whenever necessary should clarification or further information be required. Information requests should be directed to Mr. Donald R. Payne, Manager of Compliance Engineering for the South Region at (915) 541-5399.

Thank you for your consideration in this matter.

Very truly yours,

EL PASO NATURAL GAS COMPANY



Alexander H. Carameros  
Vice President

AHC:cjs

Enclosure



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

November 15, 1988

Mr. William J. Lemay, Director  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail, Room 206  
Santa Fe New Mexico 87503

Dear Mr. Lemay:

This responds to your public notice received October 27, 1988 in which several proposed groundwater discharge plans were described. We have reviewed the plans and have not identified any resource issues of concern to our agency in the following:

GW-8, El Paso Natural Gas Company, Monument Gas Plant, Lea County, NM.  
GW-9, Phillips 66 Natural Gas Company, Eunice EP Gas Plant, Lea County, NM.  
GW-10, El Paso Natural Gas Company, Jal No. 3 Gas Plant, Lea County, NM.  
GW-46, El Paso Natural Gas Company, Eunice Main Line Engine Room, Lea County, NM.  
TNT Construction Inc., Rio Arriba County, NM.

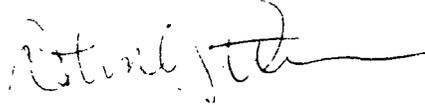
Discharge plan GW-49 is for El Paso Natural Gas Company's Blanco Plant located approximately 1 1/2 miles northeast of Bloomfield, New Mexico. El Paso Natural Gas Company proposes to close its unlined process ponds and discharge approximately 119,900 gallons per day of process and cooling tower wastewater to the Bloomfield Municipal Wastewater Treatment Plant.

The Bloomfield Municipal Wastewater Treatment Plant discharges its treated effluent to the San Juan River. The San Juan River from the Hammond Diversion upstream of Bloomfield to Farmington may provide habitat for the Federally endangered Colorado squawfish. Surveys conducted downstream of Farmington have documented the presence of both adult and juvenile squawfish in the San Juan River. The section of the San Juan River from Bloomfield to Farmington has a high likelihood of the presence of squawfish as well as other fish and aquatic organisms of importance to the rivers ecological balance.

The Bloomfield Wastewater Treatment Plant has received NPDES re-authorization (permit number NM0020770), to discharge to the San Juan River in Segment No. 2-401. The Fish and Wildlife Service would object to the addition of any new pollutants into the treatment works from an indirect discharger, such as the El Paso Natural Gas Company's Blanco Plant, that would cause an increase in biochemical oxygen demand, an increase in total dissolved solids, or a pass-through of toxic or hazardous materials. The effluent limitations of NPDES permit number NM 0020770 must not be exceeded as a result of the addition of the process and cooling tower wastewater.

These comments represent the views of the Fish and Wildlife Service. If you have any questions, please contact Tom O'Brien at (505) 824-7877 or (303) 471-7877.

Sincerely yours



W. C. Peterson  
Field Supervisor

cc:  
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
Regional Administrator, Environmental Protection Agency, Dallas, Texas  
Director, Environmental Improvement Division, New Mexico Health and  
Environmental Department, Santa Fe, New Mexico  
Regional Director, U.S. Fish and Wildlife Service Fish and Wildlife  
Enhancement, Albuquerque, New Mexico

**AFFIDAVIT OF PUBLICATION**

State of New Mexico,  
County of Lea.

I, George W. Moore

of the Hobbs Daily News-Sun, a daily newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period

of \_\_\_\_\_

One weeks.  
Beginning with the issue dated

October 28, 1988  
and ending with the issue dated

October 28, 1988

George W. Moore  
Publisher.

Sworn and subscribed to before

me this 28 day of

October, 1988  
Chera Murphy  
Notary Public.

My Commission expires \_\_\_\_\_

November 14, 1988  
(Seal)

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

**LEGAL NOTICE  
October 28, 1988  
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 has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

(GW-8) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Monument Gas Plant located approximately 3.5 miles southwest of the town of Monument in the NW/4 of Section 1, Township 20 South, Range 36 East (NMPM), Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 3500 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 35 to 60 feet with total dissolved solids concentrations from 500 to 3000 mg/l.

(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 75762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 44,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Jal No. 3 Gas Plant located approximately 5 miles

th of the city of al in the SW/4 NW/4, NW/4 SW/4 of Section 33, Township 24 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 28,600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5410 mg/l is disposed of in an OCD approved disposal well located on the plant property. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 900 mg/l.

(GW-46) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application to renew its previously approved discharge plan for its Eunice Mainline Engine Room located approximately 8 miles Northwest of the City of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was designated GW-9 and is now the responsibility of and is being renewed by Phillips 66 Natural Gas Company. The Mainline Engine Room remains the responsibility of El Paso Natural Gas Company and the portions of the previous discharge plan pertaining to the Mainline Engine Room are being renewed under Discharge Plan GW-46. Approximately 17,000 gallons per day of cooling tower wastewater with a total dissolved solids concentrations of approximately 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharges at the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October. To be published on or before November 4, 1988.

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

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STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LENAY, Director  
Journal, October 30, 1988

EDJ-15 (R-2/86)

**NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND  
NATURAL RESOURCES DEPT  
OIL CONSERVATION DIV**

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

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(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for the Jal No. 3 Gas Plant

MEXICO } ss  
lo  
**S. J. SMITHSON**

being duly sworn declares and

that I, **ADV. MGR.** of the Albuquerque Journal, and that this is in compliance with the meaning of the Session Laws of 1937, and that payment therefore has been made or that the notice, a copy of which is hereto attached, was published in its daily edition,

times, the first publication being on the 30 day

, 1988, and the subsequent consecutive

, 1988.

*Thomas J. Smithson*

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 31 day of October, 1988.

PRICE \$ 50.30

Statement to come at end of month.

ACCOUNT NUMBER C80932

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

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8900  
213

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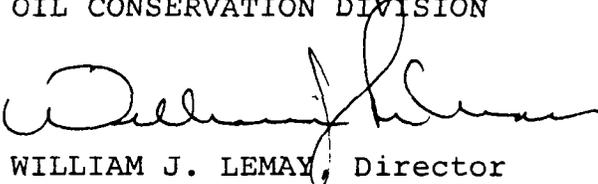
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October. To be published on or before November 4, 1988.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

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

April 6, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. John C. Bridges, Manager  
Environmental Engineering  
El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, Texas 79978

RE: Discharge Plan GW-8  
Monument Gas Plant  
Lea County, N.M.

Dear Mr. Bridges:

On October 11, 1983, the ground water discharge plan, GW-8, for the Monument Gas Plant located in Lea County was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission Regulations and it was approved for a period of five years. The approval will expire on October 11, 1988.

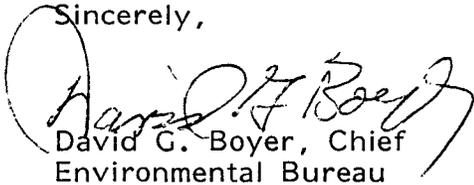
If your facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines will be used in review of your renewal application.

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

Mr. John C. Bridges  
April 6, 1988  
Page 2

If you have any questions, please do not hesitate to contact Roger Anderson  
at (505) 827-5885.

Sincerely,

  
David G. Boyer, Chief  
Environmental Bureau

DGB:RA:sl

Enclosure

cc: OCD - Hobbs

**El Paso**  
Natural Gas Company

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-2600

May 5, 1986

New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Reference:       Underground Storage Tank Notifications

Dear Sirs:

Enclosed please find copies of completed underground storage tank (UST) notifications for those tanks located at El Paso Natural Gas (El Paso) locations in New Mexico. Only those forms containing information on tanks related to activities associated with the exploration, development, or production of oil, gas or geothermal resources are included.

As you are well aware, one of the categories of tanks which are not required to be registered and are excluded according to specific statutory language are those at pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968.

On the advice of El Paso's Legal Counsel, notification forms have been completed for all tanks which might otherwise be subject to the notification requirements and have been sent to the appropriate office of the Department of Transportation (DOT). DOT regulates all facilities which are used in the transportation of gas. All the above mentioned tanks meet the definition of equipment used in the transportation of gas. As a courtesy, copies of the completed forms being sent to DOT are enclosed.

Please note that each form includes the following disclaimer:

"The tank for which this registration is made is excluded from the registration requirement because it is a pipeline facility regulated under the Natural Gas Pipeline Safety Act of 1968. El Paso Natural Gas Company is providing this form to DOT as a courtesy with copies to the appropriate state agency."

New Mexico Oil Conservation Division

May 5, 1986

Page 2

Should you need further information please contact Howard Reiquam, Director of Environmental Affairs Department or myself at (915)541-3292 or 541-2869, respectively.

Very truly yours,

*P.E. Deachart for JCB*

John C. Bridges  
Manager, Environmental Engineering  
Environmental Affairs Department

JCB:gb

# Notification for Underground Storage Tanks

FORM APPROVED  
OMB NO. 2980-008  
APPROVAL EXPIRES 6-30-88

**FOR  
TANKS  
IN  
NM**

**RETURN  
COMPLETED  
FORM  
TO**

New Mexico Environmental Improvement Division  
Ground Water/Hazardous Waste Bureau  
P.O. Box 968 (505) 827-2933  
Santa Fe, NM 87504 (505) 827-2918

**STATE USE ONLY**  
I D Number  
Date Received

## GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

**Who Must Notify?** Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means:

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances; and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

**What Tanks Are Included?** Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

**What Tanks Are Excluded?** Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;

5. surface impoundments, pits, ponds, or lagoons;

6. storm water or waste water collection systems;

7. flow-through process tanks;

8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;

9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

**What Substances Are Covered?** The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

**Where To Notify?** Completed notification forms should be sent to the address given at the top of this page.

**When To Notify?** 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

**Penalties:** Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

## INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

1 \*

### I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)

El Paso Natural Gas Company

Street Address

P. O. Box 1492

County

El Paso

City

El Paso

State

Texas

ZIP Code

79978

Area Code

915

Phone Number

541-2879

Type of Owner (Mark all that apply )

Current

State or Local Gov't

Private or Corporate

Former

Federal Gov't (GSA facility I.D. no. \_\_\_\_\_)

Ownership uncertain

### II. LOCATION OF TANK(S)

(If same as Section I, mark box here )

Facility Name or Company Site Identifier, as applicable

Monument

Street Address or State Road, as applicable

Drawer C

County

Lea

City (nearest)

Monument

State

NM

ZIP Code

88265

Indicate number of tanks at this location

2

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands

### III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here )

Job Title

Area Code

Phone Number

### IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

### V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative

John C. Bridges

Signature

John C. Bridges

Date Signed

5/3/86

CONTINUE ON REVERSE SIDE

**VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)**

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
	5007-1 *	5007-2 *			
<b>Status of Tank</b> (Mark all that apply <input checked="" type="checkbox"/> )					
Currently in Use	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Temporarily Out of Use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Permanently Out of Use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brought into Use after 5/8/86	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Estimated Age (Years)</b>					
<b>Estimated Total Capacity (Gallons)</b>	10143	28275			
<b>Material of Construction</b> (Mark one <input checked="" type="checkbox"/> )					
Steel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Concrete	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fiberglass Reinforced Plastic	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, Please Specify					
<b>Internal Protection</b> (Mark all that apply <input checked="" type="checkbox"/> )					
Cathodic Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Interior Lining (e.g., epoxy resins)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, Please Specify					
<b>External Protection</b> (Mark all that apply <input checked="" type="checkbox"/> )					
Cathodic Protection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Painted (e.g., asphaltic)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fiberglass Reinforced Plastic Coated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, Please Specify					
<b>Piping</b> (Mark all that apply <input checked="" type="checkbox"/> )					
Bare Steel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Galvanized Steel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fiberglass Reinforced Plastic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cathodically Protected	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unknown	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, Please Specify	coated steel	coated steel			
<b>Substance Currently or Last Stored in Greatest Quantity by Volume</b> (Mark all that apply <input checked="" type="checkbox"/> )					
<b>a. Empty</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>b. Petroleum</b>					
Diesel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Kerosene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gasoline (including alcohol blends)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Used Oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other, Please Specify		Oil & Water			
<b>c. Hazardous Substance</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please Indicate Name of Principal CERCLA Substance					
OR					
Chemical Abstract Service (CAS) No.					
Mark box <input checked="" type="checkbox"/> if tank stores a mixture of substances	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>d. Unknown</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Additional Information (for tanks permanently taken out of service)</b>					
<b>a. Estimated date last used (mo/yr)</b>	/	/	/	/	/
<b>b. Estimated quantity of substance remaining (gal.)</b>					
<b>c. Mark box <input checked="" type="checkbox"/> if tank was filled with inert material (e.g., sand, concrete)</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\*Disclaimer

The tank for which this registration is made is excluded from the registration requirement because it is a pipeline facility regulated under the Natural Gas Pipeline Safety Act of 1968. El Paso Natural Gas Company is providing this form to DOT as a courtesy with copies to the appropriate state agency.



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

TONY ANAYA  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-5800

March 4, 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

El Paso Natural Gas Co.  
One Petroleum Center/Building Two  
3300 North "A" Street  
Midland, Texas 79707

Attention: Mr. J. W. Cunningham

Re: EPNG Discharge Plans -  
Lea County Plants Drain  
Line Testing

Dear Mr. Cunningham:

We have reviewed the results of the drain line testing program which was conducted by EPNG as part of the discharge plan for the Jal No. 3 (GWR-10), Jal No. 4 (GWR-7), Eunice (GWR-9), and Monument (GWR-8) gas processing plants.

Upon analysis of the results and an estimation of the corrosion rates, we concur with your suggestion that yearly testing of the drain systems would be excessive. Therefore, by this letter, hydrostatic testing of the underground drain systems for the Jal No. 3, Jal No. 4, Eunice, and Monument gas processing plants will be required as part of the discharge plan renewal process. The testing program for each plant should be completed prior to the submittal of the discharge plan renewal. The discharge plan renewal shall include drawings of, and procedures for, the testing program as well as the results obtained from the testing program. A list of all piping replaced should also be included.

It should be noted that in the future, all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval or renewal.

If you have any questions concerning this letter and the effect it may have on other EPNG plants, please feel free to call Phil Baca or Dave Boyer at (505) 827-5812.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Stamets".

R. L. STAMETS  
Director

RLS/PB/dp

cc: William F. Lorang, EPNG  
OCD-Hobbs Office

P 505 905 861

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to ET Paso Natural Gas	
Street and No. 3300 N. "A" St.	
P.O., State and ZIP Code Midland, Texas 79707	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, Feb. 1982

February 25, 1985

Mr. Philip L. Baca  
Environmental Engineer  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Dear Mr. Baca:

Per our telephone conversation of this date, enclosed are copies of our Jal No. 3 and Jal No. 4 Plant drain system drawings. I have placed a check mark by the lines that were replaced or repaired.

Items b, c, d and e, as noted in O. R. Dakan's memorandum to J. W. Cunningham dated February 15, 1985, for Jal No. 3 Plant were installed in 1950. Items a and f were installed in 1959.

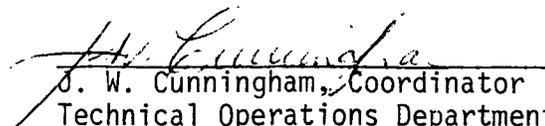
Items a and b for Jal No. 4 Plant were installed in 1952.

Hopefully, this information, along with the information supplied to you last week, will enable OCD to relax the annual drain line testing requirements of our Discharge Plans and also enable you to develop testing intervals that are realistic and can be justified by companies in our industry.

If additional information is needed, please let me know.

Sincerely,

EL PASO NATURAL GAS COMPANY

  
J. W. Cunningham, Coordinator  
Technical Operations Department

JWC:gfc

Enclosures

Plant Age: 34 yrs

Pipe Size	Sch. 40 Wall Thick.	Sch. 10 Wall Thick	Assumed C-Rate	Sch. 40 C-Rate	Sch. 10 C-Rate
3"	.216"	.120"	.02"/yr	.006"/yr	.003"/yr
4"	.237"	.120"		.007"/yr	.003"/yr
6"	.280"	.130"		.008"/yr	.004"/yr
8"	.322"	.148"		.009"/yr	.004"/yr
10"	.365"	.165"		.011"/yr	.005"/yr
				$\bar{x} = .008"/yr$	$\bar{x} = .004"/yr$

Assume Corrosion Rate of .02 in/yr

Pipe Size	Sch. 40 Wall Thick	Sch. 10 Wall Thick	Life Sch. 40	Life Sch. 10
3"	.216"	.120"	11 yr	6 yr
4"	.237"	.120"	12 yr	6 yr
6"	.280"	.130"	14 yr	7 yr
8"	.322"	.148"	16 yr	7.4 yr
10"	.365"	.165"	18 yr	8.3 yr
			$\bar{x} = 14.2$ yr	$\bar{x} = 6.9$ yr

Assume Corrosion Rate of .01 in/yr

Pipe Size	Life Sch. 40	Life Sch. 10	
3"	22 yr	12 yr	
4"	24 yr	12 yr	
6"	28 yr	14 yr	
8"	32 yr	15 yr	
10"	36 yr	16 yr	
		$\bar{x} = 28.4$ yr	$\bar{x} = 13.8$ yr

∴ Choose a 25 yr. life for pipes. Start inspecting when plants reach 25 yrs.

# PIPE REPLACED BY EPNG

JAL #4

180'	of	4"	Pipe	32 yrs.	Old
110'	of	8"	Pipe	32 yrs.	Old
75'	of	10"	Pipe	32 yrs.	Old

JAL #3

40'	of	3"	Pipe	25 yrs	Old	(High Temp)
70'	of	3"	Pipe	32 yrs	Old	
10'	of	6"	Pipe	32 yrs	Old	
25'	of	4"	Pipe	32 yrs	Old	
9'	of	6"	Pipe	32 yrs	Old	

February 19, 1985

*Test Results & Procedures  
Filed with Jal #4 DP*

New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Attention: Mr. R. L. Stamets, Director

**RE: EPNG DISCHARGE PLANS - LEA COUNTY PLANTS  
DRAIN LINE TESTING**

Gentlemen:

This letter is to advise that El Paso Natural Gas Company has just recently completed the hydrostatic drain line testing of our Lea County Plants for the year 1984. This testing was done pursuant to our approved Discharge Plans for Eunice, Jal No. 3, Jal No. 4 and Monument. Drain lines in the Jal No. 1 Plant were not tested because the plant is currently shut down. There are no plans at the present time to reactivate the plant.

Attached for your information and to be considered as part of this report are two (2) memorandums from Mr. O. R. Dakan to J. W. Cunningham detailing the results of the tests, repairs or actions taken and cost information associated with the tests.

As you will note all lines not meeting the test requirements were either repaired, replaced, or taken out of service except for line No. TDL-15"-L1, which is a clay tile line running beneath the Jal No. 3 gasoline plant concrete drain aprons and a 4" low pressure drain line running beneath the concrete drain apron in the treating plant at Jal No. 3. It would be extremely expensive to repair or replace these lines.

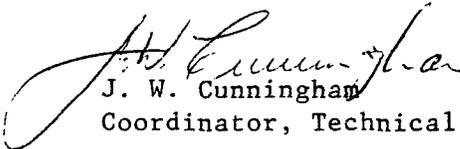
Because of the extraordinary time and expense involved in annual testing of the drain lines and because of the remote possibility of ground water contamination from leaking drain lines, El Paso Natural Gas Company respectfully requests that the annual drain line testing provision of the Discharge Plans be rescinded or at least be extended to no more than once every five years. Also, as support for our request to rescind this provision is the fact that we have been advised by Phillips Petroleum Company and Northern Natural Gas Company, who also operate plants in the Lea County Area that they do not have these requirements in their approved Discharge Plans.

Page 2  
February 19, 1985

If there are any questions regarding the test results or our request to rescind the test requirements, please advise the undersigned at your earliest convenience.

Sincerely,

EL PASO NATURAL GAS COMPANY

A handwritten signature in cursive script, appearing to read "J. W. Cunningham".

J. W. Cunningham  
Coordinator, Technical Operations

JWC:dc

TO: J. W. Cunningham

DATE: February 15, 1985

FROM: O. R. Dakan

PLACE: Permian Division-Midland

RE: RESULTS OF DRAINLINE TESTING AT SOUTHEASTERN NEW MEXICO PLANTS

After checking available drawing information, it has been determined that the underground portion of the drain systems are as follows:

<u>PLANT</u>	<u>LENGTH OF DRAIN LINES, ALL SIZES</u>
Ja1 #4	33,045 ft.
Ja1 #3	26,115 ft.
Eunice	15,535 ft.
Monument	4,665 ft.

Currently, the status of the above drain systems is as follows:

- I. Ja1 No. 4 Plant-Lines which would not hold test pressure were:
- Installed 1952* {
- a) 4" low pressure drain from reflux accumulator to 16" drain header (line has been rerouted and replaced).
  - b) 10"/8" boiler and evaporator blowdown header (line has been replaced).
- II. Ja1 No. 3 Plant-Lines which would not hold test pressure were:
- a) Line: ODL-6"-L3 Leaks in 3" drains from intercoolers were repaired. Line in service. *(1959)*
  - 1950* { b) Line: ODL-3"-L17 Opendrain from the reflux accumulator. This steel line (70') is being replaced with PVC line.
  - c) Line: 6" L.P. from hot wells to line ODL-8"-L10-10' section replaced and line retested.
  - d) Line: 4" L.P. drain from Solution exchangers to Line ODL-8"-L12 leaking under concrete apron. No repairs have been made.
  - e) Line: 6" L.P. drain to solution sump - 9' Section replaced and line retested.
  - 1959* f) Line: TDL-15"-L1 Open Apron and storm water drain. This tile line would not pressure because of joint design (Mortar joints) and inability to get a tight seal with the expandable plugs. This drain handles liquids from the Aprons during bundle cleaning operations, steam condensate from the heat tracing line steam traps, and rain water. The discharge end of the line empties into an open distribution sump and has no pressure in the line during normal operations. Under these conditions any leakage at the joints will be minimal since the liquid will take the path of least resistance (ie. the open end of the line). The line is located under all the concrete aprons North of the Gasoline Pump house and would be extremely expensive to replace. Considering the types of fluids that this

line transports and the cost of replacement, unless ordered otherwise, this line will be left as is.

At Eunice Plant, the lines which would not hold test pressures were:

- a) Line: 6" from water treating building to 8" open drain header. A short section of this line has apparently been subjected to corrosion in a "Hot Spot" where cathodic protection was interrupted. This condition is to be corrected and the clamped section of line replaced. Fluid is water treater backwash water.
- b) Line: 4" Drain from Mainline inlet scrubber area to 8" open drain header (Taps F43 and F28). This drain was found to be inactive and was permanently isolated at the 4" to 8" junction. Line is now inactive.

At Monument Plant, there were no leaks on the drain lines. All lines shown on Drainline drawing are in service.

Other than those lines, or sections, previously mentioned, all drain lines in these systems tested leak-free. Pressure charts are on file at the plant for verification of pressures and durations in accordance with the respective drain line test procedures previously published.

  
O. R. Dakan

ORD:cd

cc: L. E. Anderson  
Harold Franklin  
Bill Lorang  
Charlie Mathis  
G. T. Thurman  
P. E. Wieland  
File - 2

TO: J. W. CUNNINGHAM

DATE: FEBRUARY 7, 1985

FROM: O. R. DAKAN

PLACE: PERMIAN DIVISION-MIDLAND

**RE: 1984 DRAINLINE TESTING COSTS**

Listed below are the actual costs of Pressure Testing the drainlines at the southeastern New Mexico plants.

**Monument**

EPNG Labor	(402)	\$2052.07
EPNG Equipment	(420)	1333.37
Material & Parts	(417)	530.19
Contractor Charges	(429)	<u>5279.00</u>
	Total	\$9194.63

**Eunice**

EPNG Labor	(402)	\$3743.67
EPNG Equipment	(420)	1610.25
Materials & Supplies	(417)	1118.15
Contractors Charges	(429)	<u>6375.96</u>
	Total	\$12,848.03

**Jal No. 3**

EPNG Labor	(402)	\$4646.74
EPNG Equipment	(420)	1530.15
Materials & Supplies	(417)	3948.18
Contractor Charges	(429)	<u>7414.60</u>
	Total	\$17,539.67

**Jal No. 4**

EPNG Labor	(402)	\$10354.93
EPNG Equipment	(420)	3741.80
Materials & Supplies	(417)	6097.82
Contractors Charges	(429)	<u>6097.82</u>
	Total	\$26,292.37

Total direct cost - 4 Plants - \$65,874.70

After discussions with Hardy Cook and personnel at the respective plants, it has been estimated that approximately \$5000 additional EPNG labor and equipment charges were spent as indirect or unlabeled expenses. Plant personnel were involved in location of lines, valves and drains at various times during the testing procedure.

It is recommended that the Oil Conservation Division (OCD) be petitioned to extend the testing interval to 5 years instead of the present annual schedule. Although the next test will not be as expensive as this initial test, an annual outlay of approximately \$40,000 to \$50,000 for drain line testing is not warranted. Testing on a 5 year basis would serve the same purpose at a reduced average annual cost.

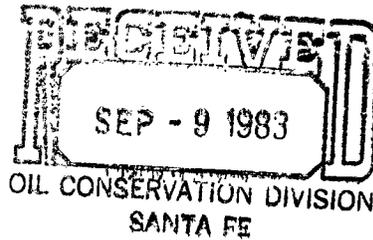


O. R. Dakan  
O. R. Dakan  
Chief Division Project Engineer

ORD:jlr

cc: L. E. Anderson  
Harold Franklin  
Bill Lorang  
Charlie Mathis  
G. T. Thurman  
P. E. Wieland  
File - 2

**El Paso**  
Natural Gas Company



P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-2600

September 6, 1983

**RECEIVED**

**SEP 15 1983**

**EID: WATER  
POLLUTION CONTROL**

Mr. Joe Ramey  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, NM 87501

Subject: Monument Plant Discharge Plan  
Lea County, New Mexico

Dear Mr. Ramey:

The following is offered in explanation to questions regarding the subject Discharge Plan submitted to the NMOCD July 22, 1983.

1. Statement of Corrosion Protection for Classifier and Oil Tanks

The classifier tank and the oil tank installed at the Plant were fabricated by welding of steel plate and are protected from corrosion by an epoxy coating (internal and external) and by connection with the Plant's cathodic protection system. See page 29 of the Discharge Plan for a reference to the epoxy coating. The tanks are open to the atmosphere and therefore are not considered pressure vessels. They were installed below grade to accomodate the gravity drainage of the Plant drain system. They will be tested as provided for in the Discharge Plan (Appendix K). During normal operation of the Plant the vessels will be checked for anomolous operation and when detected, corrective measures taken.

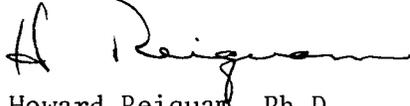
2. Clarification of "Approved Dump"

Although El Paso has performed a number of chemical analyses of sludges from pits and waste streams that show that there are no hazardous wastes to be disposed of by the Plant, El Paso has committed to analyzing the sludge removed from the classifier prior to its disposal. If the sludge is determined to be nonhazardous, as is expected, then it will be properly disposed of in an approved (State or County) landfill. If the sludge were to exhibit the characteristics of a hazardous waste as is defined in the RCRA, it would be disposed of in an approved (by Federal or State) hazardous waste disposal facility.

Mr. Joe Ramey  
September 6, 1983  
Page 2

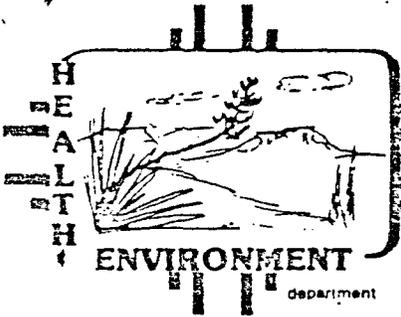
It is hoped that with these brief explanations, you will be able to determine that the Discharge Plan sufficiently addresses the New Mexico Water Quality Control Commission Regulations and may be expeditiously approved by your office.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. Reiquam".

Howard Reiquam, Ph.D.  
Director  
Environmental Affairs Department

HR:gb



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION  
P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

Steven Asher, Director

TONY ANAYA  
GOVERNOR

ROBERT McNEILL  
SECRETARY

ROBERT L. LOVATO, M.A.P.A.  
DEPUTY SECRETARY

JOSEPH F. JOHNSON  
DEPUTY SECRETARY

MEMORANDUM

TO: Charles Nylander, Chief, Water Pollution Control Bureau

THROUGH: Maxine S. Goad, Program Manager, Ground Water Section, WPCB *MSG*

FROM: David G. Boyer, Water Resource Specialist, Ground Water Section *DGB*

SUBJ: Review of Discharge Plan for El Paso Natural Gas Company, Monument Plant *lymsg*

DATE: August 30, 1983

As requested by you on August 26, 1983, I have performed a quick initial non-comprehensive review of the above referenced discharge plan and some OCD correspondence on it. The review did not include the EPNG Eunice Plant. A separate memorandum will address the complex and time consuming aspects of natural gas processing plant discharge plans. The material reviewed consisted of the following information:

1. "Discharge Plan for El Paso Natural Gas Company's Eunice and Monument Plants, Lea County, New Mexico," December, 1981.
2. "Addendum, Discharge Plan for EPNG Company's Eunice and Monument Plants, Lea County, New Mexico," December, 1982 (Submitted by EPNG to OCD February 7, 1983).
3. Letter dated February 28, 1983, to Oscar Simpson, OCD, from D.N. Bigbie of EPNG, Midland, Texas, providing additional information (requested at 2/8/83 OCD - EPNG Meeting).
4. Letter dated March 14, 1983 to EPNG, Midland, Texas from Simpson of OCD providing 8 pages of technical comments and requesting additional information. It is my opinion that much of the information requested in that letter is extraneous and unnecessary to WQCC Part 3 discharge plan review. The questions may, however, be relevant to the Hazardous Waste Program, either now or in the future, with regard to EPNG and/or Rice Engineering (who operate a Class II WC well). I find only 7 or 8 questions relevant directly to the WQCC Regulations.

August 30, 1983

5. EPNG internal memorandum dated March 18, 1983, from John C. Bridges, EPNG to EPNG-POW file. Memo summarized an OCD - EPNG March 15, 1983, meeting and detailed what information would be provided OCD pursuant to Simpson's 3/14/83 letter.
6. "Protocol for Characterizing Plant Wastewaters", 3 pages, undated. (Discusses proposed methodology to sample wastewaters at EPNG Eunice and Monument Plants to comply with WQCC Regulations. EPNG memo of 3/18/83 indicates the protocol was to be reviewed with OCD in Santa Fe on April 6, 1983.)
7. Discharge Plan for El Paso Natural Gas Company's Monument Plant, Lea County, New Mexico" July, 1983. (Supersedes all previous discharge plan submittals) Comments below reference this document unless otherwise noted.
8. One paragraph addition to the Monument Discharge Plan, dated August 1983, to be inserted on page 47 of the July, 1983, Discharge Plan.

If the discharge plan consists only of the above listed material, my initial review indicates that, at present, complete information is not available from EPNG to demonstrate and assure compliance with WQCC Regulations.

Specifically, the following deficiencies need to be rectified before approval:

1. Prior to, and ending in February, 1976, the Monument Plant treated, dehydrated and used a gasoline absorption unit in processing natural gas. Currently, the plant has effluent from gas-liquid separators, engine cooling water, cooling towers, water treatment and camp sewage (see figures 16, 17 and Table 8 from July 1983 submittal attached). Instead of using unlined ponds to dispose of these fluids (as was done previously), EPNG proposes to separate the fluids using a classifier, followed by disposal of waters to an injection well off site operated by Rice Engineering, oils to a local refiner for reclamation and reuse, and waste oil and cooling tower sludges to an "approved landfill" (p. 47).
  - A. Is the classifier above or below ground? If below ground, how will leaks be detected?
  - B. The steel oil storage tank is proposed to be located underground. How, and how frequently, is the tank to be monitored for leaks? What about corrosion protection from high TDS waters at the site? Who is the oil sold to, and what is its final disposition?
  - C. A 38 ft-diameter x 15' high "contingency" tank is planned to hold wastewaters during classifier overload and downtimes. Is this tank above or below ground? How, and how frequently, is it to be monitored?

- D. The test procedures for the plant underground drain systems submitted by EPNG as Appendix K seem appropriate. What range of volume of leak(s) can be detected using this method?
- E. Solids and sludges from several sources are to be "evaluated and disposed of in an approved landfill" (p. 47). In this regard EPNG needs to:
  - (1) Provide characteristics of the sludges to be disposed of including expected composition, volume, and percent liquids vs. solids. What "evaluation" will take place?
  - (2) Show the proposed landfill location, operator and state what is meant by "approved".
  - (3) State whether or not a liner is expected to be used, and if so type and design.
  - (4) Is the landfill operator proposing any monitoring to be undertaken at the pit for EPNG's sludges?

2. Previously, EPNG utilized at least four separate ponds for disposal of plant industrial wastewater and two more for sewage disposal. Additionally, two topographically-low areas (immediately south of the north plant and south of the south plant) received industrial pond overflow or cooling tower drainage (see Discharge Plan Figures 8, 10, 11 and 12). Although the original objective of the ponds may have been to dispose of effluents through evaporation, the presence of oils and other liquid hydrocarbons inhibits disposal by evaporation. As stated by EPNG on page 31 of the original (December, 1981) discharge plan submittal, "Oil has coated most of the ponds, significantly reducing the surface area of the water available to permit evaporation." In addition some non-hydrocarbon constituents (eg. Cl, TDS, Cr) commonly exceed WQCC standards in the unlined ponds (Table 1 attached). Although no effluent is currently being disposed of in the ponds, fluids currently in the pond with some constituents in excess of WQCC standards discharge through seepage to the subsurface. Thus proper pond closure is an integral part of the discharge plan. The pond closure plan (Appendix A of the discharge plan) has been given a quick review by me and seems satisfactory except for the following comments/questions:

- A. EPNG states that by May, 1983 all ponds were either dry, or had been pumped to lowest possible level (p.A-12) except pond #1. When will that pond be pumped dry? If the remaining fluids in Pond #1 are not sent to the classifier for treatment, how are they disposed of?

August 30, 1983

- B. No information is provided as to protection and reclamation of the low areas mentioned above that have in the past collected pond overflow water and cooling tower drainage. As part of an approved closure plan these areas must be prevented from receiving additional waters that will move and/or leach existing contaminants downwards. EPNG must propose for review and approval the methods to be taken to protect these areas from future runoff and drainage waters.
  - C. The process for mixing and harrowing fresh and contaminated soil as described on page 17 of the discharge plan for reclamation of abandoned evaporation ponds seems appropriate. However, the section "Closing Procedures" on page A-12 indicates that mixing and drying will not be done and that instead sludges will be leveled. Explain this contradiction and why mixing and harrowing is not proposed as part of the closure plan.
  - D. Since these ponds were (1) utilized prior to the 1977 adoption of the WQCC Ground Water Regulations, (2) will no longer receive effluents as part of this discharge plan, and (3) after prompt proper closure as part of this discharge plan will no longer discharge to the subsurface, post-operational monitoring under Part 3 of the WQCC Regulations would probably not be required. However, this would not relieve EPNG of responsibility for ground water pollution under other actionable laws and regulations. If EPNG for whatever reason (e.g. to allow removal only by evaporation) substantially delays the removal of the fluids in the old ponds, or does not prevent seepage due to precipitation or future runoff, the need for post-operational monitoring may be reconsidered since discharges to the subsurface would still be continuing.
  - E. The "fresh water" pond west of the north plant must be closed in a manner similar to the other ponds.
3. The March 18, 1983, EPNG internal memorandum indicates that EPNG agreed to additional, appropriate commitments at the March 15, 1983, OCD/EPNG meeting. These should be formally incorporated into the July, 1983, discharge plan, if not already done so, prior to approval.
4. Miscellaneous Technical Comments.
- A. The "NMEID Monitoring Well" on El Paso's property (p. 22, 25) is actually part of the monitoring well system installed by Climax Chemical Company to provide baseline data for a discharge plan (DP-142) that was eventually disapproved by EID in February, 1983. Sampling data by Climax and EID for this well and others in the area are available from the EID Water Pollution Control Bureau.

August 30, 1983

- B. The analyses of wells L and M presented in Table 6, page 28 of the discharge plan are not representative of Ogallala Formation waters. They instead show the impact of man-caused activities on ground water in the area (see EPNG Bibliography, pp. 48-49: #3 Boyer et. al., #19 Nicholson and Clebsch). Well P and possibly well N are more representative of uncontaminated Ogallala waters.
- C. The aerial views of discharge Figures 6 and 9 purport to show Climax Chemical Company to the north of EPNG. Climax Chemical was not constructed until about 1962. The actual companies shown in the photos are Warren's Monument Plant and the old Southern Union Refinery.

#### Summary and Recommendations

The discharge plan is not yet complete and should not yet be approved because of several outstanding issues:

1. Additional information on the integrity of the new system and its ability to prevent ground water contamination needs to be presented and reviewed.
2. The methodology and site conditions for sludge disposal in an "approved" (off-site) landfill need to be submitted and reviewed.
3. Some additional questions on the procedures for proper and expedient pond closure need to be answered. Prompt closure of existing ponds is an integral and necessary part of this discharge plan and must not be deferred by EPNG.

MSG:DGB:jba

Table 1

Water Quality Analyses of Composite Samples from Evaporation Ponds  
 at El Paso Natural Gas Company's Monument Plant  
 Analysis: December 1980

Constituent	Sample Location 1/				
	#1	#2	#3	#4	#5
Sulfate (SO <sub>4</sub> ), mg/L	589	85	90	549	55.5
Chloride (Cl), mg/L	149	2822	347	156	78.1
Nitrate (NO <sub>3</sub> as N), mg/L	2	1	1	2	2
Specific Conductance, micro mhos/cm	1400	5900	1050	1240	660
pH	7.4	7.15	7.6	7.25	7.75
Total Dissolved Solids, mg/L	1584	6073	1418	1484	552
Chromium (Cr), mg/L	0.6	0.4	0.3	1.0	0
Copper (Cu), mg/L	0.1	0.05	0	0.18	0
Iron (Fe), mg/L	0.65	0.15	0.10	0.20	0.15
Manganese (Mn), mg/L	0.14	0.09	0.03	0.03	0.05
Zinc (Zn), mg/L	0.85	0.05	0	2.0	0.07

1/ Pond designations are shown on Figure 50.

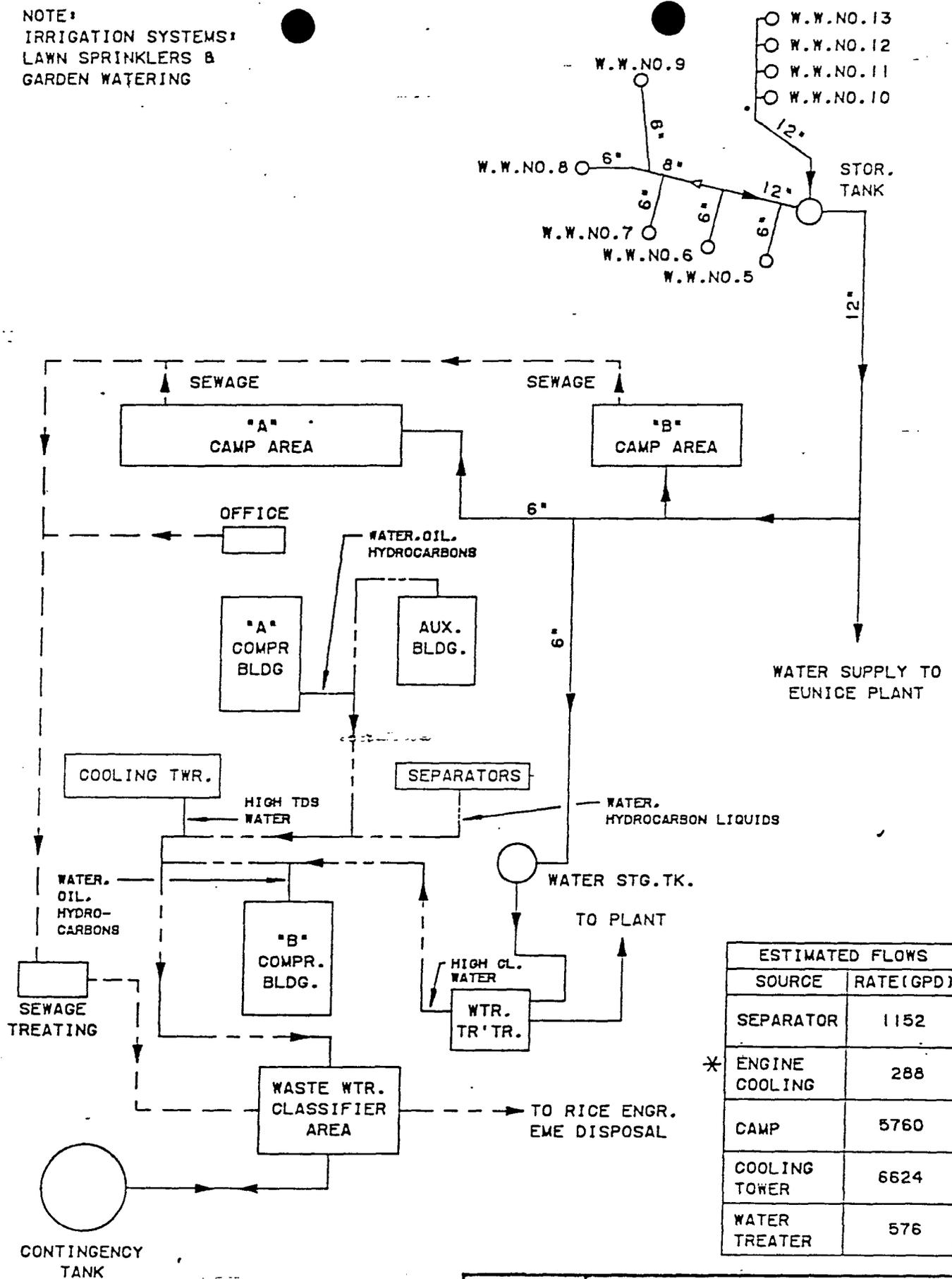
Table 2

Monument Plant  
Characteristics of Wastewater Streams

Source	Primary Effluent	Estimated Flow (GPD*)	Materials Added	Additives to Stream Purpose of Additive
Separators	Water and Hydrocarbon liquid	1,152	None	
Engine cooling water* (closed systems)	Water/oil hydrocarbon		Chromine-T	Corrosion Inhibitor
Water Treater	Water/high chloride water	576	Sodium Chloride	Zoolite Regeneration
Camp	Sewage	5,760	Chlorine	Biocide
Cooling Tower	High TDS water	6,624	Antipol-640 Hydrochem D-300 Chlorine Sulfuric Acid Toxsene 35 Toxsene 37	Anti-corrosion Dispersant Biocide pH control Biocide Biocide

\*Closed systems containment system is being installed so that engine coolants are not disposed of in a waste stream.

NOTE:  
IRRIGATION SYSTEMS:  
LAWN SPRINKLERS &  
GARDEN WATERING



ESTIMATED FLOWS	
SOURCE	RATE (GPD)
SEPARATOR	1152
* ENGINE COOLING	288
CAMP	5760
COOLING TOWER	6624
WATER TREATER	576

\* CLOSED SYSTEM DRAINAGE BEING DISCONTINUED.



FIGURE 16  
MONUMENT PLANT  
WATER AND WASTEWATER FLOW  
SCHEMATIC

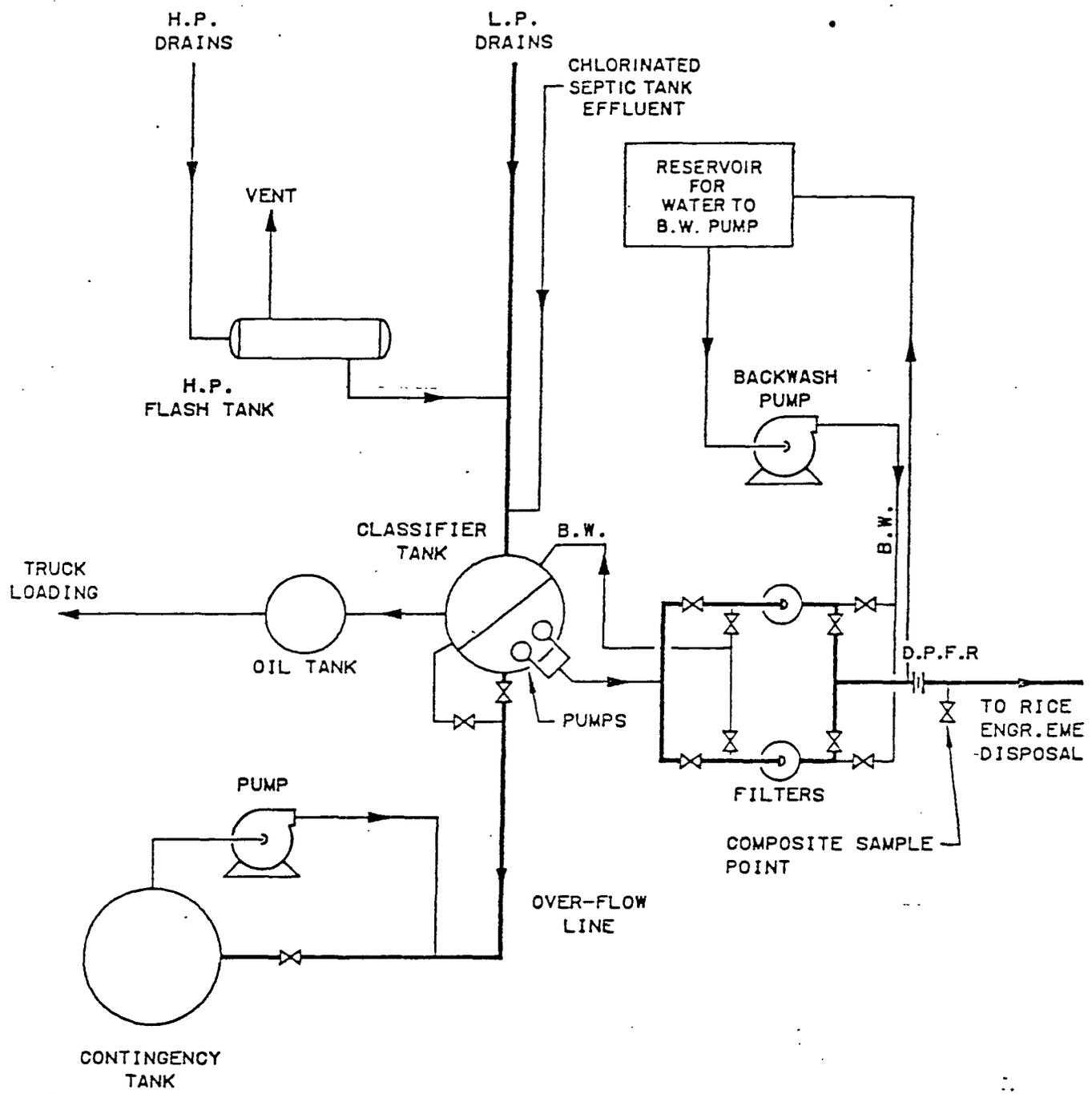
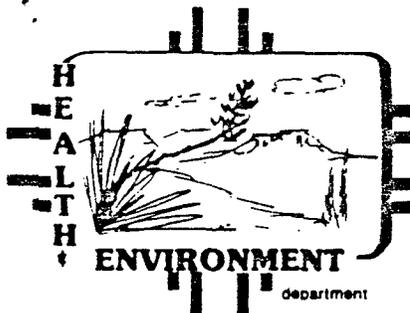


FIGURE 17  
MONUMENT PLANT  
WASTEWATER CLASSIFIER-AREA  
FLOW DIAGRAM



**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**  
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**M E M O R A N D U M**

**TO:** Charles Nylander, Chief, Water Pollution Control Bureau

**THROUGH:** Maxine S. Goad, Program Manager, Ground Water Section, WPCB *MSG*

**FROM:** David G. Boyer, Water Resource Specialist, Ground Water Section *DTB*

**SUBJ:** Review of Discharge Plan for El Paso Natural Gas Company, Monument Plant

**DATE:** September 30, 1983

As requested by you on September 9, 1983, I have prepared a summary memorandum concerning the remaining deficiencies in the El Paso Natural Gas company's Monument Plant Discharge Plan. This memorandum was prepared by me after reviewing the material contained in:

1. Mr. Oscar Simpson's memorandum to you dated September 1, 1983.
2. My memorandum of August 26, 1983 to you which contained a preliminary review of material regarding this discharge plan. All relevant comments and remaining unanswered questions from the August 26, 1983 memorandum have been incorporated in this document.
3. "Discharge Plan for El Paso Natural Gas Company's Monument Plant, Lea County, New Mexico" July, 1983. (Supersedes all previous discharge plan submittals) Comments below reference this document unless otherwise noted. My review of this document was much more comprehensive than the review performed by me prior to my August 26 memorandum.
4. One paragraph addition by EPNG to the Monument Discharge Plan, dated August 1983, to be inserted on page 47 of the July, 1983, Discharge Plan.
5. Letter to Mr. Joe Ramey of the OCD from Dr. Howard Reiquam, Director Environmental Affairs, EPNG dated September 6, 1983, containing additional explanations regarding the discharge plan.

My review indicates that additional information and/or commitments as detailed below need to be provided before approval of the discharge plan can be recommended.

1. Prior to, and ending in February, 1976, the Monument Plant treated, dehydrated and used a gasoline absorption unit in processing natural gas. Currently, the plant has effluent from gas-liquid separators, engine cooling water, cooling towers, water treatment and camp sewage (see figures 16, 17 and Table 2 from July 1983 submittal attached). Instead of using unlined ponds to dispose of these fluids (as was done previously), EPNG now separates the fluids using a classifier, followed by disposal of waters to an injection well off-site operated by Rice Engineering, oils to a local refiner for reclamation and reuse, and waste oil and cooling tower sludges to an "approved landfill" (p. 47).
  - A. One additional 24-hour composite effluent sample must be collected from the classifier and be analyzed for the constituents of Section 3-103 of the WQCC Regulations (except radioactivity) plus major cations and anions. This sample should be collected prior to the final filter between the classifier tank and the Rice disposal line to prevent filter influence on sample composition. Inorganic constituents collected should be filtered through a 0.45 micron filter prior to sample preservation (except for total mercury). Mercury and the organic compounds listed in Section 3-103 should not be filtered. Volumes of effluent transmitted to Rice during the sampling period should be recorded as was done previously. This additional sampling is necessary to characterize the effluent currently discharged to Rice; previous efforts included pond effluents or were incomplete with respect to the necessary analyses needed to characterize the effluent (pp.21, 39).
  - B. Values of Chromium in the wastewater delivered to Rice vary greatly between 24 samples taken on December 7-8, 1982 (Cr average 1.08 mg/l, high 3.3 mg/l, low <0.1 mg/l, Appendix C) and the composite sampling that occurred in April and June 1983 (Cr average 0.06 mg/l, high 0.09 mg/l, low <0.04 mg/l, Table 3, p.21). What is the reason for the discrepancy? Is chromium naturally high in oil field brines?
  - C. EPNG on page 47 of the discharge plan proposes an annual sampling and analysis of the classifier effluent prior to delivery to Rice. What methodology is to be employed and what constituents are to be sampled? If the location of the sampling point is the valve labeled "Composite Sampling Point" on Figure 17 (p. 34), what effect will the final set of filters have on the effluent composition, especially the organics?
  - D. El Paso provided clarification in their September 6, 1983, letter on the corrosion protection methods to be used for the below-grade classifier and oil tank. EPNG commits to annual testing by filling

the tanks with water and measuring the drop in level over a 4 or 8 hour time period (Appendix K, p.4). What accuracy is expected using the above test (rate in gpm), and at what level of leakage are corrective measures proposed to be taken? In lieu of requiring ground water or vadose zone monitoring of the tanks, an adequate and specific leak detection methodology must be employed by EPNG. EPNG use of the "Petrotite" methodology may be necessary to better characterize leakage from the buried tanks. This test can determine if leaks as small as 0.05 gallons per hour are occurring from underground liquid storage and handling system, and is recommended by National Fire Protection Association for buried product storage tanks.

- E. What is the final disposition of the recycled oil? Who is it sold to and are manifest papers to be made available?
- F. A 38 ft-diameter x 15' high "contingency" tank below ground is planned to hold wastewaters during classifier overload and downtimes. How, and how frequently, is it to be monitored?
- G. The test procedures for the plant underground drain systems submitted by EPNG as Appendix K seem appropriate. What range of volume of leak(s) can be detected in the various lines using this method? Are the 4" closed system drain line (p.K-5) and the 6" gravity drain(p.K-7) the only lines proposed to be tested using this procedure?
- H. EPNG has stated in the discharge plan that solids and sludges from several sources are to be evaluated and disposed of in an approved landfill (p.35, 47). These are of two major types: sludges from the cooling tower basin (p.17) and solids from the classifier. Characteristics of these sludges are distinctly different. Cooling tower sludges are mainly composed of blow sand and silt captured by the cooling tower on windy days plus calcareous calcium and sodium salt scales left as a result of evaporation. This material in turn is impregnated by various additives and residues used to inhibit corrosion, encrustation, and biological activity. Because the system is newly operative, classifier sludges have not yet been characterized but are expected to be solid or semi-solid hydrocarbon materials such as tars, thick and highly viscous oils and similar substances. Sand or grit may also be present.

EPNG has characterized sludge samples from two cooling towers for eight (8) heavy metals (Appendix B) using the EPA hazardous waste methodology of leaching 100 grams of sample with 2 liters of pH 5 water for 24 hours. Presumably the use of pH 5 water simulates natural rainwater. The results showed that only cadmium (with levels of 0.03 mg/l and 0.13 mg/l) and one chromium sample (at 0.07 mg/l) were above WCCC levels and all constituents analyzed were well below EPA "hazardous waste" levels. However, even though the

analyses show concentration levels below those set by EPA, these materials are not exempt from consideration under the WQCC Regulations and in this discharge plan. The WQCC regulations require that ground water under 10,000 mg/l TDS be protected from contamination due to leaching of this industrial material. Disposal must be accomplished so that the WQCC standards are not exceeded or that toxic pollutants are not present at a place of present or foreseeable future use.

Because of the low concentrations of leached heavy metals, EPNG can possibly dispose of these non-hydrocarbon sludges on-site if the following demonstrations can be made:

- 1) Characterization of the residual inorganic salts, and organic material in the sludge, is necessary with respect to meeting the standards of Section 3-103 and the presence of any toxic pollutant. (1-101.UU). Natural biocide degradation (if it occurs) to more inert, non-toxic substances can also be a consideration in developing a disposal plan.
- 2) Washing of the sludge on a properly drained area (eg concrete pad with liquid drainage to the classifier) may be necessary if high concentrations of inorganic salts or organic residues need to be removed from silts and sand prior to disposal. The dried material may then be demonstrated by EPNG to be inert enough to be disposed of on-site without additional special precautions.
- 3) If washing is not performed or if testing shows high concentration of inorganic salts, heavy metals, or organics remaining then disposal on-site in an approved area protected from rainfall, runoff, and runoff can still be considered after proper application and agency review.

Hydrocarbon sludges from the new classifier remain to be characterized by EPNG. These may contain relatively high concentrations of potentially harmful organic substances and disposal of these materials should be at a location where recycling or disposal of similar oil field materials by OCD is permitted (eg. Loco Hills). If such oil materials are toxic or exceed WQCC standards (but not "hazardous" as defined by EPA), disposal will not be permitted at local, state or county sanitary (domestic) landfills. EPNG has committed (letter of September 6, 1983) to disposal of "hazardous waste" in approved (State or Federal) hazardous waste disposal facilities.

Prior to removing the classifier wastes, EPNG must have characterized them, received permission to remove them to an approved location where ground water will be protected, and have indicated: (1) how such wastes will be transported, (2) their volume and frequency, and (3) the manifest system to be used for their accountability.

September 30, 1983

2. Previously, EPNG utilized at least four separate ponds for disposal of plant industrial wastewater and two more for sewage disposal. Additionally, two topographically-low areas (immediately south of the north plant and south of the south plant) received industrial pond overflow or cooling tower drainage (see Discharge Plan Figures 6 through 12). Although the original objective of the ponds may have been to dispose of effluents through evaporation, the presence of oils and other liquid hydrocarbons inhibits disposal by evaporation. As stated by EPNG on page 31 of the original (December, 1981) discharge plan submittal, "Oil has coated most of the ponds, significantly reducing the surface area of the water available to permit evaporation." In addition some non-hydrocarbon constituents (eg. Cl, TDS, Cr) commonly exceed WQCC standards in the unlined ponds (Table 1 attached). Although no effluent is currently being disposed of in the ponds, fluids currently in the pond with some constituents in excess of WQCC standards discharge through seepage to the subsurface. Thus proper pond closure is an integral part of the discharge plan. The pond closure plan (Appendix A of the discharge plan) has been given review by me and seems satisfactory except for the following comments/questions:

- A. EPNG states that by May, 1983 all ponds were either dry, or had been pumped to lowest possible level (p.A-12) except Pond #1. When will that pond be pumped dry? Are the remaining fluids in Pond #1 sent to the classifier for treatment? If not, how are they disposed of?
- B. Contrary to the statement made in the first paragraph of p.17, fluids and water has collected in the low depressions. No information is provided in the closure plan as to protection and reclamation of the low areas mentioned above that have in the past collected pond overflow water and cooling tower drainage. As part of an approved closure plan these areas must be prevented from receiving additional waters that will move and/or leach existing contaminants downwards. EPNG must propose for review and approval the methods to be taken to protect these areas from future runoff and drainage waters. The plan must also include the area southwest of "E" (Figure 3, sheet 1) where old ponds were once located (Figure 6).
- C. The process for mixing and harrowing fresh and contaminated soil as described on page 17 of the discharge plan for reclamation of abandoned evaporation ponds seems appropriate. However, the section "Closing Procedures" on page A-12 indicates that mixing and drying will not be done and that instead sludges will be leveled. Explain this contradiction and why mixing and harrowing is not proposed as part of the closure plan.
- D. Since these ponds were (1) utilized prior to the 1977 adoption of the WQCC Ground Water Regulations, (2) will no longer receive effluents as part of this discharge plan, and (3) after prompt

proper closure as part of this discharge plan will no longer discharge to the subsurface, post-operational monitoring under Part 3 of the WQCC Regulations would probably not be required. However, this would not relieve EPNG of responsibility for ground water pollution under other actionable laws and regulations. If EPNG for whatever reason (eg. to allow removal only by evaporation) substantially delays the removal of the fluids in the old ponds, or does not prevent seepage due to precipitation or future runoff to the ponds or depression areas, the need for post-operational monitoring may be reconsidered since discharges to the subsurface would still be continuing.

- E. The "fresh water" pond west of the north plant must be closed in a manner similar to the other ponds.
3. EPNG's discharge plan states that "all wastewater resulting from plant operations is now routed through a classifier" (p.19). This is interpreted to mean that all routine or deliberate discharges (such as engine or compressor drainings) to the subsurface of waste oils, water or other fluids have ceased. However other unanticipated discharges may occur as a result of spills, leaks, or pipe/tank failure. The discharge plan does not address or provide for agency review of a spill prevention and contingency plan. Unanticipated discharge reporting is required pursuant to Section 1-203 of the WQCC Regulations and includes the nature, amount and location of the discharge. The WQCC requirements supplement OCD Rule 116 "Notification of Fire, Breaks, Leaks, Spills and Blow-outs" which require reporting of only crude oil condensate and saltwater. EPNG should present as part of the discharge plan a spill, leak, and failure reporting system specific to activities at its Monument Plant. Spill failure of above ground tanks should be reported and should include schematics of where the failure was, and the quantity and quality discharged. The spill plan should state proposed minimum reporting limits and outline mitigating measures to be taken.
  4. A March 18, 1983, EPNG internal memorandum provided to the OCD indicates that EPNG agreed to additional, appropriate commitments at the March 15, 1983, OCD/EPNG meeting. These should be formally incorporated into the July, 1983, discharge plan, if not already done so, prior to approval.
  5. Miscellaneous Technical Comments.
    - A. The "NMEID Monitoring Well" on El Paso's property (p.22, 25) is actually part of the monitoring well system installed by Climax Chemical Company to provide baseline data for a discharge plan (DP-142) that was eventually disapproved by EID in February, 1983. Sampling data by Climax and EID for this well and others in the area are available from the EID Water Pollution Control Bureau.

Page 7

Memorandum - Charles Nylander  
September 30, 1983

- B. The analyses of wells L and M presented in Table 6, page 28 of the discharge plan are not representative of Ogallala Formation waters. They instead show the impact of man-caused activities on ground water in the area (see EPNG Bibliography, pp.48-49; #3 Boyer et. al., #19 Nicholson and Clebsch). Well P and possibly well N are more representative of uncontaminated Ogallala waters.
- C. The aerial views of discharge Figures 6 and 9 purport to show Climax Chemical Company to the north of EPNG. Climax Chemical was not constructed until about 1962. The actual companies shown in the photos are Warren's Monument Plant and the old Southern Union Refinery.

#### Summary and Recommendations

The discharge plan is not yet complete and should not yet be approved because of several outstanding issues:

1. Additional information on the integrity of the new system and its ability to prevent ground water contamination needs to be presented and reviewed.
2. The methodology and site conditions for sludge disposal on-site or in an "approved" (off-site) landfill need to be submitted and reviewed.
3. Some additional questions on the procedures for proper and expedient pond closure need to be answered. Prompt closure of existing ponds is an integral and necessary part of this discharge plan and must not be deferred by EPNG.
4. A reporting and contingency (mitigation) plan for unanticipated spills, leaks, and pipe/tank failures needs to be presented for review.

MSG:DGB:jba

Table 1

Water Quality Analyses of Composite Samples from Evaporation Ponds  
 at El Paso Natural Gas Company's Monument Plant  
 Analysis: December 1980

Constituent	Sample Location <u>1/</u>				
	#1	#2	#3	#4	#5
Sulfate (SO <sub>4</sub> ), mg/L	589	85	90	549	55.5
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Copper (Cu), mg/L	0.1	0.05	0	0.18	0
Iron (Fe), mg/L	0.65	0.15	0.10	0.20	0.15
Manganese (Mn), mg/L	0.14	0.09	0.03	0.03	0.05
Zinc (Zn), mg/L	0.85	0.05	0	2.0	0.07

1/ Pond designations are shown on Figure 5B.

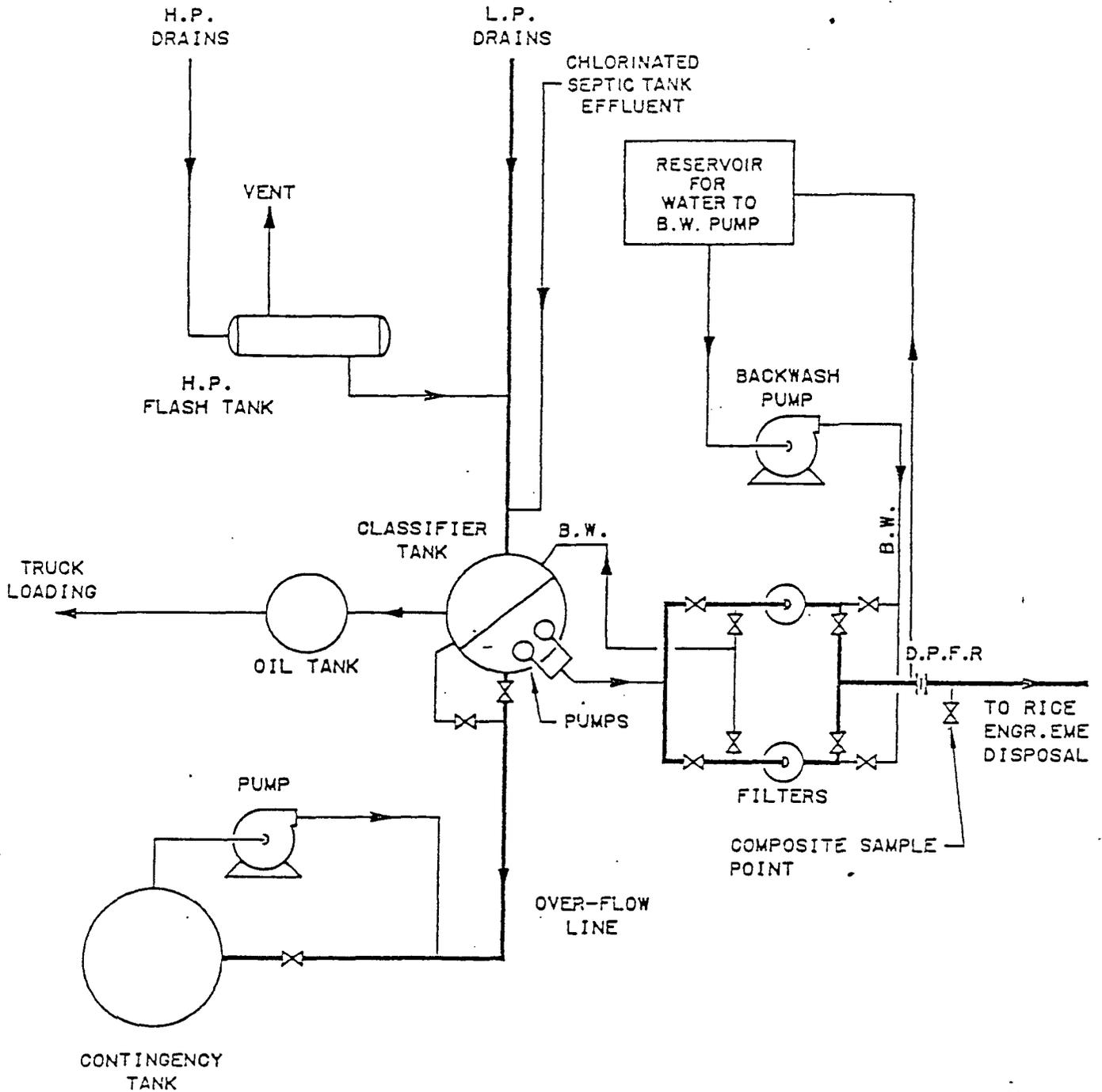
Table 2

Monument Plant  
Characteristics of Wastewater Streams

Source	Primary Effluent	Estimated Flow (GPD*)	Additives to Stream	
			Materials Added	Purpose of Additive
Separators	Water and Hydrocarbon liquid	1,152	None	
Engine cooling water* (closed systems)	Water/oil hydrocarbon		Chromine-T	Corrosion inhibitor
Water Treater	Water/high chloride water	576	Sodium Chloride	Zeolite Regeneration
Camp	Sewage	5,760	Chlorine	Biocide
Cooling Tower	High TDS water	6,624	Antipol-640 Hydrochem D-300 Chlorine Sulfuric Acid Toxsene 35 Toxsene 37	Anti-corrosion Dispersant Biocide pH control Biocide Biocide

\*Closed systems containment system is being installed so that engine coolants are not disposed of in a waste stream.





REF.DWG.NO. 1MO-1-P15 REV.A



FIGURE 17  
MONUMENT PLANT  
WASTEWATER CLASSIFIER-AREA  
FLOW DIAGRAM

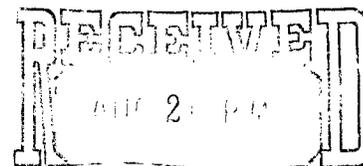
ADDENDUM  
TO  
DISCHARGE PLAN FOR  
EL PASO NATURAL GAS COMPANY  
MONUMENT PLANT  
LEA COUNTY, NEW MEXICO

For

El Paso Natural Gas Company

Prepared by  
Environmental Affairs Department  
El Paso Natural Gas Company  
El Paso, Texas

August 1983



WATER POLLUTION  
CONTROL

To page 47 add the following:

The wastewater flow records will be periodically reviewed to determine if any unexplained changes in disposal volume have developed. If any such anomalies occur, an inspection of the collection system will be conducted to identify the cause. Any changes, anticipated or otherwise, to the disposal system will, of course, be reported to NMOCD.

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION  
SANTA FE, NEW MEXICO

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plan has been submitted for approval to the Director of the Oil Conservation Division, P.O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501, telephone (505) 827-5803.

EL PASO NATURAL GAS COMPANY, Monument Field Plant (Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico), P. O. Box 1384, Jal, New Mexico 88252, also P. O. Box 1492, El Paso, Texas 79978, telephone (915) 541-3292, proposes to discharge approximately 336 barrels of waste water per day. The waste water is derived from plant process, boiler and cooling tower water, and domestic effluent. The waste water will be disposed of into an injection system operated by Rice Engineering Operating, Inc. and ultimately into an injection well(s). The total dissolved solids content of the waste water is approximately 2500 to 3000 mg/L.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing 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.

Notice Dates:

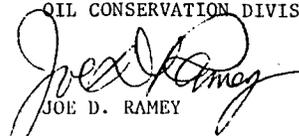
7/18/83 (ALH)

7/22/83 (HOBBS)

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at  
Santa Fe, New Mexico, on this 14th day of July, 1983.

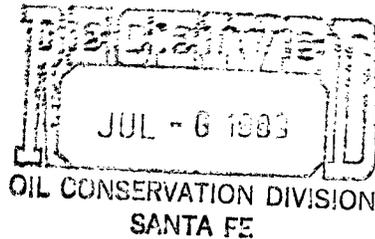
STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

  
JOE D. RAMEY  
Director

S E A L

**El Paso**  
Natural Gas Company



P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

BILLY J. MATTHEWS VICE PRESIDENT

July 1, 1983

Mr. Joe Ramey, Director  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Re: The Enclosed Discharge Plan for  
El Paso Natural Gas Company's  
Monument Plant

Dear Mr. Ramey:

Please find enclosed the complete discharge plan for El Paso's Monument Plant.

El Paso has set forth therein in detail the methods and techniques proposed to be used which will ensure compliance with the New Mexico Water Quality Act and the New Mexico Water Quality Control Commission regulations.

El Paso hereby requests that you act on the proposed plan pursuant to Sections 3-108 and 3-109 of the regulations.

Thank you for your consideration of this matter.

Very truly yours,

A handwritten signature in cursive script that reads "B. J. Matthews".

B. J. Matthews

## Protocol for Characterizing Plant Wastewaters

At the request of the New Mexico Oil Conservation Division (OCD) a protocol was prepared to describe the proposed sampling and evaluation of the wastewaters being discharged from El Paso Natural Gas Company's Monument and Eunice Plants. Although the New Mexico Water Quality Control Commission (WQCC) Regulations require characterization in a general manner, this protocol is more specific in that it will describe all necessary data, documentation and records of the sampling and testing. As part of the protocol a discussion of the use of indicator parameters and flow data is also presented.

An analytical program for characterizing wastewaters will be based on the quantity and quality of discharged wastewater from each process. A list of the processes conducted at the facilities was presented in the amended discharge plan dated 1983. Each process will be evaluated using grab samples at the process discharge point as well as compositing the wastewater at the oil/water separator.

The volume of wastewater will be measured using one or more method such as metering devices, weirs, or simply a bucket and stop watch. Sufficient measurements will be taken to ensure the reliability of the data. Volumes will be shown either graphically, or in tabular form, with a written description indicating the method used and showing calculations.

Storm flows are not known to enter the disposal system of either plant. However, a review of the plant drawings and on-site evaluation will be conducted to ensure that this is the case.

Parameters used to characterize wastewater can be categorized into organic and inorganic species. The organic content of wastewater is estimated in terms of oxygen demand using chemical oxygen demand (COD) or total oxygen demand (TOD). In addition, the organic fraction can be expressed in terms of total organic carbon (TOC). These indicator parameters provide estimates of organics present, they do not measure the same constituents. They reflect the following:

1. COD - Organics amenable to chemical oxidation as well as certain inorganics, such as sulfides, sulfites, ferrous iron, chlorides and nitrites.
2. TOD - All organics and some inorganics in terms of oxygen demand.
3. TOC - All organic carbon expressed as carbon.

The biochemical oxygen demand (BOD), a parameter normally used to measure the biodegradable organics in terms of oxygen demand, is not believed to be a relevant parameter for industrial wastes. Many industrial processes contain refractory substances that inhibit the standard BOD test, hence BOD results can be spurious when evaluating plant wastewaters.

Any substantial variation of these indicator parameters for organics will be explained as to the source and chemical character of high concentrations. For example, the presence of oily wastes will be noted. If oily wastewaters are involved, the nine organic parameters listed in WQCC regulations 3-103 will be evaluated.

Inorganic characterization of the wastewater will include those tests which provide information concerning the constituents listed in WQCC Regulation 3-103.A. The testing will be conducted first using standard indicator parameters such as pH, specific conductance, dissolved oxygen, turbidity and temperature. In those processes where the water contains only one or two additives, the wastewater samples will be analyzed for those additives. If other unknown contaminants have entered the water during the process, the indicator parameters should indicate the change. Any such change would be investigated through further analyses and review of the process.

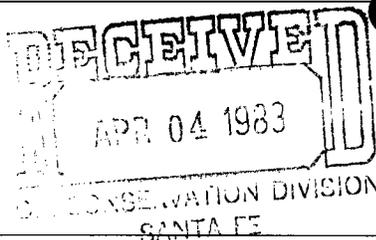
Composite samples collected at the oil/water separator will be taken hourly either for a two-day period or two separate days within a 30-day period as described in WQCC Regulation 2-101. Flow data will be taken in conjunction with the composite sampling. The hourly samples will be evaluated using the selected indicator parameters and each daily-composite sample will be analyzed for those constituents listed in WQCC regulation 3-103.

Using the flow data obtained from the individual processes, and the composite flow in the oil/water separator, a comparison will be made to account for the total volume discharged. A loss or increase in the final volume versus the measured inflow should be comparable within ten percent ( $\pm 10\%$ ) which is considered to be a reasonable range for error.

The amount of throughput of various constituents in pounds per day will be determined based on the wastewater volumes and chemical analyses. This in essence will be a simple mass balance of what has been added to the process waters and disposed of through the oil/water separator.



**El Paso** NATURAL GAS  
COMPANY



# Memorandum

TO: Oscar Simpson  
Oil Conservation Division

FROM: L. W. Webb

DATE: 3-31-83

PLACE: Monument Plant

The amount of water taken in by this plant for the month of March 1983 was 6,285 barrels. The total amount since they have started taking water is 39,007.

L. W. Webb  
Plant Supt.

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

Disposal System El Paso Natural Gas Co. Disposal System Monument Plant  
County Lea Month March 19 1965

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Monument Plant	Pico Ingr.		1	00	00	6,205	38,007	2-11.
TOTAL								

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Signature: E. M. [Signature]  
Name: E. M. [Signature]  
Company: El Paso Natural Gas Co.  
Title: Plant Superintendent

March 18, 1983

Mr. Joe Ramey  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Re: El Paso Natural Gas Company  
Eunice and Monument Discharge Plan

Dear Mr. Ramey:

The following is to confirm the discussions during the meeting held in your office on March 15, 1983 and to respond more fully to the technical comments offered by Mr. Oscar Simpson. You called the meeting to discuss the draft addendum to the Eunice and Monument Discharge Plan which El Paso submitted on February 5, 1983. For clarity and brevity, the following numbered responses correspond to the specific numbered sections of the attached NMOCD comments:

1. The reasons for combining the original discharge plan into one report were the similarities of the plants and especially the method of disposal into the Rice Engineering system. The submitted draft addendum merely continued the original format. El Paso will separate the plans and assemble all relevant information in one rewritten plan initially. Subsequent submittals (discharge plans) will liberally reference this initial rewritten plan and depart from it only where location specific information dictates.
2. Because the cross-sections wouldn't add to the information already provided in the previous submittals, you made the decision that El Paso will not be required to submit additional North-South, East-West geologic cross-sections of the Ogallala.

3. This information was requested to identify possible points of withdrawal. El Paso offered that all the available information that could be obtained from the State Engineer's maps had been previously provided to OCD. In addition, such information served no purpose in the demonstration that groundwater degradation is prevented. Based on these and other arguments, El Paso will not be required to submit this information.
4. Although related to question No. 3, El Paso will name the immediately adjacent property user (surface user), if possible. No title search is intended, however.
5. El Paso will add statements to the plan text verifying that no joint use agreements exist or easements are granted on Plant property, and that El Paso owns all plant property.
6. Same as No. 5.
7. El Paso acknowledged that corrections are appropriate and will be made.
8. El Paso has already provided a verbal description of the soil types, with references. Xerox copies of the appropriate Soil Conservation Service maps will, however, be provided.
9. El Paso will add a statement that storm runoff can't enter the plants' collection systems. The physical realities preclude such a problem at these plants. Also, please see item number 21, below.
10. El Paso has already provided as much information as could be found on past operations with a photo history. Consequently El Paso does not have to submit the information requested in number 10.
11. El Paso is in the process of preparing closure plans for both locations. Closure plans cannot be submitted with the discharge plan until after the April 6 meeting alluded to later; however, El Paso will make a determination, and inform the OCD, when they will be submitted.
12. Following considerable discussion as to the reason for this request, a desire by OCD to know if something was being stored or is leaking in the shut-down equipment was identified. To this end El Paso will incorporate a statement that nothing is being stored or is leaking in shut-down equipment.

- ✓ 13. The ponds at Eunice and Monument are known to be drying; however, the exact status of the ponds could not be discussed. The important point was that nothing is being discharged to them now. Despite this, El Paso will incorporate a statement into the plan text indicating that El Paso will pump out any remaining fluids, and the remaining sludge will air dry by evaporation. In addition, a statement on the fate of rain-water in such ponds is expected, if practical.
14. Following a demonstration that standard engineering practices were used to estimate volumes of sewage, you indicated that El Paso will not have to submit any more information on the sewage than has already been given.
- ✓ 15 & 16. El Paso will provide a composite analysis protocol to meet Sec. 3-106 (C-1) of the Water Quality Control Commission (WQCC) Regulations. The protocol to be developed by the Environmental Affairs Department (EAD) will include a general discussion of the sampling and testing procedures, data, documentation, and records. The protocol will demonstrate that the composite analysis achieves a proportional-time weighted sampling, reflecting the fluctuating flow characteristics of the plant on a daily to yearly basis. The protocol is to be reviewed with the Agency on April 7, 1983 in Santa Fe. El Paso can develop a protocol which will comply with the regulations.
17. El Paso will provide evapotranspiration vs. infiltration data to show that WQCC standards will not be exceeded in ground water if classifier and tower sludges are placed in a dedicated pit on plant property. The data will be used to show that monitoring in the vados zone is not necessary (Sec. 3-107A 3). Discussions on this topic will be included with the composite analysis protocol on April 7, 1983 in Santa Fe. Part of the same demonstration of no leachate formation is tied to the organic chemical analysis and disposal methods for Jal No. 4 which will also be discussed April 7.
18. El Paso will again verify that, utilizing the referenced methods, hazardous waste is not generated. This methodology was utilized previously. In all probability, a statement will be added to the plan indicating that appropriate hazardous waste analyses will be performed on the classifier and tower sludges to verify non-hazardous characteristics. Considerable time and expense is involved if all wastes must be evaluated accordingly.

19. This item is related to Item 18. Since this meeting, El Paso's EAD has requested and obtained a legal determination from company lawyers that the oil and gas industry is indeed exempt from the RCRA law. In addition, the mixture rule has been reviewed and within certain guidelines, El Paso can implement collection (retention) systems to capture and re-use closed cooling systems containing chromium over 5 ppm, which will constitute legitimate re-use and recycling. Such use is exempt from the hazardous waste regulations. El Paso would welcome the opportunity to review the EPA and New Mexico Hazardous Waste Regulations with you, so that you may satisfy yourself that El Paso's interpretations are correct.

El Paso also respectfully requests that the jurisdiction of the NMOCD over the plants under discussion be reaffirmed by the Water Quality Control Commission.

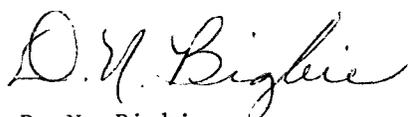
20. Because this information has already been submitted, no further information is required by the OCD.
21. El Paso will incorporate a statement into the discharge plan text indicating that no flooding potential exists for the collection and drainage system and no open drains are tied into the classifier system.
22. El Paso will incorporate a statement into the discharge plan text indicating that cleaning and disposal of debris and sludge from the collection system will be on an "as-needed" basis, because the system has not been in operation long enough with regular flows to establish a schedule.
23. El Paso's response to this request is contingent on OCD approval of disposal in a dedicated pit on plant property.
24. El Paso will incorporate a statement into the discharge plan text showing that products are not discharged. A brief summary of product types and handling methods will be included.
25. El Paso will indicate that drainlines will be hydrotested on a yearly basis. Verbal agreement was given by you that it is more appropriate, and not a part of this discharge plan, to obtain a separate permit for any hydrostatic testing. If disposal of the hydrotest water would happen to involve the plant effluent disposal system, then OCD would be notified consistent with the WQCC regulations.
26. Similiar to question No. 18, El Paso will again verify that hazardous waste activity is not being conducted.
27. This will be covered in the sampling protocol to be supplied by El Paso and reviewed with OCD on April 7, 1983. The point of sampling will be put on one of the many previously submitted drawings.

28. Section 3 - 107A (1) is addressed in the draft addendum. Section 3-107A (2 through 10) will not be necessary contingent on the April 7 meeting. However, pursuant to 3-107A (7) El Paso will incorporate a statement into the discharge plan text indicating that all records will be retained for 5 years.  
  
Pursuant to 3-107A (11) El Paso will add a statement that upon abandonment of facilities all discharges shall cease.
29. The only appropriate response is to reference the wording in the contract between Rice and El Paso.
30. El Paso will not have to submit such a map.
31. If a successful demonstration of the integrity of all gravity flow drains can be made, showing that it is very unlikely that big leaks will develop between yearly tests, this request will be deleted.
32. The testing plans are already referenced in the discharge plan. These plans will be submitted when completed.
33. This request is similiar to Item 24 and El Paso will not have to submit such a plan.
34. This information has already been submitted.
35. The discussions of the various protocols on April 7 will determine the appropriateness of the requests and responses. El Paso does not believe the recommended monitoring wells would provide useful information.
36. Since the EID well is PVC cased, the request is dropped.
37. This request is also part of the protocols to be discussed.
38. The missing figures were located.
39. El Paso will supply engineering specifications on the meters. The location has already been provided.

In summary, El Paso feels that these specific responses and general comments clarify all the remaining questions that must be addressed on the captioned discharged plan. El Paso fully expects to address all the remaining unanswered questions during our upcoming meeting on April 7, 1983. The primary objective of the submittal of discharge plans is to make the demonstrations that degradation of groundwater is prevented. During the nearly three years that have passed since the first request for a discharge plan for Eunice Plant (April 29, 1980), El Paso has spent over \$5,000,000 on wastewater collection systems in Lea County, New Mexico. The systems meet the standards of performance consistent

with technical practicability and economic reasonableness required by the New Mexico Oil Conservation Division as a constituent member of the Water Quality Control Commission. The wastewater systems now installed and working at Eunice and Monument Plants are designed exactly like the one at El Paso's Jal No. 4 Plant which was approved by the OCD from construction drawings prior to the construction of the disposal system. El Paso now wishes the approval process of the captioned discharge plan to catch up with the realities that exist at both locations; namely, expensive and effective wastewater collection systems are installed and operating properly at both locations. El Paso believes that the operating systems meet the requirements and objectives of the New Mexico Clean Water Act ["to prevent or abate water pollution"], and respectfully requests the New Mexico Oil Conservation Division's early approval of the plans.

Very truly yours,



D. N. Bigbie  
Assistant Division Superintendent

DNB/mts



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

TONY ANAYA  
GOVERNOR

March 14, 1983

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-5800

El Paso Natural Gas Company  
Two Petroleum Center/ Suite 200  
North "A" at Wadley  
Midland, Texas 79701

Attention: D. N. Bigbee

Re: OCD Review of Eunice  
and Monument Discharge  
Plan Drafts

Dear Sir:

Pursuant to the submittal of the draft of the Eunice and Monument discharge plans on February 8, 1983, attached are the Oil Conservation Division's technical comments.

If you have any questions concerning this matter, please call me at (505) 827-5822.

Sincerely,

A handwritten signature in cursive script that reads "Oscar A. Simpson III".

OSCAR A. SIMPSON, III  
Water Resource Specialist

OAS/dp

Enc.

EUNICE AND MONUMENT DISCHARGE PLANS

1 It would be greatly appreciated if the Eunice and Monument discharge plans were separated into independent reports. Also please assimilate into the reports in a coherent manner any information and data that may be forthcoming as the result of the following comments on your Eunice and Monument discharge plans.

III. DESCRIPTION OF THE ENVIRONMENT (pp. 4 to 10)

2 A. Submit a detailed N-S and E-W geologic cross-section of the Ogallala formation for both Eunice and Monument. Show the water table and the control points. The cross-sections should extend 1/2 mile beyond the property boundaries in all directions.

B. Show on a map of appropriate scale, all land use within one mile of each plant.

- 1) Industrial
- 2) Commercial
- 3) Residential
- 4) Irrigated Land
- 5) Recreational
- 3 6) State and Federal Lands
- 7) Unused Land
- 8) Abandoned and Present Water Wells
- 9) Wells Proposed to be Monitored
- 10) Pipelines
- 11) Location of Geologic Cross Sections

C. On figures 5A and B or a revision thereof:

- 4
- 1) Show ownership of adjacent property to EPNG's Eunice and Monument properties (Names and Mailing addresses)

5

2) Show all right-of-ways and easements on plant properties and ownership thereof.

6

3) Show and name any parent companies lying within plant properties. Show facilities owned.

IV. SURFACE HYDROLOGY (pp. 11-17)

7

A. Correlate Appendix A and B which have number systems to Tables 5 and 6 and Figures 5A and B which have letter systems as to drainage areas. (Eunice Plant)

8

B. Submit a map showing the distribution of the soil types for each plant. Show soil sample locations.

9

C. Describe what effect storm runoff will have on each plant's collection and drainage system. At what point (volume) will storm runoff cause overflow and flooding of the collection and drainage systems for each plant? Are there any storm drain systems? Derive calculations for each drainage area (figures 5A and B) that will predict the extent storm runoff will be degraded due to flooding of the collection and drainage systems. Submit a contingency plan or corrective plan of action that will resolve this problem.

D. Submit a more detailed history of past operations concerning waste disposal areas and ponds that include: (For Eunice and Monument Plants)

1) Date built?

2) Used for what length of time?

10

3) Volume and type of waste disposal including chemicals (chemical constituents-theoretical or analytical)

4) From what processes were they from?

5) Show on a map or aerial photo the sequence of events and locations thereof.

11

E. Submit a detailed closure plan (both plants) for past and present waste disposal areas and ponds.

DICHARGE PLANS - EUNICE AND MONUMENT

12

A. Submit a description of the whole existing plant (this includes that portion which is shut down and not presently operating). When was section or process shut down? Were all facilities properly shut down so that discharges or potential discharges of wastes, products, or chemicals cannot occur. If not, how and when will the problem be abated?

13

B. Show present status of existing ponds as to whether they are dry, being drained, and if applicable, anticipated date when ponds will be drained. How are ponds being drained? Drainage by evaporation will not be allowed.

14

C. Is all sewage being disposed of through Rice Engineering System? If not, where and how? Describe how volumes of sewage were determined. Show measuring point. Show the location of the chlorination station. What mechanism or apparatus is chlorinating the sewage effluent? Define the flow characteristics of the sewage. Describe the flow measurement apparatus in detail. Define the quality of the sewage as per Section 3-103 A, B and C.

15

Under Section 3-106 (C-1) of the WQCC Regulations 82-1, the quantity, quality, and flow characteristics of the discharge are required to be defined. The information in the discharge plans has no supporting data to verify the statements made in the report. A complete analysis of the plant effluent was not submitted as required by 3-103 (A, B and C). Organic substances were not addressed. Methods and locations of flow measurement were not defined or described. Flow characteristics of the sources of waste water were not addressed. Flow characteristics reflect or represent plant fluctuations, seasonal variations, and maintenance and repair of a plant. These fluctuations reflect quality and quantity in a plant effluent. Data, documentation, and records of sampling and testing were not submitted.

16

Under Sections 3-104 and 3-106 (C-1) WQCC regulations 82-1 EPNG is required to define the quantity, quality, and flow characteristics of any discharge (s) whether in the form of a effluent or leachate. Therefore each source point of the discharge whether separatic or constant in nature will be characterized as to its quantity, quality, and flow characteristics. The quality of each discharge shall be characterized for those constituents as

listed in Section 3-103 (A, B, and C). The quantity shall be measured by standard engineering practices such as those described in the "Handbook for Monitoring Industrial Wastewater, August 1973, PB-259 146". Refer to chapters 3, 6, and 7 for guidance. The flow characteristics reflect daily to yearly plant fluctuations which in turn reflect changes in quality and quantity.

16  
CONT'D

The flow characteristics should be used to statistically define the quantity and quality of the effluent and or lechate. EPNG is requested to statistically characterize their effluent and or leachate by the flow proportional-time weighted composite sampling technique as described in the "Handbook for Monitoring Industrial Watsewater". This is the only method that represents the intent and requirements of Section 3-106 (C-1) of the WQCC regulations.

Submit all documents, records, and data necessary to achieve the flow proportional-time weighted sampling.

- 1) Submit graphs or illustrations which illustrate your results
- 2) Show calculations
- 3) Show measuring and sampling points on figure 5A and on the flow schematic

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In reply to EPNG's letter of January 31, 1983, from O. R. Dakan and the Eunice and Monument Discharge Plans, the OCD would like to clarify the difference between New Mexico WQCC regulations and the EPA's (RCRA) Hazardous Waste Regulations:

17

- 1) The WQCC regulations have lower standards than RCRA.
- 2) If a substance is leachable and that leachate will violate WQCC standards, then disposal of that substance or leachate must be disposed of in such a manner that ground water cannot be effected.

18

- 3) The Rice Engineering injection system or wells are considered to be Class II Wells. Disposal of substances up to the limit of the RCRA standards can be disposed of in a Class II well without changing the

classification, and the monitoring and mechanical integrity requirements of the well.

- 4) Liquids, sludges, solids and any leachate thereof that are above the standards of the WQCC regulations cannot be disposed of in unlined pits where ground water has the potential to be effected. The RCRA standards do not supersede the WQCC standards in this case and cannot be applied to this case.
- 5) RCRA Hazardous Waste - land disposal - has a system of monitor wells on and around the disposal area. If any leachate from the hazardous material is detected in any quantity, then the disposal system must be modified, corrected or discontinued and removed.

EPNG is requested to submit a detailed procedural outline that will set forth the methodology of sampling, testing, evaluating and prescribing modes of disposal for all sludge in every plant. All sources or areas that generate sludge in a plant must be identified as to quality, quantity, and flow characteristics. If a data base line of analysis is sufficient to show that future testing is not required, then the testing requirements will be dropped.

Those constituents as listed in Section 3-103 (A,B, and C) are the parameters which the sludges and associated waste will be analyzed for.

The test methods to be used are:

- 1) The extraction procedure - Appendix II of 40 CFR, Part 261 (RCRA) Section 7 - for metals
- 2) EPA leachate extraction method (for organics) - 40-CFR, Part 261
- 3) EP Toxicity Test - 40 -CFR-261

The OCD will request that EPNG designate a specific disposal area for disposal of all on site wastes which cannot be disposed of by injection and in conjunction pose a threat to ground water.

The OCD requests that all leachable substances and fluids that cannot be disposed of by injection be placed in a double-lined disposal pit with a leak detection system

18  
CONT'D

between the liners. Pit plans and specifications must be approved prior to construction. Other disposal methods may be substituted upon approval.

The hazardous waste section in Dallas, Texas and the EID section concur that:

- 1) The oil and gas industry does not have exempt status once production begins from the wellhead.
- 2) The following is considered to be potential hazardous waste sources and generators of hazardous waste if they meet certain criteria:
  - a) Wastewater classifiers (sludge)
  - b) Closed cooling systems containing chromate over 5ppm
  - c) Carbon filter materials
  - d) Cooling towers greater than 5 ppm CR
  - e) DGA bottoms
  - f) Tank bottoms
  - g) Any non-hazardous material that is mixed with a hazardous substance automatically becomes a hazardous substance itself.

19

Submit a detailed description of the types of collection systems used to collect the various sources of plant effluent.

20

Submit detailed plans which illustrate and describe the various types of collection and drainage systems.

21

Submit calculations to verify the flow capability of the collection system.

22

What is the maintenance schedule for cleaning debris and sludge from the collection system?

23

Where and how is the sludge from the collection system to be disposed of?

24 Describe what products are produced from the raw gas and what is the disposition of these substances and how are they stored and transferred. (Define the chemical composition of the raw and refined products.)

25 Address hydrostatic testing and discharge of hydrostatic test water sources, include major transmission lines coming in and out of the plants. Describe past disposal practices and what intended disposal practices will be implemented for the Eunice and Monument plants and appurtenances thereof.

26 Submit a list and description for all substances used or generated at each plant that include RCRA's - Listed Wastes and Characteristic Wastes.

27 Please address Section 3-106 (C-5)

28 The OCD requests that all of the requirements as set forth in Section 3-107 A (1-11) be addressed to the discharge plans of Eunice and Monument.

29 Submit a monitoring and inspection plan which is either administered by you or Rice Engineering and that assumes responsibility of the pipeline and contents thereof from EPNG's property to the injection system and wells.

30 Show on a map Rice Engineering injection systems that take effluent from Eunice and Monument plants.

MONITORING PLAN (pp. 24 and 46)

31 To further demonstrate that Eunice and Monument plants are collecting all effluent and wastes in an appropriate manner (not polluting) and are monitoring effluent; the OCD suggests that a mass balance accounting system of all incoming and outgoing materials in the effluent and wastes be performed on a frequency sufficient to monitor and account for mass in, out, and any losses thereof. (WQCC 82-1 - Section 3-106 (C-7) and 3-107-(A-1))

32 Submit the underground drain pipe pressure testing system in greater detail for both the Eunice and Monument plants.

33 Submit a Spill Prevention Control and Counter Measures Plan (SPCCP) as part of your contingency plan for both plants - Section 3-107 (a-10).

34 ADDRESS SECTION 3-106, (C-3) - WQCC 82-1

35 EPNG is requested to submit a plan that will encompass drilling of monitor wells up and down gradient of the Eunice plant property. Configuration and spacing of the wells in respect to the plant will be determined by hydrologic and geologic conditions of the Ogalalla. The wells should be drilled to a depth of 75 feet below the ground water table or to the base of the red beds whichever is greater. The wells shall be of a minimum diameter of 2 inch I.D. and of stainless steel construction.

36 The EID monitor well should be resampled for those organic compounds as found in Section 3-103 (A) WQCC.

37 Submit data on EPNG Quality Assurance Programs for the labs that performed tests.

38 Figures - 12b and 13b are missing.

39 Describe the metering systems for the Eunice and Monument plants that meter effluent going to Rice Engineering.

Show locations on aerial photographs 5A and 5B.

**El Paso**  
Natural Gas Company

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-541-2600

March 18, 1983

Mr. Joe Ramey  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Re: El Paso Natural Gas Company  
Eunice and Monument Discharge Plan

Dear Mr. Ramey:

The following is to confirm the discussions during the meeting held in your office on March 15, 1983 and to respond more fully to the technical comments offered by Mr. Oscar Simpson. You called the meeting to discuss the draft addendum to the Eunice and Monument Discharge Plan which El Paso submitted on February 5, 1983. For clarity and brevity, the following numbered responses correspond to the specific numbered sections of the attached NMOCD comments:

1. The reasons for combining the original discharge plan into one report were the similarities of the plants and especially the method of disposal into the Rice Engineering system. The submitted draft addendum merely continued the original format. El Paso will separate the plans and assemble all relevant information in one rewritten plan initially. Subsequent submittals (discharge plans) will liberally reference this initial rewritten plan and depart from it only where location specific information dictates.
2. Because the cross-sections wouldn't add to the information already provided in the previous submittals, you made the decision that El Paso will not be required to submit additional North-South, East-West geologic cross-sections of the Ogallala.

3. This information was requested to identify possible points of withdrawal. El Paso offered that all the available information that could be obtained from the State Engineer's maps had been previously provided to OCD. In addition, such information served no purpose in the demonstration that groundwater degradation is prevented. Based on these and other arguments, El Paso will not be required to submit this information.
4. Although related to question No. 3, El Paso will name the immediately adjacent property user (surface user), if possible. No title search is intended, however.
5. El Paso will add statements to the plan text verifying that no joint use agreements exist or easements are granted on Plant property, and that El Paso owns all plant property.
6. Same as No. 5.
7. El Paso acknowledged that corrections are appropriate and will be made.
8. El Paso has already provided a verbal description of the soil types, with references. Xerox copies of the appropriate Soil Conservation Service maps will, however, be provided.
9. El Paso will add a statement that storm runoff can't enter the plants' collection systems. The physical realities preclude such a problem at these plants. Also, please see item number 21, below.
10. El Paso has already provided as much information as could be found on past operations with a photo history. Consequently El Paso does not have to submit the information requested in number 10.
11. El Paso is in the process of preparing closure plans for both locations. Closure plans cannot be submitted with the discharge plan until after the April 6 meeting alluded to later; however, El Paso will make a determination, and inform the CCD, when they will be submitted.
12. Following considerable discussion as to the reason for this request, a desire by OCD to know if something was being stored or is leaking in the shut-down equipment was identified. To this end El Paso will incorporate a statement that nothing is being stored or is leaking in shut-down equipment.

13. The ponds at Eunice and Monument are known to be drying; however, the exact status of the ponds could not be discussed. The important point was that nothing is being discharged to them now. Despite this, El Paso will incorporate a statement into the plan text indicating that El Paso will pump out any remaining fluids, and the remaining sludge will air dry by evaporation. In addition, a statement on the fate of rain-water in such ponds is expected, if practical.
14. Following a demonstration that standard engineering practices were used to estimate volumes of sewage, you indicated that El Paso will not have to submit any more information on the sewage than has already been given.
- 15 & 16. El Paso will provide a composite analysis protocol to meet Sec. 3-106 (C-1) of the Water Quality Control Commission (WQCC) Regulations. The protocol to be developed by the Environmental Affairs Department (EAD) will include a general discussion of the sampling and testing procedures, data, documentation, and records. The protocol will demonstrate that the composite analysis achieves a proportional-time weighted sampling, reflecting the fluctuating flow characteristics of the plant on a daily to yearly basis. The protocol is to be reviewed with the Agency on April 7, 1983 in Santa Fe. El Paso can develop a protocol which will comply with the regulations.
17. El Paso will provide evapotranspiration vs. infiltration data to show that WQCC standards will not be exceeded in ground water if classifier and tower sludges are placed in a dedicated pit on plant property. The data will be used to show that monitoring in the vados zone is not necessary (Sec. 3-107A 3). Discussions on this topic will be included with the composite analysis protocol on April 7, 1983 in Santa Fe. Part of the same demonstration of no leachate formation is tied to the organic chemical analysis and disposal methods for Jal No. 4 which will also be discussed April 7.
18. El Paso will again verify that, utilizing the referenced methods, hazardous waste is not generated. This methodology was utilized previously. In all probability, a statement will be added to the plan indicating that appropriate hazardous waste analyses will be performed on the classifier and tower sludges to verify non-hazardous characteristics. Considerable time and expense is involved if all wastes must be evaluated accordingly.

19. This item is related to Item 18. Since this meeting, El Paso's EAD has requested and obtained a legal determination from company lawyers that the oil and gas industry is indeed exempt from the RCRA law. In addition, the mixture rule has been reviewed and within certain guidelines, El Paso can implement collection (retention) systems to capture and re-use closed cooling systems containing chromium over 5 ppm, which will constitute legitimate re-use and recycling. Such use is exempt from the hazardous waste regulations. El Paso would welcome the opportunity to review the EPA and New Mexico Hazardous Waste Regulations with you, so that you may satisfy yourself that El Paso's interpretations are correct.

El Paso also respectfully requests that the jurisdiction of the NMOCD over the plants under discussion be reaffirmed by the Water Quality Control Commission.

20. Because this information has already been submitted, no further information is required by the OCD.
21. El Paso will incorporate a statement into the discharge plan text indicating that no flooding potential exists for the collection and drainage system and no open drains are tied into the classifier system.
22. El Paso will incorporate a statement into the discharge plan text indicating that cleaning and disposal of debris and sludge from the collection system will be on an "as-needed" basis, because the system has not been in operation long enough with regular flows to establish a schedule.
23. El Paso's response to this request is contingent on OCD approval of disposal in a dedicated pit on plant property.
24. El Paso will incorporate a statement into the discharge plan text showing that products are not discharged. A brief summary of product types and handling methods will be included.
25. El Paso will indicate that drainlines will be hydrotested on a yearly basis. Verbal agreement was given by you that it is more appropriate, and not a part of this discharge plan, to obtain a separate permit for any hydrostatic testing. If disposal of the hydrotest water would happen to involve the plant effluent disposal system, then OCD would be notified consistent with the WQCC regulations.
26. Similiar to question No. 18, El Paso will again verify that hazardous waste activity is not being conducted.
27. This will be covered in the sampling protocol to be supplied by El Paso and reviewed with OCD on April 7, 1983. The point of sampling will be put on one of the many previously submitted drawings.

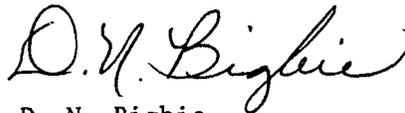
28. Section 3 - 107A (1) is addressed in the draft addendum. Section 3-107A (2 through 10) will not be necessary contingent on the April 7 meeting. However, pursuant to 3-107A (7) El Paso will incorporate a statement into the discharge plan text indicating that all records will be retained for 5 years.  
  
Pursuant to 3-107A (11) El Paso will add a statement that upon abandonment of facilities all discharges shall cease.
29. The only appropriate response is to reference the wording in the contract between Rice and El Paso.
30. El Paso will not have to submit such a map.
31. If a successful demonstration of the integrity of all gravity flow drains can be made, showing that it is very unlikely that big leaks will develop between yearly tests, this request will be deleted.
32. The testing plans are already referenced in the discharge plan. These plans will be submitted when completed.
33. This request is similiar to Item 24 and El Paso will not have to submit such a plan.
34. This information has already been submitted.
35. The discussions of the various protocols on April 7 will determine the appropriateness of the requests and responses. El Paso does not believe the recommended monitoring wells would provide useful information.
36. Since the EID well is PVC cased, the request is dropped.
37. This request is also part of the protocols to be discussed.
38. The missing figures were located.
39. El Paso will supply engineering specifications on the meters. The location has already been provided.

In summary, El Paso feels that these specific responses and general comments clarify all the remaining questions that must be addressed on the captioned discharged plan. El Paso fully expects to address all the remaining unanswered questions during our upcoming meeting on April 7, 1983. The primary objective of the submittal of discharge plans is to make the demonstrations that degradation of groundwater is prevented. During the nearly three years that have passed since the first request for a discharge plan for Eunice Plant (April 29, 1980), El Paso has spent over \$5,000,000 on wastewater collection systems in Lea County, New Mexico. The systems meet the standards of performance consistent

March 18, 1983

with technical practicability and economic reasonableness required by the New Mexico Oil Conservation Division as a constituent member of the Water Quality Control Commission. The wastewater systems now installed and working at Eunice and Monument Plants are designed exactly like the one at El Paso's Jal No. 4 Plant which was approved by the OCD from construction drawings prior to the construction of the disposal system. El Paso now wishes the approval process of the captioned discharge plan to catch up with the realities that exist at both locations; namely, expensive and effective wastewater collection systems are installed and operating properly at both locations. El Paso believes that the operating systems meet the requirements and objectives of the New Mexico Clean Water Act ["to prevent or abate water pollution"], and respectfully requests the New Mexico Oil Conservation Division's early approval of the plans.

Very truly yours,



D. N. Bigbie  
Assistant Division Superintendent

DNB/mts



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

TONY ANAYA  
GOVERNOR

March 14, 1983

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-5800

El Paso Natural Gas Company  
Two Petroleum Center/ Suite 200  
North "A" at Wadley  
Midland, Texas 79701

Attention: D. N. Bigbee

Re: OCD Review of Eunice  
and Monument Discharge  
Plan Drafts

Dear Sir:

Pursuant to the submittal of the draft of the Eunice and Monument discharge plans on February 8, 1983, attached are the Oil Conservation Division's technical comments.

If you have any questions concerning this matter, please call me at (505) 827-5822.

Sincerely,

OSCAR A. SIMPSON, III  
Water Resource Specialist

OAS/dp

Enc.

*EPNG  
Copy submitted  
To OCU me  
on ~~2-18-83~~  
3-18-83*

EUNICE AND MONUMENT DISCHARGE PLANS

1 It would be greatly appreciated if the Eunice and Monument discharge plans were separated into independent reports. Also please assimilate into the reports in a coherent manner any information and data that may be forthcoming as the result of the following comments on your Eunice and Monument discharge plans.

III. DESCRIPTION OF THE ENVIRONMENT (pp. 4 to 10)

*JOE VETOED 2*

A. Submit a detailed N-S and E-W geologic cross-section of the Ogallala formation for both Eunice and Monument. Show the water table and the control points. The cross-sections should extend 1/2 mile beyond the property boundaries in all directions.

B. Show on a map of appropriate scale, all land use within one mile of each plant.

- 1) Industrial
- 2) Commercial
- 3) Residential
- 4) Irrigated Land
- 5) Recreational
- 6) State and Federal Lands
- 7) Unused Land
- 8) Abandoned and Present Water Wells
- 9) Wells Proposed to be Monitored
- 10) Pipelines
- 11) Location of Geologic Cross Sections

C. On figures 5A and B or a revision thereof:

- 4
- 1) Show ownership of adjacent property to EPNG's Eunice and Monument properties (Names and Mailing addresses)

*JOE COM PROMISED THIS I DISAGREE WITH JOE'S SOLUTION*

5

2) Show all right-of-ways and easements on plant properties and ownership thereof.

6

3) Show and name any parent companies lying within plant properties. Show facilities owned.

IV. SURFACE HYDROLOGY (pp. 11-17)

7

A. Correlate Appendix A and B which have number systems to Tables 5 and 6 and Figures 5A and B which have letter systems as to drainage areas. (Eunice Plant)

8

B. Submit a map showing the distribution of the soil types for each plant. Show soil sample locations.

9

C. Describe what effect storm runoff will have on each plant's collection and drainage system. At what point (volume) will storm runoff cause overflow and flooding of the collection and drainage systems for each plant? Are there any storm drain systems? Derive calculations for each drainage area (figures 5A and B) that will predict the extent storm runoff will be degraded due to flooding of the collection and drainage systems. Submit a contingency plan or corrective plan of action that will resolve this problem.

D. Submit a more detailed history of past operations concerning waste disposal areas and ponds that include: (For Eunice and Monument Plants)

10

- 1) Date built?
- 2) Used for what length of time?
- 3) Volume and type of waste disposal including chemicals (chemical constituents-theoretical or analytical)
- 4) From what processes were they from?
- 5) Show on a map or aerial photo the sequence of events and locations thereof.

11

E. Submit a detailed closure plan (both plants) for past and present waste disposal areas and ponds.

DICHARGE PLANS - EUNICE AND MONUMENT

12

A. Submit a description of the whole existing plant (this includes that portion which is shut down and not presently operating). When was section or process shut down? Were all facilities properly shut down so that discharges or potential discharges of wastes, products, or chemicals cannot occur. If not, how and when will the problem be abated?

13

B. Show present status of existing ponds as to whether they are dry, being drained, and if applicable, anticipated date when ponds will be drained. How are ponds being drained? Drainage by evaporation will not be allowed.

14

C. Is all sewage being disposed of through Rice Engineering System? If not, where and how? Describe how volumes of sewage were determined. Show measuring point. Show the location of the chlorination station. What mechanism or apparatus is chlorinating the sewage effluent? Define the flow characteristics of the sewage. Describe the flow measurement apparatus in detail. Define the quality of the sewage as per Section 3-103 A, B and C.

*IF SUSPECTED SEWAGE CONTAINS OTHER SUBSTANCES BASED ON OTHER PLANT PRACTICES.*

15

Under Section 3-106 (C-1) of the WQCC Regulations 82-1, the quantity, quality, and flow characteristics of the discharge are required to be defined. The information in the discharge plans has no supporting data to verify the statements made in the report. A complete analysis of the plant effluent was not submitted as required by 3-103 (A, B and C). Organic substances were not addressed. Methods and locations of flow measurement were not defined or described. Flow characteristics of the sources of waste water were not addressed. Flow characteristics reflect or represent plant fluctuations, seasonal variations, and maintenance and repair of a plant. These fluctuations reflect quality and quantity in a plant effluent. Data, documentation, and records of sampling and testing were not submitted.

16

Under Sections 3-104 and 3-106 (C-1) WQCC regulations 82-1 EPNG is required to define the quantity, quality, and flow characteristics of any discharge (s) whether in the form of a effluent or leachate. Therefore each source point of the discharge whether separatic or constant in nature will be characterized as to its quantity, quality, and flow characteristics. The quality of each discharge shall be characterized for those constituents as

listed in Section 3-103 (A, B, and C). The quantity shall be measured by standard engineering practices such as those described in the "Handbook for Monitoring Industrial Wastewater, August 1973, PB-259 146". Refer to chapters 3, 6, and 7 for guidance. The flow characteristics reflect daily to yearly plant fluctuations which in turn reflect changes in quality and quantity.

16  
CONT'D

The flow characteristics should be used to statistically define the quantity and quality of the effluent and or lechate. EPNG is requested to statistically characterize their effluent and or leachate by the flow proportional-time weighted composite sampling technique as described in the "Handbook for Monitoring Industrial Wastewater". This is the only method that represents the intent and requirements of Section 3-106 (C-1) of the WQCC regulations.

Submit all documents, records, and data necessary to achieve the flow proportional-time weighted sampling.

- 1) Submit graphs or illustrations which illustrate your results
- 2) Show calculations
- 3) Show measuring and sampling points on figure 5A and on the flow schematic

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In reply to EPNG's letter of January 31, 1983, from O. R. Dakan and the Eunice and Monument Discharge Plans, the OCD would like to clarify the difference between New Mexico WQCC regulations and the EPA's (RCRA) Hazardous Waste Regulations:

17

- 1) The WQCC regulations have lower standards than RCRA.
- 2) If a substance is leachable and that leachate will violate WQCC standards, then disposal of that substance or leachate must be disposed of in such a manner that ground water cannot be effected.

18

- 3) The Rice Engineering injection system or wells are considered to be Class II Wells. Disposal of substances up to the limit of the RCRA standards can be disposed of in a Class II well without changing the

classification, and the monitoring and mechanical integrity requirements of the well.

- 4) Liquids, sludges, solids and any leachate thereof that are above the standards of the WQCC regulations cannot be disposed of in unlined pits where ground water has the potential to be effected. The RCRA standards do not supersede the WQCC standards in this case and cannot be applied to this case.
- 5) RCRA Hazardous Waste - land disposal - has a system of monitor wells on and around the disposal area. If any leachate from the hazardous material is detected in any quantity, then the disposal system must be modified, corrected or discontinued and removed.

EPNG is requested to submit a detailed procedural outline that will set forth the methodology of sampling, testing, evaluating and prescribing modes of disposal for all sludge in every plant. All sources or areas that generate sludge in a plant must be identified as to quality, quantity, and flow characteristics. If a data base line of analysis is sufficient to show that future testing is not required, then the testing requirements will be dropped.

Those constituents as listed in Section 3-103 (A,B, and C) are the parameters which the sludges and associated waste will be analyzed for.

The test methods to be used are:

- 1) The extraction procedure - Appendix II of 40 CFR, Part 261 (RCRA) Section 7 - for metals
- 2) EPA leachate extraction method (for organics) - 40-CFR, Part 261
- 3) EP Toxicity Test - 40 -CFR-261

The OCD will request that EPNG designate a specific disposal area for disposal of all on site wastes which cannot be disposed of by injection and in conjunction pose a threat to ground water.

The OCD requests that all leachable substances and fluids that cannot be disposed of by injection be placed in a double-lined disposal pit with a leak detection system

18  
CONT'D

between the liners. Pit plans and specifications must be approved prior to construction. Other disposal methods may be substituted upon approval.

The hazardous waste section in Dallas, Texas and the EID section concur that:

- 1) The oil and gas industry does not have exempt status once production begins from the wellhead.
- 2) The following is considered to be potential hazardous waste sources and generators of hazardous waste if they meet certain criteria:
  - a) Wastewater classifiers (sludge)
  - b) Closed cooling systems containing chromate over 5ppm
  - c) Carbon filter materials
  - d) Cooling towers greater than 5 ppm CR
  - e) DGA bottoms
  - f) Tank bottoms
  - g) Any non-hazardous material that is mixed with a hazardous substance automatically becomes a hazardous substance itself.

19

20

Submit a detailed description of the types of collection systems used to collect the various sources of plant effluent.

Submit detailed plans which illustrate and describe the various types of collection and drainage systems.

21

Submit calculations to verify the flow capability of the collection system.

22

What is the maintenance schedule for cleaning debris and sludge from the collection system?

23

Where and how is the sludge from the collection system to be disposed of?

JOE  
COMPROMISED  
24

Describe what products are produced from the raw gas and what is the disposition of these substances and how are they stored and transferred. (Define the chemical composition of the raw and refined products.)  
*I DISAGREE WITH SOLUTION*

JOE  
COMPROMISED  
THIS 25

Address hydrostatic testing and discharge of hydrostatic test water sources, include major transmission lines coming in and out of the plants. Describe past disposal practices and what intended disposal practices will be implemented for the Eunice and Monument plants and appurtenances thereof.  
*I DISAGREE WITH HIS SOLUTION*

26

Submit a list and description for all substances used or generated at each plant that include RCRA's - Listed Wastes and Characteristic Wastes.

27

Please address Section 3-106 (C-5)

JOE  
VETED 28  
3-107(2 TO 10)

The OCD requests that all of the requirements as set forth in Section 3-107 A (1-11) be addressed to the discharge plans of Eunice and Monument.

29

Submit a monitoring and inspection plan which is either administered by you or Rice Engineering and that assumes responsibility of the pipeline and contents thereof from EPNG's property to the injection system and wells.

JOE  
VETED 30

Show on a map Rice Engineering injection systems that take effluent from Eunice and Monument plants.

MONITORING PLAN (pp. 24 and 46)

JOE  
VETED 31

To further demonstrate that Eunice and Monument plants are collecting all effluent and wastes in an appropriate manner (not polluting) and are monitoring effluent; the OCD suggests that a mass balance accounting system of all incoming and outgoing materials in the effluent and wastes be performed on a frequency sufficient to monitor and account for mass in, out, and any losses thereof. (WQCC 82-1 - Section 3-106 (C-7) and 3-107-(A-1)

32

Submit the underground drain pipe pressure testing system in greater detail for both the Eunice and Monument plants.

JOE  
VETED 33

Submit a Spill Prevention Control and Counter Measures Plan (SPCCP) as part of your contingency plan for both plants - Section 3-107 (a-10).

JOE  
COMPLETED

34

ADDRESS SECTION 3-106, (C-3) - WQCC 82-1

IF I DISAGREE THEY HAVE NOT SUPPLIED THIS INFORMATION ONLY HAVE SPECIFIC CONDUCTANCE MEASUREMENTS

JOE  
VETOED

35

EPNG is requested to submit a plan that will encompass drilling of monitor wells up and down gradient of the Eunice plant property. Configuration and spacing of the wells in respect to the plant will be determined by hydrologic and geologic conditions of the Ogalalla. The wells should be drilled to a depth of 75 feet below the ground water table or to the base of the red beds which ever is greater. The wells shall be of a minimum diameter of 2 inch I.D. and of stainless steel construction.

36

The EID monitor well should be resampled for those organic compounds as found in Section 3-103 (A) WQCC.

37

Submit data on EPNG Quality Assurance Programs for the labs that performed tests.

38

Figures - 12b and 13b are missing.

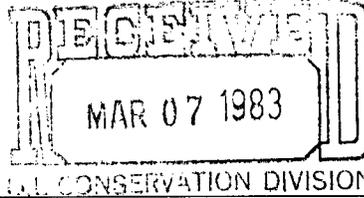
39

Describe the metering systems for the Eunice and Monument plants that meter effluent going to Rice Engineering.

Show locations on aerial photographs 5A and 5B.



**El Paso** NATURAL GAS  
COMPANY



# Memorandum

TO: Oscar Simpson  
Oil Conservation Division

FROM: E. W. Webb

DATE: 3-1-83

PLACE: Monument Plant

The amount of water taken in by Rice Ingr.  
for the month of February 1983 was 6,652 barrels.  
The total amount since they have started taking  
water is 32,712.

E. W. Webb  
Plant Supt.

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

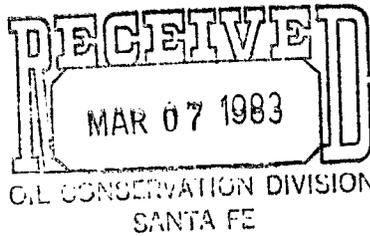
Disposal System El Paso Natural Gas Co. Disposal System Monument Plant  
County Lea Month February 19 83

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Monument Plant	Rice Engr.		1	20	36	6,652,	32,712	2-lb.
<b>TOTAL</b>								

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Remarks: \_\_\_\_\_ Name E. M. Welch  
Company El Paso Natural Gas Co.  
Title Plant Supt.

**El Paso**  
Natural Gas Company



TWO PETROLEUM CENTER / SUITE 200  
NORTH "A" AT WADLEY  
MIDLAND, TEXAS 79701  
PHONE: 915-684-5701

February 28, 1983

Mr. Oscar Simpson, III  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Re: Waste Water Discharge Plans for  
El Paso Natural Gas Company's  
Eunice and Monument Plants

Dear Mr. Simpson:

During the cursory review of the referenced Discharge Plans at our February 8, 1983 meeting, you requested additional information relative to comments made in the plans. The requests, as I noted them, are restated with answers below:

1. Provide a detailed description of the test methods used to determine the chromate levels in the plant wastewater.

The step-by-step test procedures outlined in Appendix II - EP Toxicity Test Procedure of the EPA Rules and Regulations, Part 261, Identification and Listing of Hazardous Waste, were followed to conduct the subject tests.

2. What were the ph values of the sludge samples at the beginning and completion of the tests?

The ph values of the sludge samples were stabilized to 5.0 - 0.2 at the beginning of the tests, in accordance with the test procedures. The ph values of all samples at the completion of the tests were always 5.0 - 0.2 and the allotted amount of acid was never required to maintain the required ph.

3. Provide a complete description of the sludge sampling techniques including; sample size, preservation techniques, date obtained, location obtained and name of person who obtained sample.

Sludge samples were obtained from each side of the cooling tower basins (4 samples per tower basin) by using a container mounted on a pole and dipping into the sludge. Samples ranging in size from two to five pounds were gathered and placed immediately into sealed glass containers for transportation to the laboratory, where 100 gram samples were extracted for testing purposes. The names of individuals who collected samples and the dates samples were collected are on file in the Permian Division laboratory, but were not included here due to the numerous dates involved.

4. Provide complete information relative to the certification of El Paso Natural Gas Company's Permian Division Laboratory.

Dr. Ramirez of the EID Testing Laboratories in Albuquerque, New Mexico is scheduled to visit the Permian Division laboratory on Tuesday, March 1, 1983 for purposes of providing State of New Mexico certification of the laboratory for conducting inorganic analyses.

5. Provide a complete description of wastewater sampling and analysis procedures at Monument Plant, including; sampling frequency, plant processes in operation during the sampling period and analysis techniques (one analysis of composite sample or statistical average of individual samples?).

The samples were obtained on approximately an hourly basis beginning at 9:45 AM on December 7, 1982, with the last sample obtained at 8:45 AM on December 8, 1982. Each sample was analyzed and the statistical average of these results was presented in the discharge plan. However, individual analysis results indicate concentration levels ranging from less than 0.1 mg/l to a maximum of 3.3 mg/l of chromium. Results of the analyses are summarized on the attached EPNG Company memorandum dated December 10, 1982, from Greg Kardos to Mike Keating.

Plant processes as described on pages 25 and 26 of the Discharge Plan were in operation during the 24 hour testing period. Additionally, the closed cooling system filters were backwashed during the period, resulting in the increased levels of chromium during the early afternoon and evening hours of December 7. These levels should present the "worst case" condition with respect to high chromium levels at this facility.

In addition to the above, you requested a copy of the strip chart recording of the injection flow rates and pressures, plus a complete description of the mechanical equipment and the fluid used for the Jal No. 4 disposal well step-rate test.

Page 3  
February 28, 1983

Davis Services, Inc. personnel were contacted by telephone February 9, 1983 and requested to prepare a package containing the requested information for submittal to you on February 11, 1983. I have not received a copy of the transmittal, but I trust that this information was presented to you as requested.

I believe the above information satisfies all outstanding requests for additional information relative to the referenced discharge plans. We respectfully request expeditious completion and submittal of your final comments for these plans to enable us to finalize the plans for advertising.

Sincerely,

EL PASO NATURAL GAS COMPANY



D. N. Bigbie  
Assistant Division Superintendent

DNB:dc



FEB 15 1983

TO: Mike Keating

DATE: December 10, 1982

FROM: Greg Kardos

PLACE: Permian Division Lab

RE: CHROMIUM ANALYSIS ON MONUMENT WASTE WATER TO RICE ENGINEERING.

The following are the results obtained from the samples secured 12/7/82-12/8/82 on an hourly basis. The chromium content was obtained by direct aspiration atomic absorption.

<u>Date</u>	<u>Time</u>	<u>Results mg/l Cr</u>
12-7	9:45am	<0.1
12-7	10:45	<0.1
12-7	11:45	0.1
12-7	12:45pm	1.8
12-7	1:45	2.6
12-7	2:45	3.3
12-7	3:45	2.0
12-7	4:45	1.7
12-7	6:15	1.1
12-7	7:45	2.2
12-7	8:45	1.6
12-7	9:45	1.6
12-7	10:45	1.6
12-7	11:45	1.0
12-8	12:45am	0.8
12-8	1:45	0.6
12-8	2:45	0.5
12-8	3:45	0.5
12-8	4:45	0.3
12-8	5:45	0.4
12-8	6:45	0.4
12-8	7:45	0.7
12-8	8:45	0.5
12-8	9:45	0.4

*Gregory C Kardos*  
Gregory Kardos,  
Chemist

cc: R. T. Wright  
Larry Anderson  
File

**El Paso**  
Natural Gas Company

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

February 7, 1983

Mr. Oscar Simpson, III  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

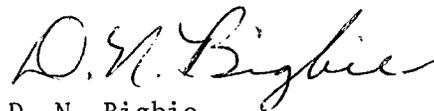
Re: Waste Water Discharge Plan  
El Paso Natural Gas Company's  
Eunice and Monument Plants

Dear Mr. Simpson:

Attached for your review and consideration is one copy of the final draft of the referenced discharge plan. Chapter VIII of this plan has been rewritten to provide additional information of the type requested during the evaluation of El Paso's Jal No. 4 Discharge Plan.

The final copies of this plan will be available by February 11, 1983, and will be submitted to you for acceptance at this time.

Sincerely,

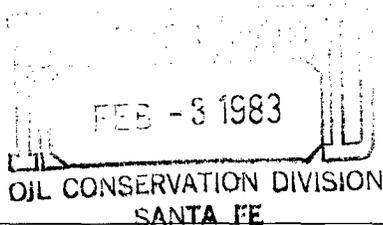


D. N. Bigbie  
Assistant Division Superintendent

DNB/mts  
Attachments



**El Paso** NATURAL GAS  
COMPANY



# Memorandum

TO: Oscar Simpson, Oil Conservation Div.

DATE: 2-1-83

FROM: E. M. Webb

PLACE: Monument Plant

The amount of water taken in by Rice Engr.  
for the month of January 1983 was 6,243 barrels.  
The total amount <sup>since</sup> they have started taking water  
from the Monument Discharge Plant is 26,060.

E. M. Webb  
Plant Supt.

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

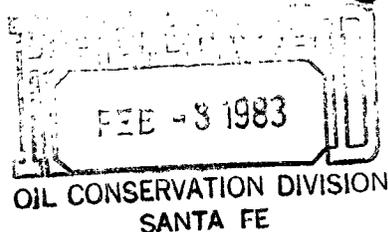
Disposal System El Paso Natural Gas Co. Disposal System Monument Plant  
County Lea Month January 19 55

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Monument Plant	Rice Ingr.		1	25	50	6,245	25,060	2-15.
<i>Herald Frymore</i>								
↓								
TOTAL								
3972288								

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Remarks: \_\_\_\_\_ Name *Herald Frymore*  
Company El Paso Natural Gas Co.  
Title Plant Supt.

**El Paso** NATURAL GAS  
COMPANY



P. O. BOX 1384  
JAL, NEW MEXICO 88252  
PHONE: 505-395-2551

January 31, 1983

New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, NM 87501

ATTN: Oscar Simpson, III  
Water Resource Specialist

RE: HANDLING METHODS FOR CLASSIFIER AND COOLING TOWER SLUDGES

Dear Mr. Simpson:

This letter is to confirm our telephone conversation of January 20, 1983 relating to the disposition of sludge from the wastewater classifiers and cooling tower basins. It is my understanding that these materials can be deposited in an on-site pit provided chemical analyses of sludge samples do not indicate unacceptable concentrations of toxic materials. As discussed, these analyses will be performed prior to removal of the sludges during normal cleaning operations to determine handling methods.

Unless notified otherwise, we will handle these classifier and cooling tower basin sludges as indicated above.

Also during our conversation you expressed concern about the residual chromium content of the cooling tower sludges because of previous water treatment. Attached is a copy of a memo indicating the chromium levels in sludge samples from cooling tower basins at various area plants. These samples were analyzed using the extraction procedure outlined in Appendix II of 40 CFR, part 261 (RCRA), and you will note that no chromium content exceeds the 5 milligram per liter requirement to be defined as a hazardous waste.

Sincerely,

*O. R. Dakan*

EL PASO NATURAL GAS COMPANY  
O. R. Dakan  
Senior Project Engineer

ORD:jls

Attachment

cc: J. W. Cronenberg  
D. N. Bigbie  
D. J. Mobbs

R. Hester  
L. E. Anderson  
File - 2

TO: Larry Anderson

DATE: January 3, 1983

FROM: Gregory Kardos

PLACE: Permian Division Lab - Jal

RE: CHROMIUM ANALYSES ON COOLING TOWER SLUDGE EXTRACTS FROM NEW MEXICO

Chromium Analyses were run by a Direct Aspiration Atomic Absorption on the following Cooling Tower Sludge Extracts which were digested with Nitric Acid. The results are as follows:

*oxygen acid*

<u>Cooling Tower Sludge Extract</u>	<u>mg/l Cr</u>
Jal #1 Refrigeration	0.12
Jal #1 Gasoline	0.10
Jal #1 Treating Plant	Less than 0.10
Jal #1 Compressor	Less than 0.10
Jal #3 Gasoline	Less than 0.10
Jal #3 "A" Tower	Less than 0.10
Monument	0.21
Eunice #1 Field	0.12
Eunice #2 Field	0.38
Eunice #3 Field	0.12
Eunice Mainline	0.42
Eunice 1&2 Field	0.10
Eunice Treating Plant	0.49

*Gregory C Kardos*  
Gregory C Kardos,  
Chemist

GCK/sf

cc: R. T. Wright  
File

*lab. not explicitly described*

*make  
L.H.B  
Cent when  
PH before  
PH after*

*(1st lost week)  
mi  
metals -*

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

Operator El Paso Natural Gas Co.

Disposal System Monument Plant

County Lea

Month November

19 82

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Monument Plant	Rice Ingr.		1	20	36	13,881	0	20-Lb.
<b>TOTAL</b>								

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Remarks: These readings were taken from

Name E M Wick

10-26-82 thru 11-30-82.

Company El Paso Natural Gas Co.

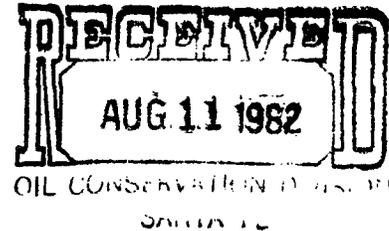
Title Plant Supt.

**El Paso**  
Natural Gas Company

TWO PETROLEUM CENTER / SUITE 200  
NORTH "A" AT WADLEY  
MIDLAND, TEXAS 79701  
PHONE: 915-684-5701

August 6, 1982

Mr. Oscar Simpson, III  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501



Re: El Paso Natural Gas Company's  
Lea County Waste Water Projects  
Construction Status Report -  
July, 1982

Dear Mr. Simpson:

Construction progress during July, 1982 on the referenced projects is outlined below:

JAL NO. 4 PLANT

Contingency Tank - Although the steel contingency tank received some damage during the heavy rain July 9, 1982, the tank had been repaired, piping tied in and internal coating completed by the week of August 2, 1982.

Injection System - The automatic filter backwash system was placed into service on manual and work is underway on the automatic control system. The system should be in full automatic operation within two weeks.

Sewage Chlorination System - A portion of this system is installed but completion is still delayed pending receipt of fiberglass tanks. If the fiberglass tank is received during the week of August 9, this system could be in full operation very near the scheduled completion date of August 15, 1982.

Plant Operations - The broken valve which was leaking water from the closed cooling system was repaired during the plant shutdown.

JAL NO. 3 PLANT

Sewage Chlorination System - Completion of this system is still delayed, pending receipt of the fiberglass tank.

Re: EPNG Lea County Waste Water Projects  
Construction Status Report - July, 1982

Page 2

JAL NO. 1 PLANT

Construction commenced during the month on the drain lines and classifier system. These systems are presently scheduled for completion by September, 1982.

X EUNICE PLANT

Construction of the sewage chlorination system was completed during July and the system will be placed into operation as soon as the automatic controls are in full operation. This should be accomplished within the next two to three weeks and waste water deliveries to Rice Engineering should commence during the month of August, 1982.

X MONUMENT PLANT

Construction is continuing and the waste water facilities appear to be on schedule for completion by late August. Deliveries to Rice Engineering should commence during September, 1982.

If you should have any questions concerning the progress or status of any of the projects, please call.

Sincerely,

EL PASO NATURAL GAS COMPANY

*D. N. Bigbie*

D. N. Bigbie  
Administrative Assistant to the  
Division Superintendent

DNB:dc

July 1, 1982

Mr. Oscar Simpson, III  
Water Resources Specialist  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, NM 87501

Re: El Paso Natural Gas Company's Lea County  
Waste Water Disposal Projects Construction  
Status Report - June, 1982

Dear Mr. Simpson:

The current status of El Paso's Lea County Waste Water Disposal  
Projects are as follows:

Jal No. 4 Plant

Contingency Tank - Tank construction, external coating and back-filling were completed during the week of June 28. The piping is in place and will be tied in during the July 12 plant shutdown. Internal coating will be completed during the week of July 7.

Injection System - No construction work on this system during the month.

Sewage Chlorination System - Material orders for this system were delayed and, combined with the delivery problems being encountered with the fiberglass contact tank, it now appears that completion of the chlorination system at Jal No. 4 will be delayed until August 15, 1982.

Plant Operations - Pursuant to discussions during your visit of June 17, 1982 our engineering personnel are working with plant operating personnel to install a temporary collection system to route the water leaking from the broken valve on the closed cooling system to the nearest plant drain line.

Jal No. 3 Plant

Chlorination System - Drawings have been completed and all material has been ordered for the chlorination system at Jal No. 3 Plant.

*Monthly Report July 82*

Mr. Oscar Simpson, III

Page 2

Re: El Paso Natural Gas Company's Lea  
County Waste Water Disposal Projects  
Construction Status Report - June, 1982

All material has been determined to be readily available except for the fiberglass contact tank. As a result, the projected completion date for this installation is now August 1, 1982.

Company work orders for relocating the drain line presently dumping into the flare condensate pit and for installing an additional filter on the injection system will be issued in early July.

Jal No. 1 Plant

There was no construction at this location during the month of June.

Construction of the drain lines and classifier system should commence by mid-July, 1982.

X Eunice Plant

El Paso's waste water discharge line was tied into the Rice Engineering system and deliveries should commence by July 15, 1982, upon completion of the sewage chlorination system and activation of system controls.

X Monument Plant

Rice Engineering notified El Paso on June 29, 1982 that capacity will be available in its system to accept the Monument waste water, tentatively by late August, 1982.

Construction of the plant waste water handling systems is continuing on schedule and should be completed by the date that Rice Engineering can accept the plant discharge.

We regret that the projected completion dates for the Jal No. 3 and Jal No. 4 chlorination systems have slipped and will exert additional effort to expedite deliveries of the fiberglass tanks and complete these installations as early as possible.

Sincerely,

EL PASO NATURAL GAS COMPANY

*D. N. Bigbie*

D. N. Bigbie  
Administrative Assistant to the  
Division Superintendent

DNB:dc



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

LARRY KEHOE  
SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

October 28, 1981

El Paso Natural Gas Company  
Two Petroleum Center / Suite 200  
North "A" at Wadley  
Midland, Texas 79701

ATTENTION: Mr. M. E. McEwen

RE: Monument & Eunice  
Discharge Plan

Dear Mr. McEwen:

In response to our telephone conversation on October 28, 1981, the Oil Conservation Division will grant El Paso Natural Gas Company an extension of time to the date of November 21, 1981, for Monument and Eunice discharge plans.

The extension was granted on the premise that El Paso needs additional time to firm up negotiations with Rice Engineering. Please disregard my letter of October 27, 1981, for the exception of the request to submit a detailed progress report for the Monument and Eunice plants since notification. These reports should include estimated time frames and completion dates for use of Rice Engineering injection system and other alternatives such as El Paso's own injection system. The OCD requests that the report be submitted to me within one month from the date of this letter.

If you have any questions on this matter, please call me at (505) 827-2534.

Sincerely,

A handwritten signature in cursive script that reads "Oscar A. Simpson, III".

Oscar A. Simpson, III  
Water Resource Specialist

OAS/dp



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

LARRY KEHOE  
SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

October 27, 1981

El Paso Natural Gas Company  
Two Petroleum Center/ Suite 200  
North "A" at Wadley  
Midland, Texas 79701

ATTENTION: Mr. M. E. McEwen

Dear Mr. McEwen:

In response to El Paso's letter of September 11, 1981 and October 9, 1981, requesting six-month extensions for Monument and Eunice Discharge Plans respectively, the Oil Conservation Division will not grant the extensions without sufficient evidence that such extensions are necessary.

The Oil Conservation Division requests that El Paso submit such documentation to substantiate your requests, and provide progress reports for Monument and Eunice Plants since notification began. The letters of September and October only reiterate reasons for extension of time that were given in a previous letter of March 24, 1981 by Mr. Smythe.

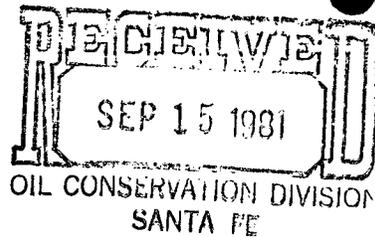
Sincerely,

A handwritten signature in cursive script that reads "Oscar A. Simpson".

Oscar A. Simpson,  
Water Resource Specialist

cc: E. F. Smythe  
Environmental Affairs  
P.O. Box 1492  
El Paso, Texas 79978

**El Paso** NATURAL GAS  
COMPANY



TWO PETROLEUM CENTER / SUITE 200  
NORTH "A" AT WADLEY  
MIDLAND, TEXAS 79701  
PHONE: 915-684-5701

September 11, 1981

Mr. Joe D. Ramey, Director  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

SUBJECT: Waste Water Discharge Plans: El Paso Natural Gas Company  
Monument Plant

Dear Mr. Ramey:

This letter is to request a six-month extension of the present due date for the referenced discharge plan from September 27, 1981 to March 27, 1982.

This extension is requested to allow sufficient time to complete negotiations with Rice Engineering and Operations Company (Rice) of Hobbs, and perform economic alternative evaluations to include drilling and operating our own disposal well.

Respectfully,

M. E. McEuen  
Division Superintendent

kgs

cc: E. F. Smythe  
J. F. Eichelmann, Jr.

RICE Engineering & Operating, Inc. SEP 13 1981

122 WEST TAYLOR TELEPHONE (505) 393-9173

HOBBS, NEW MEXICO 88240  
September 10, 1981

CONSERVATION DIVISION  
SANTA FE  
SEP 14 1981

El Paso Natural Gas Company  
P. O. Box 1384  
Jal, New Mexico 88252

Attention: Mr. Larry E. Anderson

Re: E-M-E SWD System  
Lea County, New Mexico  
(EPNG Monument Plant  
Disposal)

*with water  
Disposal Plan*

Gentlemen:

This is in response to your telephone request as to the time frame of alleviation of capacity problem in the vicinity of your Monument Plant in the E-M-E SWD System. Our AFE No. H-388 has been prepared and circulated to convert an existing P & A well to an SWD Well in the restricted area. (Contingent upon approval by the Operators, when? we anticipate successful conversion and completion of the well by around December, 1981 with construction of terminal facilities and tie line to the existing system in the first quarter of 1982. At such time (we can further con-? sider the disposal of waste water from your Monument Plant.

Please advise if we can supply any additional information at this time.

Yours very truly,

RICE ENGINEERING & OPERATING, INC.

*L. B. Goddheart*  
L. B. Goddheart  
Division Manager

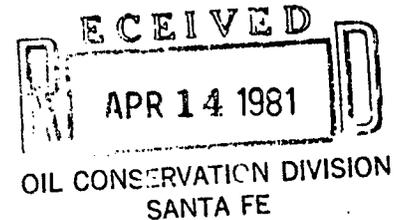
JEL/ac

JWC

**El Paso** NATURAL GAS  
COMPANY

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

April 9, 1981



Mr. Joe D. Ramey, Director  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Subject: Waste Water Discharge Plans - El Paso  
Natural Gas Company Eunice, Jal No. 1,  
and Monument Plants

Dear Mr. Ramey:

In your recent correspondence granting due date extensions for the discharge plans for the above referenced plants, you asked what alternative methods El Paso is considering in the event Rice Engineering and/or the City of Jal deny us the use of their facilities.

We have discussed this with our field management and they advise that the only practical alternative presently being considered in the event this should happen, is to dispose of the waste waters in Company owned and operated disposal wells.

The wells would be budgeted for FY 1982 and would be drilled and equipped after receipt of a permit from the Oil Conservation Division.

Yours very truly,

E. F. Smythe, P.E.  
Chief - Permits  
Environmental Affairs

sg



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

M7

BRUCE KING  
GOVERNOR

LARRY KEHOE  
SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

March 30, 1981

Mr. E. F. Smythe  
El Paso Natural Gas Company  
Box 1492  
El Paso, Texas 79978

Dear Mr. Smythe:

An extension of six months for discharge plans for your Eunice, Monument, and Jal No. 1 Plants is granted for the reasons outlined in your letter of March 24, 1981.

The only question I would have is what alternative methods are you looking at should Rice and the City of Jal deny you the use of their facilities.

Yours very truly,

JOE D. RAMEY  
Director

JDR/fd

**El Paso** NATURAL GAS  
COMPANY

MAR 30 1981  
OIL CONSERVATION DIVISION  
SANTA FE  
P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

March 24, 1981

Mr. Joe D. Ramey, Director  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

Subject: Waste Water Discharge Plans - El Paso Natural Gas  
Company (El Paso) Eunice, Jal No. 1 and Monument Plants

Dear Mr. Ramey,

During a recent meeting between yourself and representatives of the El Paso Natural Gas Company, it was pointed out that final determinations regarding the waste water discharge plans for the Eunice, Jal No. 1, and Monument Plants were contingent upon the results of El Paso's ongoing negotiations with third parties. The specific details include:

1. El Paso is presently negotiating with the Rice Engineering and Operation's Company (Rice) of Hobbs, the operating company of a cooperatively owned disposal system, to take the waste waters from the Eunice and Monument Plants for deep well disposal.

A decision among the members of the cooperative regarding the financial charges for the extension of service to El Paso will not be forthcoming for at least (three more months). When the decision is reached, El Paso will then have to conduct a cost/benefit analysis to ascertain the viability of this approach as well as other possible alternatives.

2. El Paso is negotiating with the City of Jal regarding the possibility of sending waste water from the Jal No. 1 plant to the City's EPA approved sewage treatment plant that is now under construction and scheduled for completion in 1982. Here again, a cost/benefit analysis must be conducted to determine the viability of all alternatives.

116

Mr. Joe D. Ramey  
March 24, 1981  
Page Two

On the basis of these uncontrollable third party actions, El Paso would like to request 6-month extensions to the present discharge plan due dates of the Eunice, Jal No. 1, and Monument Plants. These due dates being April 16, May 25, and March 27, respectively.

Yours very truly,



E. F. Smythe, P.E.  
Chief, Permits & Inventories  
Environmental Affairs Department

mh



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

116

BRUCE KING  
GOVERNOR

LARRY KEHOE  
SECRETARY

February 25, 1981

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

Mr. E. F. Smythe  
Chief, Permits & Inventories  
Environmental Affairs  
El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, Texas 79978

Dear Mr. Smythe:

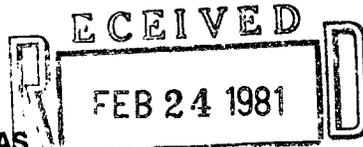
You may consider March 27, 1981, as the due date for  
the discharge plan from your Monument Plant.

Yours very truly,

JOE D. RAMEY  
Director

JDR/fd

**El Paso** NATURAL GAS COMPANY  
OIL CONSERVATION DIVISION  
SANTA FE



P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

*M4*

February 20, 1981

Mr. Joe D. Ramey  
Director  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM

Subject: El Paso Natural Gas Company  
Monument Plant Wastewater Discharge Plan

Dear Mr. Ramey:

On December 3, 1980, El Paso submitted a request for a 90-day extension of the December 27, 1980 due date for the Monument Plant wastewater discharge plan. On January 7, 1981, we received a letter from your office granting the extension.

However, in recently reviewing that letter we find that the Monument Plant due date was extended to March 3, 1981 instead of the requested 90-day extension to March 27, 1981.

El Paso is vitally in need of this extra time in accumulating necessary data for the Monument Plant plan and would like to utilize March 27, 1981 as the actual due date; thereby allowing us the benefit a full 90-day extension.

May we consider March 27, 1981 as the due date?

Very truly yours,

*E. F. Smythe*

E. F. Smythe, P.E.  
Chief, Permits & Inventories  
Environmental Affairs

EFS:gb

*Mr. E. F. Smythe*

*Dear Mr. Smythe:*

*You may consider March 27, 1981, as the due date for the discharge plan from your Monument Plant.*

*YUT  
JDR*



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

M3

BRUCE KING  
GOVERNOR

LARRY KEHOE  
SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

January 7, 1981

Mr. E. F. Smythe, P.E.  
Chief, Permits & Inventories  
Environmental Affairs Department  
El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, Texas 79978

Re: Time Extension for Monument  
Plant Waste Water Discharge  
Plan

Dear Mr. Smythe:

We have received your letter of December 3, 1980, concerning your request for an extension of 90 days.

The information El Paso submitted shows good cause why the Oil Conservation Division should grant a time extension. The due date is hereby extended to March 3, 1981.

We would like to apologize for the delay in responding to your request. Your letter was misplaced during the Christmas holidays.

Please let us know if you have any problems with this arrangement.

Yours very truly,

JOE D. RAMEY  
Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs  
El Paso Natural Gas Co., Drawer C, Monument, New Mexico  
88265

**El Paso** NATURAL GAS  
COMPANY

112A  
RECEIVED  
JAN 2 1981  
OIL CONSERVATION DIVISION  
SANTA FE

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

December 29, 1980

Mr. Joe D. Ramey  
Director  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 89501

Subject: El Paso Natural Gas Company - Monument  
Plant Waste Water Discharge Plan

Dear Mr. Ramey:

On December 3, 1980, El Paso submitted a request for a 90 day extension of the due date for the Monument Plant waste water discharge plan.

Inasmuch as we have not received a response to this request, may we assume that the extension has been granted?

Yours very truly,

*E. F. Smythe*

E. F. Smythe, P.E.  
Chief-Permits  
Environmental Affairs

pb

**El Paso** NATURAL GAS  
COMPANY

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543-2600

*MD*

December 3, 1980

Mr. Joe D. Ramey  
Director  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Subject: El Paso Natural Gas Company Monument Plant  
Waste Water Discharge Plan

Dear Mr. Ramey:

The groundwater hydrologist obtaining data for the Monument Plant discharge plan has recently reported to the Air Force for a short tour of reserve military duty.

His absence will delay preparation of the discharge plan beyond the current deadline of December 27.

May we obtain a 90-day extension of the due date for this plan?

Yours very truly,

*E. F. Smythe*

E. F. Smythe, P.E.  
Chief - Permits  
Environmental Affairs

pb

*Tom:*

*If you have no problem with  
this, give them the extension.*

*JDR*

*Memorandum*

**El Paso** NATURAL GAS COMPANY

RECEIVED  
SEP 22 1980  
OIL CONSERVATION DIVISION  
SANTA FE

P. O. BOX 1492  
EL PASO, TEXAS 79978  
PHONE: 915-543 2600

September 18, 1980

*Tom:  
What's your  
opinion of this?  
JDR*

Mr. Joe D. Ramey  
New Mexico Oil Conservation Commission  
P. O. Box 2088  
Santa Fe, New Mexico 87501

Subject: Waste Water Discharge Plans

Dear Mr. Ramey,

As you are aware, the U. S. Environmental Protection Agency (EPA) recently promulgated a comprehensive set of regulations pertaining to the management of hazardous waste activity.

Pursuant to the regulations, El Paso has been making analytical evaluations necessary to determine if hazardous waste activities are conducted at any of its plants.

One of the characteristics established by EPA for determining hazardous waste activity is the Extraction Procedure Toxicity (EP Toxicity) test. The test procedure was designed to identify wastes likely to leach hazardous concentrations of particular constituents into the groundwater under conditions of improper management.

Under the E P Toxicity procedure, constituents are extracted from the waste in a manner designed to simulate leaching action. This extract is then analyzed to determine whether it possesses any of the contaminants identified in the National Interim Primary Drinking Water Standards (NIPDWS). If the extract contains any of the contaminants in concentrations 100 times greater than that specified in the National Interim Primary Drinking Water Standards, the waste is considered to be hazardous. (To duplicate the attenuation in concentration expected to occur between the point of leachate generation and the point of human or environmental exposure, EPA applied a dilution factor of 100 to the concentration of constituents observed in the test extract.)

Inasmuch as New Mexico Water Quality Control Commission (WQCC) Regulations Nos. 3-101 and 3-103 utilize NIPDWS to ascertain the hazardous waste determinations of plant discharges, El Paso asks that it be permitted to utilize the results of its EPA EP Toxicity tests in determining the applicability of the WQCC regulations to El Paso's plants' discharges.

Yours very truly,

*E. Frank Smythe*

E. F. Smythe, P.E.  
Chief, Permits & Inventories  
Environmental Affairs

pb



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

101

~~SECRET~~

BRUCE KING  
GOVERNOR  
LARRY KEHOE  
SECRETARY

August 27, 1980

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

Mr. E. F. Smythe, P.E.  
Chief, Permits & Inventories  
Environmental Affairs  
El Paso Natural Gas Company  
P. O. Box 1492  
El Paso, Texas 79978

Re: Request for Discharge Plans

Dear Mr. Smythe:

Under provisions of the regulations of the Water Quality Control Commission you are hereby notified that the filing of discharge plans for El Paso's Jal No. 4 Plant (31 and 32-T24S-R37E) and Monument Gas Treating Plant (1-T20S-R36E) is required. Discharge plans are defined in Section 1-101.1 of the regulations and a copy of the regulations is enclosed for your convenience.

These plans should cover all discharge of effluent at the plant sites or adjacent to the plant sites. Section 3-106A. of the regulations requires submittal of the discharge plans within 120 days of receipt of this notice unless an extension of this period is sought and approved.

The discharge plans should be prepared in accordance with Part 3 of the Regulations.

If there are any questions on this matter, please do not hesitate to call me or Thomas Parkhill at 827-3260. Mr. Parkhill has been assigned responsibility for review of all discharge plans.

Yours very truly,

JOE D. RAMEY  
Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs  
El Paso Natural Gas Co., Box 1384, Jal, N. Mex. 88252  
El Paso Natural Gas Co., Drawer C, Monument, N. Mex. 88265

MONUMENT

<u>POND NUMBER</u>	<u>DIMENSIONS</u>	<u>DEPTH</u>	<u>LINING</u>
A	40' x 125'	10'	NONE
B	40' x 50'	8'	NONE
1	115' x 130'	10'	NONE
2	105' x 145'	8'	NONE
3	110' x 140'	8'	NONE
4	140' x 185'	15'	NONE
5	115' x 125'	15'	NONE

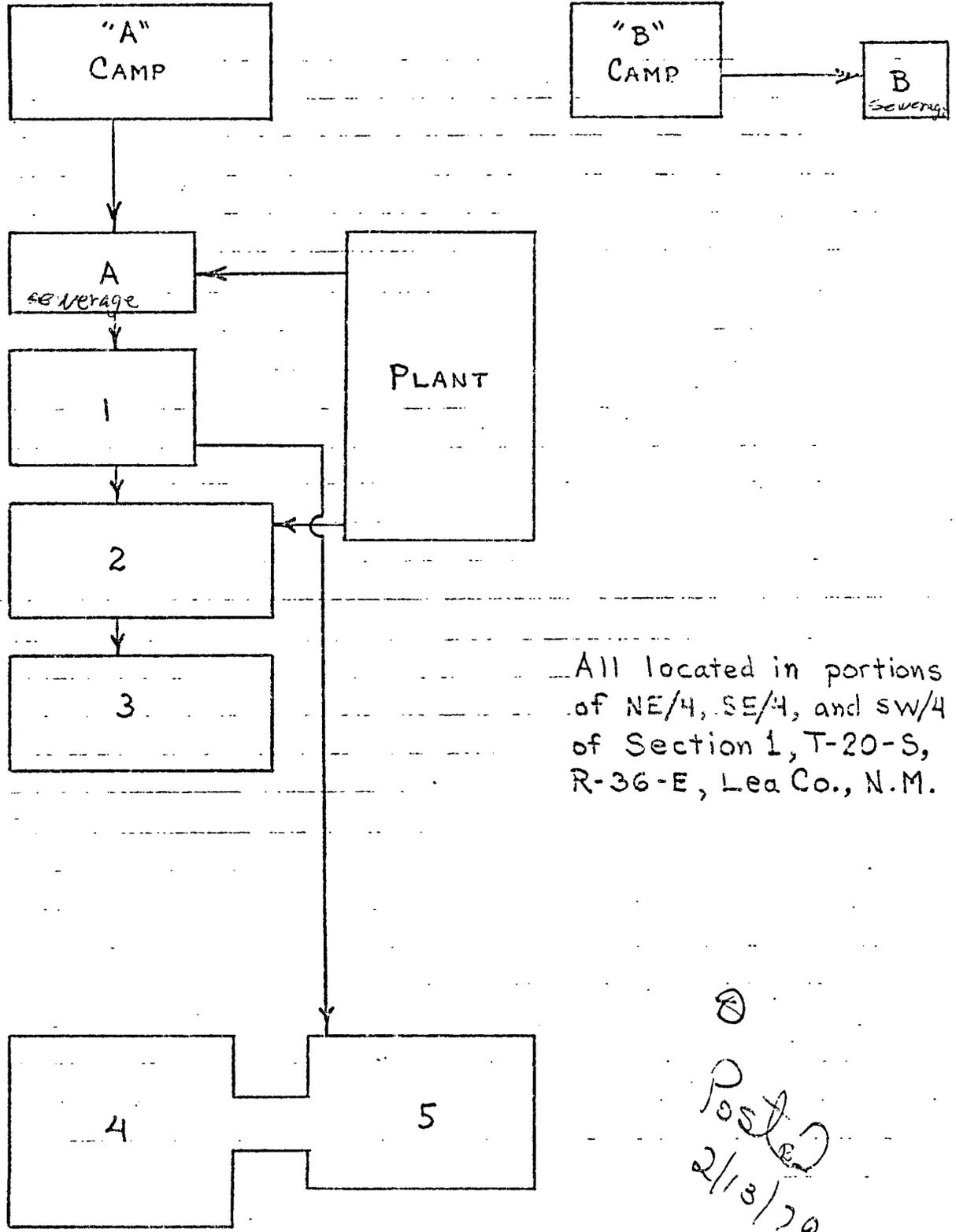
Total volume to all pits:

4.2 million gallons per year

Warren - El Paso

P. J. [unclear]  
2/13/79

# MONUMENT



All located in portions  
of NE/4, SE/4, and SW/4  
of Section 1, T-20-S,  
R-36-E, Lea Co., N.M.

Posted  
2/13/79

EL PASO NATURAL GAS COMPANY  
WATER ANALYSIS

Report date 1-5-79

Sample Location Monument Plant Sample date \_\_\_\_\_

Sample source →		Pond #1	"A" Sewage	"B" Sewage	Pond #4 & #5
CATIONS	Calcium (Ca) as ppm CaCO <sub>3</sub>	30	140	152	50
	Magnesium (Mg) as ppm CaCO <sub>3</sub>	78	50	74	38
	Sodium (Na) as ppm CaCO <sub>3</sub>	710	369	361	966
TOTAL CATIONS as ppm CaCO <sub>3</sub>		818	559	587	1054
ANIONS	Bicarbonate (HCO <sub>3</sub> ) as ppm CaCO <sub>3</sub>	132	346	348	290
	Carbonate (CO <sub>3</sub> ) as ppm CaCO <sub>3</sub>	0	0	0	0
	Hydroxide (OH) as ppm CaCO <sub>3</sub>	0	0	0	0
	Sulfate (SO <sub>4</sub> ) as ppm CaCO <sub>3</sub>	426	63	59	484
	Chloride (Cl) as ppm CaCO <sub>3</sub>	260	150	180	280
TOTAL ANIONS as ppm CaCO <sub>3</sub>		818	559	587	1054
TOTAL HARDNESS as ppm CaCO <sub>3</sub>		108	190	226	88
ALKALINITY as ppm CaCO <sub>3</sub>					
	Phenolphthalein	0	0	0	0
	Total	132	346	348	290
IRON ppm Fe		.86	.05	.08	.91
SILICA ppm Si		15.7	15.7	11.6	15.0
TURBIDITY		70	131	72	62
TOTAL DISSOLVED SOLIDS (Mmhos)		1645	820	840	1850
CAUSTICITY ppm (OH) as CaCO <sub>3</sub>					
pH		7.5	7.6	7.5	8.1
SULFITE (SO <sub>3</sub> ) ppm					
PHOSPHATES (PO <sub>4</sub> ) ppm					
	Poly				
	Ortho				
CHROMATE as ppm Chromium		.050	.025	.053	.025

Tests By Ellen Martin

cc: Charles Mathis

Remarks: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

EL PASO NATURAL GAS COMPANY  
WATER ANALYSIS

Report date 1-5-79

Sample Location Monument Plant

Sample date \_\_\_\_\_

Sample source →		Pond #3	Pond #2		
CATIONS	Calcium (Ca) as ppm CaCO <sub>3</sub>	2300	190		
	Magnesium (Mg) as ppm CaCO <sub>3</sub>	370	68		
	Sodium (Na) as ppm CaCO <sub>3</sub>	6720	1240		
	TOTAL CATIONS as ppm CaCO <sub>3</sub>	9390	1498		
ANIONS	Bicarbonate (HCO <sub>3</sub> ) as ppm CaCO <sub>3</sub>	302	436		
	Carbonate (CO <sub>3</sub> ) as ppm CaCO <sub>3</sub>	0	0		
	Hydroxide (OH) as ppm CaCO <sub>3</sub>	0	0		
	Sulfate (SO <sub>4</sub> ) as ppm CaCO <sub>3</sub>	88	172		
	Chloride (Cl) as ppm CaCO <sub>3</sub>	9000	890		
TOTAL ANIONS as ppm CaCO <sub>3</sub>	9390	1498			
TOTAL HARDNESS as ppm CaCO <sub>3</sub>	2670	258			
TOTAL ALKALINITY as ppm CaCO <sub>3</sub>					
Phenolphthalein		0	0		
	Total	302	436		
IRON ppm Fe		.48	.69		
SILICA ppm Si		12.8	7.2		
TURBIDITY		48	80		
TOTAL DISSOLVED SOLIDS (Mmhos)		11000	2680		
CAUSTICITY ppm (OH) as CaCO <sub>3</sub>					
pH		7.5	8.7		
SULFITE (SO <sub>3</sub> ) ppm					
PHOSPHATES (PO <sub>4</sub> ) ppm					
Poly					
	Ortho				
CHROMATE as ppm Chromium		.053	.175		

Tests By Ellen Martin

cc: Charles Mathis

Remarks: \_\_\_\_\_

NEW MEXICO OIL CONSERVATION COMMISSION  
Hobbs, New Mexico

WATER ANALYSIS

Well Ownership: El Paso Natural Gas Well No. \_\_\_\_\_

Land Status:  State  Federal  Fee

Well Location: Unit \_\_\_\_\_, Section \_\_\_\_\_, T \_\_\_\_\_ S - R \_\_\_\_\_ E \_\_\_\_\_  
Monument Plant

Type ~~well~~: waste water Depth: \_\_\_\_\_ feet.

~~well~~ Use: Pit

Sample Number: # 1 Date Taken: 6/15/78

Specific Conductance: 1850 m/m

Total dissolved Solids: 1700 ± PPM.

Chlorides: 596 PPM.

Sulfates: \_\_\_\_\_ PPM.

Ortho-phosphates:  V. low  Low  Med.  High

Sulfides:  None  Low  Med.  High

Date Analyzed: 6/16/78 By: John W. Runyon

N.M.O.C.C.

Remarks: \_\_\_\_\_

25 ml Sample = 142.0 x 4.2 titration = 596.4



6/19/78

El Paso Natural Gas  
Monument Plant

P.t - 75 x 75 x 3 Approx  
H<sub>2</sub>O + Oil

SW of Plant

Eddie Seary

1  
0  
1  
5  
1  
0  
0



El Paso Natural Gas  
Monument Plant

6/19/78

Pit 75 x 75 x 2 Approx  
H<sub>2</sub>O

SW of Plant

Eddie Seay